


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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:		Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	mworcester@turleyassoicates
Email:		Email:	co.uk

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:

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 refer to Section 29 of the Turley Associates Document 2

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 refer to Section 29 of Turley Associates Document 2

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:

The representations have implications for the Trafford Centre Rectangle Strategic Location. Strategic Locations are Central to the delivery and objectives of the Core Strategy.

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

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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

The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

MARK WORCESTER (TURLEY ASSOCIATES)

Signature:

Date: 29.10.10

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.

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.

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

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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 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>

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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	
------	--	--------	--

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	
-----	--	----	--

* 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.

White British _____ Irish _____ Any other white background (please specify) _____ _____ _____	Mixed White and Black Caribbean _____ White and Black African _____ White and Asian _____ Any other mixed background (please specify) _____ _____ _____
Asian or Asian British Indian _____ Pakistani _____ Bangladeshi _____ Kashmiri _____ Sikh _____ Any other Asian background (please specify) _____ _____	Black or Black British 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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
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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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st November 2010 to:
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Trafford Council
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Sale, M33 7ZF

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PEEL GROUP

TRAFFORD CORE STRATEGY

**REPRESENTATIONS ON THE PUBLICATION
DOCUMENT (DPD1) AND ASSOCIATED
EVIDENCE BASE**

Document No.1 – Representation Forms

OCTOBER 2010

CONTENTS

1. Introduction	1
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Appendices:

Representation Forms

1. Introduction

- 1.1 This document has been prepared by Turley Associates on behalf of the Peel Group. The Peel Group has made representations on a number of policies within the draft Core Strategy and associated evidence base (September 2010).
- 1.2 This document contains a representation form for each of the policies, paragraphs and plans upon which Peel has commented. This document is Document No.1 in Peels' submission.
- 1.3 The full text of Peel's representations is contained within Document No.2 which is accompanied by a total of 14 appendices.
- 1.4 Each of the individual documents is inter-related and together they comprise Peel's full case. It is important therefore that they be read together.

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

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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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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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

2.10 -2.15

AND FIGURE 1

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 REFER TO SECTION 2 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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 REFER TO SECTION 20 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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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:

THE PROVISIONS OF PARAGRAPHS 2.10-2.15 AND FIGURE 1 ARE CENTRAL TO THE
SPATIAL PLANNING APPROACH OF THE CORE STRATEGY.

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

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MARK WORCESTER (TURLEY ASSOCIATES)

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Soundness

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- 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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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**

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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

Trafford Park Spatial Profile(P.8)

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 REFER TO SECTION 3 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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 REFER TO SECTION 3 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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Trafford Council
First Floor
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Sale
M33 7ZF**

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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:

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

Paragraph Number

Policy Number

URMSTON SPATIAL PROFILE (PAGE 11)

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 REFER TO SECTION 4 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 4 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

Please continue on a separate sheet if required

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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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

Guidance Notes to Accompany Representation Form

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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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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**

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Data Protection Notice:

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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:

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

Paragraph Number

Policy Number

PARTINGTON SPATIAL
PROFILE (P16)

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.

PEEL SUPPORT THIS ELEMENT OF THE CORE STRATEGY.
SEE SECTION 5 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2).

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?

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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Sale
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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:

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

Paragraph Number

Policy Number

STRATEGIC OBJECTIVE (P20)

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 REFER TO SECTION 6 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO . 2)

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 REFER TO SECTION 6 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

Guidance Notes to Accompany Representation Form

1. Introduction

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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.

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- 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.
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- 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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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

Partington Place Objectives
(Page 29)

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**.

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(1) Justified

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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.

PLEASE REFER TO SECTION 7 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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

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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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

Soundness

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- 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

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4 General Advice

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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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.**

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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

KEY DIAGRAM (PAGE 32)

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 REFER TO SECTION 8 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2).

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 REFER TO SECTION 8 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2).

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:

THE OBJECTION RELATES TO MATTER REGARDING FLOOD RISK. FLOOD RISK ISSUES
ARE AT THE CENTRE OF THE CORE STRATEGY

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions


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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):		Organisation (if applicable):	TURLEY ASSOCIATES
Address:		Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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.**

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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:

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

Paragraph Number

Policy Number

MANCHESTER, SALFORD & TRAFFORD LEVEL 2/
HYBRID SFRA (2010)

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 REFER TO SECTION 9 OF TURLEY ASSOCIATES REPRESENTATION
DOCUMENT 2.

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:

MATTERS RELATING TO FLOOD RISK HAVE IMPLICATIONS FOR A NUMBER OF STRATEGIC LOCATIONS

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).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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

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- 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.

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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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:

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

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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

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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions


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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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:

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 REFER TO SECTION 10 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2).

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 REFER TO SECTION 10 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2).

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:

THE STRATEGIC LOCATIONS ARE CENTRAL TO THE DELIVERY AT THE OBJECTIVES OF THE CORE STRATEGY. PEEL SUPPORTS THE PRINCIPLE OF POMONA ISLAND BEING IDENTIFIED AS A STRATEGIC LOCATION BUT DOES HAVE RESERVATIONS REGARDING THE COUNCIL'S PROPOSED MIX / QUANTUM AS EXPLAINED IN THEIR REPRESENTATIONS ON OTHER PARTS OF THE POLICY

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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:

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 REFER TO SECTIONS 9 AND 11 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2).

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 REFER TO SECTIONS 9 AND 11 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2)PAGE 26.

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:

STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF
THE CORE STRATEGY

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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**

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Data Protection Notice:

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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:

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 REFER TO SECTION 12 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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 REFER TO SECTION 12 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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:

STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE
CORE STRATEGY

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).

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Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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

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

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- the most appropriate strategy when considered against the reasonable alternatives

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- flexible
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4 General Advice

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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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**

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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

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 REFER TO SECTION 16 OF TURLEY ASSOCIATES REPRESENTATION
DOCUMENT (NO. 2)

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 REFER TO SECTION 16 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT (NO. 2)

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:

STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE CORE STRATEGY.

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).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

Guidance Notes to Accompany Representation Form

1. Introduction

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- 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.
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- 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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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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:

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 REFER TO SECTION 14 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(No. 2)

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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MATTERS RELATING TO STRATEGIC LOCATIONS ARE CENTRAL TO THE DELIVERY OF
OBJECTIVES FOR THE CORE STRATEGY.

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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).

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Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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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:

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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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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:

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 REFER TO SECTION 15 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(No. 2)

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 REFER TO SECTION 15 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(No. 2)

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:

STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE
CORE STRATEGY.

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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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:

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

Paragraph Number

Policy Number

SL2 (IMPLEMENTATION TABLE) (p. 42)

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 REFER TO SECTION 16 OF TURLEY ASSOCIATES REPRESENTATION
DOCUMENT (NO. 2)

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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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:

STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE CORE STRATEGY.

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).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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

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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.

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

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

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions


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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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:

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

Paragraph Number

Policy Number

SL4 (P. 50-55) TRAFFORD CENTRE RECTANGLE

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 REFER TO SECTION 17 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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?

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:

MATTERS RELATING TO STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE CORE STRATEGY.

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions


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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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
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Sale
M33 7ZF**

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Data Protection Notice:

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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:

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

Paragraph Number

Policy Number

SL4.2 (P.50) TRAFFORD CENTRE RECTANGLE

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 REFER TO SECTION 18 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 18 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT (NO. 2)

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:

MATTERS RELATING TO THE STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE CORE STRATEGY.

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).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature: MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

Guidance Notes to Accompany Representation Form

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

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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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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**

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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:

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

Paragraph Number

Policy Number

8.63 & 8.64

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 REFER TO SECTION 19 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 19 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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

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

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“Effective” means that the document must be:

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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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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:

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 REFER TO SECTION 20 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 20 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
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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

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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:

MATTERS RELATING TO STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE CORE STRATEGY.

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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).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

Guidance Notes to Accompany Representation Form

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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.

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- 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.
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- 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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st November 2010 to:

Strategic Planning and Developments

Trafford Council

First Floor


Sale Waterside

Sale, M33 7ZF

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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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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Total number of representation forms enclosed:

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

8.55 (P53)

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**.

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(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 REFER TO SECTION 21 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT (DOC2). WE BELIEVE THAT OUR REPRESENTATIONS WOULD INCREASE THE SOUNDNESS OF THE POLICY

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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MATTERS RELATING TO STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE CORE STRATEGY

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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

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- 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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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.**

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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:

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

Paragraph Number

Policy Number

8.57

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 REFER TO SECTION 22 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 21)

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 REFER TO SECTION 22 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 21)

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:

MATTERS RELATING TO STRATEGIC LOCATIONS ARE CENTRAL TO THE DELIVERY
OF OBJECTIVES FOR THE CORE STRATEGY.

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: MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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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:

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

Paragraph Number

Policy Number

8.66

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 REFER TO SECTION 23 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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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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:

STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF
THE CORE STRATEGY.

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).

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The publication of the Inspector's Report following the Examination



The formal adoption of the Core Strategy



Signature: MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

Guidance Notes to Accompany Representation Form

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- 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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions


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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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**

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Data Protection Notice:

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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:

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 REFER TO SECTION 24 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(No. 2)

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 REFER TO SECTION 24 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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:

MATTERS RELATING TO STRATEGIC LOCATIONS ARE CENTRAL TO THE OBJECTIVES AND DELIVERY OF THE CORE STRATEGY.

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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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:

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

RELATED TO

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 REFER TO SECTION 25 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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 REFER TO SECTION 25 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO.2)

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:

MATTERS RELATING TO HOUSING GROWTH POINT FUNDING MAY HAVE IMPLICATIONS
FOR STRATEGIC LOCATIONS.

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

Guidance Notes to Accompany Representation Form

1. Introduction

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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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
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
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Sale Waterside
Sale
M33 7ZF**

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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:

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

Paragraph Number

Policy Number

10.5

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 REFER TO SECTION 25 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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

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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:

MATTERS RELATING TO DECISIONS ON HOUSING GROWTH POINT FUNDING HAVE
IMPLICATIONS FOR STRATEGIC LOCATIONS WHICH THEMSELVES ARE CENTRAL TO THE
DELIVERY OF OBJECTIVES FOR THE CORE STRATEGY

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).

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The publication of the Inspector's Report following the Examination



The formal adoption of the Core Strategy



Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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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.
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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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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:

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

Paragraph Number

Policy Number

10.17 (P65)

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 REFER TO SECTION 27 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 27 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.21)

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).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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

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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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st November 2010 to:

Strategic Planning and Developments

Trafford Council

First Floor


Sale Waterside

Sale, M33 7ZF

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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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:

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

Paragraph Number

Policy Number

TABLE L1:Net New Housing Development
Proposals 2008/9 to 2025/26

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 REFER TO SECTION 28 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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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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:

THE DISTRIBUTION OF HOUSING NUMBERS BETWEEN STRATEGIC LOCATIONS IS A
CENTRAL ELEMENT OF THE CORE STRATEGY.

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).

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The publication of the Inspector's Report following the Examination



The formal adoption of the Core Strategy



Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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

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¹ View the 2004 Act at:

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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:		Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	mworcester@turleyassoicates
Email:		Email:	co.uk

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:

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 refer to Section 29 of the Turley Associates Document 2

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 refer to Section 29 of Turley Associates Document 2

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:

The representations have implications for the Trafford Centre Rectangle Strategic Location. Strategic Locations are Central to the delivery and objectives of the Core Strategy.

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

MARK WORCESTER (TURLEY ASSOCIATES)

Signature:

Date: 29.10.10

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):		Organisation (if applicable):	TURLEY ASSOCIATES
Address:		Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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:

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 REFER TO SECTION 29 OF TURLEY ASSOCIATES DOCUMENT NO.2

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?

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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**

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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:

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 REFER TO SECTION 30 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 30 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2)

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:

THE POLICIES AS DRAFTED MAY FALL SHORT IN DELIVERING THE IMPORTANT
REGENERATION OBJECTIVES THE COUNCIL IS SEEKING TO ACHIEVE. WE WISH TO
EXPLORE SUCH MATTERS AT THE EXAMINATION.

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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

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

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- the most appropriate strategy when considered against the reasonable alternatives

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- flexible
- able to be monitored

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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:

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 REFER TO SECTION 31 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 31 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2)

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).

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The publication of the Inspector's Report following the Examination



The formal adoption of the Core Strategy



Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

Guidance Notes to Accompany Representation Form

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- 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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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:

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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:

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

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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.

PLEASE REFER TO SECTION 32 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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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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:

MATTERS RELATING TO METROLINK AND ITS EXTENSION TO TRAFFORD PARK
HAVE IMPLICATIONS FOR THE TRAFFORD CENTRE RECTANGLE STRATEGIC LOCATION.

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).

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Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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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.

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- 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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

MONITORING INFORMATION

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What gender are you?

