

Strategic Planning & Development
Trafford Council

18 October 2010

[sent via email: strategic.planning@trafford.gov.uk]

Dear Dennis

Core Strategy - Publication

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line (01623 637119).

With kind regards

Yours sincerely



Miss Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MIPSM, MRTPI*
Deputy Head of Planning and Local Authority Liaison

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Gregory Gray Associates

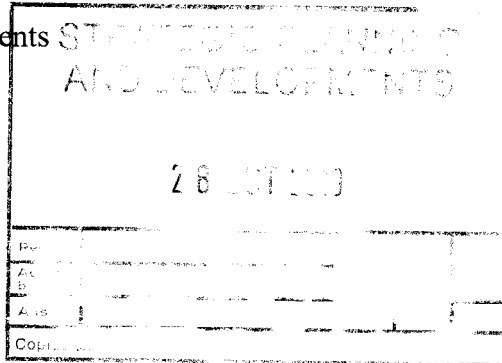
CHARTERED TOWN PLANNING CONSULTANTS

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Tel: 01252 624004 Fax: 01252 626431

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Trafford Council
Strategic Planning and Developments
1st Floor
Waterside House
Sale Waterside
Sale
M33 7ZF



25th October 2010

Dear Sir,

Formal Representations to Trafford Council's Draft Core Strategy Publication Document .

We write on behalf of our client, The Garden Centre Group, to submit comments on Trafford Council's draft Core Strategy Publication Document.

The Garden Centre Group occupies two sites in the Trafford Borough area, known as Altrincham Wyevale, located off Green Lane and Wyevale World of Pets and Leisure (WOPAL), located off Wood Lane/Thorley Lane. Both sites are located on Green Belt land between Altrincham and Timperley. Site Location Plans are enclosed with this letter.

The draft Core Strategy representations follow earlier correspondence, dated 11 August 2010, in which both sites have been promoted through the Strategic Housing Land Availability Assessment (SHLAA, 2011/12 review), in order to assist housing growth up to 2026.

Strategic Objectives

Draft strategic objective **Policy SO1** 'meeting housing needs' is supported as it seeks to promote sufficient high quality housing in sustainable locations, of a size, density and tenure needed to meet the requirement for 11,800 new dwellings up to 2026. Draft strategic objective **Policies SO2 - SO8** are also generally supported as they seek to, amongst other things, secure sustainable development and regenerate disadvantaged communities, including those in the rural areas of the Borough.

In terms of the draft Place Objectives relating to Altrincham and Neighbouring Communities, draft **Policy ALO1** seeks to ensure that high levels of residential development pressure are effectively managed. Draft **Policy ALO2** also seeks to maximise the provision of affordable units to meet the needs of the community, while draft Place Objectives **Policy ALO5** seeks to

Director: G.W.R. Gray MSc. Dip.TP MRTPI ACI.Arb Secretary: C.J. Gray

Associate Director: M.G. Cole BA(Hons.) Dip.TP MRTPI

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limit new residential growth to: *“meeting local needs, particularly for affordable housing, with general ‘market housing’ (in sustainable locations, well served by public transport) supporting local needs and regeneration priorities”*.

Draft **Policy ALO15** also seeks to manage the change of industrial land to other uses effectively, in order to protect economic/employment uses in the area. Draft **Policy ALO17** seeks to maintain the Green Belt in this area for agriculture and recreational purposes.

While the principle of the Altrincham and Neighbouring Communities Place Objectives are supported, the draft policies must allow for greater flexibility in housing growth in this area. For example, there are sites outside the identified Principal Urban Area of Altrincham that could offer considerable regeneration benefits to the wider community should an element of the site be redeveloped for housing. The policies should therefore include options for sites in the rural areas to contribute towards housing provision targets where significant regeneration benefits to the community can result as part of an early release, and where the overall environment and appearance of a site could be improved and enhanced as a result of new housing development. **Policy ALO17** should therefore recognise that uses other than agriculture and recreation, such as housing, can also be appropriate in the rural areas, where the site context could be enhanced and where the openness of the Green Belt is protected, in line with Planning Policy Guidance Note 2 (**PPG2**).

Meeting Housing Needs

Draft **Policy L1.1** indicates that within the overall supply of land made available for new development, the Council will seek to ensure that an adequate range of sites is made available across the Borough to allow a variety of types of housing, including accommodation that is affordable by all sectors of the local community. Draft **Policy L1.3** confirms: *“in order to meet the identified affordable housing need within the Borough, the Council will seek to achieve ... a target split of 60:40 market:affordable housing”*.

Draft **Policies L2.8 – L2.12** split the Borough into three broad market locations:

- *“cold”* – being the Old Trafford, Carrington and Partington *“places”*;
- *“moderate”* – being the Urmston, Stretford and Sale *“places”* and;
- *“hot”* – being the Altrincham, the Mersey Valley and Rural Communities Places.

The minimum threshold for qualifying sites will be 5 residential units in the Borough’s *“hot”* and *“moderate”* market locations and 15 within the Borough’s *“cold”* market locations. Draft **Policy L2.12** confirms that the following will apply in these areas:

- within *“cold”* market locations, a 5% contribution will be sought;
- within *“moderate”* market locations, a 20% contribution will be sought; and
- within *“hot”* market locations a 40% contribution will be sought.

Altrincham and its surrounding rural neighbourhoods fall within the *“hot”* market locations, where a 40% contribution is sought. This figure is considered high and could render some development proposals unviable, therefore The Garden Centre Group supports the Council’s view that this should be based upon and subject to economic viability. The level of affordable housing should also be based upon an up-to-date Housing Market Assessment, in

line with guidance contained in **PPS3**, which would provide a clear indication of the levels of affordable housing required in that area.

Climate Change

Draft Core Strategy **Policy L5.1** requires all new developments to minimise contributions to and mitigate the effects of climate change and maximise its sustainability by adopting measures that reduce CO₂ emissions. This will incorporate measures such as using sustainable construction techniques, managing pollution and water management particularly flood risk.

Draft **Policy L5.2** requires new residential development to meet, as a minimum, the following Code for Sustainable Homes standards:

- Year 2010 – Code Level 3;
- Year 2013 – Code Level 4;
- Year 2016 – Code Level 6; and
- By 2019 these provisions will also apply to non domestic buildings.

