



# Allerdale Borough Council

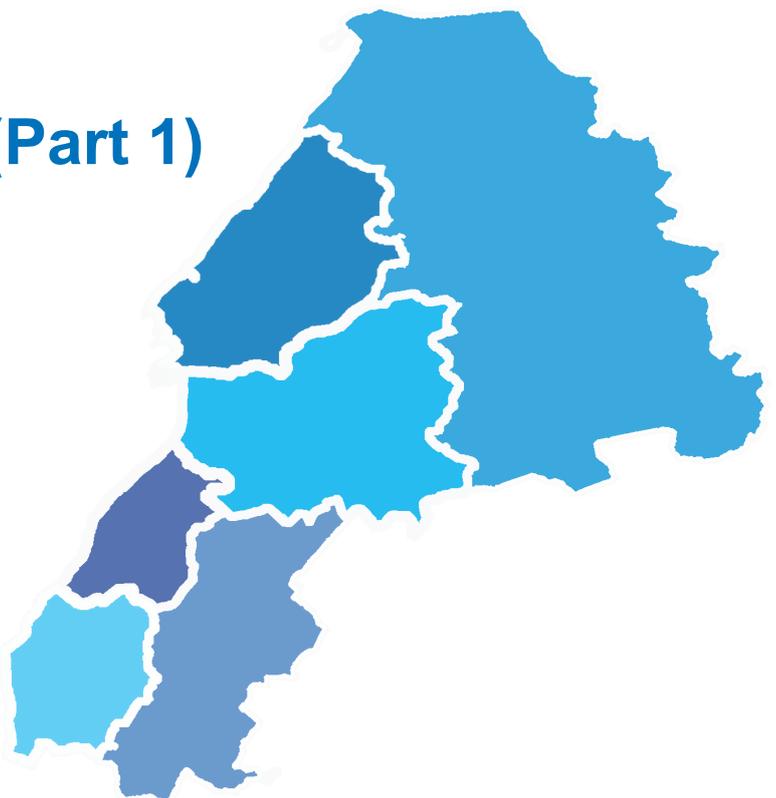


## Allerdale Local Plan (Part 1)

### Position Statement Main Matter 17:

The treatment of the  
World Heritage Site and  
the historic environment

January 2014



# Allerdale Local Plan (Part 1) Examination – Allerdale Borough Council Position Statement January 2014

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## Matter 17: The Treatment of the World Heritage Site and the Historic Environment

### Introduction

1. This Statement has been produced by Allerdale Borough Council to outline its response to the matters raised by the Inspector for the Hearings **[ED3]** into the Submitted Allerdale Local Plan (Part 1) Development Plan Document (DPD) **[CD1]**.
2. These Statements form the main basis for the Council's submission to the Hearings. They relate to the elements of the DPD that have been raised by the Inspector as matters to be discussed. Where appropriate the Statements draw upon and cross-refer to the main sources of information used in the preparation of the DPD such as the outcomes of public consultation, the Sustainability Appraisal, the evidence base and the supporting Topic Papers. Core Document numbers are given where appropriate.

### Position of the Council regarding Matter 17

3. This position statement explains the objections/comments made in respect of the historic environment elements of the Pre-Submission Draft Local Plan **[CD1]**, and the modifications proposed as a result of these objections. It summarises and groups together the concerns, and so does not specifically address every individual item that has been described as 'unsound' as many are based on the same or similar issues and these are dealt with together.
4. English Heritage was the main representor to submit representations regarding the Historic Environment elements of **CD1**. The substance of the concerns ranged from: lack of evidence base (outside of the Local Plan document itself); to lack of assessments of the historic environment and local heritage assets, to matters of detailed wording of policies and explanatory text.

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5. Following the comments made by English Heritage, a meeting was held on 29 August 2013 with the Historic Environment Planning Advisor at English Heritage North West. This clarified many of the issues and how they could be resolved. Some points were agreed as being resolved by small wording changes and these are all contained within the modifications in the Annotated Local Plan **[CD2]** including Minor **[CD3]** and Major **[CD4]** Modifications. English Heritage's representations can be summarised as follows:

- Lack of evidence base (not part of local Plan document itself). **(Issue 1)**
- Lack of qualitative information on the local historic environment within the Strategic Area Based policies and lack of assessment of significance and relative importance of heritage assets within the borough as a whole and within the localities (A Spatial Portrait, Paragraph 47 of **CD2** and Strategic Policies: Area Based S6a - S6f). **(Issue 2)**
- Mention of individual heritage assets in policies that had not been introduced or set in context in the local portraits (A Spatial Portrait, Paragraph 47 of **CD2**, and Strategic Policies – Area Based)
- Use of incorrect name of the World Heritage Site (WHS) (A Spatial Portrait, Paragraph 47 of **CD2** and throughout document). **(Issue 3)**
- Lack of inclusion of historic environment considerations in Strategic objectives: 'climate change and sustainability' 'economy', 'natural environment', 'spatial strategy and growth' and some parts of 'Built and Historic Environment'. **(Issue 4)**
- Lack of reference to the historic environment in policies: S2 Sustainable Development Principles, S3 Spatial Strategy and Growth, S13 Energy

