



TRAFFORD
COUNCIL

Development Plan Document

DPD1:
Trafford Core Strategy:

**Further Consultation on Policy L5 – Climate
Change**

April 2011

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1.0 Introduction

- 1.1 In the identification of her Main Matters, Issues and Questions Inspector raised a question in relation to this matter to which the Council provided a response in February 2011 (CD 12.35.8, MMIQ 8.21 to 8.24).
- 1.2 Having received and considered the Council's response in CD12.35.8, the Inspector determined that this matter required further exploration by way of the Hearing Sessions (Session 8). At that Hearing Session the Inspector requested that the Council re-consider its approach, within the Core Strategy, to the climate change agenda (Matters arising from Session 8 CD12.56.1).
- 1.3 At the hearing session the Inspector indicated that she considered that, in its submitted form, Policy L5 is not effective and that it is unclear if it is justified. She therefore concluded that currently Policy L5 is unsound and invited the Council to re-write both the policy text and its justification in a manner that its requirements can be easily and clearly understood; its mechanisms for delivery are realistic and transparent and; its implications for development are transparently and realistically taken into account, both in isolation and as part of the overall package of costs imposed on development by the Core Strategy.
- 1.4 This consultation paper contains a re-drafted Climate Change Policy L5, to address the concerns raised during the Core Strategy Examination.

2.0 Background

- 2.1 Policy L5 as submitted, detailed the Council's approach for bringing forward the zero carbon agenda for new built development.
- 2.2 The submitted policy detailed Trafford's local CO₂ reduction targets which were supported by two studies (AGMA Decentralised Energy Study and Trafford Low Carbon Study) and resulted in three sets of targets being proposed from the current Building Regulations Part L.
- 2.3 The principle of encouraging energy generating infrastructure for either commercial or community purposes was supported and will be retained. Also no comments were raised about the Pollution and Water sections of the policy.

3.0 A Summary of the Main Changes

- 3.1 The Policy has been re-drafted to address the concerns detailed above in the following ways:
 - The policy text relating to the national timeline to achieve zero carbon new buildings has been removed;
 - It is now proposed to apply only the CO₂ reduction targets within the Trafford Low Carbon Study, with the baseline for the targets being national Building Regulations Part L 2006;
 - The Policy has been simplified to detail two CO₂ reduction targets:
 - 40% for major development, located in the Low Carbon Growth Areas; and
 - 30% for all major development outside of these areas.

- A CO2 reduction target is no longer required for minor developments; and
- The policy has been revised to acknowledge the impact of all required planning obligations on scheme viability, and the need to demonstrate flexibility.

3.2 For the avoidance of doubt the text relating to the Pollution and Water sections of the Policy has not been altered.

4.0 The Outcome of the Sustainability Appraisal

4.1 Appendix 1 provides a Sustainability Appraisal of L5. The conclusion of this work can be summarised as follows:

The policy has the potential to deliver a number of significant sustainability benefits including reducing both contributions to and the effects of climate change and reducing the environmental impacts of consumption and production. It has positive effects on a number of other objectives.

It is anticipated that the policy would not have any negative effects on the sustainability objectives. Evidence supporting the policy demonstrates that the CO2 reduction targets are deliverable and will not impact upon the supply or pace of housing delivery set out in the Council's housing trajectory. As a result there is a greater level of certainty that the costs of incorporating the necessary features to meet these standards will not have a significant impact on the Council's objective of achieving a balanced housing market. Similarly objectives relating to Trafford's high performance economy can be achieved as there is also flexibility to negotiate on a site-by-site basis where viability concerns are raised as a potential impediment to growth.

The policy would not have an uncertain impact on any of the sustainability objectives. The policy is unlikely to have any significant effects in relation to the following objectives: improving the accessibility for all to services and facilities

encouraging a sense of community identify and welfare improving qualification and skills conserving land resources protecting and enhancing landscape and townscape character. Other policies within the Core Strategy are intended to support the achievement of these SA objectives.

4.2 This document has been prepared for consultation prior to this matter being revisited through the Trafford Core Strategy Examination. You are therefore invited to consider its contents and submit comments.

4.3 The consultation is being administered by the Programme Officer, therefore any written representations in respect of these matters should be submitted, ideally in electronic form, as further representations to the programme.officer@ntlworld.com, copied to the assistant programme officer Andrea.Edwards@trafford.gov.uk. Hard copies should be sent to the following address: Yvonne Parker, The Programme Officer, c/o Strategic Planning and Developments, Trafford Council, First Floor, Waterside House, Sale Waterside, Sale, M33 7ZF.

- 4.4 Please note that the Inspector has requested that any statements submitted should be no longer than 3000 words with very short appendices and that repetitious or lengthy submissions will be returned by the Programme Officer.
- 4.5 Following the conclusion of this consultation and consideration of its outcomes, the Council will submit a further proposed change to the Examination in respect of Policy L5 of the Plan.