As with affordable housing, policies seeking to implement sustainability ratings and BREEAM ratings in new developments must allow for greater flexibility to ensure that new development is not hindered due to the associated costs of implementing sustainable construction techniques. In order to ensure viable schemes come forward, draft **Policy L5.2** should seek to implement the required levels except where a viability assessment demonstrates that the required code/BREEAM level would render a scheme unviable.

Economy

Draft Core Strategy **Policy W1** encourages employment development in the Regional Centre first, and the Principal Urban Areas (including Altrincham) second. Outside these areas employment development will only be permitted provided it will contribute to the Plan's overall objectives; will contribute significantly to the achievement of regeneration priorities; will promote the use of derelict, vacant or under-used previously developed land; and the site is accessible by a range of alternative modes other than the private vehicle.

The above strategy is supported, as recent changes to the economic climate have demonstrated the need to have a planning framework that is flexible, capable of responding to market forces and which provides real choice in employment offer.

Allowing the redevelopment of under-used employment sites in accessible locations will enable new employment or alternative uses to come forward to the benefit of the wider Borough. In the case of the Wyevale Garden Centre sites located off Green Lane and Wood Lane/Thorley Lane, redevelopment to provide new employment/residential/mixed uses could provide much needed income and investment into the local area, resulting in new and varied employment opportunities for both skilled and unskilled workers, enabling investment and economic growth in the areas outside the Regional Centre and Principal Urban Areas. This will allow the positive transformation of rural areas, enabling their appropriate expansion, growth and regeneration in a sustainable manner.

Green Belt and Other Protected Open Space

Draft Core Strategy **Policy R4** confirms that the Green Belt will be protected from inappropriate development in line with **PPG2** guidance. Unless very special circumstances are demonstrated new buildings in the Green Belt are inappropriate unless for agriculture and forestry; essential facilities for outdoor sport and recreation and limited affordable housing. The draft Policy does not allow for the redevelopment of existing employment sites in the Green Belt which might comprise large areas of hard-standing and/or large scale buildings which in their current form restrict views of the open countryside and Green Belt and thus harm its openness.

The policy should be more flexible so that existing sites in the Green Belt can be regenerated for appropriate uses other than those specified in **PPG2**. For example, the Wyevale Garden Centre site off Green Lane is located adjacent to Altrincham College of Arts. This site comprises approximately 7,595 sq metres of floorspace together with 136 car parking spaces.


With the above in mind and although located in the Green Belt, this site could provide expansion land for the College which would ultimately provide new employment opportunities for the surrounding community. Its redevelopment could also reduce the total floor area occupied by built development, enhancing the site context and reducing the overall impact on the openness of the Green Belt.

Conclusion

The Core Strategy should reflect changes in society and future changes in development by implementing strategies that are flexible in order to reflect current and future market conditions. The Core Strategy must also recognise that enhancement and development of the Borough can not occur solely in the Regional Centre and Principal Urban Areas and, instead, out of centre locations, which are accessible and which could offer significant regeneration opportunities to the local community, should be considered as appropriate to provide new local employment opportunities, services and housing.

I would be grateful of these comments being taken into consideration in finalising the Council's Core Strategy and look forward to being kept informed of all emerging planning policy documents.

Should you wish to discuss any of these matters in more detail, please do not hesitate to contact me.

Yours faithfully 

Michael Cole

1217

From: Mike Cole [mailto:mike@ggassociates.co.uk]
Sent: 10 November 2010 09:47
To: Strategic Planning
Subject: Trafford Core Strategy

Hi Dennis

Further to your letter of 4th November (LPA Ref: CS/Publication/1217.

I can confirm that the comments made relate to proposed changes for you to consider before submitting the Plan. They are not comments made as to whether the Plan is legally compliant. We have no comments to make on the soundness or legality of the plan and we are not intending to appear at the Examination.

Please see attached with regards future stages

Kind regards

Mike Cole
(Associate Director)


Please note that we have moved to new offices. Please see details below.



Gregory Gray Associates

Victoria House
18-22 Albert Street
Fleet
Hampshire
GU51 3RJ

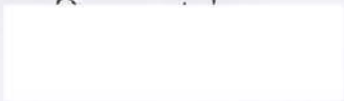
Tel: 01252 624004
Fax: 01252 626 431
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Web: www.ggassociates.co.uk

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December together with the Submission version of the Plan and all other representations received during the "Publication" consultation period.

Should you have any queries about this matter please do not hesitate to contact a member of the LDF Team on 0161 912 4475:

Yours sincerely


Dennis Smith

Name: MICHAEL COLF

Council reference number (please see header) CS/PUBLICATION 11217

I wish to be informed about the following stages in the production of the Trafford Core Strategy (please tick the relevant box(es):

Submission of the Core Strategy to the Secretary of State

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Please return to the Strategic Planning and Developments Team by 5th November 2010.

Via:

Email to: strategic.planning@trafford.gov.uk

Post to: c/o Strategic Planning & Developments,
1st Floor Waterside House, Sale Waterside, Sale M33 7ZF

Trafford's Core Strategy: Publication Document Representation Form – September 2010

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

This form has two parts –


Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

Before completing this representation form please refer to the attached guidance notes.

PART A

Please use the representation form to make a representation on the Core Strategy: Publication Document.			
1. Personal Details		2. Agents Details (If applicable)	
Name:	Alan Hubbard	Name:	N/A
Organisation (if applicable):	National Trust	Organisation (if applicable):	
Address:	Stamford Estates Office 18 High Street ALTRINCHAM Cheshire	Address:	
Postcode:	WA14 1 PH	Postcode:	
Tel:	0161 925 4330	Tel:	
Fax:	0161 929 6819	Fax:	
Email:	alan.hubbard@hotmail.com	Email:	
<p>You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of representation forms enclosed in the box below:</p>			
Total number of representation forms enclosed:			

 **The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.** An electronic version of the representation form can be found on the Council's web site at: www.trafford.gov.uk . **This form is in 'Word' format and you can type in your response and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.**

Alternatively, completed comment forms can be returned by post to the address below by no later than **Monday 1st November 2010.**

**Strategic Planning and Developments
Trafford Council
First Floor
Sale Waterside
Sale
M33 7ZF**

The form can also be **faxed** to: 0161 912 3128.

