



Representation Form

Part B

For office use only	
Consultee Ref: 1103. Representation Ref: 2287.	Date Received <div style="border: 2px solid blue; padding: 5px; color: blue; font-weight: bold; font-size: 1.2em;">RECEIVED</div> <div style="color: red; font-weight: bold; font-size: 1.2em;">24 JAN 2018</div>

Barrow Borough Council
Regulation 19 Consultation: Submission Draft Local Plan
Consultation on Proposed Major Modifications – December 2017

Please use a separate Part B form for each modification you wish to comment on. Representations must to be attached to Part A of the representation form. Please note that we cannot accept anonymous responses.

Please print your name on each separate Part B representation.

Name (Print)	Henrik Dorbeck
Organisation	Porta Planning LLP
Date	24 January 2018

1. To which of the 27 Proposed Major Modifications does this representation relate?

Please state clearly the reference number of the modification which you are commenting on from the Schedule of Proposed Major Modifications (e.g. MAJ1)	MAJ1	
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2. Do you consider the Major Modification is legally compliant?

Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	
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3. Do you consider the Major Modification is sound or sound with minor amendments?

Sound?	Yes		No	
Sound with minor amendments?	Yes	<input checked="" type="checkbox"/>	No	

If you have selected 'Yes' to either of the above then please skip question 4 and continue to question 5.

4. If you consider the Major Modification is unsound, on which grounds do you consider the document to be unsound?

Please select as many as you consider apply.

Positively Prepared	
Justified	
Effective	
Consistent with national policy	

5. Please provide details of why you consider the Major Modification is not legally compliant or is unsound. Also if you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

Please be as precise as possible.

In December 2017, a subsidiary of Centrica Plc, GB Gas Holdings Limited and SWM Gasbeteilligungs GmbH & Co. KG ("SWM"), the majority shareholder of Bayerngas GmbH, combined their European E&P activities and created a new joint venture company, Spirit Energy. Spirit Energy's landholding at Barrow comprises the North and South Morecambe Terminals, the Condensate Tank Farm and onshore buried pipelines, whilst Centrica plc retain the former Roosecote Power Station. Spirit Energy and Centrica plc should be engaged separately with respect to their properties.

Centrica plc submitted representations to the Regulation 19 draft of the Local Plan on 7 July 2017. We remind the Council that these representations supported recognition given to onshore energy assets and Policy EC7 Energy Uses Opportunity Area (EUOA), however they also requested an amendment to the boundary of the EUOA designation and amendments to the text of Policy EC7.

Spirit Energy welcomes the changes which have already been made to the boundary designation of the EUOA. However, the full extent of Spirit Energy's landholding around the North and South Morecambe Gas Terminals has not been identified within the amended designation boundary. We request all of the land shown on the attached plan is included within the EUOA designation.

Changes were also requested to the text of Policy EC7 to better reflect existing and future activities at the site, which appear to have been accepted by BBC in the 'reason' for changing the EUOA designation, however were not made to the policy text. We request the text of Policy EC7 is amended (as set out in earlier representations and below) to acknowledge the importance of the existing energy operations on the site, as well as identifying the development potential for future exploration, production, generation and transmission of energy and related activities.

The amendments requested are justified, having regard to NPPF Paragraphs 7, 19 and 21, which seek to enable sustainable growth, create flexible policy frameworks for future development and supports existing businesses. We consider the Plan (with the requested amendments) would meet the "tests of soundness" set out at NPPF Paragraph 182, for the following reasons:

- **Positively prepared** – the Plan has taken into account the development and potential infrastructure requirements, having positively responding to the ongoing needs of existing businesses
- **Consistent with national policy** – the Plan would be consistent with the NPPF, which states that planning should operate to encourage and not act as an impediment to sustainable growth (paragraph 19) and that significant weight should be placed on the need to support economic growth through the planning system and policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. Investment in business should not be over-burdened by the combined requirements of planning policy expectations and local authorities should support existing business sectors, taking account of whether they are expanding or contracting (Paragraph 21).

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations. 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.

6. Please set out what change(s) you consider necessary to make the Major Modification legally compliant or sound, having regard to the tests you have identified in question 3 where this relates to soundness.

Please say why you consider the change(s) will make the Major 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.

In summary, Spirit Energy requests:

1. Amendment to the boundary of the EUOA to include its entire landholding (refer to the attached ownership plan)
2. Amendment to the text of Policy EC7, as follows:

“Policy EC7: Energy Uses Opportunity Area

*The area identified on the Proposals Map around **and including** the North and South Morecambe Gas Terminal **and former Roosecote Power Station sites** is considered to have specific potential and suitability for uses, including those related **to and supporting management of the exploration, production, generation and transmission of energy and associated infrastructure and uses. Existing energy industry and related development will be protected and new energy industry and related development will be encouraged in this area subject to meeting the criteria in Policy EC3 and the requirements of any accompanying environmental assessments.***

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

Yes I wish to participate	<input type="checkbox"/>	No I do not wish to participate	<input checked="" type="checkbox"/>
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8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Not applicable.

Please attach any additional documentation you consider necessary to support your representation.

Submitting your representation

In order to be valid you must complete both Part A and Part B of the representation form and return them to the Planning Policy Team via email or post.

- E-mail: developmentplans@barrowbc.gov.uk
- Post to: Planning Policy, Barrow Borough Council, Town Hall, Duke Street, Barrow-in-Furness, Cumbria, LA14 2LD

Please note that representations cannot be kept confidential but all responses will be held by the Council in accordance with the Data Protection Act 1998. All representations received and any information provided will be open to public scrutiny including publication on the Council's website.

Personal information (such as your address or email address) will remain confidential. However, your contact details will be shared with the Programme Officer and Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to the above.

If you have any queries regarding the consultation process please do not hesitate to contact the Planning Policy Team on 01229 876341.



NOTES

DRAWING NUMBER		ISSUED FOR APPROVAL	
DATE	BY	DATE	BY
09/11	C		

SCALE		FORMER NOTICE NO.		ECF NO.	
DATE	BY	DATE	BY	DATE	BY

centrica energy
INFRASTRUCTURE RESOURCES LIMITED
MARINE OPERATIONS

Costain Petrofac

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TITLE: **BARROW TERMINAL SITE BOUNDARY**

DRAWING NO. A55E/00/00/10/08/01/61454 REV. C