

Regulation 16 Consultation
on the Submitted Powick Neighbourhood Plan
RESPONSE FORM

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Powick Parish Council has submitted the draft Powick Neighbourhood Plan to Malvern Hills District Council. In accordance with Regulation 16, Malvern Hills District Council would like to invite comments from organisations and individuals on the Neighbourhood Plan.

This consultation runs for six weeks from Monday 8th June to 23:59 on Monday 20th July 2026.

If you wish to comment on the draft Powick Neighbourhood Plan **please complete and return this form no later than 23:59 pm on Monday 20th July 2026 to:**

Email: neighbourhoodplanning@malvern hills.gov.uk , or by

Post: Planning Policy, Malvern Hills District Council, The Council House, Avenue Road, Malvern WR14 3AF.

The personal information you provide on this form will be held and processed in accordance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation 2018.

Please note that your name and comments will be made publicly available when displaying the outcome of this consultation and cannot be treated as confidential. Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be published. Your details will be retained in order for us to validate your comments. We will use these details to notify you of the progress on the Powick Neighbourhood Plan. If you do not wish to be notified of the progress of the Neighbourhood Plan please let us know by ticking the appropriate box at the end of this response form.

Please fill in your details in the boxes below:

Full Name: Peter Loader

Organisation (if applicable):

Address (including postcode):

Telephone number:

Email address:

Please state which part of the draft Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Mainly section 3.3 but other – sections referenced in my text below including section 4.33

Please use the space below to make comments on this part of the Neighbourhood Plan.

1 Executive Summary

This document makes comments on the Powick Neighbourhood Plan 205-41 (“the Plan”) which is currently out for consultation to Powick residents by Malvern Hills District Council (MHDC). These comments are underpinned by an evidence based set out in sections 3-4 of this document.

As a resident of Powick I would like to make the following comments:

- Section 3.3 of the plan infers that there is a climate emergency. There is strong evidence that this is not the case (see section 3 of this document below) and therefore:
 - this should not be cited as a key planning issue to be tackled by the plan
 - should be removed from the vision on page 12
 - the first bullet under “Environment” should be removed from page 13
- Section 4.33 of The Plan creates confusion for potential applicants for renewable energy schemes. More precise guidance in the Plan would help alleviate this:
 - For example, the Plan should make it clear that those areas of land already rejected in the South Worcestershire Development Plan as unsuitable for solar farm development will not be supported for such developments (see section 4 below)
 - It could also make clear that the Neighbourhood is within the setting of the Malvern Hills and that the policies of the Malvern Hills National Landscape are supported by the Plan and have precedence over other elements of the Plan such as in relation to renewable energy schemes
 - This would have prevented, and could prevent in the future, a whole load of wasted effort on the part of MHDC planners, planning applicants and affected residents, businesses and visitors to the area such as was the case with the recent Monksfield Solar Farm planning application
- Whilst there may be no climate emergency, most residents would I am sure support the concept of cleaner and cheaper energy which can improve health and wellbeing and living standards. The development plan could further these goals by:
 - Strongly encouraging that solar panels be fitted to the rooves of all new residential and commercial buildings that are built in the area if they are to gain the support of the parish council at the planning stage
 - Making it clear that the parish council would not support applications that failed to heed this guidance
 - To this end CA10 with respect to resulting in lower tariffs would seem to be a sound initiative!
- Reference to carbon footprints should be removed from the plan given the lack of evidence of climate emergency
- Policy PWK8 in bullet 2 should make reference to “not increasing congestion” both in the long term and *for prolonged periods during construction* (e.g. for more than 4 weeks)
 - This would prevent other companies thinking it acceptable to dig up the A449 (and therefore create single lane operation) for 14 months as was the case with the proposed Monksfield Solar Farm development

- A rationale could be provided specifically in relation to the A449 which is not only a key route for residents, visitors and local businesses, but also for emergency services
- Policy PWK11 – surely all buildings should comply with building regulations without the need for the parish council to state it?!
- I don't understand CA5 in the Community Action Section – it infers that the street lighting would always be resisted by the parish council – surely this can increase public safety?!