Data Protection Notice:

Please note that all comments will be held by the Council on the database for the duration of the Local Development Framework (LDF) and will be available for public inspection under the Freedom of Information Act 2000.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Vision

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

X

No

4. (2) Sound*

Yes

No

X

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

X

(2) Effective

(3) Consistent with national Policy

X

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

It is unclear that the current proposed wording of the Vision has fully considered comments submitted in response to the June 2009 'further consultation' or to the subsequent 'Further Consultation' in March 2010; the Trust remains concerned that the Vision does not encompass the consideration of the Borough's landscapes or the overall approach to the prudent use of natural resources. In detail: Trafford has a number of distinctive landscape types, such as those associated with its important river valleys and the mosses. These are special for the natural environmental resources that they contain, but in addition they also represent an important layer of landform that has shaped and defined the Borough, its communities and its character. Trafford's landscapes are both valued and well used – they are in close proximity to the substantial urban population and a vital resource in providing refreshment and breathing space. At present the landscape element is missing from the Vision.
(Contd.)

Trafford's Core Strategy: Publication Document Representation Form – September 2010

Contd.

As such it is considered that the Vision does not adequately reflect one of the key features of the Borough and the need to safeguard and enhance it, and furthermore that this approach is contrary to relevant advice in PPS1 on sustainable development (with particular reference to environmental aspects) and to PPS7 and its approach to landscape character. A suggested addition is set out below.

Secondly, the draft Vision remains silent on how the Borough will ensure the prudent use of natural resources. There are some good examples in the Borough, such as that on National Trust land at Stamford Brook, that have demonstrated what is possible on a major development site in terms of meeting sustainable construction goals. This work has embraced the expectations of PPS1 (and its Supplement on Climate Change); however, it is imperative that a clear lead, that conforms to this national advice, is followed in the Core Strategy – furthermore it is considered that such an intention should be part and parcel of the overall Vision for Trafford. This might best be addressed by adding a new paragraph relating to sustainable construction as set out below.

Please continue on a separate sheet if required

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Re-word the second paragraph to make specific reference to landscape, e.g. *"The historic, built and natural **environment, and landscapes (including strategic Green Infrastructure and the Green Belt), will be preserved, protected and enhanced**".*

Add a new paragraph relating to sustainable construction: **"All new development will encompass the principles of sustainable construction, and in particular will ensure that the recycling of materials is maximised and that natural resources are used prudently."**

Please continue on a separate sheet if required

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.

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

X

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

Trafford's Core Strategy: Publication Document Representation Form – September 2010

9. 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 in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Alan Hubbard

Date:

1st November 2010

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

**Trafford's Core Strategy: Publication Document
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PART B – Please use a separate sheet for each representation**

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Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Strategic Objectives
2, 7 & 8

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

X

No

4. (2) Sound*

Yes

X

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(2) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Strategic Objectives have been the subject of several earlier consultations and have been noticeably improved in response to consultees views and in the light of both national planning policy and the particular characteristics of Trafford. The Trust is pleased to support the detailed wording of the Strategic Objectives.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

-

Please continue on a separate sheet if required

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

X

No, I do not wish to participate at the Oral examination

--

~~Yes, I wish to participate at the oral examination~~

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

X

The publication of the Inspector's Report following the Examination

X

The formal adoption of the Core Strategy

X

Signature:

Alan Hubbard

Date:

1st November 2010

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

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Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

Place Objective RCO1

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

X

No

4. (2) Sound*

Yes

No

X

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(3) Justified

X

(2) Effective

(3) Consistent with national Policy

X

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Trust maintains its stance that the Rural Communities need to be protected from any 'inappropriate development' not just inappropriate residential development. No justification is set out in the document as to why inappropriate commercial development, for example, would be considered suitable in the rural areas of Trafford. Furthermore, much of the area in question is Green Belt land and to allow any type of inappropriate development, residential or otherwise, would be contrary to national planning policy as set out in PPG2. (It would also be inconsistent with the Vision in the Publication Core Strategy which states that the aspiration is to preserve, protect and enhance the Green Belt, and with Strategic Objective SO5.)

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Delete the word "residential" from RCO1; and replace "safeguard and protect" with "safeguard, protect and enhance".

Please continue on a separate sheet if required

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.

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

X

No, I do not wish to participate at the Oral examination

~~Yes, I wish to participate at the oral examination~~

9. 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 in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

X

The publication of the Inspector's Report following the Examination

X

The formal adoption of the Core Strategy

X

Signature:

Alan Hubbard

Date:

1st November 2010

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

**Trafford's Core Strategy: Publication Document
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PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
<input type="text" value="8.69 & 8.80"/>	<input type="text" value="SL5"/>

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4. (2) Sound*	Yes	<input type="text"/>	No	<input type="text" value="X"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(4) Justified	<input type="text"/>
(2) Effective	<input type="text" value="X"/>
(3) Consistent with national Policy	<input type="text"/>

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Proposed Policy SL5 makes specific reference at **SL5.2** to the provision of high quality green infrastructure, alongside improved connections to the wider countryside and protection/enhancement of existing natural assets. This is confirmed by the justification at para 8.80 which also refers to the provision of green infrastructure alongside open space, sport and recreational facilities. However, the table of implementation projects at para 8.69 only makes specific reference to open space and new outdoor sports provision rather than any wider green infrastructure proposals. It is unclear how the wider green infrastructure facilities, which it is agreed are needed, will be delivered. (In this context attention is also drawn to Policy L8.3 which notes the potential inclusion of Green Infrastructure contributions [in addition of those for open space, sport and/or recreation].)

Contd.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

6. Contd.

The final bullet point of **SL5.4** makes specific reference to one particular feature of the historic environment to the exclusion of all others. Especially as no site plan showing either the approximate or detailed extent of site SL5 has been included in the Submission Core Strategy document it is not possible to determine if this is the full extent of heritage assets that needs to be considered. In this context it is noted that the previous consultation version of the Core Strategy did include such a plan and in the Trust's view potentially did raise more extensive cultural heritage issues, including for assets that it manages on behalf of the nation at the Dunham Massey Estate.

Given the much more general locational information provided in the Submission Core Strategy it is considered that a more general approach is required to heritage assets and their protection/enhancement. A suggested wording is set out below in Section 7.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Amend the Table at para 8.69 to include the provision of wider green infrastructure facilities that will benefit existing and proposed communities as well as protecting and enhancing biodiversity in the wider area.

Amend the last bullet point in **SL5.4** to read:

- **To protect, enhance and preserve heritage assets and their wider settings, including the Listed Church of St George.**

Please continue on a separate sheet if required

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

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Alan Hubbard

Date:

1st November 2010

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

10.14

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

X

No

4. (2) Sound*

Yes

No

X

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(5) Justified

(2) Effective

X

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

(It would appear that the cross reference here should be to part L1.9 in Policy L1 [not to part L1.6])

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Amend cross reference to be to part L1.9.

