

Stakeholder Reference:

Document Reference:

Part A

Making representation as Statutory Consultee, Local Authority or Town and Parish Council

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Steve	
Last Name	Craddock	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Canal & River Trust	
Address		
Post Code		
Telephone Number		
E-mail Address		

Part B

REPRESENTATION

To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?

MM no: 8

Supporting document reference:

Do you consider this Main Modification and/or supporting document of the Local Plan to be:

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

The Trust welcomes the changes proposed in MM8 (and in other relevant modifications) that would recognise health and wellbeing principles in place shaping. We suggest that this is consistent with the NPPF (particularly sections 8 and 12).

Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan 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.

REPRESENTATION

To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?

MM no: 16

Supporting document reference:

Do you consider this Main Modification and/or supporting document of the Local Plan to be:

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

The Trust welcomes the changes proposed in MM16, which would require Health Impact Assessments for large development proposals. We suggest that this is consistent with the NPPF, particularly the need to enable and support healthy lifestyles in section 8 (para 92). The NPPF is clear (as is the Council's Local Plan) that the provision of green infrastructure (the NPPF definition of which includes blue spaces) is an important part of supporting healthy lifestyles. We look forward to working with developers and the council to consider opportunities to improve the Trust's network in the borough, as appropriate

Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan 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.

REPRESENTATION

To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?

MM no: 19

Supporting document reference:

Do you consider this Main Modification and/or supporting document of the Local Plan to be:

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

The Trust supports the inclusion of 'blue infrastructure' within part C (xvi) of policy SP4.

Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan 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.

REPRESENTATION

To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?

MM no: 26

Supporting document reference:

Do you consider this Main Modification and/or supporting document of the Local Plan to be:

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

The Trust would welcome further discussions with the Council if it intends to undertake an assessment of the needs of people residing in houseboats under the Housing Act 1985 (as amended). We note that the change made to para 3.2 is simply a factual statement.

Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan 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.

REPRESENTATION

To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?

MM no: 66

Supporting document reference:

Do you consider this Main Modification and/or supporting document of the Local Plan to be:

Legally compliant: Yes

Sound: Yes

If no, then which of the soundness test(s) does it fail?

Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

The Trust welcomes the change proposed to policy DM17 in MM66. This reflects the agreement reached between the Council, the EA and the Trust through the examination. We suggest that this change will help to ensure that the physical relationship between new development and blue infrastructure owned and managed by the Trust appropriately takes account of its multifunctional nature and ability to support health and wellbeing.

Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan 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.

Signature: Steve Craddock Date:
21/09/2021