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Coast Innovation Zone, S20 (Nationally significant Infrastructure Projects), S25 (Sports Leisure and Open Space), S37 (Shoreline Management and Coastal Development). **(Issue 5)**

- The plan does not pick out anything considered to be of priority or particular importance within the Built and Historic Environment Section (Cockermouth Area Policy p57 of **CD2**). **(Issue 6)**
- Inaccuracies within the numbers of designated heritage assets (Allerdale: A Spatial Portrait Paragraph 57, Paragraph 48 and also Paragraph 267 of **CD2** (Policy S27 Heritage Assets). **(Issue 7)**
- Lack of guidance on development that affects archaeological assets (Policy S27 Heritage Assets). **(Issue 8)**
- Inadequate description and insufficient weight given to the importance of the WHS and need to reinforce its significance, Policy S17 (Tourism, Coastal and Countryside Recreation) and Policy S28 (Hadrian's Wall World Heritage Site). **(Issue 9)**
- Insufficient weight given to 'historic' harbours and coastline given mention policy text (Policy S13 Energy Coast Innovation Zone). **(Issue 10)**
- Lack of assessment of heritage assets at Derwent Forest, Policy S18 (Derwent Forest). **(Issue 11)**
- Maps not illustrating the historic environment (Strategic Policies –Area Based). **(Issue 12)**

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6. Following the meeting with English Heritage and consideration of its comments, the Council has proposed modifications to policies and text to directly address many of the comments. There are places where policies or text have not been altered directly but the comments have been addressed and covered elsewhere in the Plan. There are a few areas where comments have been analysed but not directly acted upon. In these cases, the Council has taken a careful look at the policies and how they fit within the aims of NPPF and how they are read in conjunction with the whole range of Local Plan policies. All representations and the Council's response to these representations are summarised in the Consultation Statement Appendix 1 **[CD8a (1)]**.
  
7. The Council's position on the areas objected to by English Heritage, as set out in **CD2**, are:

**Issue 1: Lack of Evidence Base (not part of Local Plan document itself)**

8. It is considered that the matters raised by English Heritage concerning the lack of evidence base related to the lack of reference to and availability of information readily available on the Council's website at that time. This has been addressed and information from the evidence base has been drawn together and is now available on the Council's Local Plan website.

**Issue 2: Lack of qualitative information on the local historic environment within the Strategic Area Based policies and lack of assessment of significance and relative importance of heritage assets within the borough as a whole and within the localities (A Spatial Portrait, Paragraph 47 of CD2 and Strategic Policies: Area Based S6a - S6f)**

9. The proposed modifications now contain an overview of the importance and main characteristics of Allerdale's historic built environment in its Spatial Portrait (Built and Historic Environment, Paragraphs 47-49). Policy S6 a –f, now also

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contain a summary of the historic backgrounds to and principal heritage interests of the main settlements within the localities.

**Issue 3: Mention of individual heritage assets in policies that had not been introduced or set in context in the local portraits (A Spatial Portrait, Paragraph 47 in Modifications document, and Strategic Policies – Area Based)**

10. Heritage assets that have been mentioned in policies and text have now been introduced earlier in the plan Modifications, in the Spatial Portrait and the locality profiles S6a –S6f.

**Issue 4: Use of incorrect name of the World Heritage Site**

11. This has been remedied so that wherever it is mentioned prominently (aims, objectives, SO3h – DM6) the full name: ‘Frontiers of the Roman Empire (Hadrian’s Wall): World Heritage Site’ has been used, and then immediately after and in later parts of the plan where it is mentioned, but not as the main subject, it has been shortened to ‘Hadrian’s Wall World Heritage Site’. Furthermore, the Appendix 1 ‘Glossary and Acronyms’ has been updated with an entry for Hadrian’s Wall. This clearly sets out the approach.

**Issue 5: Lack of inclusion of historic environment considerations in Strategic objectives: ‘climate change and sustainability’ ‘economy’, ‘natural environment’, ‘spatial strategy and growth’ and some parts of ‘Built and Historic Environment’**

12. English Heritage has suggested that these Strategic Objectives should refer to the need to also consider the Historic Environment. The Council feels that these objectives would not be read in isolation and that wherever relevant and necessary, the Built and Historic Environment Strategic Objectives SO5a to SO5f will be read alongside all others and due weight will be required to be

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given to the Historic Environment objectives wherever circumstances require it. As such, mention of the historic environment within objectives concerning other subject areas is considered unnecessary. It is considered that this approach is aligned with the NFFP and is therefore sound.