Please continue on a separate sheet if required

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

X

No, I do not wish to participate at the Oral examination

~~Yes, I wish to participate at the oral examination~~

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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The publication of the Inspector's Report following the Examination

X

The formal adoption of the Core Strategy

X

Signature:

Alan Hubbard

Date:

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Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(6) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

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Revised Policy L6 (in particular at L6.2(d)) effectively addressed the concerns raised in earlier draft versions about the need to promote the reduction in the use of natural resources during construction, e.g. by greater use of recycled materials. The Trust is pleased to support proposed Policy L6.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

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

X

No, I do not wish to participate at the Oral examination

~~**Yes**, I wish to participate at the oral examination~~

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The publication of the Inspector's Report following the Examination

X

The formal adoption of the Core Strategy

X

Signature:

Alan Hubbard

Date:

1st November 2010

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Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

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5. Do you consider the DPD is **unsound** because it is not:

(7) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

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Policy L7 has evolved from its earlier draft versions and is considered to relevant to the circumstances of Trafford; National Trust is pleased to support proposed Policy L7.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

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The publication of the Inspector's Report following the Examination	<input checked="" type="checkbox"/>
The formal adoption of the Core Strategy	<input checked="" type="checkbox"/>

Signature:

Alan Hubbard

Date:

1st November 2010

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Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
<input type="text"/>	<input type="text" value="R1"/>

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4. (2) Sound*	Yes	<input type="text"/>	No	<input type="text" value="X"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(8) Justified	<input type="text" value="X"/>
(2) Effective	<input type="text" value="X"/>
(3) Consistent with national Policy	<input type="text" value="X"/>

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The proposed text of this Policy has not had regard to previous representations made in respect of the wider settings of heritage assets and in particular is not consistent with the approach set out in PPS5 – especially Policy HE10 relating to settings. HE10 confirms the importance that should be attached to settings and in particular the need to assess the impact of development proposals upon the settings of heritage resources having regard to their significance. The current approach is not consistent with this advice. Furthermore the supporting text does not provide any justification for taking an inconsistent approach, e.g. no arguments are advanced as to why the settings of heritage assets in Trafford should not be safeguarded and enhanced (indeed settings are not referred to at all). **(Contd.)**

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

6. Contd.

The introductory wording at **R1.2** is somewhat contorted, but in essence is lacking any specific reference to the wider setting of heritage assets and the need to take these into consideration in the preparation, assessment and determination of development proposals.

The second sentence of **R1.3** specifically, and unhelpfully, refers to “Within these areas the Council will...”. Whereas published guidance by English Heritage on matters such as Conservation Area Appraisals and Management Plans is clear that wider settings need to be assessed as part of this work, for example including key views into and out of a Conservation Area. The reference in the fourth bullet point to wider settings acknowledges the importance of this facet of Conservation Areas but is compromised by the introductory sentence’s reference to “within these areas”. **R1.5** also refers to Conservation Areas rather than recognising that their influence extends beyond their boundaries.

Listed buildings are appropriately referred to at **R1.6** by specific linking to their wider settings. However, the remaining text does not recognise that other heritage assets also have wider settings, e.g. Registered Historic Parks and Gardens, Scheduled Monuments.

(The identification of important skylines that are a key and distinctive feature of Trafford, in last bullet point of **R1.6**, is welcomed and strongly supported. Similarly the approach at **R1.7**, **R1.8** and **R1.9** is appropriate and relevant to the circumstances in Trafford.)

In respect of settings it is the Trust’s experience both generally and within Trafford that often the greatest threat to the significance of individual buildings, areas of heritage importance, or designated parks and gardens is not from proposals relating to within the designated area but from those outside. It is not unusual for the assets themselves to be in the hands of individuals or bodies that recognise and understand their significance and historical importance and care for them accordingly. In the case of the Dunham Massey Estate, for instance, it is that understanding allied with ever increasing knowledge that guides major and on-going conservation works that themselves add value to visitor’s appreciation of the assets. However, the vistas from the Hall and, at least as importantly, the surroundings of the Park and Garden (including its own designed views) have over the years been subject to several external threats – new road links, a major distribution depot/interchange, housing proposals. Such threats remain today, e.g. the impact of the proposed road works relating to the A556 between the M56 and the M6 including the related junction improvements – the impact of the final design remains to be assessed but important changes have been considered by the Highways Agency in response to the impacts upon Dunham.

Whilst a number of the Conservation Areas in the south of the Borough physically adjoin each other (so the setting of one is actually inside another) this is not universally the case and there are particular issues relating to the impacts of development upon the settings of more isolated Conservation Areas such as Linotype (in Broadheath) or those in Altrincham town centre.

A number of changes are suggested below that it is considered are necessary to a) ensure consistency with PPS5, b) relate to the specific circumstances of the various heritage resources within Trafford, and c) provide effective policy advice for developers. It is also considered that some complementary additional text (potentially based upon the comments set out above) needs to be added to the Justification – National Trust would be pleased to examine the detail of this together with the Council and English Heritage as appropriate.

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Amend **R1.2** to read: "Developers must demonstrate how proposed development will complement and enhance Trafford's identified heritage assets, including their wider settings, and that it will not have any unacceptable adverse impact upon their significance."

Amend **R1.3** second sentence to read: "Within these Areas and their wider settings the Council will:"

Amend **R1.5** to read: "In addition to preserving or enhancing Conservation Areas and their wider settings, the Council will identify..."

Amend **R1.6** as follows – "Accordingly developers will be required, where appropriate, to demonstrate how their development will protect, preserve and enhance the following heritage assets, including their wider settings:" (The words 'and their settings' can then be deleted after 'Listed Buildings' in the first bullet point.)

Please continue on a separate sheet if required

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

~~No, I do not wish to participate at the Oral examination~~

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

National Trust is a significant owner of heritage assets across England, Wales and Northern Ireland with particular experience of development in an historic environment and the pressures that such assets are under from external threats. In Trafford it has one of its prime, and most extensive, assets – the Dunham Estate – comprising not only designated assets of the highest order but also much of the historic wider farmed estate and estate villages, together with covenant interests in the nearby urban areas. The Trust has undertaken detailed work to explore the extent of settings at several of its properties in other parts of England and has day to day experience of the pressures that historic resources are under. It therefore believes that, as at other Core Strategy Hearings where it has been invited to contribute to discussions of heritage issues, that it can add understanding to the issues raised by proposed Policy R1 and their local implications.

