



Allerdale Local Plan (Part 2)

Main Modifications Consultation September 2019

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: Planning Policy, Allerdale Borough Council, Allerdale House, Workington CA14 3YJ

By email: siteallocations@allerdale.gov.uk

Telephone: 01900 702790

Please return no later than 4 pm on Friday 1 November 2019

Allerdale Borough Council is now seeking representations on the **Main Modifications and Policies Map changes only, and no other aspects of the plan**. 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 his report on the Plan. By submitting this form you are consenting to your personal information and representations being stored and used for this purpose. All representations will be published with personal details such as email address and telephone number being removed.

Further guidance is available online at www.allerdale.gov.uk/siteallocations, or by contacting the Planning Policy Team

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(For official use only)

Consultee _____ MM _____ Policy _____ Elem. _____ Date _____
ID _____ Sound _____ 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	N/A	Mr.
First name	N/A	Graham
Last name	N/A	Hale
Job title (if applicable)	N/A	Associate Planner
Organisation (if applicable)	Port Derwent Properties Ltd	WYG
Address	██████████ ██████████ ██████████	██████████ ██████████ ██████████ ██████████
Postcode	██████████	██████████
Tel Number	N/A	██████████
Email	N/A	██████████

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

Publication of the inspectors' recommendations	Yes
Adoption of the Local Plan Part 2	Yes
Other planning policy and Local Plan news	Yes

If you have provided an email address our default is to update you electronically.

Part B: Your Representation

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

Main Modification Number:	MM52	Paragraph:		Policy:	SA52 (Page 131	Map:	
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2. Do you consider the Main Modification makes the Development Plan Document legally compliant?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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3. Do you consider the Main Modification makes the Development Plan Document:

Sound	<input checked="" type="checkbox"/>	Unsound	<input type="checkbox"/>
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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	<input type="checkbox"/>
(2) is not justified – the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.	<input type="checkbox"/>
(3) is not effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.	<input type="checkbox"/>
(4) is not consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the NPPF.	<input type="checkbox"/>

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.

Our client is pleased to see that Main Modification MM52 now gives improved flexibility to allow the principle of development on land identified as Green Infrastructure to be supported in principle by the Local Planning Authority, albeit subject to other policy considerations. The Main Modifications therefore gives enhanced recognition that commercial and other forms of development can take place on such areas, and that Green Infrastructure can be integrated within commercial and other forms of development.


The Main Modifications show that with the greater policy flexibility, it is possible that through careful design, the functionality and connectivity of areas designated as Green Infrastructure can still be maintained without necessarily imposing a blanket ban stopping new development coming forward and sterilizing such sites in perpetuity, which are often vacant and in poor condition.

There remains a concern the revised policy wording requires major development to strengthen and connect with other green infrastructure network and could still be interpreted in a negative way. It is also of concern that the Policy could be used as a tool to unreasonably protect areas from economically viable development where some part of the Green Infrastructure may need to be changed. The Policy must therefore be implemented by Officers and Members in a flexible, responsible and pragmatic way to enable economically viable development to come forward, and the Local Planning Authority must not see the Policy as an excuse to halt suitable and appropriate development on such sites.

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.

N/A

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

Signature:		Date:	21 st October 2019
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Please note that there is a separate representation form for comments on the Habitats Regulations Assessment and Sustainability Appraisal Addendums.