Finally, I would like to state that there is much to commend in the Powick Neighbourhood Plan, and it is clear that much thought and effort has gone into it. I hope that these suggestions will be found helpful.

2 Introduction

This document provides an evidence base to underpin the comments made by Peter Loader on the Powick Neighbourhood Plan 2025-41.

- Section 3 demonstrates even the IPCC has very little confidence in the evidence to support there being a climate emergency caused by human activity
- Section 4 references a survey done for the preparation of the South Worcestershire Development Plan in which several sites located within the Powick Neighbourhood were identified and deemed unsuitable for renewable energy schemes

3 Climate Emergency

In this section I demonstrate that the Intergovernmental Panel on Climate Change (IPCC) itself admits to having low confidence in evidence of climate change. In one of the few areas where it does have confidence in the evidence, we demonstrate that the current rate of temperature increase is lower than historical data periods. Finally, we cite further evidence that shows that the science is not “settled”, again citing the IPCC's own reports to show that this is the case.

We can therefore conclude that there is no climate emergency and therefore predicating a quest for renewable energy upon such an emergency is ill-judged and should not underpin the design of a Neighbourhood Plan.

3.1 IPCC impact assessment

The table below is re-produced from the IPCC's own risk assessment in relation to climate change extracted. According to the IPCC, the report from which the table was extracted was “released on 20 March 2023 to inform the 2023 Global Stocktake under the United Nations Framework Convention on Climate Change”. I conclude that it would be reasonable to state that it is an authoritative document.

The table lists 33 different climate impact-drivers, i.e. indicators that climate change is occurring. It contains three columns of risk assessment underpinned by data analysis:

- Whether evidence of climate changes has already been observed in data
- Whether it is expected that evidence of climate change will emerge by 2050
- Whether it is expected that evidence of climate change will emerge between 2050 and 2100

Each indicator is colour coded in the table as detailed below:

High confidence of decrease	Medium confidence of decrease	Low confidence in direction of change	Medium confidence of increase	High confidence of increase
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The various numbered notes detailed below the table indicate whether the evidence exists only in certain parts of the world.

From the table it can be seen that:

- There is high confidence that the data shows any meaningful evidence of change in only 5 of the 33 indicators
 - Of these 5, only 2 are global
 - In the other 3, the evidence of change is only present in some regions of the world
- There are only 2 further indicators for which evidence of any meaningful change is expected appear by 2100
- There are only 3 indicators where there is medium confidence of any evidence of change in the historical data
 - For which 2 are only present in some regions of the world
- There are only 2 further indicators where there is medium confidence that change will occur by 2100, both of which will only be in some regions of the globe.

So in summary, in 24 of the 33 indicators there is low confidence that there is any evidence to suggest any climate change!!!

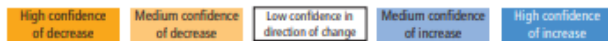
Chapter 12

Climate Change Information for Regional Impact and for Risk Assessment

Table 12.12 | Emergence of CIDs in different time periods, as assessed in this section. The colour corresponds to the confidence of the region with the highest confidence: white cells indicate where evidence is lacking or the signal is not present, leading to overall *low confidence* of an emerging signal.

Climatic Impact-driver Type	Climatic Impact-driver Category	Already Emerged in Historical Period	Emerging by 2050 at Least for RCP8.5/SSP5-8.5		Emerging Between 2050 and 2100 for at Least RCP8.5/SSP5-8.5	
Heat and Cold	Mean air temperature	1				
	Extreme heat	2	3			
	Cold spell	4	5			
	Frost					
Wet and Dry	Mean precipitation		6	7		
	River flood					
	Heavy precipitation and pluvial flood				8	
	Landslide					
	Aridity					
	Hydrological drought					
	Agricultural and ecological drought					
	Fire weather					
Wind	Mean wind speed					
	Severe wind storm					
	Tropical cyclone					
	Sand and dust storm					
Snow and Ice	Snow, glacier and ice sheet		9		10	
	Permafrost					
	Lake, river and sea ice	11				
	Heavy snowfall and ice storm					
	Hail					
	Snow avalanche					
Coastal	Relative sea level		12			
	Coastal flood					
	Coastal erosion					
Open Ocean	Mean ocean temperature					
	Marine heatwave					
	Ocean acidity					
	Ocean salinity	13				
	Dissolved oxygen	14				
Other	Air pollution weather					
	Atmospheric CO ₂ at surface					
	Radiation at surface					

