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Bradford Local Plan Group  
City of Bradford Metropolitan District Council  
2nd Floor South, Jacob's Well  
Nelson Street  
Bradford  
BD1 5RW

Our Ref: 21173/A3/NTH/SO  
31 March 2014

Dear Sir/Madam,

**BRADFORD METROPOLITAN DISTRICT COUNCIL, CORE STRATEGY DEVELOPMENT PLAN DOCUMENT PUBLICATION DRAFT, MARCH 2014**

We are writing to you on behalf of our Client RES UK and Ireland Limited in response to the Core Strategy Development Plan Document for Bradford District.

RES is one of the world's leading renewable energy project developers with operations across Europe, North America and Asia-Pacific. The company has been an established presence at the forefront of the wind energy industry since the 1970s, with a wind portfolio which has grown to more than 6GW worldwide. As a result of their long-term involvement in the renewable energy sector, RES has gained a high level of expertise in the development, design, construction, financing and operation of small to large scale wind farm projects, as well as, biomass, solar PV, anaerobic digestion, offshore wind and marine energy. Within Bradford District we would like to highlight our comments in relation to Policy EN6 of the Core Strategy, which seeks to promote the growth of renewable energy resources.

With every project, RES is committed to building a more sustainable future. Therefore it is integral that each of their schemes is designed and built to generate energy in the most economic way with minimal environmental impact. A positive planning policy framework is essential to the delivery of renewable energy schemes and as such RES is generally supportive of the Council's approach towards renewable energy.

RES are fully engaged in the development plan process and we wish to participate in creating a positive framework which will promote the generation of energy from renewable and low carbon energy.

The 2009 Renewable Energy Directive set a target for the UK to achieve 15% (up from 3%) of its energy consumption from renewable sources by 2020. The Coalition Government has stated its commitment to increasing the deployment of renewable energy across the United Kingdom and this is set out in the UK Renewable Energy Roadmap 2011 (and subsequent updates). There is also a longer term objective to achieve an 80% reduction in greenhouse gas emissions by 2050.



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The planning system has a significant part to play in achieving these objectives, although obviously this relies on the development industry bringing forward good sites, selected on the basis of robust policy guidance. Policies have been put in place at a national and local level to guide Local Planning Authorities in their determination of applications for renewable energy development. Therefore there must be consistency between the approach of Local Planning Authorities and national level planning policy.

The National Planning Policy Framework (NPPF) states that Local Planning Authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. The framework indicates that Local Authorities should have a positive strategy to promote energy from renewable and low carbon sources and design their policies to maximise renewable and low carbon energy development, while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.

RES supports the principle of a clear criteria based approach that aligns itself with the strategic energy targets and the enabling national policies.

As a leading renewables developer, RES is supportive of criteria-based policies which seek to ensure that the impacts associated with renewable energy schemes are satisfactorily addressed. With regard to the 'Core Strategy Development Plan Document', our specific comments are as follows:

1. RES is generally supportive of the approach set out under Policy EN6 of the Core Strategy which is considered genuinely positive and encouraging of new proposals for renewable energy.
2. In accordance with the NPPF, the criteria set out under Part B of Policy EN6 is effectively worded to ensure that the impacts associated with renewable energy schemes are satisfactorily addressed whilst avoiding the imposition of arbitrary thresholds or separation distances which are unjustified and contrary to national planning guidance.
3. Although generally supportive of the approach set out under Policy EN6 RES is concerned with the wording of the last sentence under Part B which states that Applicants should:

**'ensure that development will have no adverse impact on the integrity of the South Pennine Moors SAC/SPA'.**

In accordance with paragraph 98 of the NPPF, when determining planning applications, Local Planning Authorities (LPAs) 'should approve the application if its impacts are **(or can be made)** acceptable'. This presumption to approve renewable schemes if adverse impacts can be satisfactorily mitigated is not currently reflected in the wording highlighted above. Rather the Policy states that permission for wind turbines will only be permitted if the applicant can demonstrate that there will be **'no adverse impacts'**. This requirement is considered **unjustified** and may preclude the development of projects, which subject to the implementation of adequate mitigation measures, would otherwise be deemed acceptable in planning and environmental terms. For the reasons stated above we therefore advise that this part of the Policy is revised in order to establish an approach which is consistent with guidance contained within the NPPF

We look forward to being involved with this policy document as it progresses.

Please acknowledge safe receipt of this representation.

Yours faithfully,

 **TRAVERSE-HEALY**  
Associate