Male		Female	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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.**

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Sale Waterside
Sale
M33 7ZF**

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Data Protection Notice:

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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:

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 REFER TO SECTION 33 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 33 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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.**

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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:

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 REFER TO SECTION 35 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2).

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 REFER TO SECTION 35 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT (NO.2).

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:

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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

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

View the amending 2008 Act at:

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

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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- 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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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:

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

Paragraph Number

Policy Number

L6.2(c) (P98)

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 REFER TO SECTION 36 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2).

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?

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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:

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 REFER TO SECTION 37 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 37 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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:

POLICY W1 HAS IMPLICATIONS FOR STRATEGIC LOCATIONS WHICH ARE CENTRAL TO THE DELIVERY AND OBJECTIVES OF THE CORE STRATEGY.

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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
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First Floor
Sale Waterside
Sale
M33 7ZF**

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Data Protection Notice:

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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:

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 REFER TO SECTION 38 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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 REFER TO SECTION 38 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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:

POLICY HAS IMPLICATIONS FOR STRATEGIC LOCATIONS WHICH ARE CENTRAL TO THE OBJECTIVES
AND DELIVERY OF THE CORE STRATEGY

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).

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Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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

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

Soundness

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- the most appropriate strategy when considered against the reasonable alternatives

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- deliverable
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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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:

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

Paragraph Number

Policy Number

18-13-18-16

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.

PEEL SUPPORTS THIS POLICY BUT REQUESTS THE INCLUSION OF SOME ADDITIONAL
TEXT. SEE SECTION 39 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2)

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?

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:

THIS POLICY HAS RELEVANCE TO THE STRATEGIC LOCATIONS WHICH ARE CENTRAL TO THE DEIVERY AND OBJECTIVES OF THE CORE STRATEGY.

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: MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	mworcester@turleyassociates.co.uk

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:

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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:

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 REFER TO SECTION 40 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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The publication of the Inspector's Report following the Examination

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Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH OCTOBER 2010

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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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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.

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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
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**

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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

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 REFER TO SECTION 41 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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 REFER TO SECTION 41 OF TURLEY ASSOCIATES REPRESENTATION DOCUMENT
(NO. 2)

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: MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29TH 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

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions


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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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
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Sale
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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:

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 REFER TO SECTION 42 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2).

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 REFER TO SECTION 42 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO.2).

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:

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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.
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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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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:

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 REFER TO SECTION 43 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2).

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 REFER TO SECTION 43 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2).

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:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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.

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.

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

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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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**

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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

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 REFER TO SECTION 44 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT
(NO. 2).

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?

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).

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The publication of the Inspector's Report following the Examination

The formal adoption of the Core Strategy

Signature:

MARK WORCESTER (TURLEY ASSOCIATES)

Date: 29.10.10

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

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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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.

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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

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

Please return this form by Monday 1st 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.

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

 **PLEASE SUBMIT ELECTRONICALLY IF POSSIBLE TO:**
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:	MARK WORCESTER
Organisation (if applicable):	PEEL GROUP	Organisation (if applicable):	TURLEY ASSOCIATES
Address:	C/O AGENT	Address:	1 NEW YORK STREET MANCHESTER
Postcode:		Postcode:	M1 4HD
Tel:		Tel:	0161 233 7676
Fax:		Fax:	
Email:		Email:	MWORCESTER@TURLEYASSOCIATES.CO.UK

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
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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:

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

Paragraph Number

Policy Number

L5 (TABLE 5 . 1)

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 REFER TO SECTION 46 OF TURLEY ASSOCIATES REPRESENTATIONS DOCUMENT (NO.2). PEEL REQUEST SOME POLICY CLAIRIFICATION WHICH PEEL BELIEVE WOULD MAKE THE POLICY EVEN MORE SOUND.

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?

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

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

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Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	
------	--	--------	--

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	
-----	--	----	--

* 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.

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

Sexual Orientation

Trafford's Core Strategy: Publication Document

Representation Form – September 2010

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	_____		

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

PUBLIC CONSULTATION FEEDBACK FORM

Please complete and return by Monday 1st November 2010

NAME:	ORGANISATION:
--------------	----------------------

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)

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

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)

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?

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

5. Helpline

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

Any other comments?

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?

7. Any further comments/suggestions

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

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LEEDS
LONDON
MANCHESTER
SOUTHAMPTON

www.turleyassociates.co.uk

PEEL GROUP

TRAFFORD CORE STRATEGY

**REPRESENTATIONS ON THE PUBLICATION
DOCUMENT 2 (DPD2) AND ASSOCIATED
EVIDENCE BASE**

(SEPTEMBER 2010)

1ST NOVEMBER 2010



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1. Introduction

- 1.1 These representations to the Trafford Core Strategy Publication Document (September 2010) (hereafter referred to as the “draft Core Strategy”) have been prepared by Turley Associates on behalf of the Peel Group (Peel) with support from HR Wallingford, The Traffic, Transport and Highway Consultancy and AECOM.

Peel Group

- 1.2 Peel Group is a leading property, infrastructure and transport organisation with a diverse range of land, development, investments and infrastructure interests. Within the North West, these include the Port of Liverpool, the Manchester Ship Canal, the Bridgewater Canal, Heysham Port, Liverpool John Lennon Airport, the Trafford Centre and numerous developments and projects from within the portfolios of Peel Land and Property, Peel Energy and Peel Environmental.
- 1.3 Peel is currently leading the delivery of some of the Region's most significant regeneration projects including MediaCityUK and both the Liverpool and Wirral Waters schemes.
- 1.4 Peel is committed to continuing its history of investment in the growth and vitality of the North West; furthering its role in delivering major regeneration projects; and continuing to contribute to the sustainable economic growth of the Region.
- 1.5 Peel's interests in the Borough of Trafford are longstanding, wide ranging and multi-faceted. As noted above, they own and operate the Trafford Centre Shopping and Leisure Centre including Barton Square. They also own the land on which the Trafford Sports Village has been developed and which contains uses such as Playgolf, Chill FactorE, and the David Lloyd Sports Centre.
- 1.6 As is evidenced through the representations contained within this document they are also the majority landowner within the Pomona Island, Trafford Wharfside and Trafford Centre Rectangle Strategic Locations and have key landholdings in the Partington area. They also have other smaller landholdings throughout the Borough.
- 1.7 In other sectors, they operate both the Manchester Ship Canal and the Bridgewater Canal, both of which pass through the Borough. Peel Energy are shortly to submit a planning application for the development of a 20MW Biomass fuelled renewable energy plant in Barton.

Peel's Involvement in the Core Strategy Preparation

- 1.8 Peel has made detailed representations at each stage of the preparation of the Trafford Core Strategy and its associated evidence base and has engaged in the preparation process through a series of meetings and discussions with Council officers.
- 1.9 The suite of documents submitted to Trafford Borough Council to date is as follows:
- 2006:
 - Representations on Trafford Draft Highway Contributions (October)
 - Representations on Trafford Draft Sustainability Scoping Report (October)
 - 2007:
 - Representations on Core Strategy Issues and Options Paper (August)
 - Representations on the Trafford Partington Area Action Plan Issues and Option and Evidence Base (October)
 - Representations to Trafford Core Strategy Development Management and Core Policies (November).
 - 2008:
 - Representations to Call for Sites (August)
 - Representations on Core Strategy Preferred Options (August)
 - Representations on Draft Strategic Housing Land Availability Study (August)
 - Representations on Draft Sustainability Appraisal
 - Submission of Trafford Centre Rectangle Development Framework
 - Submission of Trafford Quays Concept Statement
 - 2009:
 - Representations on Trafford Strategic Sites Assessments (January)

- Representations on Trafford Economic Viability Study (March)
- Representations on Draft Housing Strategy Preferred Options (June)
- Representations on Core Strategy Preferred Options (June)
- Representations on Evidence Base (August)
- Submission of Trafford Quays Delivery Report (August)
- Representations on Trafford SPD Scope and Content (October)
- Representations on Further Consultation on Policies L2, L4, W1 and R5 (December)
- 2010
 - Representations on the Core Strategy Further Consultation on Vision, Strategic Objectives and delivery Strategy (March / April)
 - Further representations in relation to the Strategic Flood Risk Assessment (April 2010)
 - Further submissions regarding SFRA 30 April 2010

1.10 Many of the representations made by Peel over the last three years have been addressed by the Council in the Core Strategy Publication Document. Others have not.

1.11 This document sets out Peel's position in relation to a number of individual policies, paragraphs and plans.

1.12 It is relevant to these representations that Peel is currently in detailed discussion with the Environment Agency regarding the issue of flood risk within Trafford, particularly with regard to the assessment of the potential of flooding from the Manchester Ship Canal (MSC) and the Bridgewater Canal. Peel's interest in flood risk matters is also multi-faceted. As noted above, it is a key landowner within the Borough and, through its ownership of the Manchester Ship and Bridgewater Canals, is a statutory undertaker in respect of these water transport routes, a Navigation Authority and a drainage body. The Manchester Ship Canal has been identified in the Council's Level 2 SFRA as a potential source of flooding to some sites and Peel **objects** to the findings of that assessment report because it considers the assessment to be based on erroneous assumptions regarding the operation of the MSC. Peel **reserves its position** in respect of making further and more detailed representations on the draft Core Strategy should the outcome of the

ongoing discussions with the Environment Agency materially affect the Group's views as set out in this document or give rise to new issues not currently addressed.

1.13 The structure of this document broadly follows that of the draft Core Strategy. It deals firstly with strategic policy issues (Part A) before detailing Peel's representations in relation to the Pomona Island, Trafford Wharfside, Trafford Centre Rectangle and Carrington Strategic Locations (Part B). It then sets out representations in respect of some of the Core Policies (Part C).

1.14 It is supported by the following suite of appendices:

- Appendix 1 – Proposed Alternative Inner Area Boundary
- Appendix 2 – Trafford Centre Rectangle Development Framework (October 2010)
- Appendix 3 – Trafford Quays Concept Statement (October 2010)
- Appendix 4 – Trafford Quays Delivery Report (August 2009)
- Appendix 5 – Planning Application Submission for Trafford Quays (Phase 1a)
- Appendix 6 – Planning Application Submission for Trafford Quays (Phase 1b)
- Appendix 7 – Technical Note Prepared by TTHC dealing with WGIS (October 2010)
- Appendix 8 – Comparison of Pomona Island and Carrington Strategic Locations
- Appendix 9 – Wallingford Review of Level 2 / Hybrid SFRA (EX6297)
- Appendix 10 – Wallingford Study of Operational Reliability of MSC (EX6400)
- Appendix 11 – Wallingford Study of Bridgewater Canal (EX6401)
- Appendix 12 – AECOM Comparables Study
- Appendix 13 – Bircham Dyson Bell Legal Note Summary of EA Policies and Guidance on Classification of Flood Defences

- Appendix 14 – AECOM Flood Risk Assessment for Pomona Island (October 2010).
- Appendix 15 - DNV Sluice Reliability on the Manchester Ship Canal

1.15 The Trafford Quays Delivery Report (**Appendix 4**) was prepared to support representations made in August 2009. Its principal purpose was (and is) to demonstrate that there are no technical or environmental barriers to the development of Trafford Quays. While the assessment of compliance with planning policy has been superseded by recent policy changes (such as the revocation of the North West Regional Spatial Strategy) the technical analysis regarding matters such as utility capacity, ecology and highways remains relevant. Indeed, since its production Peel has prepared and submitted applications for outline planning permission for the first two phases of development at Trafford Quays (Phases 1a and 1b); see Appendices 5 and 6 respectively. They provide further evidence of the deliverability of commercial and residential development at Trafford Quays.

1.16 An up to date assessment of the way in which Peel's proposals comply with the national and strategic planning policy framework can be found in **Appendix 2 – Trafford Centre Rectangle Development Framework**.

1.17 This document is document No.2 of the submission. A separate document (No.1) containing all relevant representations forms is also part of Peel's submission.