1. High confidence except over a few regions (CNA and NWS) where there is low agreement across observation datasets.
2. High confidence in tropical regions where observations allow trend estimation and in most regions in the mid-latitudes, medium confidence elsewhere.
3. High confidence in all land regions.
4. Emergence in Australia, Africa and most of Northern South America where observations allow trend estimation.
5. Emergence in other regions.
6. Increase in most northern mid-latitudes, Siberia, Arctic regions by mid-century, others later in the century.
7. Decrease in the Mediterranean area, Southern Africa, South-west Australia.
8. Northern Europe, Northern Asia and East Asia under RCP8.5 and not in low-end scenarios.
9. Europe, Eastern and Western North America (snow).
10. Arctic (snow).
11. Arctic sea ice only.
12. Everywhere except WAN under RCP8.5.
13. With varying area fraction depending on basin.
14. Pacific and Southern oceans then many other regions by 2050.



The chapter of the full report from which the table was extracted can be found here:

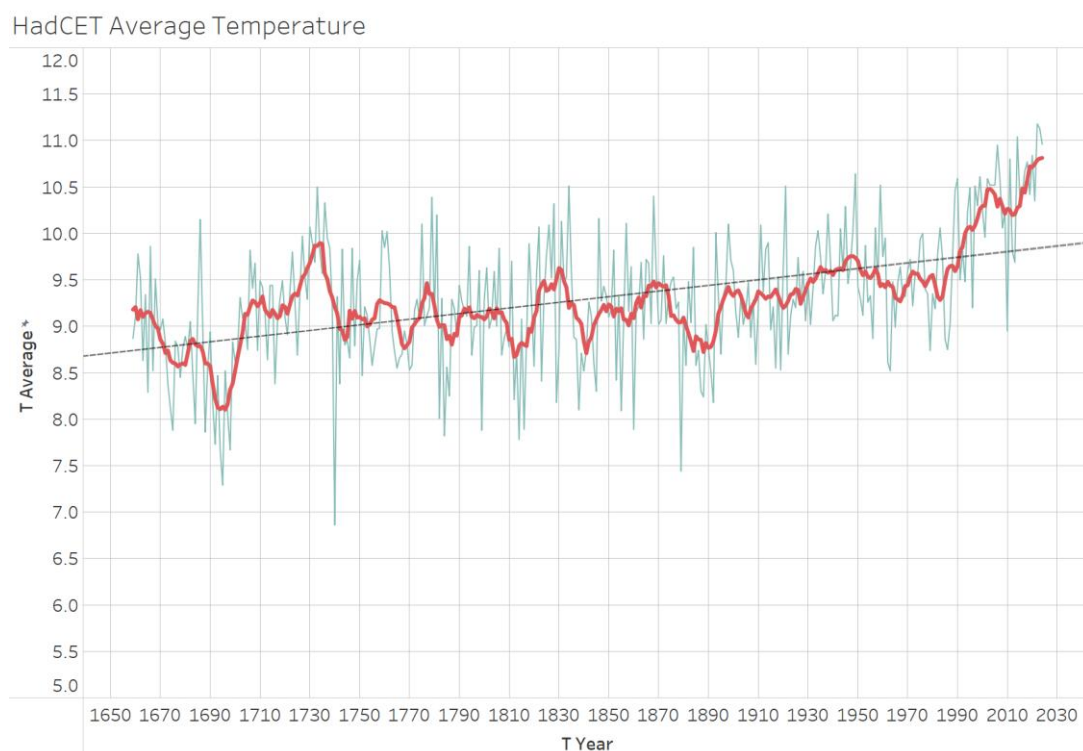
https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter12.pdf

3.2 UK temperature data

One of the few climate change indicators in which the IPCC has high confidence in is mean air temperature, albeit this confidence is not high for all regions of the world.