5.0 Redrafted Policy L5 Climate Change

- 14.1 Climate Change is one of the biggest challenges we face and it impacts on a wide range of different policy areas. The effects of climate change need to be considered at all stages of the development process in order to ensure that development minimises its impacts and mitigates its effects.

POLICY L5 CLIMATE CHANGE

Climate Change is one of the biggest challenges we face and it impacts on a wide range of different policy areas. The effects of climate change need to be considered at all stages of the development process in order to ensure that development minimises its impacts and mitigates its effects.**POLICY L5 CLIMATE CHANGE**

L5.1 New development should mitigate and reduce its impact on climate change factors, such as pollution and flooding and maximise its sustainability through improved environmental performance of buildings, lower carbon emissions and renewable or decentralised energy generation.

CO2 Emissions Reduction

L5.2 New major built development will be required to minimise its contributions towards and/or mitigate its effects on climate change, in line with both national standards and local targets. The local CO2 emissions reduction target set in Table L5.1 will apply to the following:

- Residential development equal to or greater than 10 units; and
- Non-Residential development above a threshold of 1,000m² floor area.

L5.3 Developments below the thresholds, but involving the erection of a building or substantial improvement to an existing building (such as extensions or change of use), will be encouraged to adopt the principles of energy efficiency and incorporate appropriate micro-generation technologies, to help contribute towards reducing CO2 emissions within Trafford. Those developments within Conservation Areas or which include Listed Buildings will also be encouraged to adopt these principles.

CO2 Emissions Reduction Target

L5.4 Development will need to demonstrate how it contributes towards reducing CO2 emissions within the Borough. This should include incorporating measures such as applying sustainable design and construction techniques prior to utilising renewable energy generation technologies, examples of which can be found in the Supporting Technical Note.

L5.5 The Council recognises that the achievable levels of reduction in CO2 emissions are dependent upon the scale and location of the proposed development. Therefore, the following spatial areas have been identified, which have distinct opportunities to deliver different CO2 reduction targets:

- Low Carbon Growth Areas (LCGAs); and
- Outside LCGAs.

The main focus for high levels of residential and economic growth has been tested to determine a CO2 reduction target(s) for the Borough. In light of the viability testing, three LCGAs have been identified that can

L5.6 The main focus for high levels of residential and economic growth has been tested to determine a CO2 reduction target(s) for the Borough. In light of the viability testing, three LCGAs have been identified that can deliver a higher local CO2 emissions reduction target (see Table L5.1) than the rest of the Borough. Location plans outlining the LCGAs – these are Altrincham Town Centre, Carrington and Trafford Park are provided within the Supporting Technical Note.

L5.7 Table L5.1 details a CO2 reduction target using the 2006 Part L Building Regulations as a baseline.

	Minimum % CO2 emission reduction target from a baseline Part L Building Regulations 2006
LCGA	40%
Outside LCGA	30%

L5.8 Once changes in Building Regulations exceed the targets in Table L5.1, the targets will no longer apply.

How to Calculate and Reduce CO2 Emissions

L5.9 All new built development meeting the thresholds set within paragraph L5.2 is required to submit a Carbon Budget Statement. A template for the Carbon Budget Statement is included within the Supporting Technical Note to help applicants calculate the baseline level of CO2 to be emitted from the proposed development and to provide guidance on measures to reduce emissions.

L5.10 CO2 emissions should be reduced by applying the following hierarchy:-

1. Design and construction techniques to reduce the demand for energy (for example: through the orientation of building; internal layout; and superior energy efficiency measures such as extra insulation);
2. Technology (for example through sourcing low carbon or renewable energy generation, including any district energy network which may be accessible).

L5.11 The Council will encourage applicants to consider and incorporate CO2 reduction design techniques within the building prior to investigating technology solutions. Guidance on both these options is detailed in the associated SPD and the Supporting Technical Note.

Viability

L5.12 The Council expects that all new major development will deliver the required CO2 emissions reductions. However in those circumstances where it can be demonstrated that provision can not be feasibly delivered on site and/or where meeting the targets in Table L5.1 would affect scheme viability such that the development could not proceed, contributions will be sought to fund a carbon off-set scheme (allowable solutions fund), which will fund infrastructure measures off site to reduce CO2 emissions at a lower cost than on site measures.

L5.13 The allowable solutions will introduce a scheme to fund measures and required infrastructure in line with the Core Strategy Policy L8 and the associated SPD. Allowable solutions contributions will be set at a level which enables the developer to meet the carbon reduction target for the development as set out in Table L5.1, except where this can be shown to make the development unviable, in which case a lesser contribution will be accepted by the Council.

Energy Generating Infrastructure Opportunities – Commercial or Community

L5.14 The Council recognises the role that commercial and community low carbon, renewable and decentralised energy generation and distribution facilities can play in reducing CO2 emissions and providing viable energy supply options to serve new and existing developments. The impact of such infrastructure and any suitable mitigation measures will be assessed in line with the policies within this Plan, in particular Policy L7 – Design Quality and Protecting Amenity.