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The publication of the Inspector's Report following the Examination	<input checked="" type="checkbox"/>
The formal adoption of the Core Strategy	<input checked="" type="checkbox"/>

Signature:

Date:

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Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(9) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

National Trust wishes to support Policy R2 – it appropriately records the range of natural environment resources across the Borough and proposes relevant requirements to ensure that the overall resource is respected and enhanced as a result of development activity. It is also considered to be consistent with, and add a local dimension to national planning policy as set out in PPS9.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

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Signature:

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Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
<input type="text"/>	<input type="text" value="R3"/>

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4. (2) Sound*	Yes	<input type="text" value="X"/>	No	<input type="text"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(10) Justified	<input type="text"/>
(2) Effective	<input type="text"/>
(3) Consistent with national Policy	<input type="text"/>

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Trust has been supportive of this approach throughout its gestation and continues to support it now. The NW has undertaken important leading work at a Regional level and the proposed Policy approach provides a suitable Trafford dimension to this.

To quibble...it is considered that the Bridgewater Canal is a very important linear and multi-functional route within the Borough which provides connectivity on water, as well as on foot/cycle via its towpath. Whilst **R3.2** is correctly prefaced with wording that is clear that the bullet points that follow are not exhaustive, it is nonetheless considered that the Bridgewater Canal should be added into the first bullet point.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

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Add an additional bullet point at **R3.2**:

- Public rights of way including cycle-ways, footpaths, and bridleways, **the Bridgewater Canal** and other recreational routes.

Please continue on a separate sheet if required

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Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

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6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

National Trust has commented upon earlier versions of this Policy and is content with the Submission version as now put forward. In particular the approach importantly recognises both the role of agriculture over a large part of the land area of Trafford and also the need to look positively at opportunities for rural diversification (consistent with PPS7) – especially to ensure that viable uses can be found for important historic and vernacular buildings, many of which are no longer appropriate to meet the needs of modern day farming but have potential to accommodate a wide range of new uses whilst retaining their overall integrity, appearance and character.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Please continue on a separate sheet if required

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.

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

X

No, I do not wish to participate at the Oral examination

~~**Yes**, I wish to participate at the oral examination~~

9. 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 in the oral part of the examination.

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

X

The publication of the Inspector's Report following the Examination

X

The formal adoption of the Core Strategy

X

Signature:

Alan Hubbard

Date:

1st November 2010

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(12) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Policy is supported. Particular attention is drawn to **R5.4** and the cross-reference to Policy R3 – this is especially critical in ensuring that where new green spaces are brought forward that consideration is given to the wider multi-functional benefits that they can deliver – e.g. provision of native tree and hedge planting along the boundaries of areas for outdoor sports in order to ensure that wildlife corridors/connections are enhanced, or the use of permeable surfaces for 'hard' areas to assist the role of such areas in providing temporary flood water storage.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Please continue on a separate sheet if required

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

No, I do not wish to participate at the Oral examination

~~Yes, I wish to participate at the oral examination~~

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Submission of the Core Strategy to the Secretary of State for independent Examination	<input checked="" type="checkbox"/>
The publication of the Inspector's Report following the Examination	<input checked="" type="checkbox"/>
The formal adoption of the Core Strategy	<input checked="" type="checkbox"/>

Signature:

Alan Hubbard

Date:

1st November 2010

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: National Trust

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
<input type="text"/>	<input type="text" value="R6"/>

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4. (2) Sound*	Yes	<input type="text"/>	No	<input type="text" value="X"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(13) Justified	<input type="text" value="X"/>
(2) Effective	<input type="text" value="X"/>
(3) Consistent with national Policy	<input type="text"/>

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

As previously advised..."Whilst the inclusion of Dunham Massey as a cultural and tourism resource is welcomed it is noted that...the significance is wider than just the Hall and Registered Park & Garden – rather it encompasses the significance of the wider agricultural estate (including related buildings) and the ownership interests in the settlements of Dunham Town and Dunham Woodhouses, as well as related features such as the Mill at Bollington, the Estate Office in Altrincham and woodland areas."

It is considered that the reference to Dunham Massey should be amended to reflect this wider remit.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Amend R6.1, fifth bullet point to read:

- The National Trust owned Dunham Massey Estate.

Please continue on a separate sheet if required

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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

X

No, I do not wish to participate at the
Oral examination

~~**Yes**, I wish to participate
at the oral examination~~

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Submission of the Core Strategy to the Secretary of State for independent Examination

X

The publication of the Inspector's Report following the Examination

X

The formal adoption of the Core Strategy

X

Signature:

Alan Hubbard

Date:

1st November 2010

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

Trafford's Core Strategy: Publication Document Representation Form – September 2010

Guidance Notes to Accompany Representation Form

1. Introduction

The development plan document (DPD) is published in order for representations to be made prior to submission to the Communities and Local Government (CLG) Minister. Once they have been considered by the Council, the representations will be submitted alongside the published DPD to CLG and an independent Planning Inspector will be appointed to hold an Examination in to the Plan. The Planning and Compulsory Purchase Act 2004 (as amended)¹ (the 2004 Act) states that the purpose of the examination is to consider whether the DPD complies with the legal requirements and is 'sound'.

2. Legal Compliance

The Inspector will first check that the DPD meets the legal requirements under s20 (5) (a) of the 2004 Act before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The DPD in question should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the Local Development Documents it proposes to produce over a 3 year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If the DPD is not in the current LDS it should not have been published for representations. Trafford's LDS can be found on Trafford's website and is available at Sale Waterside.
- The process of community involvement for the DPD in question should be in general accordance with the LPA's Statement of Community Involvement (SCI). The SCI is a document which sets out the strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs and the consideration of planning applications). Trafford's SCI (2010) can be found on Trafford's website and is available at Sale Waterside.
- The DPD should comply with the Town and Country Planning (Local Development) (England Regulations) 2004 (as amended). On publication, the LPA must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The LPA must also place local advertisements and notify the DPD bodies (set out in the regulations) and any persons who have requested to be notified.
- The LPA is required to provide a Sustainability Appraisal Report when they publish a DPD. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure that they reflect social, environmental and economic factors. The Sustainability Appraisal for the Core Strategy can be found on Trafford's website and is available at Sale Waterside.

