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Dear Ms Parker

TRAFFORD COUNCIL CORE STRATEGY: SUGGESTED FURTHER CHANGES TO THE PUBLICATION CORE STRATEGY

You have invited representations on the further changes to the Trafford Core Strategy. The HBF would like to submit the following statements.

Schedule of Suggested Further Changes to the Publication Core Strategy

Ref S300.37

We object to the proposed change as contrary to national policy as set out in PPS3.

Paragraph 29 of PPS3 requires local planning authorities to carry out an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed and the likely impact upon overall levels of housing delivery.

The Council has not adequately demonstrated that its affordable housing requirement is deliverable in accordance with the requirement in paragraph 29 of PPS3. The Council is still awaiting the outcome of its Affordable Housing Economic Viability Assessment and until this is completed its affordable housing policy cannot be regarded as sound.

Relying on stand alone viability assessments to accompany each application is onerous, expensive and out of step with the Government's *Planning for*

Growth agenda which is to relieve developers from burdensome regulation (see point (v) in the Written Ministerial Statement: Planning for Growth).

The Council should be able to demonstrate that the policies in its core strategy are justified and deliverable in most instances and not rely on site specific viability assessments to circumvent this problem. Open book viability assessments should be the exception not the rule. The need for open book assessments suggests that the 40% affordable housing target is undeliverable in many circumstances.

We also object to the delegation of such matters to a Planning Obligations SPD. This is contrary to paragraph 6.1 of PPS12 which requires that important matters of policy should be addressed in the DPD.

Further consultation on policy L5 – Climate Change

The policy is unsound. It is unjustified and is not in conformity with national policy as set out in the *Planning and Climate Change Supplement to PPS1*. The policy should be deleted.

The revised targets as set out in table L5.1 are still not justified. The *Planning and Climate Change Supplement to PPS1* clearly states in paragraph 31 that any policy that attempts to anticipate levels of sustainability in advance of those set out nationally must be evidence-based, demonstrating the local circumstances that warrant and allow for any departure from the stepped national programme. The Council, through its Sustainability Appraisal has still not presented a compelling case justifying why it is able to depart from the national programme.

In its Sustainability Appraisal the Council argues that the targets it will introduce via table L5.1 will be applied flexibly so that regard is given for site viability. Flexibility in the application of planning policy is not the same thing as evidence that justifies the accelerated targets in the Core Strategy. Rather applying policy flexibly is a planning technique that is used to address exceptional circumstances where viability is a problem. Policy should be sound and deliverable in most instances having been based upon good evidence. The soundness of policy cannot be based on viability assessments being undertaken on each and every occasion.

Paragraph L5.11 - The policy is also too prescriptive in how these carbon reductions will be achieved. This is contrary to national policy which will leave this to the discretion of developers. See recommendation 8 of the Zero Carbon Hub's report to Government (*Carbon Compliance: setting an appropriate limit for zero carbon homes: findings and recommendations*, Zero Carbon Hub, February 2011).

Paragraph L5.12 – The policy is contrary to emerging national policy by prescribing an approach to allowable solutions. This is a matter to be left to the discretion of developers. See recommendation 8 of the Zero Carbon Hub's report to Government (*Carbon Compliance: setting an appropriate limit*

for zero carbon homes: findings and recommendations, Zero Carbon Hub, February 2011).

The policy is unnecessary as all new development will have to comply with the Building Regulations and the Government's stepped programme to zero carbon homes from 2016. These are mandatory requirements. The Government's Part L requirements are already world beating standards. Requiring developments to exceed these national targets without the evidence to justify this, would be injurious to housing delivery and contrary to the Government's growth agenda. We recommend that the policy is deleted.

Yours sincerely

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