Pollution

- L5.15 Development that has potential to cause adverse pollution (of air, light, water, ground), noise or vibration will not be permitted unless it can be demonstrated that adequate mitigation measures can be put in place.
- L5.16 Where development is proposed close to existing sources of pollution, noise or vibration, developers will be required to demonstrate that it is sited and designed in such a way as to confine the impact of nuisance from these sources to acceptable levels appropriate to the proposed use concerned.
- L5.17 Within the Borough's Air Quality Management Zones developers will be required to adopt measures identified in the Greater Manchester Air Quality Action Plan, to ensure that their development would not have an adverse impact on the air quality.

Water

- L5.18 The Council will seek to control development in areas at risk of flooding, having regard to the vulnerability of the proposed use and the level of risk in the specific location. This will involve a sequential approach to determining the suitability of land for development and application of the exception test, as outlined in national planning policy, where necessary.
- L5.19 Developers will be required to demonstrate, where necessary by an appropriate Flood Risk Assessment (FRA) at the planning application stage, that account has been taken of flood risk from all sources (including rivers, canals, sewers, surface water run-off and groundwater) as identified in the Council's Strategic Flood Risk Assessment and/or shown on the Key Diagram, and that the proposed development incorporates flood mitigation and management measures appropriate to the use and location.
- L5.20 Developers will be required to improve water efficiency and reduce surface water run-off through the use of appropriate measures such as rain water harvesting, water recycling and other Sustainable Drainage Systems (SUDS) appropriate to the various parts of the Borough, as mapped in the Council's Strategic Flood Risk Assessment. Further guidance will be set out in the supporting Technical Note SPD and to provide guidance on measures to reduce emissions.

IMPLEMENTATION

Implementation Mechanisms

Implementation will generally be through private sector development. Climate change priorities will be identified and allocated in the Land Allocations DPD. Other climate change needs will be implemented through the planning application decision making process.

Delivery Agent

The delivery agents will include the public and private sector.

Timescales

This will be ongoing throughout the Plan period. Phasing for the development of the Strategic Locations is set out in detail in Tables L1 and W1. This phasing reflects the likely availability of funding and programme of works anticipated at this time.

Funding

Funding will include private and public sector investment, and S106 contributions.

Justification Text

CO2 Emissions Reduction

14.2 The thresholds applied within this policy have been tested by the Trafford Low Carbon Study (2011). Developments below these thresholds or are Listed Buildings or located in Conservation Areas are encouraged to adopt the principles of energy efficiency and low carbon energy generation detailed in this policy. Further guidance on energy efficiency for Listed Buildings and developments in Conservation Areas can be found on English Heritage's website.

CO2 Emissions Reduction Target

14.3 The Climate Change Act (Amendment 2009) sets out a target of 34% reduction in CO2 emissions by 2020 and 80% reduction by 2050. This supports the Governments policy commitment through Building Regulations to progressively reduce carbon emissions from new buildings through to 2016 and from non-residential buildings through to 2019, or any subsequent superseding timescales.

14.4 The justification to set local CO2 emissions reduction targets is detailed in national, sub-regional and local documents. The Supplement to PPS1 sets out the guidance for local authorities to identify the potential for renewable and low carbon technologies and to set local requirements for decentralised energy supply within Development Plan Documents.

14.5 In 2009, the UK government designated Greater Manchester as a Low Carbon Economic Area for the Built Environment. This designation indicates that the city region is expected to be an exemplar for low carbon buildings, to provide a focus for job creation and economic development in the low carbon sector. This is supported by the Greater Manchester Strategy, of which a key

component is to achieve a reduction in CO2 emissions of between 30-50% by 2020.

- 14.6 Trafford's Sustainable Community Strategy contains key objectives around carbon emissions reduction: PE5 (more energy saving environmentally friendly homes) and PE6 (less carbon emissions from businesses per capita). Trafford's Low Carbon Study (2011) tested a range of development types across the Borough along with a range of low carbon and renewable technologies. Trafford's Low Carbon study identified local CO2 emissions reduction targets primarily linked to the location of development and how this influences viability. These local targets are applied on top of Building Regulations Part L 2006.
- 14.7 The delivery of these targets and their effect on viability has been considered through Policy L8. The viability of all the case study development proposals within the Trafford Low Carbon Study have been tested against the cost for CfSH Level 4 and the BREEAM 'very good' standard. Therefore viability has been tested at a higher development costing than is currently required.
- 14.8 The selection of development typologies and housing market areas, including the related sensitivity testing using development appraisal case studies, has demonstrated that the targets would not impact upon the supply or pace of housing delivery set out in the Council's housing trajectory and provision of affordable housing (Policies L1 and L2).
- 14.9 A range of CO2 reduction targets were modelled (from 10% to 50% compared to the baseline of Part L of 2006 Building Regulations). The results showed the LCGAs to be viable to deliver 15% CO2 reduction using these technologies (on top of Part L Building Regulations 2006), with the rest of the Borough (Outside of LCGAs) able to deliver a 5% reduction target (on top of Part L Building Regulations 2006). Once changes in Building Regulations exceed this level the revised Building Regulations will be applied. The Trafford Low Carbon Study (2011) has assumed a developer's return of at least 15% for a scheme to be viable.
- 14.10 The higher carbon emissions reduction target for the LCGAs can be delivered through a combination of superior energy efficiency measures, on-site microgeneration measures and/or large-scale technology options/Area Wide Options (AWO). AWOs provide an opportunity for carbon reduction infrastructure at a scale (including district energy networks), which may prove more affordable to deliver than micro-generation measures. The Trafford Low Carbon Study tests the viability of a range of example AWOs.

