



TOWN AND COUNTRY PLANNING ACTS

APPEAL BY:-

MCCARTHY AND STONE RETIREMENT LIFESTYLES LTD

PLANNING PERMISSION FOR DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF A PART 3 STOREY PART 4 STOREY BUILDING COMPRISING 25NO. RETIREMENT FLATS, CLOSURE OF BOTH EXISTING VEHICULAR ACCESSES AND FORMATION OF NEW VEHICULAR ACCESS ONTO OAKFIELD WITH ASSOCIATED LANDSCAPING AND CARPARKING.

ADDRESS:

35 OAKFIELD SALE M33 6NB

PLANNING INSPECTORATE APPEAL REFERENCE

APP/Q4245/W/23/3325034

LOCAL PLANNING AUTHORITY REFERENCE:

109745/FUL/22

PROOF OF EVIDENCE OF ELISABETH LEWIS

BA (HONS) DIP TP (CONSERVATION) MRTPI

ON BEHALF OF TRAFFORD COUNCIL

OCTOBER 2023

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1.0 Qualifications and Experience

1.1 I am currently employed at Trafford Borough Council as the Heritage & Urban Design Manager within the Planning Service. I have over 20 years' experience working in the heritage sector, 17 years of those in the role of a Local Authority Conservation Officer within Greater Manchester. I have been employed at Trafford Council for 12 years as a Heritage Development Officer and I have occupied my current post since July 2022.

1.2 I manage the Heritage & Urban Design Team and provide specialist heritage and design advice to a wide range of stakeholders within the public and private sectors. I have substantial experience of analysing the significance of a wide range of designated and non-designated heritage assets and evaluating the impact of development on significance in accordance with legislative controls, national and local policy and other relevant guidance. I have extensive knowledge of heritage assets cross the borough of Trafford and understand how local character and distinctiveness facilitate creative design responses and influence place shaping.

1.3 Additionally, I provide strategic engagement for major schemes such town centre masterplans; area action plans; sites for land allocations; renewable energy schemes; enabling developments; national infrastructure projects and contribute to policy writing.

1.4 Recent achievements include; Borough wide Trafford Design Code funded by DLUHC under the Design Code Pathfinder Programme; Trafford Local Heritage List funded by MHCLG, supported by Historic England and managed by GMAAS & University of Salford; contribution to the Civic Quarter Area Action Plan; Trafford Wharfside; Trafford Waters, Stretford Town Centre masterplans, Places for Everyone historic environment assessments for site allocations; New Carrington & Timperley Wedge policies and the Council's heritage lead for HS2 Phase 2B.

1.5 I previously held the position of Inspector of Historic Buildings & Areas at Historic England for four years. I provided expert technical advice and policy guidance on heritage related planning applications, major development proposals and infrastructure projects to local planning authorities, government bodies and the public, covering the Yorkshire & North East regions. I contributed to a number of Design Review Panels and advised on significant conservation led regeneration projects such as Sheffield Retail Quarter; Phase 2 redevelopment of Park Hill & The Piece Hall, G1, Halifax.

1.6 I am also an active member of the Greater Manchester Conservation Officers Group, which includes representatives from Historic England and the Greater Manchester Archaeological Advisory Service (GMAAS).

1.7 I have a BA (Hons) in Town and Country Planning and a Postgraduate Diploma in Building Conservation. I have been a member of the Royal Town Planning Institute since 2004.

1.8 The evidence which I have prepared and provide for this appeal reference APP/Q4245/W/23/3325034 in this proof of evidence is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

2.0 Scope of Evidence

2.1 The appeal subject of this Proof of Evidence relates to a full planning application submitted by McCarthy and Stone Retirement Lifestyles Ltd relating to 35 Oakfield, Sale.

2.2 My evidence relates to an appeal by McCarthy and Stone Retirement Lifestyles Ltd against the refusal of planning application LPA ref: 109745/FUL/22.

2.3 In my evidence I shall set out the Council's case in relation to built heritage referring to the following:-

- Planning legislation, policy and guidance
- Appeal site description and surroundings
- Significance of affected non-designated heritage asset
- Proposed development & impact on significance
- The Council's conclusion that the appeal should be dismissed

2.4 The Heritage & Urban Design Team was consulted on the planning application on 8th March 2023. In my capacity as Heritage & Urban Design Manager, I provided a written response on heritage matters on 27th April 2023¹. The application was refused under delegated powers on 5th May 2023. This included the following reason for refusal relating to built heritage:-

Refusal Reason 1

The proposed development would lead to the total loss of a non-designated heritage asset and its setting (35 Oakfield) which would have an adverse and irreversible impact on its significance and as such its demolition would result in unacceptable harm to the character and appearance to the

¹ Appendix A

surrounding area. On balance, the benefits of the scheme would not outweigh the severe harm that would be caused to this non-designated heritage asset, contrary to Policy R1 of the Trafford Core Strategy and paragraph 203 of the National Planning Policy Framework. The application also fails to avoid or minimise the conflict between the asset's conservation and the proposal, contrary to paragraph 195 of the National Planning Policy Framework.