**PART A – REPRESENTATIONS ON
STRATEGIC POLICIES**

2. Chapter 2 (Paragraphs 2.10-2.15) and Figure 1

Representation

- 2.1 Paragraphs 2.1 - 2.7 of the draft Core Strategy discuss the role of the Manchester City Region as part of the Northern Way Growth Strategy. They advise that Greater Manchester is one of the two pilot statutory City Regions which were announced in the 2009 Budget and that work is underway to establish a new Combined Authority for the City Region which will co-ordinate transport, regeneration and economic development functions across the 10 districts. The draft Core Strategy confirms that the Greater Manchester Strategy (2009) has been produced, and that it sets out the strategic priorities for the City Region in the period to 2020. The non-statutory status of the Greater Manchester Strategy is acknowledged.
- 2.2 Paragraph 2.10 states that the Manchester City Region has been divided into a number of sub areas; those relevant to Trafford are the Regional Centre, the Inner Areas and the southern part of the City Region. Within Trafford, the Inner Area is stated to include Trafford Park and North Trafford. This follows the approach of the now revoked North West Regional Spatial Strategy (RSS) which identified the Inner Areas as a focus for new residential development, securing a significant increase in the population to support major regeneration activity, the improvement of community facilities and the creation of sustainable communities.
- 2.3 Figure 1 delineates the proposed boundary of the Regional Centre and Inner Area as they apply in Trafford.
- 2.4 Peel wishes to maintain its **objection** to the proposed delineation of the Inner Area boundary (Figure 1) as being **unsound** because it is neither justified nor effective. There are two grounds; the lack of consultation on alternative boundary configurations and the exclusion of the Trafford Centre Rectangle (TCR). There are sound planning reasons for the inclusion of the TCR within the Inner Area boundary. Also of relevance is the revocation of RSS.
- 2.5 If the overall approach to spatial planning in the draft Core Strategy is to follow the approach of the revoked RSS, Peel considers that a more logical Inner Area boundary, and one which would increase the soundness and consistency of the Core Strategy, would be that shown on the plan at **Appendix 1**. Our reasoning is set out below.
- 2.6 The draft Core Strategy confirms (at paragraph 2.10) that the Inner Area within Trafford **comprises** Trafford Park and North Trafford; there is no reference in that

paragraph to any intention that the Inner Area should only include part of Trafford Park or North Trafford. The draft Core Strategy also clearly recognises that the Trafford Centre Rectangle forms part of Trafford Park¹. North Trafford is also part of the definition of the Inner Areas and it is beyond argument that the Trafford Centre Rectangle is in North Trafford.

- 2.7 The decision to include North Trafford and Trafford Park within the Inner Area has clearly been influenced by the provisions of former North West RSS. However, while it may be the case that the Inner Areas within Manchester and Salford are based on the Housing Market Renewal Areas which had been designated in those districts, Trafford does not have an HMRA or anything like the extent of poor quality housing that is found in the neighbouring districts. The Inner Area within Trafford is therefore of a different character and the inclusion of Trafford Park, where there is no existing housing within its area reflects its role as both an existing, and future potential, strategic employment area which provides for large numbers of jobs for those living in the surrounding residential neighbourhoods. The Trafford Centre Rectangle is a critical component with regard to current and future employment opportunities and, together with Wharfside, is one of only two areas within Trafford Park where there is a realistic opportunity to develop a significant volume of new housing accommodation. This is all the more evident from the fact that both areas are defined by the draft Core Strategy itself as Strategic Locations.
- 2.8 Following on from the above it is clear that, within Trafford, the definition of the Inner Area boundary should focus on opportunity rather than on need. Accordingly, the boundary should be defined so as to maximise the opportunity for the development of a substantial volume and high quality of new housing in North Trafford, which can generate a significant increase in the population of the area and help to achieve the step change that is required in the provision of high quality housing to support the economic growth in Trafford Park, the Regional Centre and the City Region. New economic development is also required to provide accommodation for modern businesses in all of the growth sectors in line with Trafford's key role within the City Region.
- 2.9 The Trafford Centre Rectangle has formed an integral part of Trafford Park since the early 1900s and was, indeed, a strategic development site within the statutory Trafford Park Urban Development Area designated in the late 1980s for a period of 10 years. One of the main reasons why the Secretary of State granted planning

¹ Refer to the Trafford Park Spatial Profile (Page 8) and Trafford Park Place Objectives, in particular TPO1 (Page 21)

permission for the Trafford Centre in 1993 was the contribution it would make to the regeneration of Trafford Park.

- 2.10 Trafford Park is one of the largest employment areas in the UK and has been a strategic employment area for decades – contributing c 75,000 jobs at its peak. Within the Park the Trafford Centre Rectangle supports a substantial number of jobs –in excess of 10,000 – which is approximately 20% of the total employment in Trafford Park and the Rectangle and is well placed to make a significant contribution to meeting future development needs both for new employment and housing. This opportunity consists of approximately 6 or more sites including Trafford Quays which could be brought forward for development in the period to 2026 including sites suitable for high quality housing and business accommodation (see **Appendix 2**).
- 2.11 Further, the Trafford Economic Development Plan sets out the commitment of TBC and its partners to make a significant contribution to the achievement of the economic growth of MCR and also notes the considerable potential of Trafford Park to play a role in this through the means of a new Vision and Strategy for its enhancement and repositioning as a strategic employment area in the 21st Century. In this context reference is made to the 2009 ARUP Employment Land Study, undertaken for the North West Regional Assembly to inform draft RSS, which notes the significance of the likely shift in demand away from manufacturing. This points to a major opportunity over the plan period for change and renewal in Trafford Park and in this regard it is noteworthy that work on the production of a Masterplan for Trafford Park is in hand which will assist with its repositioning.
- 2.12 The Vision and Implementation Report, published in October 2008 as the first stage of the Trafford Park Masterplan, identifies Trafford Park as comprising 3 areas, Wharfside, the Trafford Park core area, and the TCR. It proposes that the largest part of the part, the Core Area, should continue to be safeguarded for economic development but notes that the TCR is already established as a mixed use area and has potential for substantial residential development and the creation of a sustainable residential community which would enable people to live in close proximity to their places of work and many facilities and transport links.
- 2.13 Existing developments in the Trafford Centre Rectangle have already contributed to significant improvements to the public transport accessibility of Trafford Park. The potential for a wider range of uses including residential on sites such as Trafford Quays which will support further improved public transport is recognised in the Trafford Park Accessibility Study (2007) which was commissioned jointly by GMPTE, TBC and SCC (see **Appendix 2** for further detail).

2.14 The importance of the contribution which the Trafford Centre Rectangle can make to the provision of new housing for the City Region has also been confirmed by the fact that the Rectangle is specifically identified as one of the areas of Trafford where further development should be brought forward in the Government's "Partnerships for Growth" initiative. The New Growth Points (NGP) initiative was announced by the Government in 2006 when 29 local authorities and partnerships were named as NGPs, commencing a long term partnership for growth with the Government. The programme was subsequently expanded and, in July 2008, the Government confirmed that a bid by AGMA had been approved. As part of this bid, Trafford is one of four local authorities in Manchester committed to increasing the supply of good quality new housing to ensure that Greater Manchester's contribution to the growth of the UK economy is not constrained. Importantly, in the Government's document "Second Round Growth Points", the Trafford Centre Rectangle is included as one of the identified areas where further development will be encouraged and brought forward.

2.15 As noted above, the Council's spatial approach appears to have been shaped by policies in the revoked RSS. The Council also makes reference to the Greater Manchester Strategy, although that document makes no specific reference to the Inner Areas. If the Council has wrongly assumed that it could not include the Trafford Centre Rectangle within the Inner Areas because of the RSS, that constraint plainly does not apply now that the RSS has been revoked. The key question is whether the Trafford Centre Rectangle Strategic Location, which has been identified as an important element in the achievement of the draft Core Strategy (see paragraph 8.4 of the draft Core Strategy) and is supported by a detailed, robust and credible evidence base, sits more logically within the Inner Areas than immediately outside it. The answer plainly is that it is more logical and more sound to include this Strategic Location within the Inner Area.

2.16 In conclusion, having regard to:

- the scale of City Regions and the consequential implications for the extent of Regional Centres and Inner Areas;
- the fact that the draft Core Strategy recognises the need for economic growth to be supported by a supply of new good quality housing;
- the objective of the draft Core Strategy to focus economic growth in the Regional Centre, with the concern that residential development in the Inner Areas is crucial to support that economic growth and the consequential requirement for the Inner Areas to focus on the provision of opportunity as well as meeting need:

- the inclusion of both North Trafford and Trafford Park within the description of the Inner Area, within both of which the Trafford Centre Rectangle clearly lies;
- the contribution which the Rectangle has made and continues to make as part of Trafford Park in terms of regeneration, job creation and improved public transport accessibility;
- the particular opportunity presented by Trafford Park to contribute to the economic growth of the Manchester City Region, as envisaged by the Council's Economic Development Plan; and
- the opportunity for residential development in the Trafford Centre Rectangle particularly at Trafford Quays as recognised by the Government's recent "Second Round Growth Points" document.

It is clear that the most appropriate approach would be for the Trafford Centre Rectangle to be located within the Inner Area boundary. This would render this part of the draft Core Strategy sound as it is both justified and will be effective.

Amendment Requested

Figure 1: That the boundary of the Inner Area be amended so as to include the Trafford Centre Rectangle.

An amended boundary line is shown on the plan at **Appendix 1**.

3. Trafford Park Spatial Profile (Page 8)

Representation

- 3.1 Peel considers that the reference in the spatial profile to the Barton Swing Bridge being within a tentative World Heritage Site is **unsound** as it is misleading and not justified. The potential World Heritage Site covered a much more extensive area and, more critically, has not been progressed despite first being contemplated more than 10 years ago. The tentative list of World Heritage Sites drawn up by the Government in the 1990's is no longer current and a new list is being compiled. The new list will be shorter and more focussed according to the Department of Culture, Media and Sport's web site and it is not known if the Bridgewater Canal Area will be included.
- 3.2 Accordingly Peel **requests** deletion of the reference to the proposed World Heritage Site designation.

Requested Amendment

- 3.3 That the relevant paragraph be amended to read as follows:

A number of key inland waterways run through the area – the Bridgewater Canal with scope particularly to increase tourism and enhance its role as an environmental asset, and the Manchester Ship Canal with scope to provide opportunities for increased sustainable movement of freight. Its industrial past is still visible and is characterised by heritage features such as the Barton Swing Aqueduct on the Bridgewater Canal.

4. Urmston Spatial Profile (Page 11)

Representation

- 4.1 Peel **objects** to the inclusion of the highlighted text within the following sentence:

*“Whilst not in this place, the Trafford Centre Rectangle lies adjacent to it **and the impacts of it can sometimes be felt**”*

- 4.2 This statement is **unsound**. It has not been justified as there is no evidence advanced by the Council to justify the assertion.

Requested Amendment

- 4.3 Peel requests that the sentence be amended to read as follows:

“Whilst not in this place, the Trafford Centre Rectangle lies adjacent to it”.

5. Partington Spatial Profile (Page 16)

- 5.1 Peel wish to **support** the description of Partington as it has been drafted.

6. Strategic Objective No.3 (SO3) (Page 20)

Representation

- 6.1 Peel **requests** the revision of S03 to acknowledge and give strong emphasis to the strategic role of Trafford Park as a sub-regional employment location. Peel considers that, as drafted, the objective is **unsound** as it fails to reflect the evidence base which demonstrates the existing and future importance of Trafford Park to the economic success of the City Region.

Requested Amendment

- 6.2 It is requested that Strategic Objective S03 be amended to read as follows:

S03: Meet employment need – establish the right conditions to sustain individual employment sites and larger employment areas, particularly the sub-regionally important Trafford Park, so that they may attract new and diverse investment so as to enable Trafford as a whole to remain competitive and realise economic growth.

7. Place Objectives: Partington (Page 29)

Representation

- 7.1 Peel **requests** the inclusion of an additional objective which gives emphasis to the need to maximise private sector investment in Partington. This should be shown as PAO1 with the numbering for all subsequent place objectives increasing by one.

Amendment Requested

A new PAO1 to read as follows:

“To maximise private investment in Partington and make best use of available public sector resources”.

8. Key Diagram (Page 32)

Representation

- 8.1 Peel **objects** to elements of the Key Diagram. At present it shows areas of the borough which it is suggested are at risk of flooding from the Manchester Ship Canal and areas benefitting from Manchester Ship Canal Defences. As there are no published Environment Agency maps relating to flood risk from the Manchester Ship Canal and as discussions with the Environment Agency are ongoing, the inclusion of this detail on the Key Diagram is both premature and without justification. The provisions of the Key Diagram are therefore **unsound**.

Amendment Requested

That the references to 'areas at risk of flooding from the Manchester Ship Canal' and 'areas benefitting from defences on the Manchester Ship Canal' be deleted.

Part B – Strategic Locations

9. Representations on the Manchester, Salford and Trafford Level 2/Hybrid Strategic Flood Risk Assessment (2010)

Strategic Flood Risk Assessment

- 9.1 Peel **objects** to the Level 2 Strategic Flood Risk Assessment (SFRA) prepared by JBA Consulting for Manchester, Salford and Trafford Councils (March 2010), which Peel considers to be **unsound** for the reasons set out below. Peel consider that the unsoundness of the level 2 SFRA calls into question those planning policy decisions taken on the basis of the SFRA and those which have been influenced by it. Accordingly, the representations relate also to the provisions of Trafford Council's draft Core Strategy, the Sustainability Appraisal Report and PPS25 Flood Risk Exception Test document and the PPS25 Flood Risk Sequential Test of Proposed Strategic Locations and Other Development Areas document. In particular Peel considers that the Council's reliance on the SFRA has resulted in its taking an over cautious approach in determining the range, quantum and distribution of land uses considered appropriate in a number of the Strategic Locations in the CORE STRATEGY.