How to calculate and reduce CO2 emissions

- 14.11 All new built development meeting the thresholds needs to minimise its use of energy. The Council requires the application of good design principles and construction techniques to reduce the energy demand of the development, prior to incorporation of technologies. For example, this could include siting, passive solar gain, thermal performance, internal layouts of rooms, extra insulation (including green roofs and walls resulting from their insulation properties) to maximise the energy efficiency of the development. Further guidance is included in the Supporting Technical Note and associated SPD.

14.12 A tool to help applicants identify how much CO2 their proposed development will emit and to calculate the CO2 reduction target has been produced in the form of a Carbon Budget Statement (CBS). A template for the CBS is available in the Supporting Technical Note. Applicants are advised to complete a CBS, or incorporate the content within the Design and Access Statement or Planning Statement which may accompany their planning application. An equivalent document will be accepted if it meets the required content of the CBS. The associated SPD and Supporting Technical Note also offer guidance on design and construction techniques and appropriate technologies.

Viability

14.13 The Council expects that all new major development will deliver the required CO2 emissions reductions. However in those circumstances where it can be demonstrated that provision can not be feasibly delivered on site and/or where meeting the targets would affect scheme viability such that the development could not proceed, contributions will be sought to fund a carbon off-set scheme, which will fund infrastructure measures. Allowable solutions will enable the developer to meet CO2 emissions reduction targets at a lower cost per tonne of CO2 saved than on-site/near site infrastructure solutions which may render the development non-viable. Where necessary to maintain viability, the Council will accept proposals which combine design and construction techniques, technologies and allowable solutions to help applicants achieve their CO2 reduction target on-site.

14.14 Allowable solutions contributions will be set at a level which enables the developer to meet the carbon reduction target for the development, except where this can be shown to make the development unviable, in which case a lesser contribution will be accepted by the Council.

14.15 The Government consultation on The Definition of Zero Carbon Homes introduces “allowable solutions” as a way of introducing a carbon offset scheme to fund larger schemes and required infrastructure. “Allowable Solutions” will include a range of off-site solutions, from retrofitting existing buildings to large scale stand alone renewable energy generating schemes. The viability of all planning applications will be assessed in line with Policy L8 and the associated SPD.

Energy Generating Infrastructure Opportunities – Commercial or Community

14.16 PPS1 states that planning authorities should provide a framework that promotes and encourages renewable and low carbon energy generation and distribution. Trafford encourages the development of commercial and community energy generation infrastructure in suitable locations, providing the opportunity for new and existing developments to use energy which is more carbon efficient. This position reflects the Department of Energy and Climate Change (DECC) progression towards formulating a strategy for national and local government to help people individually, and as a part of their community, to heat and power their homes and businesses, to provide energy security as well as CO2 emissions reduction, and delivery of such energy infrastructure should take both of these factors into account.

14.17 The impact of commercial or community energy generating facilities will be assessed in line with the policies within this Plan and against any suitable mitigation measures proposed. Impact will be assessed with particular regard to:

- Matters of design quality: addressing scale, density, height, massing, layout, elevation treatment, materials, hard and soft landscaping, boundary treatment; and
- Matters of protecting amenity: the development to be compatible with the surrounding area; not prejudice the amenity of the future occupiers of the development and/or occupants of adjacent properties by reason of overbearing, overshadowing, overlooking, visual intrusion, noise and/or disturbance, odour or in any other way.

Pollution

14.18 The Borough generally possesses a good quality environment which the Council intends to retain and improve wherever possible. Pollution, noise and vibration damage the environment and should be prevented or mitigated. The Council will use its planning powers as the most effective mechanism to control pollution, noise and vibration at source. Proposals for development close to sources of pollution, noise or vibration will be required to ensure an acceptable environment for users of the development.

14.19 The Trafford Air Quality Management Area identifies where air quality will not reach the national health based objectives. Trafford and the 9 other Greater Manchester Authorities published their Air Quality Action Plan, which sets out how the conurbation will improve air quality. The plan is mainly concerned with tackling transport related emissions, and is closely tied to the Local Transport Plan for Greater Manchester.

