



Representation Form

Part B

For office use only

SUB/131/2281

Consultee Ref:	131	Date Received RECEIVED 24 JAN 2018
Representation Ref:	2281	

Barrow Borough Council
Regulation 19 Consultation: Submission Draft Local Plan
Consultation on Proposed Major Modifications – December 2017

Please use a separate Part B form for each modification you wish to comment on. Representations must be attached to Part A of the representation form. Please note that we cannot accept anonymous responses.

Please print your name on each separate Part B representation.

Name (Print)	Claire Walters
Organisation	National Trust
Date	16 th January 2018

1. To which of the 27 Proposed Major Modifications does this representation relate?

Please state clearly the reference number of the modification which you are commenting on from the Schedule of Proposed Major Modifications (e.g. MAJ1)	MAJ	2
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2. Do you consider the Major Modification is legally compliant?

Legally compliant?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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3. Do you consider the Major Modification is sound or sound with minor amendments?

Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Sound with minor amendments?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If you have selected 'Yes' to either of the above then please skip question 4 and continue to question 5.

4. If you consider the Major Modification is unsound, on which grounds do you consider the document to be unsound?

Please select as many as you consider apply.

Positively Prepared	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with national policy	<input checked="" type="checkbox"/>

5. Please provide details of why you consider the Major Modification is not legally compliant or is unsound. Also if you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

Please be as precise as possible.

Green spaces are an intrinsic part of the borough's Green Infrastructure. The Trust therefore supports in principle the identification of an additional area of green space at Walker Street/James Street, Askham in Furness. However the Trust remains concerned that the Council's approach to the definition of Green Infrastructure (i.e. the policy framework underpinning Policy GI4) remains flawed. Specifically, it does not fully recognise the full range of GI benefits provided by the wider rural area – including water courses and bodies, and public rights of way linkages. The Trust's property at Sandscale Haws is a good example of this type of GI asset.

The National Trust has raised concerns at earlier stages in the preparation of the Local Plan in this regard, notably submitted in respect of the Preferred Options consultation, dated 4th September 2015 and the Pre Submission Draft consultation, dated 4th July 2017.

Detailed comments were also submitted in relation to the supporting Green Infrastructure Strategy (in draft format at this time). It is noted that the Final Draft GI Strategy (July 2016) retains the previous approach, as does the Submission Draft Local Plan.

In the National Trust's view therefore, the Local Plan fails the tests of legal compliance and soundness in respect of Green Infrastructure, since it does not fully reflect the NPPF's definition:

Green infrastructure: *A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.*

Please note: *Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.*

6. Please set out what change(s) you consider necessary to make the Major Modification legally compliant or sound, having regard to the tests you have identified in question 3 where this relates to soundness.

Please say why you consider the change(s) will make the Major Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Detailed comments regarding the Council's restrictive approach towards defining GI assets, together with a suggested way forward have previously been submitted by the Trust, notably during the Preferred Options consultation and Pre Submission Draft consultation. These remain of relevance.

7. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
I wish to participate		I do not wish to participate	X

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Please attach any additional documentation you consider necessary to support your representation.

Submitting your representation

In order to be valid you must complete both Part A and Part B of the representation form and return them to the Planning Policy Team via email or post.

- E-mail: developmentplans@barrowbc.gov.uk
- Post to: Planning Policy, Barrow Borough Council, Town Hall, Duke Street, Barrow-in-Furness, Cumbria, LA14 2LD

Please note that representations cannot be kept confidential but all responses will be held by the Council in accordance with the Data Protection Act 1998. All representations received and any information provided will be open to public scrutiny including publication on the Council's website.

Personal information (such as your address or email address) will remain confidential. However, your contact details will be shared with the Programme Officer and Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to the above.

If you have any queries regarding the consultation process please do not hesitate to contact the Planning Policy Team on 01229 876341.