

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



**PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**  
[strategic.planning@trafford.gov.uk](mailto:strategic.planning@trafford.gov.uk)

Office Use Only	
Date	
Ref	
Ack	

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:		Name:	
Organisation (if applicable):		Organisation (if applicable):	
Address:		Address:	
Postcode:		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](http://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](mailto:strategic.planning@trafford.gov.uk).**

Alternatively, completed comment forms can be returned by post to the address below by no later than **Monday 1<sup>st</sup> 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.

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**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

4. Do you consider the DPD is:

4. (1) Legally Compliant

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.

Please continue on a separate sheet if required

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### 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?

☐

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.

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

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

## 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)<sup>1</sup> (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.

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.

<sup>1</sup> View the 2004 Act at:  
[http://www.opsi.gov.uk/acts/acts2004/ukpga\\_20040005\\_en\\_1](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](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](http://www.opsi.gov.uk/si/si2009/pdf/uksi_20090401_en.pdf)

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### 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 text<sup>2</sup>. 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.

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

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### 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.

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### MONITORING INFORMATION

Please complete the following if you are responding as an individual, by ticking the relevant option.  
This information will be used for statistical purposes only and will not be kept with your representation form.  
Please complete one form per person, not per representation.

What gender are you?

Male		Female	
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What is your age?

Under 16		16-25		26-35		36-45	
46-55		56-65		66-75		76+	

What do you do in Trafford? (tick those which apply)

Live		Work		Study	
Other (please state)					

Do you consider yourself to have a disability or impairment, as defined in the Disability and Discrimination Act 1995\*?

Yes		No	
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\* The Disability and Discrimination Act 1995 defines a disabled person as someone with a physical or mental impairment, which has substantial long term adverse effects on his/her ability to carry out normal day to day activities.

What is your ethnic group? Please tick the box that you believe best describes your ethnic origin.

<b>White</b> British Irish Any other white background (please specify) _____ _____	_____ _____ _____	<b>Mixed</b> White and Black Caribbean White and Black African White and Asian Any other mixed background (please specify) _____ _____	_____ _____ _____ _____
<b>Asian or Asian British</b> Indian Pakistani Bangladeshi Kashmiri Sikh Any other Asian background (please specify) _____ _____	_____ _____ _____ _____ _____	<b>Black or Black British</b> Caribbean African Any other Black background, (please specify) _____ _____	_____ _____ _____
Chinese or other ethnic group Chinese Any other ethnic background (please specify) _____ _____	_____ _____		

### Sexual Orientation



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How would you describe your sexual orientation?

Heterosexual	_____
Gay	_____
Lesbian	_____
Bisexual	_____
Do not wish to answer	_____

Religion / Belief

What is your religious belief?

Buddhist	_____	Jewish	_____
Christian	—	Muslim	_____
Hindu	_____	Sikh	_____
Humanist	—	No	_____
Other Religious Belief (please specify)	_____	Religion	_____
_____	—		
—	_____		
_____	—		
—	_____		
Do not wish to answer	—		

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## PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1<sup>st</sup> November 2010

<b>NAME:</b>	<b>ORGANISATION:</b>
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### 1. By which method/s did you hear about the consultation? (tick as many as appropriate)

Mail shot	
Website	
Helpline	
Material in libraries/Access Trafford	
Press publicity	

Other (please state)

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### 2. Are there any other methods by which you would like to see future consultations publicised? (please state)

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## COMPLETE THE FOLLOWING SECTIONS AS APPROPRIATE

### 3. Consultation Representation Form

	No	Could be better	Yes
Was the representation form easy to complete?			
Did the representation form allow you to adequately express your comments?			

Have you any suggestions for improving any aspect of the representation form? (please comment)

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### 4. Website

	No	Could be better	Yes
Was it easy to find the Publication consultation material?			
Was it easy to find the Evidence Base material?			
Was the facility useful for making comments?			

Any other comments?

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## 5. Helpline

	No	Could be better	Yes
Was your query dealt with quickly and effectively?			

Any other comments?

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## 6. Material in libraries/Access Trafford offices

	No	Could be better	Yes
Was it easy to locate the Publication consultation material?			
Were facilities for inspection satisfactory?			

Any other comments?

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## 7. Any further comments/suggestions

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**Thank you for completing this form, your feedback is very much appreciated.**

**Please return this form by Monday 1<sup>st</sup> November 2010 to:**  
**Strategic Planning and Developments**  
**Trafford Council**  
**First Floor**  
**Sale Waterside**  
**Sale, M33 7ZF**

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

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