Water

14.20 A Strategic Flood Risk Assessment for Greater Manchester was published in August 2008 and identified broad flood risk arising from all sources within the sub-region, including Trafford. Detailed mapping was produced for river flood zones 2 (medium risk), 3a (high risk), 3b (functional floodplain) and 3 (with climate change). A map identifying the different types of Sustainable Drainage System which are appropriate in various parts of the sub-region was also produced.

14.21 Due to a number of data limitations in the sub-regional SFRA, in May 2009 Manchester, Salford and Trafford Councils commissioned further work in the form of a Level 2/Hybrid Strategic Flood Risk Assessment (SFRA). This detailed study, the first outputs from which were published in March 2010, provides an updated assessment of flood risk arising from rivers (including revised maps for the river flood zones) together with an assessment of flood risk from canals, sewers, surface water and groundwater.

14.22 The Manchester, Salford and Trafford Level 2/Hybrid SFRA comprises 4 volumes:-

- 1.1 User Guide
- 1.2 Level 1 Report
- 1.3 Level 2 Report
- 1.4 Maps

- 14.23 Key elements of relevance to Trafford include detailed outputs on flood risk arising from the Manchester Ship Canal, Bridgewater Canal, the River Mersey at Carrington and within Sinderland Brook catchment. A number of Critical Drainage Areas (CDAs) are also identified due to known surface water/sewer flooding issues. The User Guide provides technical advice on reducing runoff within CDAs and advises that Flood Risk Assessments (FRAs) will be required for developments within these areas on sites of 0.5 Hectares or above.
- 14.24 In accordance with national policy, the Manchester, Salford and Trafford Level 2/Hybrid SFRA will be used to assist in the application of the Sequential and Exception tests in identifying strategic locations and other development areas, and in determining planning applications. Information within the SFRA will also be of benefit in informing a range of other Council functions, including those identified in the Flood and Water Management Act 2010 and related Regulations.
- 14.25 Trafford has developed a Climate Change Adaptation Strategy setting out in more detail action planned over the next 10 years. It highlights opportunities for water efficiencies and reducing surface runoff. Stamford Brook with its wider more holistic approach to water management is a good example of SUDS.
- 14.26 In developing its strategic policies for flood risk, the Council has also had regard to the Environment Agency's North West River Basin Management Plan, the objectives of which will need to be achieved by 2015, and Catchment Flood Management Plans for the Upper Mersey and the Irwell.

Which Objective(s) delivered by this Strategic Location/Policy	Reference Number(s)
Key Objective(s) of the SCS	SE7 PE5, PE6, PE7 BH3
Strategic Objective(s)	SO7
Place Objective(s)	TPO16, TPO17 OTO22, OTO23 STO19, STO20 URO14, URO15 MVO14 SAO20, SAO21 ALO25, ALO26 PAO18, PAO19 CAO22, CAO23

Appendix 1 - Sustainability Appraisal for Policy L5 Climate Change

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
Social								
S1. Achieving a better balance and mix in the housing market	0	0	0	Medium	N/A	N/A		
<u>Comments:</u> Requiring new development, including major new development, where energy savings can be maximised, to minimise its contributions towards and / or mitigate its effects on climate change could restrict the supply of housing where it makes development unviable through the costs associated with design and construction techniques and renewable / low carbon technologies. However, the SHLAA has demonstrated that there are sufficient and developable housing sites in the Borough to meet its housing provision requirements. Trafford's Low Carbon study identified local CO2 emission reduction targets primarily linked to the location of development and how this influences viability. The policy provides flexibility in situations where viability concerns are raised as a barrier to deliverability of new developments (including housing). Such flexibility will ensure that housing schemes of an appropriate mix of types and tenures to meet local need can come forward, whilst also maximising the contribution that new development makes towards reducing CO2 emissions wherever possible. In conclusion, the policy will have a neutral impact on the objective because achieving a better balance and mix in the housing market should not be hindered by the policy.								
S2. Improve accessibility for all to services and facilities	0	0	0	High	N/A	N/A		Other policies in the Core Strategy will ensure that development is directed to more accessible areas within Trafford.
<u>Comments:</u> Unlikely to have any significant effects.								
S3. Enhance transport infrastructure; improve accessibility and quality of life to all communities.	0	0	0	High	N/A	N/A		Other policies in the Core Strategy will ensure that development is directed to more accessible areas within Trafford.
<u>Comments:</u> The policy deals primarily with the role of built development on addressing the effects of climate change and therefore will have no significant effect on the objective of enhancing transport infrastructure.								
S4. Reduce crime, disorder and	0	0	0	High	N / A	N / A		