¹ View the 2004 Act at:

http://www.opsi.gov.uk/acts/acts2004/ukpga_20040005_en_1

View the amending 2008 Act at:

http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga_20080029_en.pdf

View the 2009 amending Regulations at:

http://www.opsi.gov.uk/si/si2009/pdf/uksi_20090401_en.pdf

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

The DPD must have regard to any Sustainable Community Strategy (SCS) for its area Trafford's SCS – 2021: A blueprint has been prepared by Trafford's Local Strategic Partnership (The Trafford Partnership) and is available on the Partnership's website.

3. Soundness

Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning in paragraphs 4.36 4.47, 4.51 and 5.52 and the boxed text². The Inspector has to be satisfied that the DPD is justified, effective and consistent with national policy. To be sound a DPD should be:

Justified

This means that the DPD should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts.

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

Effective

This means the DPD should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities

The DPD should also be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen.

The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make it clear that major changes may require a formal review including public consultation.

Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Annual Monitoring report. This report must be produced each year by all local authorities and will show whether the DPD needs amendment.

Consistent with national policy

The DPD should be consistent with national policy, where there is a departure, LPAs must provide clear and convincing reasoning to justify their approach. Conversely you may feel that the LPA should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.

² View at <http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp>

Trafford's Core Strategy: Publication Document Representation Form – September 2010

Soundness

To be “sound” a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

- “Justified” means that the document must be:
- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives

“Effective” means that the document must be:

- deliverable
- flexible
- able to be monitored

The concepts of justification and effectiveness are expanded at paragraphs 4.36 – 4.38 and 4.44 – 4.47 in PPS 12.

If you think the content of a DPD is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the DPD on which you are seeking to make representations or in any other DPD in the LPA's Local Development Framework (LDF). There is no need for repetition between documents in the LDF.
- If the policy is not covered elsewhere, in what way is the DPD unsound without the policy?
- If the DPD is unsound without the policy, what should the policy say?

4 General Advice

If you wish to make a representation seeking a change to a DPD or part of a DPD you should make it clear in what way the DPD or part of the DPD is not sound having regard to the legal compliance check and the three tests set out above. You should try to support your representation by evidence showing why the DPD should be changed. It will be helpful if you also say precisely how the DPD should be changed. Representations should cover succinctly all the information, evidence and supporting information to necessary to support/justify the representation and suggested change as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Where there are groups who share a common view on how they wish to see a DPD changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Further detailed guidance on the preparation, publication and examination of DPDs is provided in PPS12.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

1035

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

Before completing this representation form please refer to the attached guidance notes.

PART A

Please use the representation form to make a representation on the Core Strategy: Publication Document.

1. Personal Details


2. Agents Details (If applicable)

Name:	Ms Rose Freeman	Name:	
Organisation (if applicable):	The Theatres Trust	Organisation (if applicable):	
Address:	22 Charing Cross Road London	Address:	
Postcode:	WC2H 0QL	Postcode:	
Tel:	020 7836 8591	Tel:	
Fax:	020 7836 3302	Fax:	
Email:	planning@theatrestrust.org.uk	Email:	

You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of representation forms enclosed in the box below:

Total number of representation forms enclosed:

One

 **The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.** An electronic version of the representation form can be found on the Council's web site at: www.trafford.gov.uk . **This form is in 'Word' format and you can type in your response and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.**

Alternatively, completed comment forms can be returned ~~by post to the address below by no later than~~ **Monday 1st November 2010.**

**Strategic Planning and Developments
Trafford Council
First Floor
Sale Waterside
Sale
M33 7ZF**

STRATEGIC PLANNING AND DEVELOPMENTS			
27 OCT 2010			
Ins:			
Action by:			
Ans:			
Copies to:			

The form can also be **faxed** to: 0161 912 3128.

Data Protection Notice:

Please note that all comments will be held by the Council on the database for the duration of the Local Development Framework (LDF) and will be available for public inspection under the Freedom of Information Act 2000.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: The Theatres Trust

3. To which part of the DPD does this representation relate?

Paragraph Number

R6.5

Policy Number

R6

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document Representation Form – September 2010

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Comment only: While we find the document to be Sound, we would suggest that the inclusion of the Cricket Club in R6 is incorrect as, strictly speaking, although it may also be a tourism issue, this is substantially a sports matter and should be included in Policy R5. If someone were to look for this topic they would presumably go to the Sport and Recreation heading rather than Culture and Tourism.

Please continue on a separate sheet if required

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

No

No, I do not wish to participate at the
Oral examination

Yes, I wish to participate
at the oral examination

9. 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 in the oral part of the examination.

Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

Yes

The publication of the Inspector's Report following the Examination

Yes

The formal adoption of the Core Strategy

Yes

Signature:

Rose Freeman

Date:

27 October 2010

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

1150

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s) (Please submit a separate Part B for each representation you wish to make)

Before completing this representation form please refer to the attached guidance notes.

PART A


Please use the representation form to make a representation on the Core Strategy: Publication Document.

1. Personal Details		2. Agents Details (If applicable)	
Name:	P. J. THOMPSON (Mr)	Name:	
Organisation (if applicable):		Organisation (if applicable):	
Address:	328 OLDFIELD ROAD ALTRINCHAM	Address:	
Postcode:	WA14 4RS	Postcode:	
Tel:		Tel:	
Fax:		Fax:	
Email:		Email:	

You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of representation forms enclosed in the box below:

Total number of representation forms enclosed:	2
--	---

[E24R4 + 13L4]

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**Strategic Planning and Developments
Trafford Council
First Floor
Sale Waterside
Sale
M33 7ZF**

STRATEGIC PLANNING AND DEVELOPMENTS	
01 NOV 2010	

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**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: P. J. THOMPSON (div)

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number	
<u>R 4.3</u>	<u>24 R 4</u>	<u>(page 136)</u>

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4. (2) Sound*	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and ^{5.2}5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	<input type="checkbox"/>
(2) Effective	<input type="checkbox"/>
(3) Consistent with national Policy	<input type="checkbox"/>