To assess whether this confidence was well-founded, I examined actual measured temperature data going back to 1659. This was sourced from the HadCET data (HadCET stands for Hadley Centre Central England Temperature). This is the longest instrumental record of data in the world. This data can be sourced online free of charge.

The chart below shows the average monthly temperature by month from 1659 through to 2025 along with a trend line that has been plotted for the data set as a whole. The blue line is average annual temperature in degrees C and the red line is a smoothed average. The dotted line shows the rising trend.



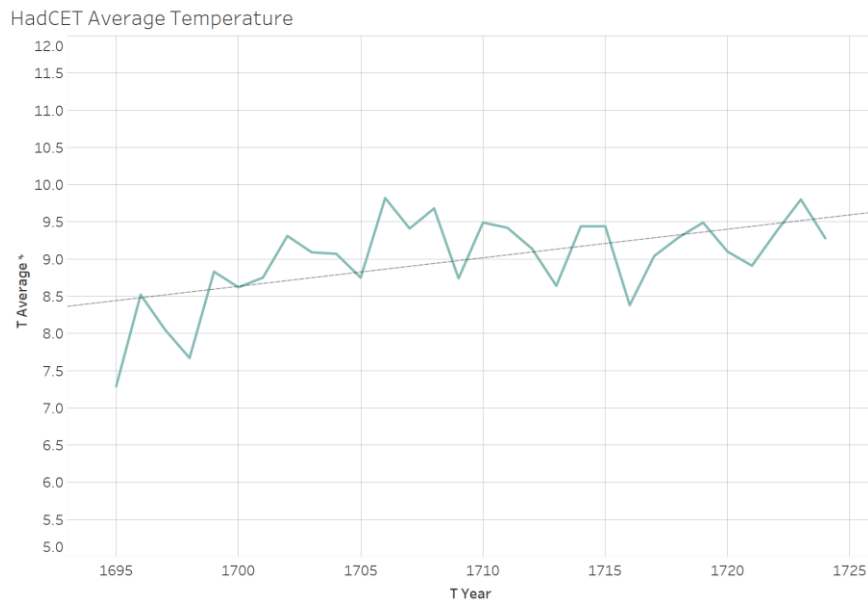
From this chart we can see that:

- that temperatures now are hotter than other periods in the data
- there is a rising temperature trend – calculated as 0.3°C per annum on average
- *and that this trend exists for the dataset as a whole, not just the last 150 years*

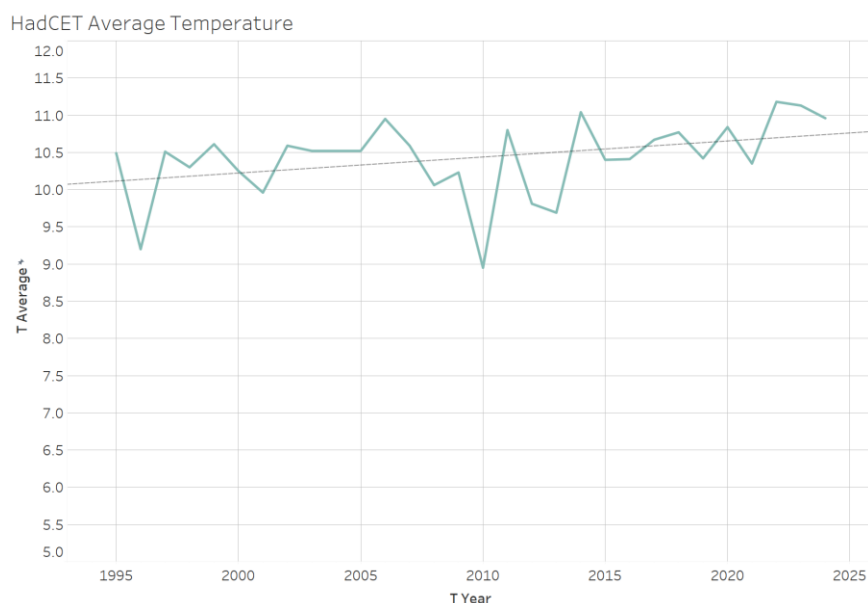
Therefore, it would be reasonable to conclude that the rising temperature trend started before the industrial revolution and the type of human activity to which temperature rises are attributed by some.