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
the fear of crime	<u>Comments:</u> Unlikely to have any significant effects.							
S5. Reduce poverty and social exclusion	+	+	+	High	Borough wide	Long term	Improved quality of life Improved health	Other policies in the Core Strategy will ensure that development is well related to, and accessible from, areas of deprivation in Trafford
	<u>Comments:</u> The provision of new homes built to a higher standard of energy efficiency should reduce the incidence of fuel poverty. The cost of energy supplied from greener energy infrastructure could also potentially be lower than traditional fossil fuel energy infrastructure, although there is only limited certainty in relation to this.							
S6. Encourage a sense of community identity and welfare and value diversity, improve equity and equality of opportunity	0	0	0	High	N / A	N / A		
	<u>Comments:</u> Unlikely to have any significant effects.							
S7. Improve qualifications and skills of the resident population	0	0	0	High	N / A	N / A		
	<u>Comments:</u> Unlikely to have any significant effects.							
S8. Improve the health and, inequalities in health of the	+	+	+	High	Borough wide	Long term	Improved quality of life	

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
population	<p><u>Comments:</u></p> <p>The policies seeks to reduce CO2 emissions across the Borough (whilst recognising that the achievable levels of reduction are dependent upon the scale and location of new development). Reducing CO2 emissions will have significant benefits for public health, for example by providing a better living environment for people with respiratory diseases.</p> <p>The policy will also ensure that development that has potential to cause adverse pollution (air, light, water, ground), noise or vibration will not be permitted unless it can be demonstrated that adequate mitigation measures can be put in place. Within the Borough's Air Quality Management Zone developers will be required to adopt measures identified in the Greater Manchester Air Quality Action Plan, to ensure that development would not have an adverse impact on air quality.</p> <p>In conclusion, the policy will have a positive impact on the health of the local population.</p>							
S9. Protect and improve local neighbourhood quality	+	+	+	High	Borough wide	Long term	Improved image of the Borough and increased inward investment	
	<p><u>Comments:</u></p> <p>The policy requires new development to incorporate flood mitigation and management measures and seeks to prevent air, light, water, ground pollution and noise or vibration which can all have a detrimental impact on the quality of life for those affected. Whilst the policy is broadly supportive of commercial or community low carbon, renewable and decentralised energy generation and distribution facilities – this is only where it would have an acceptable impact on the local environment and where suitable mitigation measures are proposed.</p> <p>In conclusion, it is considered that the policy would have a positive impact on the quality of the local environments in Trafford and there are no perceived drawbacks to this objective.</p>							
Environment								
E1. Reduce the effect of traffic on the environment	0	0	0	Medium	Borough wide	Long term		Other policies in the Core Strategy will ensure that development is directed to more accessible areas within Trafford.

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
	<p><u>Comments:</u></p> <p>The policy deals primarily with the role of built development on addressing the effects of climate change and therefore will have no significant effect on the objective of reducing the effect of transport on the environment. This represents a change in the scoring from the previous policy as the revised policy no longer refers to the Code for Sustainable Homes or BREEAM standards (and the provision of adequate facilities for cyclists).</p>							
E2. Protect, enhance and restore open space, biodiversity, flora and fauna, geological and geomorphological features	+	+	+	Medium	Borough Wide	Long term	Improved image of the Borough.	
	<p><u>Comments:</u></p> <p>Adapting to Climate Change in Trafford (October 2009) states that Trafford's parks and open spaces will be significantly affected by the projected changes to the climate in the North West of England. Hotter, drier summers will mean an increased risk of droughts which could damage trees, shrubs and open areas of grass and meadows. Prolonged dry spells also dehydrate topsoil, which means that rain is less easily absorbed when it comes, and this can increase the risk of flooding in extreme weather events which are forecast to increase in frequency. At present, parks and open spaces can absorb heavy rainfall and allow it to soak away without running off onto highways or into residential areas, but this ability will be reduced by the hotter, drier summers which are forecast to occur in the future.</p> <p>The policy requires developments to minimise their contribution towards and / or mitigate its effects of climate change, achieved through measures such as applying sustainable design and construction techniques and / or utilising renewable energy generation technologies. In addition, by preventing development that would result in adverse pollution, the policy is likely to have a positive impact on biodiversity, flora and fauna, geological and geomorphological features.</p> <p>Areas of green open space – provided as part of new developments have the potential to provide carbon sinks – as well as having a beneficial impact on biodiversity. The use of SUDs can also benefit biodiversity. Other measures which the policy would support (seeking a reduction in CO2 emissions) would include new tree planting scheduled based on urban heat island and flooding models (see the Adapting to Climate Change in Trafford Study).</p> <p>In conclusion, climate change is a major threat to Trafford's parks and open spaces and this policy – which seeks to mitigate and reduce the impact of new development on climate change factors – will have a positive impact on this objective. The evidence provided in the policy points to a medium level of confidence in the affects.</p>							
E3. Reduce contributions to climate change	++	++	++	High	Borough wide	Long term	Increased energy security. Reduced energy costs may improve business competitiveness	