Consultation Requirements

- 9.2 It is of significant concern to Peel that the Level 2 SFRA has been conducted without adequate consultation with them, given the Group's clear and multi-faceted interests as a key stakeholder.
- 9.3 Peel in its various guises (including inter-alia the Manchester Ship Canal Company) has a legitimate interest in the SFRA in its capacity as a Navigation Authority, Statutory Undertaker and affected landowner. It benefits from powers to "make or maintain works for the drainage of land" and is, therefore, a de-facto operating Authority as detailed in Annex H14 of PPS25. PPS25 notes at paragraph 6 (Key Planning Objectives) that Local Authorities should adopt a "partnership approach" with such bodies to ensure "that best use is made of their knowledge, expertise and information". Paragraph 33 refers to the involvement of those stakeholders outlined in Appendix H in the formulation of Local Development Documents (LDDs) and paragraph 25 outlines the need for Local Authorities to consult "when preparing policies in their LDD's on flood risk management and in relation to areas potentially identified as areas at risk of flooding". Paragraph 23 recognises that flood risk issues can affect the value of land, the cost of developing

it and the cost of its future management and use and, as such, advises that such matters be considered as early as possible.

- 9.4 The emphasis placed on consultation is repeated within the PPS25 Practice Guide. Paragraph 2.52 lists further organisations which ought to be consulted in addition to those identified in Annex H of PPS25. Paragraph 2.59 states that Navigation Authorities (defined as British Waterways and/or navigation authorities, as appropriate) should be consulted by the LPA in relation to sites adjacent to or which discharge into canals. This is because Navigation Authorities may be able to give advice on potential issues associated with the canal network (paragraph 3.29).
- 9.5 Paragraph 3.46 of the Practice Guide further advises Local Authorities of the need to ensure that SFRAs are developed in partnership with other key stakeholders and encourages early discussion on matters such as the scope of the assessment. Finally, navigation authorities are identified as potential sources of information for Level 1 SFRAs (paragraph 3.54).
- 9.6 Paragraph 3.1 on the SFRA reports that the Manchester Ship Canal Company is a key stakeholder and has been consulted as part of the SFRA process. Contrary to this assertion, Peel believes the level of consultation undertaken to have been inadequate.
- 9.7 Given the lack of adequate consultation with Peel, it is considered that the SFRA, as presently drafted, is predicated on an incomplete, flawed and potential unsound evidence base omitting, inter-alia, the input and engineering expertise of the Peel's engineering staff and consultants.
- 9.8 PPS12 Local Spatial Planning requires that Core Strategies should be based on thorough evidence (paragraph 4.37) and advises that this will be a factor to be considered in determining whether the plan is justified and meets the important test of soundness (paragraph 4.52). The Practice Guide to PPS25 provides further amplification of this point advising that "it is unlikely that a LDD that was not supported by an adequate evidence base on flood risk would be found to be sound".
- 9.9 In this case the Council has proceeded without a full and sound evidence base on flood risk, and has made decisions on policies and land use allocations based on incomplete and, possibly, unchecked information in respect of flood risk. In Peel's view, this calls into question some of the decisions made by the Council with regard to the location of residential and other PPS25 "vulnerable" uses in some of the Strategic Locations designated in the draft Core Strategy as well as decisions

with regard to the quantum and distribution of such uses in those locations. Peel therefore proposes a number of amendments to the wording of policies and supporting text in relation to some of the Strategic Locations as set out under the representations concerning each individual Strategic Location.

- 9.10 The concerns of the Peel as they relate to the more detailed elements of the Level 2 SRFA are set out in subsequent sections.

Methodology

- 9.11 As noted earlier, Peel has significant and serious concerns regarding the reliability of the Level 2 SFRA and its soundness and, hence, as this is as a critical piece of the evidence basis underpinning the emerging Core Strategy, regarding the soundness of the emerging Core Strategy itself.

- 9.12 These concerns relate principally to the methodology employed by JBA Consulting in the production of the Level 2 SFRA.

- 9.13 HR Wallingford has prepared a detailed review of the Level 2 SFRA on behalf of Peel and their report (Report EX 6297) is attached as **Appendix 9**. The key conclusions of the HR Wallingford assessment are as follows:

- The output of the SFRA does not address all the issues required in the PPS25 Practice Guide; in particular there is no assessment of the current condition, operation, management policy or probability of possible operational failures of the water management structures of the Manchester Ship Canal (MSC). Rather, scenarios of gate failures are proposed which do not reflect the operational experience of the MSC since its construction over 100 years ago.
- The wording of the SFRA document casts unnecessary and unfounded doubt on the normal operation of the Manchester Ship Canal. The normal operation of the Manchester Ship Canal infrastructure should be the basis of comparison as the standard case; the description “best case” for normal operation is misleading since this casts doubt on whether the normal operating conditions are achievable.
- The representation of the sluices of the MSC in the modelling of the Level 2 SFRA assumes that the discharge characteristics have reduced efficiency as being “a reasonable representation of residual risk”. However, there is no justification of this arbitrary choice.

- The breaching scenarios for the Bridgewater Canal give cause for concern as to the method used to identify potential breach locations and on the method used to determine the outflow hydrograph. Crucial factors that are missing from the method of assessment of the breach risk zones are: canal bank construction, canal bank surface cover; and canal bank condition, maintenance and inspection regimes. An initial examination of the shape of the canal outflow hydrographs reveals that the shape is not always consistent with the usual effect of the progressive erosion of the canal bed away from the breach, which is one of the controlling mechanisms stated on Page 39 of the Level 2 SFRA.
- Although the mapping of inundation extent might show areas which could flood under certain scenarios of canal embankment breaching, there is no assessment of the likelihood that should be associated with the breach. The Level 2 SFRA describes the approach as 'conservative' but without any assessment of the influence of this conservatism on the mapped area of potential hazard. The best use of the information in the scenarios might be to illustrate where a more detailed assessment is required, but the information cannot be sufficiently sound for making definitive planning decisions.
- In terms of the mapping, the assumptions used in the scenarios for the operation of the MSC and the breaching of the Bridgewater Canal presented in the Level 2 SFRA lead to an over estimate of the consequent flood levels for the supposed frequency of flood occurrence. Thus the extent of the Flood Zones are over-stated which will lead to a misrepresentation of the actual degree of flood hazard. A critical point is the interaction of the interpretation of these scenarios presented with the application of the Sequential and Exceptions Tests in planning decisions that flow from the SFRA. For previously developed land/ sites these may fail the Sequential Test, whereas the appropriate development should be considered through the Exception Test.

9.14 Peel has also commissioned expert assessments of the operational performance of the MSC and the risk of flood events arising, from HR Wallingford, AECOM, DNV and Halcrow, who all have relevant expertise in these matters. The findings of that joint work are set out in a second report produced by HR Wallingford (Report EX 6400) which is included with these representations at **Appendix 10**. This work draws upon a study undertaken by DNV Consultants in relation to risk assessment which is included as **Appendix 15**. The key conclusions of this detailed assessment can be summarised as follows:

9.15 The assessment of the reliability of the operation of the sluices on the Manchester Ship Canal has shown that the high reliability of the operation of the sluice structures arises from:

- each set of sluices incorporates some redundancy in the form of multiple individual sluice gates,
- there is redundancy at each location in terms of monitoring systems that detect the water levels and the state of operation of the sluice gates,
- there is redundancy at each location in terms of the systems for operating the gates, including the option of purely manual, unpowered control,
- the sluices are used in routine Canal operations to maintain the operating water levels, which indicates a level of testing that far exceeds typical dedicated flood defence systems.

9.16 The results of the reliability analysis show the following results for a site with four sluice gates when demand is made for all four gates to open:

- 92.8% Probability of all four sluice gates opening
- 99.11% Probability of at least 3 gates opening
- >99.25% Probability of at least 2 gates opening
- >99.25% Probability of at least 1 gate opening
- <0.75% Probability of all four gates failing to open

9.17 Moreover, in the process of reliability assessment, conservative figures were chosen for the probability of failure of a system component at a variety of points so that the overall reliability figures obtained should be a cautious estimate of the actual operational performance of the gates.

9.18 The interpretation of the reliability assessment is that the limits of the Flood Zones are dominated by the probability of hydrological processes and the probability of occurrence of any particular flood level can be assessed by assuming the normal operational function for all the sluices.

9.19 Peel has also taken legal opinion from Bircham Dyson Bell LLP with regard to Environment Agency policies and guidance on flood risk assessment and their Report is at **Appendix 13**. That advice reflects the conclusions of HR Wallingford. In respect of the application/interpretation of the Environment Agencies Policies and Guidance on Classification of Flood Defences they have confirmed that the

sluices on the Ship Canal are not flood defences for the purposes of modelling and mapping flood zones.

Precedents

- 9.20 AECOM has examined the approach adopted by the Environment Agency in preparing flood risks maps associated with the Upper River Thames and the River Nene. The conclusions of their report (**Appendix 12**) confirm the advice of Bircham Dyson Bell.
- 9.21 The Environment Agency owns 44 locks and weirs sites on the upper River Thames and one lock on the River Kennet. During normal flow conditions these structures help to maintain water levels between Cricklade and Teddington and ensure that the Thames is navigable by boats. When flows increase, these structures are fully opened to minimise any impact on the flow and level.
- 9.22 The internet based flood risk maps for the upper River Thames show a limited extent of flood risk, and so far as AECOM can ascertain, are predicated on a model which assumed sluice gates to be fully raised or operating in their normal mode; as per EA Policy Guidance. Such an approach is consistent with the conclusions of Bircham Dyson Bell.
- 9.23 AECOM draw similar conclusions in respect of the River Nene, along the navigable reaches of which are 37 locks and weirs. Again, the internet based flood risk maps prepared by the EA are predicated, as far as AECOM can tell, on the assumption of sluice gates being fully open or operating in their normal mode.

Bridgewater Canal

- 9.24 Peel /MSCC have also commissioned HR Wallingford to undertake a detailed assessment of the Bridgewater Canal in Manchester, Salford and Trafford to identify flood hazard adjacent to the Canal. This report (Report EX 6401) is included as **Appendix 11** to these representations. The work included:
- A survey of the condition of the Canal in Manchester through visual inspection and condition indexing using a condition grading method developed by the Environment Agency and British Waterways
 - An assessment of the potential for the Canal to breach both at the areas identified in the SFRA and at other locations identified in the visual inspection

- An assessment of the flooding from the Bridgewater Canal from either overtopping or breaching based on hydraulic modelling of the Canal, the land and the watercourses adjacent to the Canal including the Manchester Ship Canal.

9.25 The main findings of the report can be summarised as follows:

- The Bridgewater Canal is generally maintained in a “Good” or “Very Good”² condition with only minor or cosmetic defects that will have no effect on performance or structural integrity.
- The SFRA identified several areas of flooding from canal breach (SFRA Canal Zone Breach Zones A and B) where this analysis shows that there is “Very Low”³ probability of a breach occurring and so flooding from breaching is a “Very Low” flood risk (annual probability 0.01% or less).
- The assumption in the SFRA that for breaching the Canal water level is full to bank level is unrealistic; such conditions imply the “Improbable” coincidence of a flood with the breach formation. The implication of this is that an unrealistically large volume of water is released during the breach scenarios in the SFRA leading to an overstatement of the area of hazard.
- The time delay of 24 hours assumed in the SFRA between a breach occurring and the emergency stop logs being placed on the Canal is unrealistically long given the instrumentation and procedures put in place by the Navigation Authority. This leads to an overestimate of the volume of water leaving the Canal to cause flooding and so to an overstatement of the area of hazard.
- The areas of overtopping risk are overstated in the SFRA; with, for example, very little of the former Pomona Docks site being exposed to inundation in the 0.1% annual probability flood which has “Low” probability, in contrast to the widespread flooding suggested in the SFRA.
- The very limited extent of inundation from overtopping at Pomona for the 1% annual probability flood could easily be eliminated in any

² The terms “Very Good” and “Good” have specific meanings for condition grading and are defined in the text.

³ Specific categories “Very Low” and “Improbable” for probability are defined in the text along with other categories, extending the categorisation of flood probability of PPS 25 to less frequent (lower probability) events.

redevelopment of the area without increasing flood risks away from the site.

- In contrast to the walkover survey undertaken for the SFRA, the condition survey and condition grading indicates that the likelihood of breach at Pomona is “Very Low”. The retained head of water under normal conditions is modest and the banks of the Canal under the Metrolink are heavily engineered and in “Very Good” condition. Any overtopping velocities are small and are insufficient for a breach to form due to overtopping during a flood on the Medlock. No simulations of breaching have been undertaken in the Pomona area since to do so would suggest a potential hazard where it is in fact negligible.
- The SFRA shows extensive Canal Flood Hazard Zones A and B in the reach of the Canal between Stretford Junction and the Barton Aqueduct Swing Bridge. The visual inspection, Halcrow land survey and Environment Agency 2 m LiDAR topography did not identify any areas where flood risk should arise from the Canal in this reach. No overtopping was predicted from the River Medlock floods and there was no potential for a breach to form. It is concluded that the SFRA Canal Flood Hazard Zones in this area are erroneous.