We can substantiate this further by showing that 300 years ago, temperature had risen more rapidly in the period 1695-1725 than they had in the period 1995-2025.

The first chart shows the trend in temperatures for 1695-1725:



The second chart shows the trend in temperatures for 1995-2025:



- We can see visually the steeper line on the first chart.
- The rate of increase for 1695-1725 0.33°C per year
- The rate of increase for 1995-2025 0.22°C degrees centigrade per year

Therefore, temperatures were rising more rapidly 300 years ago than they are now!

3.3 Interpretation of climate data from thousands of years ago

The planet earth is believed to have been created 4.54 billion years ago. As we have seen in section 3.2 above, measurement temperature by instrument and documentation of the findings has only occurred for a single data set since 1659. 366 years is only 0.0000081% of the lifetime of the planet earth!

One might conclude that trying to use such a small data set to determine whether current temperatures are at a historic high or are rising faster than ever before would be pure folly. Recognising this, climate “scientists” have sought to estimate historic temperature using a range of proxy data sources, including:

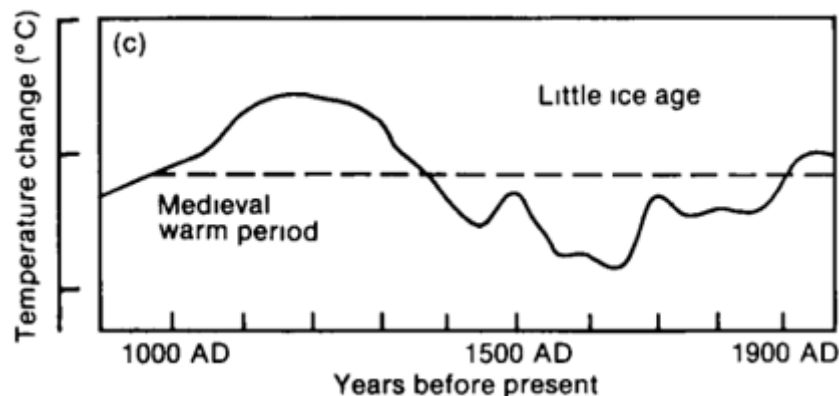
- Tree rings
- Ocean and lake sediment
- Ice cores
- Stalactites and stalagmites

In theory, these can be used to estimate temperature if, for example, it is true that trees grow at different rates depending on the temperature. A historical “record” of temperature created in this manner is known as a “temperature reconstruction”.

The problem is, depending on which types of measure are used, how much weighting is given to each measure and from which geographical locations they are sourced, a different interpretation of historical climate can be achieved. This is problematic, as it means there is low confidence in what the historical temperature across the globe actually were!

Evidence of this problem can again be found in the IPCC’s own reports.

In its first report in 1990 it included a chart showing estimated temperatures year on year over the last 1000 years:

