

Respondent name / organisation / agent	Summary of rep	Council Response
PHD Design	The requirements for an Outline Application under the Criteria Based Documents are identical to a Full Application.	Noted and clarification included on criteria based requirements.
	Many of the documents requested can be dealt with planning condition.	PPG paragraph 006 'Use of planning conditions', states that local planning authorities should limit " <i>the use of conditions requiring their approval of further matters after permission has been granted</i> ". It is considered that in order to ensure that all critical material considerations are dealt with appropriately, they must be dealt with during the course of a planning application and not left to condition. When left to condition, issues such as Landscape Strategies and Drainage Strategies cannot always be implemented as set out on approved plans, resulting in the need for unnecessary delay in the implementation of permissions.
P Kilvert	The comments made were related to planning policy and not the validation of planning applications.	
V Woodward	The comments made were not related to the validation of planning applications.	
J Ritchie	The comments made were not related to the validation of planning applications.	
J Williams	Query raised with Appendix 2 (Viability Assessment guidance) in relation to the requirement for "Projection Model/Overage" and concern that this would lead to a liability for Council Tax Payers	This section remains the same as within previously adopted Validation Checklists. Viability Assessments do not result in any liabilities on Council Tax payers.

Altrincham Neighbourhood Design Business Plan - Design Group	A comprehensive checklist for all the variations of planning applications and lots of information required from applicants, are there any significant changes?	All changes were listed in the report presented to Planning and Development Committee on 12 December.
	The level of information required for outline planning applications should be reduced to providing sufficient information to understand the principle of development.	Noted and clarification included on criteria based requirements.
	Concern raised with appendices and how they are to be used	Noted.
	Query over SuDS and the involvement of the Environment Agency. Shouldn't the actions and strategy be clearly defined by the Environment Agency.	The Environment Agency are a statutory consultee on certain applications as set out in The Town Country Planning (Development Management Procedure) (England) Order 2015.
	There is a risk of the design code being applied too literally e.g. landscape led design for a development that covers an entire site.	The Trafford Design Code is an adopted SPD and these comments do not relate to the validation of planning applications.
Stantec	The criteria for outline planning applications should include parameters plans.	Noted. Parameters Plans added to the outline planning application checklist.
G Kitson	Biodiversity Net Gain Statement/Plan - threshold is too low. Account should be taken of the potential for Net Gain, metric of the 10% net gain is low, meaning the resources utilised in surveying, reviewing and preparing the necessary information via site visits etc potentially outweighs the gain in environmental terms.	BNG requirements are set by legislation and these comments do not relate to the validation of planning applications.
	Design Code Compliance Statement - This is a restriction to creativity and a complete misunderstanding of the architectural design process	The Trafford Design Code is an adopted SPD and these comments do not relate to the validation of planning applications.

	<p>Drainage Strategy / Statement - This should be a standard condition for any Major applications approvals which can then be implemented as part of a discharge application and should be covered by Building Regulations. Preparing a sufficiently detailed drainage design requires RIBA Stage 4 detailed design which isn't sustainable when there is no guarantee of planning permission.</p>	<p>It is considered that in order to ensure that all critical material considerations are dealt with appropriately, they must be dealt with during the course of a planning application and not left to condition. When left to condition, issues such as Drainage Strategies cannot always be implemented as set out on approved plans, resulting in the need for changes to schemes and delays in the implementation of permissions.</p>
	<p>Energy Statement - should be covered by Building Regulations. Not economically viable to undertake RIBA stage 4 design prior to approval.</p>	<p>The requirement for an Energy Statement is set out in Policy JP-S2 of the adopted Places for Everyone Plan (2024).</p>
	<p>Façade Design Analysis - repetition of Design Code Compliance Statement.</p>	<p>The two document requirements are different.</p>
	<p>Heritage Assessment - Definition of 'character' needs to be clarified. Character develops over time.</p>	<p>NPPF paragraphs 207-211 set out how Heritage Assessments should be carried out. Historic England provide advice on topics such as character, e.g. https://historicengland.org.uk/whats-new/research/back-issues/historic-character-and-good-design/.</p>
D Peacock	<p>There's no publicly available list of NDHAs and requirement for Heritage Statements should be removed</p>	<p>A draft list of locally listed buildings is available on the Council's website - Executive Agenda 18 November 2024. This will be consulted on in the first quarter of 2025. It is important to note that NDHA's can also be identified through the planning process.</p>
	<p>General comment on mapping of conservation areas</p>	<p>All Conservation Areas are mapped on the Trafford My Council map.</p>
	<p>Unreasonable to require an energy statement for every full planning application.</p>	<p>Noted and clarification included on criteria based requirements.</p>

