



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:	MM58	Paragraph:		Policy:	S18 (bullet e)	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	X
(2) is not justified – the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.	X
(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.

(See also Objection to MMX7)

As set out elsewhere in the Trust's responses to the Main Modifications the term 'historic assets' has no specific definition either in national policy or in the Core Strategy. Indeed in other Main Modifications it is correctly being replaced by 'heritage assets' and that is also appropriate in Policy S18 e).

However, of equally great concern in this instance is the proposal to include the word "valuable" – this is considered to be superfluous as all heritage assets are by definition of value, if they were not they would not be 'heritage assets'.

Furthermore in assessing development proposals it is not the impact upon 'value' but rather upon 'significance' that matters. The appropriate tests are set out in the NPPF and in Core Strategy Policies S28 and S29. The proposed amended wording to Policy S18 e) is inconsistent with the approach to heritage as set out in those tests and there is no justification set out either elsewhere in Policy S18 e) or in the supporting text to it to

warrant taking any different approach heritage; indeed para 209 states the intention to respect historic (*should say 'heritage'*) assets.

It is also noted that the reason for the Modification is "*to provide additional detail on what the development is expected to take into account*" which does not indicate any justification to depart from national planning policy or proposed Policies S28 and S29.

(NB National Trust welcomes and supports the addition of the words "*and demonstrate how the wider landscape context has been taken into account*" as it is considered essential that development proposals should respect and, wherever possible reinforce, distinctive local character including relevant landscape character attributes.

(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 proposed text to read as follows:

"Ensure the siting, design and scale of all elements of the proposed scheme are appropriate, and will safeguard and enhance important landscape features, valuable historic heritage assets, and existing wildlife species and habitats and demonstrate how the wider landscape context has been taken into account. The proposal will seek to minimise and where appropriate mitigate adverse impacts,"

(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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