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BY POST AND EMAIL

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24th October 2011

Dear Ms Parker,

**TRAFFORD COUNCIL CORE STRATEGY EXAMINATION
CONSULTATION ON SUGGESTED CHANGES SCHEDULE – LIVING DOCUMENT (CD 12.4)**

We write on behalf of SEGRO, who own a number of sites and land within Trafford Park, and whom wish to respond to the above consultation. We set out our representations below with reference to the Suggested Change reference numbers.

Suggested Change Reference S300.41

We support the amendments to paragraphs 2.11 – 2.15 which seek to clarify the boundaries within Trafford for the Inner Areas and Regional Centre and welcome the addition of the boundary lines on the Inset Proposals Map included at Appendix 2. We believe that this will provide clarity as to the type of uses and focus of development that is considered acceptable in each which is welcomed.

Suggested Change Reference S300.46

The change to Policy L5 to remove the requirement for a 40% reduction in CO2 emissions for new developments located in three Low Carbon Growth Areas (LCGA), of which Trafford Park is one, is supported. This requirement to achieve a significant reduction in CO2 emissions over and above both national standards and current Building Regulations would have a serious impact on SEGRO's business and the ability to deliver new development within Trafford Park.

Notwithstanding the deletion of the 40% requirement, the Council are now seeking to apply a CO2 reduction target of up to 15% reduction above current Building Regulations in LCGAs. The Council consider that major developments have the potential to deliver higher local CO2 emissions than the rest of the Borough. We note that this is an aspiration rather than a specific requirement and the Council acknowledge in paragraph L5.6 that:

“This is subject to the new energy generation infrastructure and programmes in these locations being delivered within the plan period.”

Paragraph L5.7 goes on to state that:



“These higher CO2 reduction targets will be applicable where the infrastructure exists at the time that the relevant planning application is determined.”

Clearly the provision of ‘new energy generation infrastructure’ is key in the Council seeking new developments to achieve up to a 15% reduction in CO2 emissions over and above current Building Regulations. Paragraph L5.7 confirms that only where the infrastructure exists should these higher targets be applied, which is welcomed. The policy as drafted therefore provides a degree of flexibility to developers, once the requisite infrastructure is in place, to decide whether and by how much above current Building Regulations they wish to aim to reduce CO2 emissions up to the 15% target specified. The Policy can thus be read that until the ‘new energy generation infrastructure’ is in place any new development would only need to achieve the requisite standards set out in the Building Regulations.

To strengthen the policy further we would propose the additional text (underlined) to paragraph L5.7:

“These higher CO2 reduction targets will only be applicable where the infrastructure, required as detailed in paragraph L5.6 above exists at the time that the relevant planning application is determined.”

We welcome the deletion of paragraphs L5.14 and L5.15 as these sought to link the payment of financial contributions when the proposed CO2 reductions were not met. Notwithstanding the deletion of these two paragraphs we feel the incorporation of measures to reduce CO2 emissions could affect viability particularly when the type of use and the location of the use are taken into consideration. We therefore feel that there should be recognition within the Plan that there may be instances when seeking higher levels of reductions in CO2 emissions may not be feasible and would result in developments becoming unviable. We therefore propose the following wording to replace paragraphs L5.14 and L5.15.

“The Council expects that all new major development will deliver the required CO2 emission reductions, however in those circumstances where it can be demonstrated that these cannot be feasibly delivered without having an adverse impact on the viability of the development, a lower level will be accepted by the Council.”

Suggested Change Reference S300.120

We support the deletion of the word “some” from paragraph W1.4 of Policy W1. By deleting it, there is no restriction on the amount of offices that could now be provided in locations identified including Trafford Park Core. We also support the inclusion of paragraph 18.8 which provides the justification for the identification of other foci for office developments outside of the town centre.

In the meantime if you require any clarification of this matter please do not hesitate to contact either Mark Sitch or myself.

Yours sincerely,

JOHN PEARCE
Senior Planner

Cc Steve Lord - SEGRO