10. Pomona Island (Policy SL1)

- 10.1 Peel wishes to **support** the identification of Pomona Island as a Strategic Location. The site is predominantly in single ownership (Peel), is in the main immediately available for development and is located in a highly sustainable part of the Regional Centre. Part of the Pomona Island site has the benefit of an extant planning permission and its redevelopment for a mix of uses will assist in the regeneration of this part of the City Region. The particular deliverability / sustainability credentials of Pomona Island are set out in **Appendix 8**.

11. Pomona Island (Policies SL1.2 and SFRA)

- 11.1 The Pomona Island site has been identified by the Council as a key regeneration opportunity (being located within the Old Trafford Priority Regeneration Area) and planning permission exists for 546 residential units on part of the site which Peel intends to build out. The permission remains extant until 2012. There is also a Council endorsed Masterplan for the redevelopment of the wider site area which demonstrates the potential of the site for a residential led mixed use development incorporating a hotel and other commercial and leisure uses.
- 11.2 The draft Core Strategy proposes to allocate Pomona Island for a mix of uses, inter-alia residential, employment and commercial leisure. However, the scale of the residential allocation has been reduced substantially from c.1500 units (as it appeared in the Further Consultation on Preferred Option version of the Core Strategy 2009) to nothing more than the already consented 546 units. Furthermore the previous proposal to include hotel and bar uses within the allocation has been deleted by the Council.
- 11.3 Peel wishes to maintain its **objection** to the reduction in the number of residential units and deletion of reference to hotel and bar uses. These changes since the 2009 version of the draft Core Strategy are not founded upon a robust and credible evidence base and are **not sound**. In residential terms, having regard to availability and deliverability which are fundamental to the development planning system, Peel considers the site to have the potential to accommodate at least 800 units during the plan period to 2026. It is Peel's belief that beyond the plan period the site has the capacity to deliver additional units over and above the 800 suggested.
- 11.4 As noted above, the site lies within a Priority Regeneration Area within the Regional Centre. The benefits associated with and the appropriateness of significant residential development at Pomona Island are recognised by the Council in its Background Note on the Five Strategic Locations (September 2010). The key aspects of the site's sustainability credentials are summarised within **Appendix 8**. These include the potential to improve accessibility for all to services and facilities, reducing poverty and social exclusion and conserving land resources.
- 11.5 The Council's decision to reduce the residential component of Pomona Island and delete the hotel / bar allocation is understood to have been entirely determined by the conclusions of the Level 2 Strategic Flood Risk Assessment and the Core Strategy Sequential Test and Exception Test documents.

- 11.6 It is pertinent to note in this context that the Council's Sustainability Report of June 2009 in respect of the Preferred Options stage of the draft Core Strategy that

“The proposals for Pomona have the potential to deliver a range of significant sustainability benefits...key ones...improving accessibility for all to services and facilities; reducing poverty and social exclusion; conserving land resources; enhancing Trafford's economic performance; improving the Borough's image as a business location; and reducing disparities. The accessibility of the site by public transport and its proximity to areas of deprivation could also result in positive effects on a range of sustainability objectives, including reducing the effect of traffic on the environment; reducing contributions to climate change and improving air quality.”

- 11.7 The Sustainability Appraisal Report Appendices June 2009 confirmed all the above positive benefits. Aside from a potential “minor negative” concern over biodiversity (which it was accepted could be dealt with by way of mitigation measures) the only potential concern was that the Site “may” be at risk of flooding from the Bridgewater Canal. Trafford Council has therefore consistently regarded the Pomona site as a highly accessible and sustainable location and has considered that the introduction of residential development on the site will have considerable sustainability and regeneration benefits. The only caveat in the 2009 appraisal was the need to confirm the likely impact on the development site of flood risk following the completion of the SFRA. It is therefore of substantial concern to Peel not only that a significant change in the Council's position has been made on the basis of a flawed and unsubstantiated SFRA but that the changes to the uses considered appropriate at the site were actually made before the SFRA had actually been completed.
- 11.8 The Council's Core Strategy PPS25 Flood Risk Sequential Test Document (March 2010) reports that 51% of the Pomona Island site falls within Flood Zone 3 with 49% lying within Flood Zones 1 and 2. An important point to appreciate however is that there are no publicly available Environment Agency flood maps for the Pomona area and that these are still under discussion between the Environment Agency and the Manchester Ship Canal Company.
- 11.9 Peel considers that the Level 2 Strategic Flood Risk Assessment is fundamentally flawed in terms of the methodology applied resulting in an exaggeration of flood risk at Pomona Island rather than a true ‘assessment’ of flood risk as is required by PPS25. Peel therefore **objects** to the SFRA and the conclusions that have flowed from its use by the Council as part of the draft Core Strategy evidence base,

in documents such as the sequential test. Further details of Peel's concerns can be found in the site specific Flood Risk Assessment prepared by AECOM (see paragraph 11.10 below).

11.10 Peel considers that the sequential testing and the exception testing to be similarly flawed. In addition the testing is based on an incorrect assumption that the aforementioned planning permission for 546 units would expire in 2010 and a wholly unfounded conclusion that Peel had no intention of implementing the consent. In Peel's view this flawed evidence base and these flawed assumptions have adversely affected decisions taken by the Council in relation to the scale of residential development to be allocated to Pomona Island and, by proxy, to the Carrington Strategic Location (SL5).

The AECOM Flood Risk Assessment

11.11 AECOM have been instructed by Peel to prepare a site specific Flood Risk Assessment (FRA) for the Pomona Island site and their report is attached at **Appendix 14**. The FRA has been prepared in accordance with PPS25: Development and Flood Risk Practice Guide- Communities and Local Government, March 2010.

11.12 From the updated modelling work undertaken it has been found that the majority of the Pomona Island site lies in Flood Zone 1 and 2 with an isolated section in Flood Zone 3. Specifically approximately 12% of the total sites lies within Zone 3 with the remaining 88% being with Zones 1 and 2, with the majority of this 88% being in Zone 2. By contrast the SFRA shows 51% of the Site in Flood Zone 3 and 42% in Zone 2. The SFRA's findings therefore show a significantly larger area in Zone 3 than has been demonstrated to be the case on the base of the updated modelling work.

11.13 In summary the site specific Flood Risk Assessment clearly demonstrates that a significantly smaller proportion of the site falls within Flood Zone 3 than is suggested by the SFRA and the Council's Sequential Test document and that a significantly larger proportion of the site falls within Flood Zones 1 and 2.

11.14 PPS25 advises that, residential uses, hotels and drinking establishments such as bars fall within the 'more vulnerable' category of land uses. However they can, nevertheless, be developed in Zones 1 and 2 subject to the completion of a Flood Risk Assessment without triggering the need for the requirements of the PPS25 exceptions test to be met. The completed FRA demonstrates how residential, hotel

and bar development in Flood Zones 1 and 2 would be protected from and would be at low risk of flooding.

11.15 PPS25 also states that the other main land uses proposed for Pomona Island site (employment, leisure, retail, restaurants and open space) fall within the 'less vulnerable' and 'water compatible' categories and as such, are capable of being located on those parts of Pomona Island which lie within Flood Zone 3a subject to a flood risk assessment. Again, the completed FRA demonstrates how such uses can be protected from and would be at low risk of flooding.

11.16 Taking all of the above together it is apparent that the level of flood risk at Pomona Island is significantly lower than has been portrayed in the Level 2 SFRA and, in turn, the Council's PPS25 Sequential Test and Exception Test documents.

11.17 The majority of Pomona Island lies within Flood Zones 1 and 2, with only an isolated section in Zone 3, and is clearly capable of accommodating a significantly greater number of residential properties than is currently proposed in the draft Core Strategy along with hotel / bar uses subject to appropriate site master planning. During the plan period it is envisaged that the site could deliver up to 800 units.

11.18 In line with the approach taken at the Trafford Wharfside, Carrington and Trafford Quays locations, appropriate site master planning can be ensured through the inclusion of a requirement within the terms of Policy SL1 for uses classified by PPS25 as being 'more vulnerable' to be located outside Zone 3 areas with the additional caveat of '*unless the requirements of the PPS25 exception test can be met*'. The approach taken in respect of Pomona should be amended to be consistent with that adopted for these other locations.

Housing Reallocation

11.19 In the circumstances Peel **requests** that Policy SL1.2 be revised such that, at the very least, the site be identified to provide 800 residential units within the plan period and that hotel and bar uses be reinstated as being appropriate uses to be included within the mixed use redevelopment of this key site.

11.20 It is suggested that the requested reinstatement of housing numbers (254 units) be achieved through a corresponding reduction in housing numbers at the Carrington Strategic Location (SL5).

11.21 Residential development at Pomona Island should be strongly favoured in preference to Carrington for reasons relating to the comparative level of 'fit' with

strategic planning objectives, sustainability credentials and deliverability of housing.

11.22 Attached at **Appendix 8** is a qualitative comparison of the Carrington and Pomona sites against a number of indicators which provides a clear justification for this preference.

11.23 In summary this reveals that there are number of sustainability and deliverability issues concerning the Carrington Strategic Location, whereas the Pomona Island Strategic Location is predominantly in single ownership, has the benefit of planning permission with an approved masterplan and is in the main immediately available. Pomona is located within an area of established residential demand whereas Carrington has been identified as lying within a 'cold' market area. Further Pomona is located within the 'Most Accessible Area' as defined by SPD 1 and is capable of accommodating development without major infrastructure improvements whereas Carrington is located within the 'Least Accessible Area' as defined by SPD1 where development would need to be supported by major infrastructure improvements many of which may not be available to support early phases of development.

11.24 These sustainability and deliverability considerations all support a greater focus of residential provision at Pomona in the early phases of the plan period and a reduced level of provision at the Carrington site in order to render the Core Strategy sound.

Amendments Requested

1. The addition of a further bullet point within Policy SL1.2 which confirms the potential for the location to deliver:
 - A further 254 residential units (over and above the 546 consented)
2. The revision of the Phasing Table under paragraph SL1.5 to show an additional 254 units in the first phasing period (494 in period 2011/12-2015/16).
3. The addition of a Policy either before or after Policy L1.5 to read as follows:

“Uses classified in PPS25 as being More Vulnerable to flooding such as residential, certain leisure uses, healthcare and educational facilities must be located outside Flood Zone 3 unless the PPS25 exception test can be met.”

12. Pomona Island - Policy SL1 (Implementation Table)

Representation

12.1 Peel **objects** to the inclusion of a requirement (within the 9th line of the Implementation Table) for the provision of new canal crossing across the Manchester Ship Canal. There is no evidence to suggest that such provision is needed to support development at Pomona (reflected in its Priority 4 status). Pomona is already a highly sustainable location which enjoys good linkages to surrounding areas and public transport. It is likely that provision of the bridge would be of greater benefit to the wider area than it would be to development at Pomona specifically. As such it is not be reasonable to require development at Pomona to fund its provision.

Amendment Requested

That the 9th line of the Implementation Table and its associated requirements be deleted.

13. Trafford Wharfside (Policy SL2)

- 13.1 Peel wishes to the **support** the identification of Wharfside as a Strategic Location. The area comprises previously developed land located in a highly sustainable part of the Regional Centre. It has great potential, as part of Mediacity:uk, to deliver major new economic and residential development. Such is the scale of residential development opportunity, a range of housing to meet the boroughs identified needs could be provided.

14. Trafford Wharfside (Policy SL2.4)

Policy SL2.4 – Development Requirements

Representation (1)

- 14.1 Peel wishes to maintain its **objection** to the inclusion of the third bullet point which requires the provision of new pedestrian bridge crossing at Mediacity:uk. This bridge is currently being implemented for completion by the end of 2010. It is not justified therefore to retain the reference to this being a 'Development Requirement' and therefore **not sound**.
- 14.2 Whilst Peel does not wish to object to the inclusion of a requirement for the provision of direct pedestrian link across Manchester Ship Canal at Clippers Quay, as is indicated by the third bullet point of Policy SL2.4 and recognises the desirability of providing improved linkages across the Manchester Ship Canal they consider that there may be the potential to provide a linkage which serves more than just pedestrians. Further detailed analysis and discussion is required to confirm the feasibility of this and also whether the linkage might be better created in a location other than Clippers Quay. The current wording is therefore unnecessarily and prematurely specific as to the location and form of this proposed linkage. It does not represent the most appropriate strategy because the detailed analysis required has not yet been carried out.

Amendment Requested

Within the third bullet point of Policy SL2.4:

- Delete the reference to a pedestrian bridge crossing at Mediacity:uk being required;
- Delete the reference to a pedestrian bridge crossing at Clippers Quay being required.