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

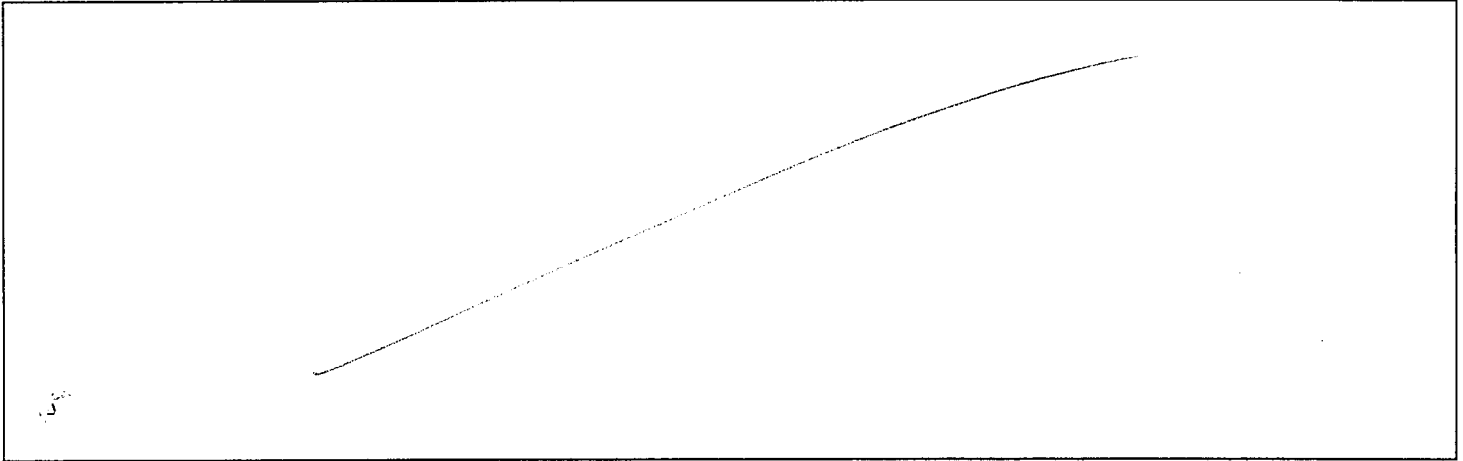
I fully support the Council's proposal at R4.3. This will eliminate the possibility of the "significant harm" identified in § 24.11 (page 138), and thus strengthen Daventry Green's green belt role, elaborated at § 24.17. The findings of the May 2009 Trafford Employment Land Study [see pp. 111-112, § 18.6] that there is no need to retain the 36-4 HA for development, is a further indicator that the entirety of Daventry Green should be of Green Belt status; this will steer development pressures towards the sustainable urbanized employment locations referred to in § 24.13.

Please continue on a separate sheet if required

**Board's Core Strategy: Publication Document
Representation Form – September 2010**

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.



Please continue on a separate sheet if required

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

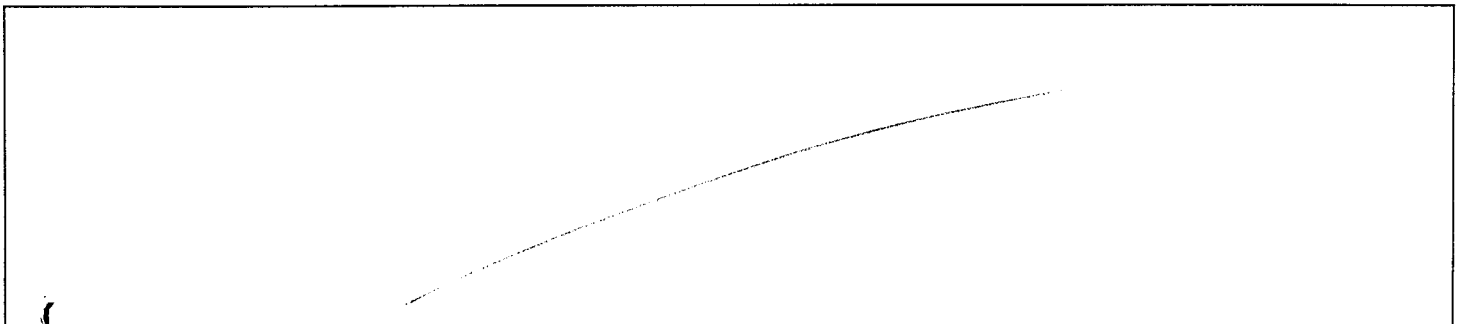
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8. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. 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 in the oral part of the examination.

Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Date:

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

rd's Core Strategy: Publication Document

resentation Form – September 2010

RT B – Please use a separate sheet for each representation

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: P. J. THOMPSON

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

L4.11

13 L4

(p. 83)

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered no to 4 (2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

I agree with L4.11, but in view of paragraph 13.15 on page 86, I consider that the Council should permit some freight traffic on the Bridgewater Canal, in certain specific circumstances and subject to specific controls to safeguard frontagers and the general locality. There could be occasions where bulk loads could use this canal, thus obviating large lorries from the narrow lanes in the areas around this canal. It was originally opened for freight, and any surviving wharves/transshipment points should be protected for possible occasional re-use.

Please continue on a separate sheet if required

**Board's Core Strategy: Publication Document
Representation Form – September 2010**

PART B - CONTINUED

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

Please continue on a separate sheet if required

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

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

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

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 in the oral part of the examination.

Board's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

- Submission of the Core Strategy to the Secretary of State for independent Examination
- The publication of the Inspector's Report following the Examination
- The formal adoption of the Core Strategy

Signature:

Date:

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

1076

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

Before completing this representation form please refer to the attached guidance notes.


PART A

Please use the representation form to make a representation on the Core Strategy: Publication Document.

1. Personal Details		2. Agents Details (If applicable)	
Name:	MARK PRIESTNER	Name:	
Organisation (if applicable):	WARBURTON PARISH COUNCIL	Organisation (if applicable):	
Address:	LANDS END FARM MOSS LANE WARBURTON, LYMM CHESHIRE	Address:	
Postcode:	WA13 9TX	Postcode:	
Tel:		Tel:	
Fax:		Fax:	
Email:		Email:	

You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of representation forms enclosed in the box below:

Total number of representation forms enclosed:	
---	--

 **The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to make their responses in this way.** An electronic version of the representation form can be found on the Council's web site at: www.trafford.gov.uk . **This form is in 'Word' format and you can type in your response and return it as an e-mail attachment to strategic.planning@trafford.gov.uk.**

Alternatively, completed comment forms can be returned by post to the address below by no later than **Monday 1st November 2010.**

**Strategic Planning and Developments
Trafford Council
First Floor
Sale Waterside
Sale
M33 7ZF**



The form can also be **faxed** to: 0161 912 3128.