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
	<p><u>Comments:</u></p> <p>Policy will lead to the construction of more energy efficient buildings and will increase the proportion of energy that is generated from low carbon or renewable energy sources. It also encourages the development of commercial and community low carbon, renewable or decentralised energy generation.</p>							
E4. Reduce impact of climate change	++	++	++	High	Borough wide	Long term	Integrating SUDs into new development can enhance biodiversity	
	<p><u>Comments:</u></p> <p>Organisations such as the Met Office, UK Climate Impacts Programme and the Tyndall Centre for Climate Research focus on three main themes for the UK relating to climate change:-</p> <ul style="list-style-type: none"> • Warmer, wetter winters with increased rainfall and flooding. • Hotter, drier summers with increasing dry spells and drought. • More extreme weather events such as storms, hurricanes and flash floods. <p>The Greater Manchester Strategic Flood Risk Assessment has identified parts of Trafford as being a High Risk area for future flooding. This policy requires developers to incorporate flood mitigation and management measures appropriate to the use and location. Developers will be required to improve water efficiency and reduce surface water run-off through the use of appropriate measures such as rain water harvesting, water recycling and other Sustainable Drainage Systems (SUDS) approach to the various parts of the Borough as mapped in the SFRA.</p> <p>There is also flexibility to negotiate on a site-by-site basis about developments where viability concerns are raised as a potential impediment to growth.</p> <p>In conclusion, the policy will have a significant positive impact on this objective.</p>							
E5. Reduce the environmental impacts of consumption and	+	++	++	Medium	Borough wide	Long term		

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
production	<p><u>Comments:</u></p> <p>The policy requires new developments to maximise its sustainability through improved environmental performance of buildings, lower carbon emissions and renewable or decentralised energy generation. The increased generation of energy from renewable sources should decrease the need to extract, transport and consume fossil fuels.</p> <p>In conclusion, the policy will have a positive impact on this objective. The effects are stepped up in the medium and longer term in anticipation of the increasing requirements of national policy on energy conservation set out in the policy's justification.</p>							
E6. Conserve land resources and reduce land contamination	0	0	0	High	N / A	N / A		
	<p><u>Comments:</u></p> <p>Unlikely to have any significant effects.</p>							
E7. Protect and improve water quality	+	+	+	High	Borough wide	Long term	Positive secondary benefits for biodiversity.	
	<p><u>Comments:</u></p> <p>The policy requires developers to improve water efficiency and reduce surface water run-off through the use of appropriate measures such as rain water harvesting, water recycling and other Sustainable Drainage Systems (SUDs) appropriate to the various parts of the Borough as mapped in the SFRA.</p> <p>The policy also states that development that has the potential to cause adverse pollution (including of water) will not be permitted unless it can be demonstrated that adequate mitigation measures can be put in place.</p> <p>In conclusion, the policy will have a positive impact on this objective.</p>							
E8. Protect and improve air quality	+	+	+	High	Borough wide	Long term	Improved quality of life, particularly for those who suffer from respiratory illnesses	

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
	<p><u>Comments:</u></p> <p>The policy states that development that has potential to cause air pollution will not be permitted unless it can be demonstrated that adequate mitigation measures can be put in place. Within the Borough's Air Quality Management Zones developers will be required to adopt measures identified in the Greater Manchester Air Quality Action Plan, to ensure that their development would not have an adverse impact on the air quality.</p> <p>Evidence to support the policy – the AGMA decentralised energy study – provides operational guidance on appropriate low carbon solutions in different areas of the Borough, including AQMZs. Air quality is a potential locational and operational constraint. Biomass plants contribute to nitrogen dioxide and particulate emissions. Recent modelling by AEA Technology for the London Councils has suggested that biomass plant in Air Quality Management Areas may require closer regulation – particularly near major roads. In particular, the specification of combustion systems, pollution control equipment and stack height are likely to require specific attention.</p> <p>In conclusion, the policy will have a positive impact on this objective.</p>							
E9. Protect and enhance the diversity and distinctiveness of landscape and townscape character and cultural facilities	0	0	0	High	N / A	N / A		
	<p><u>Comments:</u></p> <p>Unlikely to have any significant effects. Supporting guidance on sustainable design and construction techniques and / or utilising renewable energy generation technologies has been prepared to support the policy. This will help to ensure that CO2 reduction is built into the design and construction in a manner which protects and enhances diversity and distinctiveness of the landscape / townscape.</p> <p>L5.13 ensures that whilst promoting commercial and community low carbon, renewable and decentralised energy generation and distribution facilities, that the development of such infrastructure will not be allowed where it would have an unacceptable impact on the local environment and where suitable mitigation measures are not proposed.</p>							
Economic								
EC1. Enhance Trafford's high performance and sustainable economy to provide a powerful contribution to regional growth	+	++	++	Medium	Borough wide	Long term	Increased inward investment Reduced poverty and deprivation	Other policies in the Core Strategy will ensure that sites are brought forward to ensure an appropriate supply of sites and premises.

