



Allerdale Local Plan (Part 1)

Main Modifications

Representation Form

Please complete a separate representation form for each Main Modification you wish to comment on. Representations must be made in writing, using the comments form, and sent either by email or post to:

By post: Kerry Trueman, Programme Officer, Allerdale Borough Council, Allerdale House, Workington CA14 3YJ

By email: kerry.trueman@allerdale.gov.uk

Telephone: 07582 310 364

Please return to the Programme Officer no later than 4 pm on Friday 28th March 2014

Allerdale Borough Council is now seeking representations on the Main Modifications only. The changes are proposed by the Council to address issues of legal compliance and soundness and only representations on these matters will be accepted. All representations will be forwarded to the Inspector who will consider them prior to issuing her report. By submitting this form you are consenting to your personal information and representations being stored and used for this purpose.

Further advice and guidance can be obtained by contacting the Programme Officer directly or by visiting the Allerdale Borough Council Website:

www.allerdale.gov.uk/localplanexamination

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(For official use only)

Consultee ID _____ MM _____ Policy _____ Elem. Sound _____ Date Rec. _____

Part A: Personal details

*if an agent is appointed, the contact details of both parties must be completed.

	Personal details	Agent's details (if applicable)*
Title	Mr.	N/A
First name	Alan	
Last name	Hubbard	
Job title (if applicable)	Planning Adviser	
Organisation (if applicable)	National Trust	
Address	National Trust Cheshire Hub 18 High Street ALTRINCHAM Cheshire	
Postcode	WA14 1PH	
Tel Number	0161 234 9983	
Fax Number	-	
Email	alan.hubbard@nationaltrust.org.uk	

Please indicate if you wish to be notified of any of the following:

Publication of the inspectors' recommendations	X
Adoption of the Local Plan	X
Other planning policy and Local Plan news	X

If you have provided an email address our default is to update you electronically, however, if you would prefer paper correspondence please tick here:

Part B: Your Representation

1. To which proposed change (Main Modification Number) does this representation relate?

Main Modification Number:	MMX7	Paragraph:		Policy:	DM5	Map:	
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2. Do you consider the Main Modification makes the Development Plan Document legally compliant?

Yes	neither	No	neither
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3. Do you consider the Main Modification makes the Development Plan Document:

Sound		Unsound	X
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If you have selected unsound, do you consider it:

(1) has not been positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements	
(2) is not justified – the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.	
(3) is not effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.	
(4) is not consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the NPPF.	X

4. Please give details of why you consider it to be unsound, not legally compliant, or why you support it. Please be as precise as possible.

In a number places the Modifications have correctly picked up that Allerdale's heritage resources are more correctly referred to as 'heritage assets' – this being the terminology used in the NPPF including in particular in Chapter 12 (Conserving and Enhancing the Historic Environment) and in the Glossary:

“Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

“Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).”

The Allerdale Core Strategy includes a definition of 'heritage assets' (page 179) that is consistent with the NPPF. It is unclear what is meant by the wording “historic asset” in

the proposed insertion at c) in MMX7, i.e.:

“c) The development conserves and enhances the historic environment and historic assets;”

The wording should be amended in order to be consistent with the NPPF and with the terminology used elsewhere in the Allerdale Core Strategy. Indeed it is noted that the proposed Main Modifications include such changes elsewhere, e.g. MM8, MM55, MM75 and MM85 correctly propose to replace “historic assets” with “heritage assets”.

(Continue on a separate sheet/expand box if necessary)

5. Please set out what change(s) you consider necessary to make the modification legally compliant or sound. It will be helpful if you are able to put forward your suggested wording of any proposal or text. Please be as precise as possible.

Amend MMX7 at c) to read as follows:

“c) The development conserves and enhances the historic environment and historic heritage assets;”

(Continue on a separate sheet/expand box if necessary)

Your representation should cover succinctly all the information, evidence and supporting information to support/justify the representation and the suggested change.

Signature:	<i>Alan Hubbard</i>	Date:	24 th March 2014
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