Peel would not object to the introduction of a replacement 'third' bullet point worded as follows:

- new direct linkage over Manchester Ship Canal

Representation (2)

- 14.3 Peel maintains its **objection** to the requirements of the fourth bullet point of Policy SL2.4. It is not justified in that no robust and credible evidence has been advanced by the Council for on or off site provision of either a new 2-form entry primary school or secondary school. It is therefore **unsound**.

Amendment Requested

That the fourth bullet point of Policy SL2.4 be deleted.

15. Trafford Wharfside (Policy SL2.6)

Representation

- 15.1 Peel **objects** to the wording of Policy SL2.6 as currently drafted. This is because PPS25 allows 'more vulnerable' uses to be located within Flood Zone 3 where the PPS25 exceptions test can be met. The current wording is therefore **not compliant with national policy**. Additional wording (marked as underlined below) is therefore requested.

Amendment Requested

The wording of Policy SL2.6 to be amended to read as follows:

Uses classified in PPS25 as being More Vulnerable to flooding such as residential, certain leisure uses, healthcare and educational facilities must be located outside Flood Zone 3 unless the PPS25 exception test can be met.

16. Trafford Wharfside - Implementation Table (Pages 42 and 43)

Representation (1)

- 16.1 Consistent with the representations made in respect of Policy SL2.4, Peel **requests** the deletion of the reference to the provision of a direct pedestrian link across Manchester Ship Canal at Mediacity:uk in line one of the table.

Amendment Requested

Line 1 of Implementation Table

That the reference to the provision of a direct pedestrian link across the Manchester Ship Canal at Mediacity:uk be deleted.

Representation (2)

- 16.2 Consistent with representations made in respect of Policy SL2.4 (third bullet point): While Peel does not object to the requirement for the provision of a direct pedestrian link across the Manchester Ship Canal at Clippers Quay and recognises the desirability of providing improved linkages across the Manchester Ship Canal, they consider that there may be the potential to provide a linkage which serves more than just pedestrians. Further detailed analysis and discussion is required to confirm the feasibility of this and also whether the linkage might be better created in a location other than Clippers Quay. The proposal included in the draft Core Strategy Implementation Table (10th line) is unnecessary and prematurely specific as to the location and form of this proposed linkage. It does not represent the most appropriate strategy because the detailed analysis required has not yet been carried out
- 16.3 Peel does **object** to the “Priority 2” categorisation given to this infrastructure requirement, however, and accordingly to Page 35 of the draft Core Strategy. Priority 2 projects are those which are “needed” to ensure the sustainability of growth proposed in the draft Core Strategy.
- 16.4 As far as Peel is aware, no work has been undertaken which demonstrates that such works are ‘needed’ for this purpose. Hence the decision to propose a Priority 2 categorisation is unjustified and Peel maintains its **objection**. Peel requests that

this be replaced with a “Priority 3” categorisation such that the linkage would be proposed in order to ‘assist’ in ensuring the sustainability of planned growth. This relates more accurately to its status.

Amendment Requested

- 16.5 Peel requests that the text within the 10th line of the implementation table be amended in part to read as follows:

Project: Direct link across Manchester Ship Canal
Priority: 3

Representation (3)

- 16.6 Peel **objects** to the reference to the need for reinforcement of the local water supply network in the 3rd line of the implementation table and the categorisation of these works as Priority 2 (i.e. needed to ensure the sustainability of planned growth).
- 16.7 Peel has no knowledge that such reinforcement is required by the relevant undertakers and the reference to the need for reinforcements is not supported by evidence or justification. Indeed the Council’s Background Technical Report on the Five Strategic Locations only confirms that reinforcement works ‘may be necessary’. Hence the categorisation is unjustified. It should be given a Priority 4 status (i.e. requiring further investigation).

Amendment Requested

That the priority status of reinforcement to the local water supply network be re-categorised as Priority 4 (i.e. requiring further investigation).

17. Trafford Centre Rectangle (Policy SL4)

- 17.1 Peel is generally **supportive** of the provisions of Policy SL4, subject to the small number of amendments / additions which are explained in subsequent sections.
- 17.2 Peel considers that development within the Trafford Centre Rectangle has the potential to make a significant contribution towards the realisation of the Strategic Objectives of the draft Core Strategy.
- 17.3 These reasons are expanded upon at length within **Appendix 2** (Trafford Centre Rectangle Development Framework), **Appendix 3** (Trafford Quays Concept Statement) and **Appendix 4** (Trafford Quays Delivery Report and Appendices). These documents provide a credible and robust evidence base supporting the designation of the area as a Strategic Location.
- 17.4 With reference to Strategic Objectives S01, S03 and S05, the Trafford Centre Rectangle (specifically Trafford Quays) has the potential to accommodate a significant quantum of residential accommodation and in doing so will make a major contribution toward meeting housing land requirements in the plan period and beyond.
- 17.5 Furthermore, its size will enable a mix of property types and tenures to be provided including family and affordable homes and homes which meet an aspirational need alongside commercial B1 accommodation and community facilities of an appropriate scale all set within an attractive and landscaped setting. A sustainable neighbourhood will be created in close proximity to the key employment areas of Trafford Park and the Regional Centre, capable of attracting and retaining a cross section of the Borough's population.
- 17.6 The ability of Trafford Quays to accommodate a significant quantum and range of dwellings is particularly important given the absence of other significant residential development opportunities, particularly within northern areas of the borough, and the need to attract families and high income households into the north of the Borough.
- 17.7 With reference to Strategic Objective S06, it is of note that, with their proximity to the Trafford Bus Station, sites within the Trafford Centre Rectangle are already highly accessible by public transport and, through the creation of a critical mass of residential development and new employment facilities, there exists the opportunity to improve further the levels of public transport connectivity with the rest of Trafford Park, Salford Quays and the Regional Centre as well as employment opportunities which will emerge at Port Salford and Salford Community Stadium located across

the Ship Canal to the immediate west of the M60 Barton Bridge. Improved connectivity will further support economic growth.

- 17.8 With reference to Strategic Objectives S07 and S08, the inter-related stages of site master-planning and the preparation of detailed development proposals, will provide the appropriate forums to ensure the delivery of sustainable developments which incorporate sustainable construction principles and which protect the historic built environment.

18. Trafford Centre Rectangle - Policy SL4.2

Representation

- 18.1 Peel **requests** that the text of the second bullet point of this Policy be amended to make clear that the figures for employment land provision relate only to the development of new employment land (i.e. land that is being brought forward for employment use for the first time) and not to proposals to change the use of a building from Use Class B1 to B8, for example, or proposals to redevelop an existing or former employment site.
- 18.2 The present approach of the policy is **unsound** as it would result in proposals to 'recycle' existing employment land or buildings for new employment uses taking up some of the proposed employment allocation. In this situation a lesser amount of new development would be delivered within the TCR than the draft Core Strategy wishes, contrary to economic development objectives.
- 18.3 Consistent with the above observation the approved development of the former Kratos site (which has an existing lawful use for employment purposes) should not be included within the 15 hectare provision.
- 18.4 Such an amendment will more closely reflect the role which the Trafford Centre Rectangle can play in meeting economic development objectives.

Requested Amendment

- 18.5 That the second bullet point of Policy SL4.2 be amended to read as follows:

- 15 hectares of new employment land providing high quality commercial (B1) development

19. Trafford Centre Rectangle - Policy SL4.4 (2nd bullet) and associated Paragraphs 8.63 and 8.64

Representation

- 19.1 Peel **object** to the requirement in the second bullet point of the Policy for developments within the Trafford Centre Rectangle to contribute towards a scheme to mitigate the impact of the development on the M60. Peel therefore consider that this second bullet point is **unsound**.
- 19.2 The apparent justification for this requirement is contained within paragraphs 8.63 and 8.64 which reference the outcome of the Greater Manchester Transport Modelling Assessment.
- 19.3 A review of the relevant GM model report has been completed by the Traffic, Transport and Highways Consultancy (TTHC). This revealed that the transport modelling work done to date is very broad brush and, in the circumstances, cannot be relied upon to support the detailed formulation of specific policy requirements of the Core Strategy of the kind envisaged in the second bullet point.
- 19.4 For example, the main summary page of the web-site entitled 'Trafford Council, GM LDF Transport Modelling' confirms that the only work to date (Phase 1) reported in November 2009:
- "takes no account of any HAg proposals and.....the Western Gateway Improvement Scheme (WGIS)..."*
- It further advises that:
- "caution needs to be applied in terms of drawing final conclusions".*
- 19.5 The more specific Technical Note "Trafford Transport Impacts" of LDF proposals (November 2009) explains that there is 'global' assumed growth with no specific sites and it is not clear where this assumed growth is located.
- 19.6 It is the firm view of TTHC and Peel that the current wording of the third bullet point (which relates to the Western Gateway Infrastructure Scheme) should be taken as being the full and sufficient contribution which development within the Trafford Centre Rectangle should make to offsite highway works in the area as this is designed to assist in the relief of congestion in the wider area. In particular the evidence adduced by the Council does not warrant the retention of the second bullet point.

19.7 A Technical Note has been prepared by the Traffic, Transport and Highways Consultancy is contained at **Appendix 7**. This contains further commentary on the matter and, amongst other things, explains the rationale which underpins the WGIS scheme (i.e. the issues it seeks to address), the nature of the development (i.e. scope of the physical works and associated timing), the improvements which it will deliver and Peel's role in and contribution to its delivery.

Amendment Requested

Peel requests that the second (2nd) bullet point of Policy SL4.4 and paragraphs 8.63 and 8.64 be deleted.

20. Policy SL4.4 (fourth bullet point)

20.1 Peel **objects** to the wording of the fourth bullet point of Policy SL4.4 as it is presently drafted. This is because PPS25 allows 'more vulnerable' uses to be located within Flood Zone 3 where the PPS25 exceptions test can be met. The current wording is therefore **not compliant** with national policy. Additional wording (marked as underlined below) is therefore requested.

Amendment Requested

The wording of the fourth bullet point to be amended to read as follows:

A Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and that it will where possible reduce flood risk overall. Uses classified in PPS25 as being more vulnerable to flooding such as residential, certain leisure uses, healthcare and educational facilities must be located outside Flood Zone 3 unless the PPS25 exception test can be met.

21. Trafford Centre Rectangle - Paragraph 8.55

Representation

- 21.1 It is **requested** that the policy justification be expanded to explain the role which Trafford Quays can play in meeting identified housing needs, in particular the need for high quality 'aspirational' homes in the north of the Borough and supporting economic growth in the Borough as a whole and Regional Centre more generally. This would assist in demonstrating the soundness of the policy by providing a fuller justification.

Requested Amendment

- 21.2 Accordingly it is requested that Paragraph 8.55 be amended to read as follows:

8.55: The location is a predominantly a brownfield development location (with the exception of greenfield land at the Trafford Quays site). It has the potential, particularly on the Trafford Quays site, to deliver high quality residential accommodation that will help meet Trafford's identified housing needs up to and beyond the end of the plan period.

The identified housing need includes a requirement for higher quality, larger 'aspirational' housing particularly in the north of the Borough to support employment and economic growth in Trafford and the Regional Centre more widely and to create a more sustainable pattern of development. With the exception of Trafford Quays, few sites in the Borough are of sufficient size to provide the mix of properties which Trafford requires nor do they enjoy the locational advantages of Trafford Quays in terms of its proximity to the Trafford Park Core Area and Regional Centre both of which are key employment locations. The Council's Strategic Housing Land Availability Assessment confirms that there are no other opportunities in the north of the Borough to create an aspirational residential environment which is capable of matching the attractions of suburbs in the south of the Borough.

The Trafford Centre Rectangle also has the potential to provide a range of employment opportunities to meet the economic regeneration and development needs of the Borough and to contribute towards the economic prosperity of the City Region. Using land efficiently within this location will reduce the need to release further Greenfield land elsewhere in the borough.

22. Trafford Centre Rectangle - Paragraph 8.57

Representation

- 22.1 Whilst the content of this paragraph is factually correct, its inclusion in a document which covers the period to 2026 is, in Peel's view, inappropriate and therefore **unsound**. An **objection** is made and Peel request its deletion.

Amendment Request

Peel requests the deletion of paragraph 8.57.

23. Trafford Centre Rectangle - Paragraph 8.66

Representation

- 23.1 Peel **objects** to the inclusion of reference to the location of specific uses within Trafford Quays being “designed to reflect the outcome of the Manchester, Salford and Trafford Level 2/Hybrid Strategic Flood Risk Assessment”. The SFRA is **unsound** for the reasons explained in Section 9.
- 23.2 An alternative and more appropriate form of words which would satisfy the test of soundness is set out below:

Amendment Requested

Paragraph 8.66 be amended to read:

“The precise location of specific uses will be dependent on flood risk assessment including appropriate mitigation measures carried out at the stage of the Land Allocations Development Plan Document or submission of a planning application.”