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
	<p><u>Comments:</u></p> <p>The policy will improve the sustainability of the economy by providing more energy efficient premises for businesses. This could reduce operating costs for businesses and improve their competitiveness. In addition, the policy may also lead to the creation of new employment opportunities in the design and production of renewable energy generation technologies and infrastructure.</p> <p>The deliverability of the CO2 reduction targets and the need to consider their effect on viability has been considered, which will ensure that the pace of new development envisaged to make a powerful contribution to regional growth will not be impeded. There is also flexibility to negotiate on a site-by-site basis where viability concerns are raised as a potential impediment to growth.</p> <p>In conclusion, the policy will have a positive impact on this objective.</p>							
EC2. Reducing disparities by releasing the potential of all residents particularly in areas of disadvantage	+	+	+	Low	Borough wide	Long term		
	<p><u>Comments:</u></p> <p>The policy will improve the sustainability of the economy by providing more energy efficient premises for businesses. This could reduce operating costs for businesses and improve their competitiveness. In addition, the policy may also lead to the creation of new employment opportunities in the design and production of renewable energy generation technologies and infrastructure.</p> <p>In conclusion, the policy will have a positive impact on this objective.</p>							
EC3. Enhance Trafford's image as a business and tourism destination	+	+	+	Medium	Borough Wide	Long Term		
	<p><u>Comments:</u></p> <p>The policy encourages the development of low carbon, renewable or decentralised energy generation infrastructure, which may improve Trafford's image as a green energy industry/business area.</p> <p>In conclusion, the policy will have a positive impact on this objective.</p>							
EC4. Encourage the long term sustainability of Trafford's Town	+	+	+	High	Borough wide	Long term	Increased inward investment	

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
Centres	<p><u>Comments:</u></p> <p>The policy requires new development to incorporate appropriate flood mitigation and management measures and seeks to prevent air, light, water, ground and noise pollution. Local CO2 emission reduction targets have been set for the Low Carbon Growth Areas (LCGAs) and outside LCGAs. Altonham Town Centre is included as a LCGA where the policy sets a reduction target of 40% from a baseline part L Building Regulations 2006. Other town centres outside the LCGAs have a target of 30% reduction. The achievement of these targets will have a drastic impact on the air quality.</p> <p>The AGMA decentralised energy study (2010) specifically identified a number of strategic projects that would become priority investments. Of relevance to Trafford's town centres was the recommendation for the development of strategic heating projects in and around thirty four local centres, anchored by public buildings and based on 1-5 MWe scale natural gas or bio fuel CHP technology. Whilst these specific projects may not be implemented in Trafford, they do provide the private sector with examples of ways to address this issue and provide a high level of confidence in the effects.</p> <p>In conclusion, the policy will have a positive impact on this objective.</p>							
EC5. Improve the social and environmental performance of the economy	+	+	+	High	Borough wide	Long term		
	<p><u>Comments:</u></p> <p>The policy would reduce energy consumption for businesses. It would also direct development to areas that are not susceptible to flooding, limit adverse pollution and encourage the development of low carbon and renewable energy generation infrastructure.</p> <p>In conclusion, the policy will have a positive impact on this objective.</p>							
Sustainability Summary								

L5: Climate Change								
SA Objective	Timescale			Nature of Effect				Mitigation
	0 – 5 years	5 – 10 years	10+ years	Certainty	Scale	Permanence	Secondary, cumulative, synergistic	
<p>Unsurprisingly, Policy L5 Climate Change has the potential to deliver a number of significant sustainability benefits, including reducing both contributions to and the effects of climate change and reducing the environmental impacts of consumption and production. It has positive effects on a number of other objectives.</p> <p>It is anticipated that the policy would not have any negative effects on the sustainability objectives. Evidence supporting the policy demonstrates that the CO2 reduction targets are deliverable and will not impact upon the supply or pace of housing delivery set out in the Council's housing trajectory. As a result, there is a greater level of certainty that the costs of incorporating the necessary features to meet these standards will not have a significant impact on the Council's objective of achieving a balanced housing market. Similarly, objectives relating to Trafford's high performance economy can be achieved as there is also flexibility to negotiate on a site-by-site basis where viability concerns are raised as a potential impediment to growth.</p> <p>The policy would not have an uncertain impact on any of the sustainability objectives. The policy is unlikely to have any significant effects in relation to the following objectives: improving the accessibility for all to services and facilities, encouraging a sense of community identity and welfare, improving qualification and skills, conserving land resources, protecting and enhancing landscape and townscape character. Other policies within the Core Strategy are intended to support the achievement of these SA objectives.</p>								

Key for effects

++ major positive; + minor positive; 0 neutral; – minor negative; – – major negative; ? uncertain