



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:	MM3	Paragraph:	57	Policy:		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.

(See also National Trust's response to MMX7)

The second sentence of the proposed modification introduces the term 'historic assets' which is neither consistent with the NPPF nor defined in the Glossary to the Core Strategy – both refer to, and define, the term "heritage assets" and set out the differences between 'designated' and 'non-designated' or 'local' heritage assets.

In the absence of any reasoning as to why the words 'historic assets' are used, and in particular how they differ from 'heritage assets' then the wording should be consistent with the NPPF and the definitions set out both there and in the Glossary to the Core Strategy.

(It is noted that the next words after the paragraph in question then specifically state: "Allerdale's **heritage** assets include."

(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 the proposed text to read as follows:

*“Allerdale’s historic environment contributes significantly to its landscape and townscape character. There are a wide range of ~~historic~~ **heritage** assets including Hadrian’s Wall and associated structures (‘Frontiers of the Roman Empire (Hadrian’s Wall) World Heritage Site’), pre-historic structures and archaeology, medieval churches, defensive castles, mansions and pele towers, 17th and 18th century farmhouses and associated agricultural buildings, medieval farming and coastal villages, medieval towns with many Georgian frontages and buildings as well as Victorian developments. There are also historic planned areas such as the Georgian streets in Maryport and Portland Square, Workington and the Victorian resort of Silloth.”*

(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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