

Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012

Publication Draft - Representation Form

Monday 17th February until Monday 31st March 2014

This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website:
www.bradford.gov.uk/ldf.

For further information you can contact the Local Plan Group by:

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

Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- **Part A** – Personal Details
- **Part B** – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- **Part C** – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read to this information to make the fullest use of this opportunity.

Please return this completed representation form to the Local Plan Group by either:

- **E-mail to:** ldf.consultation@bradford.gov.uk
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,
2nd Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

**For your representation to be 'duly made' the Council must
receive it no later than 5pm on Monday 31st March 2014**

For Office Use only:			
Date			
Ref			

Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

Publication Draft - Representation Form

PART A: PERSONAL DETAILS

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

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Mr	
First Name	[REDACTED]	
Last Name	Baldwin	
Job Title (where relevant)	Treasurer	
Organisation (where relevant)	Wharfedale Friends of the Earth	
Address Line 1	[REDACTED]	
Line 2	Ilkley	
Line 3	West Yorkshire	
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: [REDACTED]

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.

For Office Use only:			
Date			
Ref			

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	<input type="text"/>	Paragraph	<input type="text"/>	Policy	EN6
---------	----------------------	-----------	----------------------	--------	------------

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="text"/>	No	X
4 (2). Sound	Yes	<input type="text"/>	No	X
4 (3). Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.

If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Wharfedale Friends of the Earth is a local environmental campaigning group, composed of residents of Ilkley and Addingham. We strongly support the move to a low-carbon, renewable energy supply in support of national and international commitments on climate change. We discussed the policies in the Core Strategy for Energy in our meeting of March 3rd, and have agreed the following points to be submitted.

In general, we find the policies on energy are **unsound**, because they are ineffective to achieve the levels of renewable energy production we need as Bradford's fair contribution to fighting climate change. Also we query some factual points and inconsistencies with national planning policy.

We face **exceptional circumstances** with the onset of climate change and the urgent need to reduce carbon emissions. A decentralised energy supply also provides opportunity for new income streams to communities that wish to invest in their own renewables projects, alongside commercial projects that are required to provide financial benefits to communities that host them. Alongside most other renewables, including microgeneration, we favour onshore wind at larger scale. It is among the cheapest of renewables, and should be exploited as far as possible in the UK to keep energy bills as low as possible as we transition to a low carbon energy system. Bradford district is blessed with abundant wind. **However, exploitation of wind energy in the Bradford is virtually non-existent and lagging far behind most other local authority areas in the UK.** We also see significant untapped potential for other renewables, including hydropower, solar, anaerobic digestion and sustainable biomass.

In general, the NPPF requires that local authorities design policies to maximise renewable development, and we are not convinced that this is reflected in Bradford's Core Strategy. The Core Strategy promotes the development of renewable energy in general, however the policies laid out in EN6 emphasise too strongly some perceived constraints to the development of renewable energy, mainly in relation to wind turbines. There is no absolute target for renewable energy capacity, just a commitment to a net increase within each monitoring period, which is inadequate in ambition and unlikely to inspire progress. We suggest a target similar to Leeds, which is 75 MW by 2021.

We note that almost all of the windy, rural parts of Bradford district are designated Green Belt. However, there are **special circumstances** requiring rapid development of renewables, and we consider the installation of sensitively designed wind energy projects on Green Belt land is fully justified. We also note the precedent of a wind farm approved on Green Belt near Leeds (Hook Moor). Also we note that Bradford Council now see fit to build housing on Green Belt. So if it is justified to use Green Belt for housing, then surely with respect to the special circumstances created by climate change, we are justified to permit wind turbines and other renewables on Green Belt. In fact, renewables projects do not contribute at all to the merging of urban areas, unlike housing development.

Some further concerns related to individual points are as follows:

5.3.104 states that account is taken of local requirements, feasibility and viability: this is very vague and should be clarified, or else removed. Latest planning guidance for wind farms permits consideration to be given to the expected energy contribution of a project, but the NPPF also confirms that small scale projects should be supported. The reference to “local requirements” is not clear at all. We support renewables projects that provide more energy than is required by the nearest community – an “export” of surplus power can provide income to the community and a contribution to the regional and national energy supply.

5.3.112 suggests that the Wharfe and Aire valleys have special landscape value and are inappropriate for siting of wind turbines. However, we support some wind turbine or wind farm development, sensitively designed, in these areas. Until recently the Wharfe Valley had a wind farm at Chelker Reservoir, in full view from the Cow and Calf, which in our opinion sat very sympathetically in the landscape. So a policy against wind turbines in these areas is not justified, given actual experience.

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Plan 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.

5.1.105 **is factually incorrect**, the consultation zone for wind turbine proposals is 15 km, not 30 km (this is the advisory zone). In fact, Knabs Ridge wind farm is operating without any problems for the airport, at a distance of ~19 km.

5.3.103 **is factually incorrect**, it should refer to the “high pressure gas grid” rather than “the gas grid” as anaerobic digestion projects generally connect with the *intermediate* gas grid.

5.3.104 **should be removed.**

5.3.112 **should have most of the sentences removed**, leaving just “Proposals will need to have an assessment of environmental, economic and social impacts.”

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

Please be as precise as possible.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to argue in favour of more renewables in Bradford district, and counter any opposing arguments.

Please note the inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:		Date:	20/03/2014
----------------------	---	--------------	------------

