

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

| For Office Use only: | |
|----------------------|--|
| Date | |
| Ref | |

The Council are seeking comments on the Proposed Main Modifications to the Core Strategy, following the Examination in Public in March 2015. The changes are proposed by the Council to address issues of legal compliance and soundness and we can only accept representations on these matters.

Comments on the Proposed Main Modifications Schedule are invited from **Wednesday 25th November 2015 until Wednesday 20th January 2016.**

REPRESENTATIONS MUST ONLY RELATE TO THE PROPOSED MAIN MODIFICATIONS.

You can access the Core Strategy documents online and additional copies of this form from our website: www.bradford.gov.uk/planningpolicy then 'Core Strategy Proposed Main Modifications', or you may request copies by:

- Emailing us at: planning.policy@bradford.gov.uk
- Phoning us on: (01274) 433679

Completed representation forms must be returned to Development Plans, by the deadline below, by either:

- **E-mail to:** planning.policy@bradford.gov.uk
- **Post to:** Core Strategy - Proposed Main Modifications
Development Plans Group
City of Bradford Metropolitan District Council
2nd Floor South - Jacobs Well
Nelson Street
Bradford
BD1 5RW

**ALL COMMENTS MUST BE MADE IN WRITING AND SHOULD BE RECEIVED
BY THE DEVELOPMENT PLAN GROUP AT EITHER OF THE ABOVE ADDRESSES
NO LATER THAN 4PM ON WEDNESDAY 20TH JANUARY 2016.**

Personal Details & Data Protection Act 1998

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district. Please note that the Council cannot accept any anonymous comments.

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PART A: PERSONAL DETAILS

* If an agent has been appointed, please complete only the Title, Name and Organisation in box 1 below and complete the full contact details of the agent in box 2.

| | 1. YOUR DETAILS* | 2. AGENT DETAILS (if applicable) |
|---|----------------------------------|----------------------------------|
| Title | Dr | |
| First Name | [REDACTED] | |
| Last Name | Randall | |
| Job Title (where relevant to this representation) | Development Manager | |
| Organisation (where relevant to this representation) | Renewable Energy Systems Limited | |
| Address Line 1 | [REDACTED] | |
| Line 2 | [REDACTED] | |
| Line 3 | [REDACTED] | |
| Line 4 | Hertfordshire | |
| Post Code | WD4 [REDACTED] | |
| Telephone Number | [REDACTED] | |
| Email Address | [REDACTED] | |
| Signature: | [REDACTED] | Date: 11/01/2016 |

3. Please let us know if you wish to be notified of the following:

| | | | | |
|---|-----|-------------------------------------|----|--------------------------|
| The publication of the Inspector's Report? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| The adoption of the Core Strategy? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| Are you attaching any additional sheets / documents that relate to this | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

| | | |
|-----------------|--------------------------------------|-------|
| representation? | No of sheets / documents submitted : | 1 Map |
|-----------------|--------------------------------------|-------|

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PART B – YOUR REPRESENTATION - *Please use a separate sheet for each representation.* (Additional Part B forms can be downloaded from the web page)

4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM123

5. Do support or object the proposed main modification?

Support

✓

Object

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

✓

No

7. Do you consider the proposed main modification to be 'sound'?

Yes

✓

No – 'unsound'

8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

Effective

Consistent with National Planning Policy (the NPPF)

9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to the proposed main modifications).

Renewable Energy Systems consider the Core Strategy sound in relation to the requirements set out in the Written Ministerial Statement (WMS) 18th June 2015 regarding onshore wind policy. As you are aware the DCLG announcement represents a substantial change in planning policy, placing increased importance on the identification of sites suitable for onshore wind energy. As yet, however, there has been little guidance advising how developers, Local Planning authorities and local communities should respond to the new planning guidance, both to ensure that the positive planning approach at the heart of the NPPF (specifically para 97) is retained and also to ensure that the UK planning system remains fair and balanced.

The Written Ministerial Statement states that:

"When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:

- the development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing."

Although we are not currently promoting any specific sites within the Bradford Metropolitan District, we believe that there is significant potential to work with your council and to take a partnership approach to identifying suitable sites for onshore renewable energy projects. We also believe that there is significant support RES could provide to your planning team, given our expertise of onshore wind site selection. RES is happy to provide support to the Council and provide data to inform the identification of suitable areas for wind energy development.

By way of context, RES note that Rotherham Borough's Council has recently published their draft Sites & Policies Plan, which identifies areas that are suitable for wind energy development. The approach they have taken is quick and efficient, and heavily reliant on policy criteria. RES supports their approach as an effective method of identifying suitable areas and meeting the requirements of the Written Ministerial Statement. The approach taken by Rotherham Borough Council is simple and uses only two criteria, landscape designations and wind speed. Rotherham Borough Council have focused on excluding landscape designations and divided the remaining area of the Borough by wind speed to determine the scale of potential onshore wind development (either potentially suitable for small and medium wind turbines or potentially suitable all wind turbines).

I have attached a map of a broad area in Bradford with potential for onshore wind. We would be happy to produce more detailed, refined site maps taking into account housing buffers and other constraints, to assist with the identification of sites suitable for onshore wind.

Please add my contact details to your database and notify me of any future consultations. Should you require any additional information or wish to discuss or clarify any matter, please do not hesitate to contact me.

10. Please set out what changes you consider necessary to make the proposed main modification legally compliant or sound, having regard to the test you have identified at Q7 above.

You need to say why this change will make the proposed main modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

11. Signature:



Date: 11/01/2016

Thank you for taking the time to complete this Representation Form.