24. Carrington Strategic Location (SL5)

Policy SL5.2

Representation

- 24.1 Policy SL5.2 proposes to allocate Carrington as a Strategic Location for, inter-alia, 1560 residential properties and 75 hectares of employment land. It is noted that this is a significant change from previous drafts of the Core Strategy as the Council has hitherto resisted third party proposals that the Carrington location should be identified as a suitable area for major housing developments in part because of its poor accessibility especially by public transport.
- 24.2 It is understood that the proposed recent inclusion of a significant level of residential development with the Carrington Strategic Location originated from concerns which the Council had regarding flood risk at the Pomona Island site (SL1). As we have explained in the representations on Policy SL1, the Council's concerns relating to flood risk at Pomona have been exaggerated due to flawed assumptions used within the Level 2 Strategic Flood Risk Assessment.
- 24.3 Peel wishes to maintain its **objection** to the scale of proposed residential allocation at Carrington and associated phasing strategy on two grounds.
- 24.4 Firstly, the scale of allocation is predicated on an assumption that residential development could be delivered on the site from 2011/12 onwards which for the reasons explained below is unrealistic. Secondly, the scale of the allocation belies the site's location in a currently unsustainable location. The approach of the draft Core Strategy in this regard is not fully justified and is **unsound**.

Deliverability and Sustainability

- 24.5 The historic use of the location is as a major chemicals plant with a complexity of ownerships (land, plant and equipment). The Council acknowledge that land has been contaminated by existing and former uses of the site and will undoubtedly require remediation to enable redevelopment for residential development and associated open spaces to take place. The site is not located within an established residential area, is physically disconnected from other communities and is bounded by the Green Belt to the south, east and north. It is also located within one of the least accessible areas of the Borough as defined by the Council's SPD 1 (Developer Contributions to Highway and Public Transport schemes) having poor linkages to the local and strategic highway network and poor levels of service by

public transport. Significant (in terms of scale, cost and time) improvements to highway and public transport infrastructure are identified as being needed. A requirement for a new crossing over the Manchester Ship Canal (to be funded by the private sector) is to be investigated further.

24.6 The location does not have the benefit of planning permission for residential development and, as noted above is in a number of different ownerships. While the assumed annualised build rate might be reasonable over the longer term this is highly unlikely to be achieved in the early phases of the Plan period for a number of reasons. The timescales associated with resolving land ownership issues, applying for and securing permission and discharging any relevant Section 106 or planning conditions including those relating to site investigations, site remediation and installation of necessary infrastructure, and mobilisation of contractors all lend support to the argument that the delivery of houses on the site from 2011/12 onwards is unrealistic. Also, given that the Carrington site is not an established residential location and that Carrington was identified as a cold market area in the Council's SHMA take up rates of housing in the early years of the development are likely to be low and it is very unlikely that the 360 houses will be completed by 2016 as envisaged in the draft Core Strategy.

24.7 In view of the foregoing, and consistent with representations made in respect to Policy SL1, Peel requests that a minimum of 254 residential units be transferred from the Carrington (SL5) to the Pomona Island (SL1) Strategic Location. Whilst there are number of deliverability issues concerning the Carrington Strategic Location, Pomona Island is predominantly in single ownership, has the benefit of planning permission, is located within the Regional Centre, is located within the Most Accessible Area as defined by SPD 1 and is capable of accommodating development without major infrastructure improvements. These deliverability considerations all support a greater focus of residential provision at Pomona and a reduced level of provision at the Carrington site, if there is to be any confidence in the ability of the draft Core Strategy to meet Trafford's strategic housing requirements.

Amendment Requested

That the residential development allocation proposed in the first bullet point of Policy SL2.5 be reduced by at least 254 units (i.e. to show 1306 units at the most) and the phasing table after Policy SL5.5 be amended to reduce the number of units in the period to 2015/16 by 254 units.

PART C – CORE POLICIES

25. Policy L1.3 (Page 62) and related paragraph 10.5 (Page 64)

Representation

- 25.1 Policy L1.3 states that in the event that Housing Growth Point funding is not forthcoming, the Council will reconsider whether it is appropriate to retain the increased housing growth targets including the 20% uplift until 2018. Peel **objects** to this statement on the grounds that it has not been established or demonstrated that the achievement of the higher figure is dependent upon the availability of the HGP funding which was always going to be a relatively modest sum in terms of the costs of developing this additional housing. Accordingly the policy is not founded upon robust and credible evidence **and is unsound**.
- 25.2 Peel suggest that a more sound approach would be to provide, within the wording of the policy, a statement to the effect that the Council may have to revise its overall housing growth targets if it is found that sites which were dependent upon HGP funding cannot be brought forward if that funding is not forthcoming. It is requested that the text of Policy L1.3 and paragraph 10.5 should therefore be amended to make clear that any reconsideration of housing land targets / housing distribution should be carried out only as a result of specific sites (the delivery of which was dependent on HGP funding) not being brought forward for this reason and any reduction in the figures should be in proportion with the agreed capacity of those sites.

Requested Amendment

- 25.3 It is requested that Policy L1.3 be amended to read as follows:

In the event that funding for the Housing Growth Point is not forthcoming, the Council may need to consider whether it is appropriate to retain the increased housing land targets (the 20% uplift referred to in Policy L1.2) through to 2018. However any such revision of these targets will be made only if sites which were dependent on the availability of such funds cannot then be brought forward and in proportion to the level of housing provision which had been assumed to be made by those sites.

- 25.4 It is requested that Paragraph 10.5 be amended to read as follows:

Table L1 shows that there is sufficient flexibility to demonstrate that the housing numbers including the 20% uplift could be delivered. However, in the event that the Housing Growth Point funding is not forthcoming it may not be possible to provide the infrastructure to support that level of residential development. In this circumstance the Council will consider the need to reduce the annualised target and the level of housing provision in proportion to the assumed level of contribution of any sites where the delivery of the site was dependent on the receipt of growth point funding.

**26. Policy L1.9 (Page 63) and related paragraph 10.13
(Page 65)**

26.1 Peel does not wish to make a representation in respect of this policy.

27. Paragraph 10.17

Representation

- 27.1 It is **requested** that reference to the Regional Planning Body be deleted in light of its abolition by the Coalition Government

Requested Amendment

- 27.2 That paragraph 10.17 be amended to read as follows:

10.17 The Council will consider the findings of this monitoring work to determine whether or not a review of this development plan policy is needed.

28. Table L1 – Net New Housing Development Proposals 2008/9 to 2025/6

Representation

- 28.1 Consistent with and for the reasons given in the representations made in respect of Policies SL1 and SL5, Peel **objects** to the level of housing development attributed to the Pomona Island and Carrington Strategic Locations.
- 28.2 It is considered that the Pomona Island Strategic Location has the ability to accommodate at least 800 residential units in the period to 2026 (the plan period). An uplift of at least c254 units is therefore **requested**.
- 28.3 Peel believes the start date which has been assumed for residential development at Carrington is unrealistic for the reasons referred to earlier in this statement. Further, Pomona Island offers a far more sustainable location for the delivery of residential development than Carrington as is evidenced in **Appendix 8**.
- 28.4 Accordingly, it is **requested** that the level of housing development proposed for Carrington be reduced by 254 units with this number transferred to Pomona Island.

Requested Amendment

- 28.5 Table L1 should be amended in part as follows:

	2008/9- 2010/11	2011/12- 2015/16	2016/17- 2020/1	2021/2- 2025/6	Total	% Brownfield
SL1 Pomona Island	0	494	306	0	800	100
SL5 Carrington	0	106	600	600	1306	100
Regional Centre Area Total	0	894	606	200	1700	100
South City Region Area Totals	1150	2206	2300	2550	8206	75

29. Policy L2 (Affordable Housing)

29.1 Peel objects to this policy but only insofar as it does not provide any clarity as to the level of affordable housing provision that should be made in respect of any residential sites brought forward in the Trafford Centre Rectangle. The Trafford Centre Rectangle forms part of Trafford Park and was not considered as part of the Council's Strategic Housing Market Assessment for the understandable reason that there is virtually no existing housing within Trafford Park (with all the housing in the original Trafford Park Village having been cleared 30 or more years ago) and there has been no housing built in Trafford Park for over 100 years. Any new housing developed at Trafford Quays or elsewhere within the Trafford Centre Rectangle will therefore need to create its own new market. It follows that this area will be a Cold Market for housing purposes for much of the Plan period until it can be become established. Consequently any requirement for affordable provision within the Trafford Centre Rectangle should be at the lower end of the range of requirements indicated in Policy L2.

Requested Amendment

It is requested that the first bullet pointed paragraph L2.9 be amended to read as follows:

- *“cold” – being the Trafford Park, Old Trafford, Carrington and Partington “Places”....*

30. Policy L3.4 – Partington Priority Regeneration Area

Representation

- 30.1 Peel **requests** the inclusion of the additional wording set out below either immediately before or immediately after the series of bullet points. It is considered that this amendment will assist in setting context of the policy so will improve its soundness.
- 30.2 Peel **objects** to the wording of the fifth and sixth bullet points within this Policy and request that additional wording as identified by the underlining below be included. There is an identified over provision of open spaces in Partington. The policy objective should aim to enhance the quality of open space and public realm and the connections between spaces, and then ensure that the improved and strengthened areas are safeguarded thereafter. This approach will help transform the local environment and perceptions, which will in turn facilitate sustainable regeneration.
- 30.3 Peel also **objects** to the wording of the final bullet point within this Policy on the basis that an additional caveat is needed to make clear that the specified development would be acceptable in Flood Zone 3 if the relevant tests of PPS25 can be met. The current wording is **not compliant** with national policy.
- 30.4 The additional caveat requested is shown as underlined below.

Amendment Requested

The following wording to be included immediately before or following the bullet points:

“Whilst some limited public funds may be available, the regeneration of Partington will need to be driven by private sector investment. Partington is a ‘cold’ market area, hence securing viable investment will be a challenge. In considering private sector proposals in Partington, the Council is likely to need to prioritise and balance the range of policy requirements against financial viability of proposals brought forward”.

The fifth and sixth bullet points within Policy L3.4 should be amended to read as follows:

- *Where development is proposed on amenity open space and / or public realm*

a contribution will be required to secure improvements to the quality of remaining areas of open space and / or public realm and green connections between them, while ensuring that standards of sufficiency, as set out in Policy R5, are achieved;

- *Additional contributions towards the provision / improvement of open space and / or public realm in and around the township over and above the contributions required in accordance with Policy R5 may be required in order to fund improvements to the quality of open space.*

The final bullet point within Policy L3.4 should be amended to read as follows:

- *Developers will be required to locate uses classified in PPS25 as being 'more vulnerable' to flooding such as residential, certain leisure uses, healthcare and educational facilities outside Flood Zone 3 unless the relevant policy test set out within PPS25 can be met.*

31. Policy L3.5 – Partington Priority Regeneration Area

Representation

- 31.1 Peel **objects** to the inclusion of the words ‘over and above’ within the second bullet point. The basis for the objection is that there is no evidence or justification for requiring contributions ‘over and above’ the requirements of Policy R5. As such the policy is **unsound**.
- 31.2 An alternative form of words for the second bullet point is set out below.
- 31.3 Peel also **objects** to the wording of the third bullet point within this Policy on the basis that an additional caveat is needed to make clear that the specified development would be acceptable in Flood Zone 3 if the relevant tests of PPS25 can be met. As presently drafted the third bullet is **not compliant** with national planning policy. The additional caveat requested is shown as underlined below.
- 31.4 Peel also **objects** to the wording of the final bullet point on the basis that there is no evidence or justification to support the requirement for additional contributions to highway and public infrastructure to those which would be required by SPD1. Accordingly Peel considers this part of the policy to be **unsound**. An alternative form of words is proposed below:

Amendments Requested

Wording of 2nd bullet point to be amended to read as follows:

- Provide additional contributions towards the provision / improvement of open space and public realm in and around the township of a quality and quantity appropriate to Partington.

Wording of 3rd bullet point to be amended to read as follows:

- *Locate vulnerable uses such as those identified within PPS25 outside of the areas identified as Flood Zone 3 unless the relevant policy test of PPS25 can be met.*

Wording of final (fourth) bullet point to be amended to read as follows:

- *Provide contributions equivalent to SPD1 and work with the Council and its Partners to ensure that they are directed towards transport and accessibility*

projects that will deliver sustainable transport benefits to Partington.