**Issue 6: Lack of reference to the historic environment in policies: S2 Sustainable Development Principles, S3 Spatial Strategy and Growth, S13 Energy Coast Innovation Zone, S20 Nationally significant Infrastructure Projects, S25 Sports Leisure and Open Space, S37 Shoreline Management and Coastal Development**

13. English Heritage has suggested that these Strategic Policies should refer to the need to also consider the Historic Environment. The Council feels that these policies will not be read in isolation and that wherever relevant and necessary, Policy S27 'Heritage assets' will be read alongside these policies and due weight will be required to be given to the Historic Environment. As such, mention of the historic environment within policies primarily concerning other subject areas is considered unnecessary
14. In addition, as the Local Plan should be read as a whole it removes the need to include specific references to the historic environment in every policy.
15. It is the Council's view that Strategic policies should be kept simple and deal with matters of general principle. Policies will be weighed against each other and prioritised as appropriate according to the specific site and development proposals concerned. It is felt that the Council's approach is aligned with that of the NPPF and is sound.

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**Issue 7: The plan does not pick out anything considered to be of priority or particular importance within the Built and Historic Environment Section (Cockermouth Area Policy, p45, p57 of CD2).**

16. English Heritage suggested that this paragraph should pick out specific aspects of the Historic Environment considered to be of priority or particular importance. The Council is of the opinion that there is much of historic importance within the Cockermouth locality (as for other localities) and that listing all would be impractical and listing a selection could imply that assets not mentioned are less significant. An overview of the historic environment which picks out certain key assets in this locality is contained within the locality profile S6c (Strategic Policies – Area Based, p51)

**Issue 8: Inaccuracies within the numbers of designated heritage assets (Allerdale: A Spatial Portrait Paragraph 57, Paragraph 48 and also Paragraph 267 of CD2 (Policy S27 Heritage Assets)).**

17. The number of listed buildings referred to in **CD1** was an attempt to recognise the fact that many listings in Allerdale are group listings covering terraces or groups of buildings, so the number of listed buildings is greater than the number of listings. However this has now been modified, as suggested by English Heritage and the number of listings, rather than the number of listed buildings are detailed in paragraph 48, Allerdale: A Spatial Portrait and in the text associated with Policy S27 in paragraph 267

**Issue 9: Lack of guidance on development that affects archaeological assets (S27)**

18. It is considered that Policy S27 covers the principles of assessing impacts upon all heritage assets including archaeological assets and it is considered that the same policy principles apply to archaeological assets as to all other types of

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heritage assets. However, archaeological assets have been specifically mentioned in the policy in case there are situations where they are not considered a heritage asset. The need for recording of assets where they will be removed or covered is included in Modifications Paragraph 275.

**Issue 10: Inadequate description and insufficient weight given to the importance of the WHS and need to reinforce its significance, S17 (Tourism, Coastal and Countryside Recreation) and S28 (Hadrian’s Wall World Heritage Site).**

19. There are descriptions of the World Heritage Site contained within the Area Based locality sections of the Strategic Policies for Workington, Maryport, Wigton, Silloth and Aspatria. These policies require protection of the WHS and encourage opportunities to better reveal its significance. Its importance is emphasised particularly in paragraphs 270, 276, 277 and 278 and its protection is covered by Policies S27 (Heritage Assets) and S28 (Hadrian’s Wall World Heritage Site). This is considered an appropriate level of description and weight for the Local Plan.

**Issue 11: Insufficient mention and weight given to historic harbours and coastline. S13 (Energy Coast Innovation Zone)**

20. The reference to ‘historic’ harbours in policy S13 related to the fact that the ports were well established as commercial ports rather than to their heritage value. A minor modification **M50 [CD3]** is proposed to remove the reference to ‘historic’ from this policy to aid clarity.

**Issue 12: Lack of assessment of heritage assets in Derwent Forest S18 (Derwent Forest).**

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21. There is currently no information concerning heritage assets on this site. However, any proposals will require the development of a Masterplan which will include a detailed assessment and safeguarding of valuable historic assets as required by Policy S18 (Derwent Forest) e). Any heritage assets identified will be covered by Policy S27 and all applications that will affect the significance of a heritage asset will require a heritage statement to be included that will assess the significance of the asset and the impact of the proposal upon that significance.

**Issue 13: Maps not illustrating the historic environment**

22. This comment referred to the small scale locality maps within the Area Based Strategic Policies. It is not appropriate or practical to show Heritage Assets here or at this scale. English Heritage agreed that they will be more appropriately shown on the proposals map in Allerdale Local Plan Part 2.

**Summary/Conclusions**

23. The Council understands and agrees with many of the comments made by English Heritage and has addressed these in its proposed modifications. However, there are a number of suggestions made where the Council feels that altering policies or explanatory text as suggested would unnecessarily complicate and lengthen them and could potentially undermine their effectiveness.
24. The Council's policies are considered to be clear and specific to the specific aspects, and where appropriate sites, that they concern. These will be weighed against each other according to the circumstances of specific development proposals. This approach is considered to be sound and in line with the NPPF