	<p>The requirement for an energy statement means bringing RIBA Stage 4 design into Stage 3 when a planning application is made. This will necessitate the applicant spending potentially thousands of pounds on consultant fees before they even know if they are going to have an application approved. Consideration should also be had as to removing any overlap with Part L of the Building Regulations</p>	<p>Noted, however this requirement comes from PfE JP-S2 and must be complied with.</p>
	<p>Concerned by the resources which would be expended in producing such an assessment (Energy Assessment), based on so many unknowns and variables, for smaller applications.</p>	<p>Noted, however this requirement comes from PfE JP-S2 and must be complied with.</p>
	<p>Context Character Appraisal needs to be explicitly stated that it should be proportional to the scale and impact of development proposed</p>	<p>Noted, comment added regarding proportionality.</p>
	<p>Digital Connectivity Statement - This appears to duplicate the requirements of Part R of the Building Regulations</p>	<p>Noted, however this requirement comes from PfE JP-C2 and must be complied with.</p>
	<p>Ecological survey better undertaken as a condition for relevant proposals.</p>	<p>Planning authorities are required to consider the potential impacts of development on protected and priority species, and the scope to avoid or mitigate any impacts when considering planning applications. This information must form part of relevant applications.</p>
	<p>General comment on Active Travel requirement for Timperley Wedge.</p>	<p>Noted, not relevant to the Validation Checklist.</p>

	Façade Design Analysis - requirement for detailed design detail should be left to condition	The requirement for a Façade Design Analysis is not new and the LPA consider this requirement necessary to ensure all relevant design details are submitted for consideration.
	Local Labour Agreement - pro-forma should be provided for completion	Noted. As set out in PfE JP-J1 developers will be expected to enter into local labour and training agreements through planning obligations and other mechanisms where appropriate.
	Materials Schedule - usually left to condition	The LPA consider this requirement necessary to ensure all relevant design details are submitted for consideration.
	Site Wide Landscape Strategy captures too many applications and is too demanding for small schemes and would be required even if no landscaping included. Requirement should be limited to major applications only.	All full, outline and reserved matters planning applications that comprise built development are expected to incorporate landscape into the scheme, no matter the size. The Validation Checklist states "Whilst a Site Wide Landscape Strategy is required for all developments, they should be proportionate to the scale of the scheme."
	Some consideration should be had to the additional cost to the applicant and its resultant value to the determination - could put applicants off development or require them to take risks without guarantee of approval.	Noted.
Greater Manchester Combined Authority	GMCA are working to simplify the planning process for those who are installing heat pumps which do not meet the requirements to be considered permitted development.	Noted.