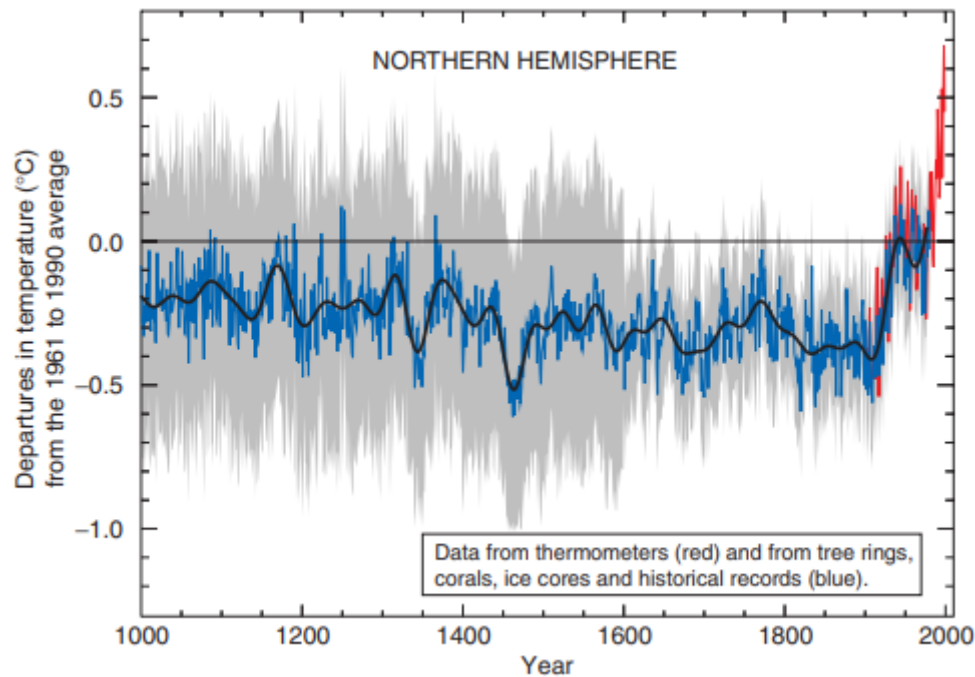


From this temperature reconstruction we can see:

- That temperatures were warmer in the medieval warm period than they are now
- There was a cooling period known as the “little ice age” during the 16th and 17th centuries
- The period around 1700 does indeed have a steep warming as show in the HadCET data which remember, is the only instrument-measured data source going back that far

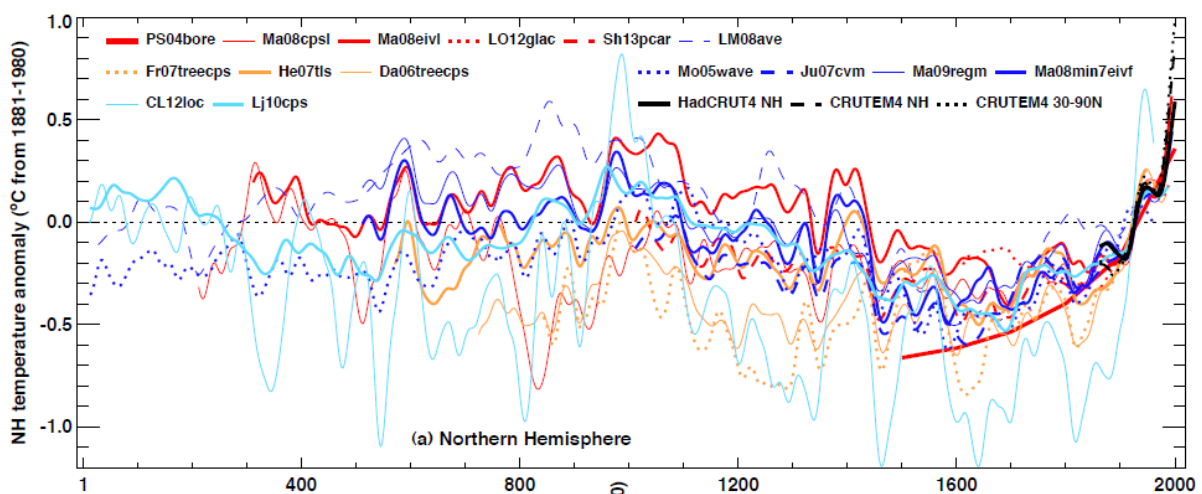
So, using this method of temperature reconstruction, it is clear that we need not be particularly concerned about current temperatures.

Nevertheless, the IPCC decided to use a different methodology in subsequent reports. This is known as the hockey stick chart and is re-produced from its 3rd climate assessment report:



This has flattened the medieval warming and little ice age periods and emphasises the more recent temperature rises. The grey shading does however represent the uncertainty in the actual shape.

Which should we believe? Well, I would argue take your pick as a further IPCC assessment report provided evidence of the climate reconstructions that can be created depending on the method used:



It is clear that climate scientists don't really know what has happened in the past. Therefore, how can we know whether temperatures are rising faster than ever before, let alone whether they are warmer than ever before? It is perhaps not surprising that the IPCC has little confidence that there is any evidence of climate change occurring in its main indicators.

3.4 Conclusion

It matters not which one of the many reconstructions, if any, is correct. The key conclusion pertinent to this document is that there is considerable doubt as to whether anything out of the ordinary is currently happening with our climate, and that in reality, the climate has always changed.