Data Protection Notice:

Please note that all comments will be held by the Council on the database for the duration of the Local Development Framework (LDF) and will be available for public inspection under the Freedom of Information Act 2000.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Warrington Parish Council.

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
<u>L17</u>	<u>L1</u>

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4. (2) Sound*	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	<input type="checkbox"/>
(2) Effective	<input type="checkbox"/>
(3) Consistent with national Policy	<input type="checkbox"/>

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

We agree with the 80% of new housing provision to use braun field land.

Please continue on a separate sheet if required

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Warrington Parish Council.

3. To which part of the DPD does this representation relate?

Paragraph Number Policy Number

R4.4|6

R4

R4.1

4. Do you consider the DPD is:

4. (1) Legally Compliant Yes No

4. (2) Sound* Yes No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

we agree with Trafford Council's statement to protect existing agricultural land as an important resource and to protect the Green Belt & other protected open land from development.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

PART B – Please use a separate sheet for each representation

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Warburton Parish Council.

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

3.4

vision for Trafford
Page 18

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

VISION for Trafford states that housing growth will be within the urban area, primarily in the north east of the borough. Table L1 shows only 30% of the housing growth to be in this area, whilst 70% is in the south city region. This seems to be in conflict with the stated vision.

Please continue on a separate sheet if required

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

PART B – Please use a separate sheet for each representation

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Warburton Parish Council.

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

L1.3

L1

4. Do you consider the DPD is:

4. (1) Legally Compliant

Yes

No

4. (2) Sound*

Yes

No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Planning Growth Point Status allows an extra 20% housing to 2018 in exchange for infrastructure investment in that area. If this is not forthcoming then there is no justification to vastly exceed the laid down housing targets set for Trafford.

Please continue on a separate sheet if required

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation: Warrington Parish Council.

3. To which part of the DPD does this representation relate?

Paragraph Number

Policy Number

L1.3

L1

4. Do you consider the DPD is:

4. (1) Legally Compliant Yes No

4. (2) Sound* Yes No

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national Policy

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Placing Growth Point Status allows an extra 20% housing to 2018 in exchange for infrastructure investment in that area. If this is not forthcoming then there is no justification to vastly exceed the laid down housing targets set for Trafford.

Please continue on a separate sheet if required

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010**

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

If Housing Growth Point Status is not funded as originally stated then the additional 20% of housing over & above Trafford's housing target should be deleted from the number of housing developments to 2026.

Please continue on a separate sheet if required

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please note also that the Inspector is not obliged to consider any previous representations that have been made in respect of this Plan. You are urged, therefore, to re-submit, on copies of this form, any previously submitted representations that, in your view, remain valid and that you wish the Inspector to consider.

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

No, I do not wish to participate at the Oral examination

Yes, I wish to participate at the oral examination

9. 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 in the oral part of the examination.

Trafford's Core Strategy: Publication Document Representation Form – September 2010

If you wish to be informed as the Core Strategy progresses through to adoption, please indicate which of the following stages you wish to be informed of by ticking the adjoining box(es).

Submission of the Core Strategy to the Secretary of State for independent Examination

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

Date:

Thank you for taking the time to fill in our Core Strategy representation form, your comments are very much appreciated.

The Planning Inspector. Trafford Core Strategy: Consultation on the Publication Document

Dear Sir/Madam,

The Parish Council of Warburton is largely made up of local people engaged in agriculture and rural affairs. Due to the very late season caused by unusually inclement weather during September and most of October, the Council was not able to call a meeting (and reach a quorum) until November to discuss the latest consultation on the Trafford Core Strategy and to formulate a representation to reflect the views of the parishioners of Warburton. It was unfortunate that our regular council meetings fell either side of the consultation period.

We apologize for the late submission of the Representation of Warburton Parish Council and please ask that you consider our Representation to what is a very important document for the future of not just the residents of our parish, but the whole of Trafford.

Yours sincerely,

Mark Priestner
Warburton Parish Council

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010**

Office Use Only	
Date	
Ref	
Ack	

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
strategic.planning@trafford.gov.uk

1146

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s) (**Please submit a separate Part B for each representation you wish to make**)

Before completing this representation form please refer to the attached guidance notes.

PART A

Please use the representation form to make a representation on the Core Strategy: Publication Document.


1. Personal Details

2. Agents Details (If applicable)

Name:	S. C. WILLIAMS	Name:	
Organisation (if applicable):		Organisation (if applicable):	
Address:	17 LITGATEY DRIVE HALE BARN ALTRINGHAM CHESHIRE	Address:	
Postcode:	WA15 0BW	Postcode:	
Tel:		Tel:	
Fax:		Fax:	
Email:		Email:	

You only need to fill out one copy of your contact details if you are submitting all your comments at the same time, but please indicate the total number of representation forms enclosed in the box below:

Total number of representation forms enclosed:	1
---	---

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Alternatively, completed comment forms can be returned by post to the address below by no later than **Monday 1st November 2010.**

**Strategic Planning and Developments
Trafford Council
First Floor
Sale Waterside
Sale
M33 7ZF**

STRATEGIC PLANNING AND DEVELOPMENTS	
29 OCT 2010	

The form can also be **faxed** to: 0161 912 3128.

Data Protection Notice:

Please note that all comments will be held by the Council on the database for the duration of the Local Development Framework (LDF) and will be available for public inspection under the Freedom of Information Act 2000.

**Trafford's Core Strategy: Publication Document
Representation Form – September 2010
PART B – Please use a separate sheet for each representation**

You need only complete one copy of your contact details but please put your name or organisation that you are representing on each additional representation form and indicate the total number of forms enclosed in the box provided on the contact details form.

Name or Organisation:

3. To which part of the DPD does this representation relate?

Paragraph Number	Policy Number
24.16	R4

4. Do you consider the DPD is:

4. (1) Legally Compliant	Yes	✓	*	No	
4. (2) Sound*	Yes	✓		No	

** but I have no way of checking*

The considerations in relation to the DPD being 'sound' are explained in Planning Policy Statement 12 in paragraphs 4.36-4.47, 4.51 and 5.52 and the boxed text.

If you have entered **no** to 4 (2), please continue to **Q5**. In all other circumstances, please go to **Q6**.

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	
(2) Effective	
(3) Consistent with national Policy	

6. Please give details of why you consider that the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please continue on a separate sheet if required

**Ord's Core Strategy: Publication Document
Representation Form – September 2010**

PART B - CONTINUED

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD 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.

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The formal adoption of the Core Strategy

Signature:

Date:

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