	Should be made clear what evidence could be required for a heat pump application.	There is an ongoing consultation on MCS 020 which is to make installing a heat pump easier and more accessible. It is considered prudent to wait for the outcome of this consultation before updating the requirements for non-PD ASHPs.
	If a noise assessment will be required then this would need to be added to the householder list of criteria-based documents.	There is an ongoing consultation on MCS 020 which is to make installing a heat pump easier and more accessible. It is considered prudent to wait for the outcome of this consultation before updating the requirements for non-PD ASHPs.
National Highways	Request to include advice that when developers are required to assess the impact of their development the strategic road network they should consult National Highways at pre-application stage.	Noted and additional information incorporated into the relevant section.
Sport England	Provided a copy of the Sport England Checklist of Recommended Information Requirements.	Noted and additional information incorporated into the relevant section.
Sustrans and Trans Pennine Trail	No comments	
Natural England	Provided comments on:	
	When the LPA should consult Natural England	Noted.
	Recommended amended wording to the threshold for an Ecological and Biodiversity Survey	Noted. Wording amended.
	Recommended to include reference to the Natural England tools that are available and include reference to ancient woodland, protected habitats and species.	Noted and additional information incorporated into the relevant section.

	Air Quality Assessment requirements where development may affect a European/Internationally or Nationally designated site.	Noted. Additional AQA requirement added.
	General comments on BNG requirements	Noted. GMCA has set a higher standard for BNG information in application submissions.
	Request to include a note highlighting the need to protect soils and agricultural land	Reference to agricultural land classification included in the relevant section. NE's comments on soil protection related to policy and guidance and not the validation of applications.
	Recommend that applications screen for peat presence and include requirement for a Peat Survey.	Noted. Reference to Peat Survey included in the Ecological and Biodiversity Survey.
	Noise Assessment should also be required to have regard to adverse effect of noise on wildlife.	Noted. Additional Noise Assessment requirement added.
	Request requirement to consider the potential impacts of water level and quality changes on any wetland or water sensitive designated sites where relevant.	Noted. Additional note added to Drainage Strategy/Statement section.
Mining Remediation Authority	No comments due to the lack of any coal mining features at surface or shallow depth in the Trafford area which could pose a risk to surface stability and public safety.	
Manchester Airport Group	No comment	
Peel Land and Peel Waters c/o Turley	Potential repetition of information across Outline and Reserved Matters Application checklists.	Noted and clarification included on criteria based requirements.

	<p>The draft validation lists various assessments / appraisals that would need to be provided as part of subsequent reserved matters applications, notwithstanding that such matters will have been considered at outline planning stage. Reserved Matters applications should not be used as an opportunity to reassess the acceptability of the approved parameters which have been deemed to be acceptable, in respect of each of the above topics, by reference to the approval of the outline permission.</p>	<p>Noted and clarification included on criteria based requirements.</p>
	<p>in respect of outline applications, the requirement for supplementary information is typically governed by planning conditions attached to the outline</p>	<p>PPG paragraph 006 'Use of planning conditions', states that local planning authorities should limit "<i>the use of conditions requiring their approval of further matters after permission has been granted</i>". It is considered that in order to ensure that all critical material considerations are dealt with appropriately, they must be dealt with during the course of a planning application and not left to condition. When left to condition, issues such as Landscape Strategies and Drainage Strategies cannot always be implemented as set out on approved plans, resulting in the need for unnecessary delay in the implementation of permissions.</p>

	Wording suggested to reflect that the requirement for these documents will be case specific, more focused and limited in scope than would be required at outline and full application stage, would be dependent on the detail of the design, the extent to which these issues have been fully dealt with at outline stage and have regard to the conditions attached to the outline permission	Noted.
	Not possible to provide the following information during outline application stage:	
	Materials Schedule	Noted and clarification included on criteria based requirements.
	Local Labour & Training Agreements	Noted. As set out in PfE JP-J1 developers will be expected to enter into local labour and training agreements through planning obligations and other mechanisms where appropriate. Planning obligations can only be entered into at Outline and Full planning application stage.
	Site Wide Landscape Strategy	Noted. Note regarding outline planning applications included in the relevant section.
	Waste Management Strategy	Requirement removed.
	The level of information that can be provided for outline planning applications is dependent on the detailed design and delivery of the scheme which is not available at outline stage.	Noted.