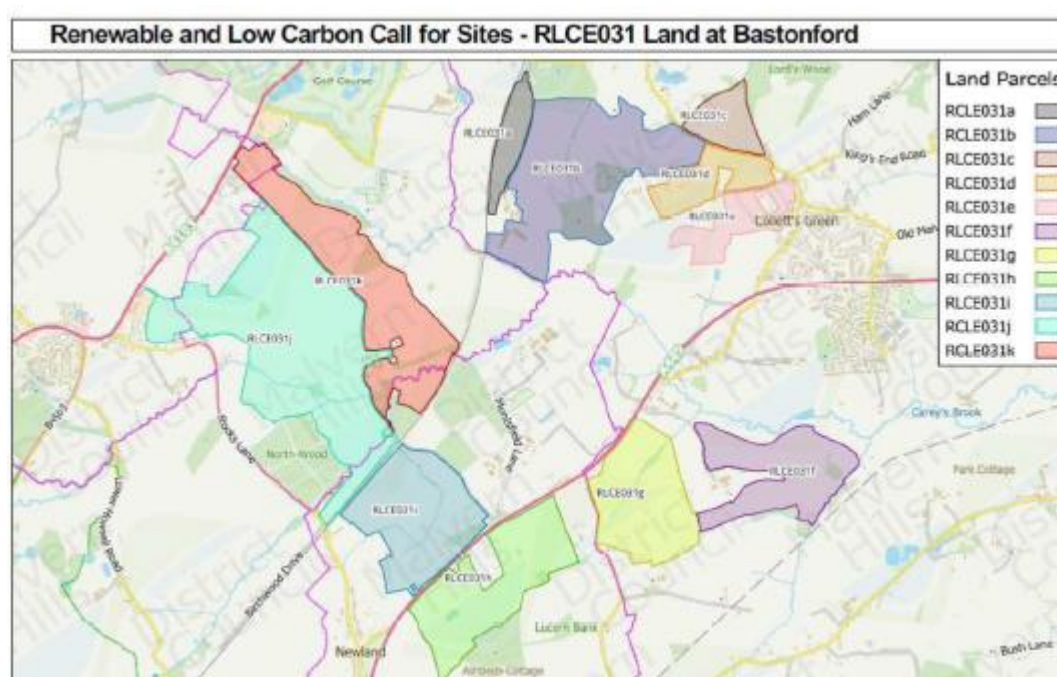
John Abbot in his paper "Using Oscillatory Processes in Northern Hemisphere Proxy Temperature Records to Forecast Industrial-era Temperatures" shows that statistical techniques can be applied

that incorporate factors such as ocean movements, cycles of planets including the sun etc to accurately predict the temperatures that we have observed in the last 150 years as part of normal cyclical patterns in the earth's climate.

As for why the IPCC continues to promote manmade climate change in its “summary for policy maker” documents whilst its supplementary documents seem to cast doubt on these conclusions, I can only speculate. However, Donna Laframboise's book “The delinquent teenager...” provides some insight into how this might have happened.

4 South Worcestershire Development Plan Review

As part of the South Worcestershire Development Plan Review (SWDPR) process and a call for sites to be nominated for low carbon energy schemes was made. These sites included “RLCE031 Land at Bastonford” much of which is within the Powick Neighbourhood as shown below:



The diagram is taken from the report (South Worcestershire Councils Renewable and Low Carbon Energy Call for Sites Site Assessment Background Report, July 2022”. In that report, the site is rejected for various reasons including:

- The wider landscape and visibility impacts arising from scale,
- Neighbouring land uses (some neighbouring dwellings)
- Potential visibility impacts (PRoW)
- Surface water flooding
- Nature designation (adjacent to site of regional or local wildlife importance).

It would be helpful to developers and indeed to future parish councillors and MHDC planners if the Plan were to reflect these reasons for refusal so that lengthy planning processes can be prevented with early triage due to suitability for the above reasons.

Please use a separate form for each representation.

Future Notification

Please state whether you would like to be notified of the decision on the Neighbourhood Plan proposal:

Yes

☒

No

☐

Signature



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Date 19/06/2026

Thank you for completing this form.