32. Policy L4.5 - Integrated Public Transport Network (first bullet point)

Representation

- 32.1 Peel **objects** to the first bullet in Policy L4.5, which refers to encouraging and promoting the improvement and extension of Metrolink but does not plan for alternatives to Metrolink. The draft Core Strategy's soundness would be improved if the prospect of the delivery of other frequent and reliable public transport services was also identified in this part of the Policy.
- 32.2 Peel's particular concern relates to the proposal to extend Metrolink into Trafford Park. The statutory powers for this were first granted over 20 years ago, in the late 1990s. The related compulsory purchase powers in due course lapsed and were renewed in 2001. Once again, however, these powers have since lapsed. The possibility of constructing an extension of Metrolink into Trafford Park was revived during 2007/2008 as part of a proposal to introduce congestion charging in Manchester. Following a referendum, however, these proposals were not pursued.
- 32.3 One of the difficulties in promoting the Trafford Park extension of Metrolink has been the lack of public funding available for it. The "Transport Considerations" document produced by TTHC as part of the Trafford Quays Delivery Report (**Appendix 4** to these representations) describes a much cheaper and more deliverable bus priority alternative (see paragraphs 7.4 – 7.11). This alternative would not prejudice the Metrolink extension if that were to become deliverable.
- 32.4 Since TTHC's document was produced, an express bus service with limited stops has been introduced connecting the Trafford Centre with Manchester City Centre and passing through Trafford Park. In addition, Peel and Trafford Council are in discussions as to ways of providing further time savings and timetable reliability for this major bus artery. These discussions arose out of the suggestions made in TTHC's document referred to above. The project is called Parkway Express Busway and initially is focussed on delivering improvements between Parkway Circle and Peel Circle (Phase 1) and Peel Circle and Trafford Bus Station (Phase 2). It will include off-highway running and signalised priority. Topographical surveys are now being carried out to enable good quality cost estimates to be produced. Compulsory purchase powers will not be required and funding is available.
- 32.5 Accordingly, Peel **requests** an amendment to the first bullet in Policy L4.5, which will improve the deliverability of the draft Core Strategy and therefore its

effectiveness because it will recognise that alternative more deliverable solutions will also be encouraged and promoted.

Requested Amendment

- *The improvement and extension of the Metrolink light rail network within the Borough and / or provision of some alternative high frequency public transport option;*

33. Policy L4.5 (third bullet point)

Representation

33.1 Peel wishes to **support** the provisions of third bullet point of this policy.

34. Policy L5.2 (Sustainable Construction)

Representation

34.1 Peel does not wish to make a representation in respect of this policy.

35. Policy L5.5 (Co² Emissions Reductions Target Framework) & Table L5.1

Representation

- 35.1 Peel objects to the provisions of Policy L5.5 and the associated table (Table L5.1) on the basis that its requirements for CO² reduction go beyond those set out at national level through Building Regulations. The required levels of reduction are at least 15% higher than those required at national level. No evidence or justification has been adduced by the Council to demonstrate why requirements over and above set out at national level are appropriate or deliverable at the local level. As such this part of the policy is **unsound**.

Amendment Requested

Peel requests that the requirements of the policy be deleted or amended to reflect the requirements of current Building Regulations.

36. Policy L6.2 (c) – Waste

Representation

36.1 Peel wishes to **support** the provisions of this part of Policy L6.

37. Policy W1 – Economy

Policy W1.5

Representation

- 37.1 Peel **requests** the inclusion of additional wording at the end of Policy W1.5 to make clearer the sustainability advantages of locating some employment development within the Trafford Centre Rectangle. This will assist in setting out the justification of the policy.

Requested Amendment

- 37.2 Peel requests that Policy W1.5 be reworded as follows:

W1.5: B1 office uses will be focused in the Regional Centre (Pomona and Wharfside) and the town centres. Some B1 development will be appropriate within Trafford Park Core, Carrington, Broadheath and at Trafford Centre Rectangle where it supports existing employment uses and employment regeneration initiatives. The Council considers that the provision of further B1 accommodation within the Trafford Centre Rectangle would have particular sustainability advantages given: the broad mix of uses which exists in the area at present; the proximity of many sites to the Trafford Bus Station; and the Council's wish to see the creation of a new residential community at Trafford Quays (see Policy SL4).

38. Policy W1.11

Representation

- 38.1 Peel wishes to maintain an **objection** to Policy W1.11 and the policy hurdle created for developing non employment uses on existing employment sites.
- 38.2 A definition of what constitutes an existing employment site or employment use is not provided within the terms of the policy. If the policy is taken to mean those sites and uses currently falling within one of the B Class Uses in the Use Classes Order (as per Policy W1.1) then Policy W1.11 would appear to conflict with other elements of the Core Strategy and this is **unsound**. For example, a hotel or cultural use would be regarded as a 'non employment' use for the purposes of this part of the policy. As such proposals for these uses would have to satisfy the tests set out in the four bullet points of the Policy when they would clearly be capable of generating employment albeit within a different use class.
- 38.3 The requirements and constraints set out within the Policy also appear to contradict the broader range of uses which the Core Strategy envisages being brought forward in the Strategic Locations. For the Trafford Centre Rectangle for example, Policy SL4 seeks to encourage, amongst other things hotel development and community facilities whilst Policy R6 encourages the provision of facilities for tourism and culture.
- 38.4 As many of the sites which are expected to come forward for development within the Trafford Centre Rectangle are currently used for B Class purposes, some proposals for development may fall foul of Policy W1.11.
- 38.5 In terms of the specific 'tests' of the policy, Peel **objects** to the inclusion of the second bullet point. If a site is demonstrated to comply with the first policy test (redundancy) then requiring applicants to also demonstrate the non-availability of alternative sites within the locality would serve no useful planning purpose. Indeed, aside from the instances where proposals for main town centre uses are proposed in out of centre or edge of centre locations, there is no national planning policy requirement to demonstrate the unsuitability or unavailability of alternative sites. The policy **does not therefore reflect national policy**

Amendment Requested

- 38.6 It is requested that Policy W1.11 be amended to read as follows:

W1.11: In determining applications for the redevelopment of existing employment sites for non employment uses outside of the defined strategic locations, developers will be required to provide a statement to the satisfaction of the Local Planning Authority, demonstrating that:

- There is no need for the site to be retained for employment purposes and it is therefore redundant;
- The proposed redevelopment would not compromise the primary function of the locality or the operations of neighbouring uses;
- The proposed development is in accordance with other policies in the Development Plan for Trafford.

39. Policy W1 - Paragraphs 18.13 – 18.16

Representation

39.1 These paragraphs seek to justify the Council's decision to propose the release of land outside existing town centres for B1 Office accommodation. Whilst Peel **supports** the Council's proposed approach it is considered that paragraphs 18.13 – 18.16 may benefit from further expansion to better communicate the Council's reasoning and justification for this element of the draft Core Strategy.

Amendment Requested

39.2 Accordingly, Peel **requests** that Paragraphs 18.13-18.16 be redrafted as follows:

- 18.13 The Council has assessed the need for the development of further B1 office accommodation in the borough in the period to 2026. The analysis undertaken concludes that significant growth in the demand for B1 office accommodation can be expected in the plan period. This is due to a predicted significant growth in financial, business services and intensive knowledge based industries. The need identified ranges from 143,000-181,000 sq metres (gross).
- 18.14 The Council has assessed the potential to accommodate some or all of this need on sites within or on the edge of the Borough's four town centres. The analysis has shown that town centre sites / edge of centre sites are only realistically capable of accommodating c.27,000 sq metres of accommodation.
- 18.16 This means that in order for the borough to realise its economic regeneration objectives, land outside of town centres must be released for B1 Office development. A range of sites have been identified and assessed having regard to Planning Policy Statement 4.
- 18.17 Outside town centres, the main areas identified for additional office development in the Core Strategy are Pomona and Wharfside. Development in both of these areas will result of the development of previously-developed land (in Pomona's case a long standing derelict site), will provide significant employment opportunities (in Wharfside's case in particular, it will support the expansion of Mediacity:uk), will allow for increased investment in the area and will support social inclusion as they are closely linked to the deprived areas of Old Trafford and Ordsall in Salford. These two locations are also within the Regional Centre which is a key focus for office development.

18.18 Some office development in Trafford Park Core, Carrington and Broadheath is appropriate if it will involve previously developed land, can be linked to existing employment uses and, to varying degrees, can promote social inclusion.

18.19 Further office development within the Trafford Centre Rectangle will deliver particular sustainability advantages, given the range of land uses which presently exist within the Rectangle the proximity of many sites to the Trafford Bus Station and the proposal of Policy SL4 to introduce c1000 new dwellings within the plan period. The mix of existing and proposed uses will result in the creation of a highly sustainable community where people have the opportunity to live, work and spend their leisure time.

40. Policy W2.14 – Out of Centre Development

Representation

- 40.1 It is considered that the provisions of the final sentence of Policy W2.14 may place future planning applications for non-bulky comparison goods at a disadvantage **and is not compliant with national policy**. Given the provisions of the remainder of the policy its inclusion is also considered to be unnecessary. Peel therefore **objects**.

Requested Amendment

- 40.2 It is requested that the final sentence of Policy W2.14 be deleted such that the amended policy reads as follows:

W2.14: Proposals to expand any of the three existing retail warehouse parks (White City, Trafford and Altrincham) should be justified against the tests set out in government guidance.

41. Policy W2.15 – Out of Centre Development

- 41.1 Peel **requests** that Policy W2.15 be expanded to confirm that the borough's existing out of centre retail developments and parks are the preferred focus (ahead of new sites) for further retail development of an appropriate scale that cannot be accommodated within or on the edge of a relevant town centre .
- 41.2 It is also **requested** that the policy be expanded to make clear that the provision of local community services / facilities (that might include retail as part of a mixed use development) will not be prohibited in key strategic locations such as Pomona, Trafford Wharfside or Trafford Quays.

Requested Amendment

- 41.3 It is requested that Policy W2.15 be expanded to read as follows:

W2.15 The Borough's existing out of centre retail developments and parks shall be the preferred focus for further retail development of an appropriate scale that cannot be accommodated within or on the edge of a relevant town centre. In line with this approach the Council is committed to the provision of a new superstore on Chester Road in Old Trafford of a scale which is limited to that which will address any outstanding need within the Old Trafford / Stretford area (see Core Policy I3 and SL3). The Council is also committed to securing the provision of community facilities, which may include retail, of an appropriate scale, at the key Strategic Locations of Pomona Island (Policy SL1), Trafford Wharfside (SL2) and Trafford Quays (SL4).

42. Policy R1.2 – Historic Environment

- 42.1 The Policy sets out a requirement for developers to demonstrate how their development shall complement **and** enhance the existing features of heritage significance.
- 42.2 This goes **beyond what is required in national guidance** (namely preservation **or** enhancement) and in the absence of any justification as to why a more stringent requirement should apply within Trafford and it is **unsound** and Peel request that it be amended.

Requested Amendment

- 42.3 That Policy R1.2 be amended to read as follows:

Policy R1.2: Developers must demonstrate how the development will preserve or enhance the existing features of historic significance; in particular in relation to conservation areas, listed buildings and other areas of identified heritage assets, and that the proposed development will not have any unacceptable adverse impact on the same.

43. Policy R1.6 – Heritage Assets

Representation

- 43.1 This policy sets out a requirement for developers to demonstrate how their development will protect, preserve **and** enhance certain heritage features including listed buildings. Again, this goes **beyond the requirements of national guidance** and Peel requests its modification.

Requested Amendment

- 43.2 That the first sentence of Policy R1.6 be amended as follows:

R1.6: Accordingly developers will be required, where appropriate, to demonstrate how their development will protect, preserve or enhance:

44. Policy L5.4 – Climate Change

Representation

- 44.1 Peel supports the policy's encouragement of low carbon, renewable or decentralised energy proposals. Peel believes that responsible and sustainable energy generation in the Borough should play a significant role in mitigating climate change and in contributing to national Co2 emission reduction targets. Therefore the inclusion of this policy should be considered **sound**.

45. Policy L5.4 – Climate Change

45.1 Peel Energy **requests** the policy clearly defines that in a scenario where the borough's CO2 emission reduction targets have been achieved that this would not be a material consideration in the determination of any low carbon energy generating proposal. The justification being that the accepted need for this development, as stated in national policy, goes beyond reasons of climate change mitigation. This type of development must also be encouraged to allow Trafford to contribute to increased national energy security through a more diverse energy mix. The inclusion of this point of clarification would make the policy more sound.

46. Policy L5 – Table 5.1

Representation

- 46.1 In respect to Table L5.1, Peel Energy **objects** to the suggested requirement within the minimum CO2 reduction requirements for target area 1 to '*connect to a Combined Heat & Power/district heating network*'. Peel considers that the identification of any specific efficiency measures (such as connection to a CHP system) is over prescriptive as there are likely to be different optimal solutions in different situations. The joint working that is likely to take place between Peel, the Council and others in relation to development projects will provide opportunities to explore alternative measures that may prove to be more viable and effective for a particular development. Furthermore, the policy may place unacceptable demand on developers proposing low carbon or renewable power stations to deliver Combined Heat and Power. Any such development proposals should not be prejudiced if heat-off take is not part of the plant design. Although Combined Heat and Power can deliver many benefits it is not always commercially viable or feasible to facilitate. Allowing for a connection to other forms of low carbon / renewable energy sources would make the policy more sound.
- 46.2 Peel therefore requests an amendment to the wording of Table to remove the specific reference to CHP or a district network.



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