2.5 This evidence is presented on behalf of Trafford Council and will examine the significance of the non-designated heritage asset and its setting and the impact of the proposed development on that significance. It should be read in conjunction with the proof prepared on behalf of the Council by Mr Cormac McGowan, who will undertake the overall planning balance judgement required by para 203; NPPF as set out in refusal Reason 1.

3.0 Relevant Legislation, Local and National Planning Policies & guidance

3.1 An overview of the most relevant legislation, policies and guidance relevant to the Inquiry, is provided in Appendix B. It is this policy context which underpin the views expressed in this proof of evidence. Reference is also made in Section entitled 'Analysis of Main Issues' including other documents where relevant and a summary is provided below.

3.2 DEVELOPMENT PLAN

The Trafford Core Strategy 2012

S08 -Protect the historic built environment

3.3 Policy R1 – Historic Environment [R1.1, R1.2, R1.5 & R1.6].

3.3 Places For Everyone (Pfe)

9.11 Heritage

Policy JP-P2 Heritage

3.4 NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

Paragraphs 8, 152, 189, 192 – 197 & 203-205.

Annex 2 (Glossary)

3.5 NATIONAL PLANNING PRACTICE GUIDANCE (NPPG)

006 Reference ID: 18a-006-20190723

008 Reference ID: 18a-008-20190723

009 Reference ID: 18a-009-20140306 PPG.

018 Reference ID: 18a-018-20190723

039 Reference ID: 18a-039-20190723

040 Reference ID: 18a-040-20190723

3.6 Trafford Historic Landscape Characterisation Report

In accordance with para 192 of the NPPF, Policy R1 & Policy JP-P2 Heritage, the Report assists in providing up-to-date evidence about the historic environment in the Borough and can be utilised to assess the significance of heritage assets and the contribution they make to their environment.

3.7 Extracts from further relevant documents such as the **Trafford Draft Local Heritage List, Trafford Design Code & Relevant Case Law & Appeal Decisions** are included in Appendices B & I.

4.0 Main Issues

I will consider the following;

- i) Whether 35 Oakfield & its setting has sufficient significance to merit consideration in determining the application.
- ii) Whether the proposed development will cause unacceptable harm to the significance of the non-designated heritage asset and the character and appearance of the surrounding area.
- iii) Whether the Appellant has sought to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

5.0 Analysis of Main Issues

i) *Whether 35 Oakfield and its setting has sufficient significance to merit consideration in determining the application.*

5.1 Site Description & Affected Heritage Asset(s)

The appeal site comprises of a detached mid Victorian Villa, a number of ancillary buildings, car parking provision and a large communal garden located on the south west side of Oakfield. The main building is currently occupied and used for residential purposes comprising nine flats with an additional five flats in a detached two storey building. The Officer's Committee Report² provides a detailed description of the appeal site.

5.2 I assessed the heritage significance of 35 Oakfield and the wider site in 2021 in response to a pre-application enquiry and confirmed the building and its setting as a non-designated heritage asset³ for the following reasons;

5.3 35 Oakfield exhibits moderate significance for its architectural, and historic (illustrative) values. Despite some alteration, the historic plan form is still legible and the villa retains its integrity. There is a still good level of architectural integrity with a well-balanced composition, palette of traditional materials and distinctive architectural features. The villa, its spacious setting and historic boundary walls make an important contribution to the street scene and sense of place. The villa and its setting is one of the last surviving early villas on Oakfield. The building illustrates the historic development of Sale as an early suburban settlement. There is coherence with the adjoining Forest Prep School [formerly Ellesmere], St Marys C of E to the west and

² CD-A63

³ Pre-application enquiry; Appendix A

several other substantial dwellings of a similar period along Oakfield which amplify this significance and experience of one another.

5.4 In the absence of an adopted local list, 35 Oakfield was “considered to be a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes... assets identified by the local planning authority (including local listing)”⁴. The PPG offers further guidance on this matter at para 040; “There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence”. It is not therefore a requirement of the NPPF nor the PPG to keep a local list in order to identify heritage assets nor is the process of identifying such assets confined to a local list or other repository.

5.5 The PPG continues at para 040; “In some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations”. This clarifies that local planning authorities can identify non-designated heritage assets as part of the decision making process and planning judgement is required to determine whether a building or site does in fact have a degree of heritage significance. Historic England’s Advice Note 7⁵ reiterates this at para 27 stating;

⁴ CD-C1

⁵ CD-F7

“Non-designated heritage assets may also be identified by the local planning authority during the decision making process on planning applications, as evidence emerges”. The process of identifying non-designated heritage assets during the decision making process was also accepted by the Inspector in Appeal Ref: APP/Q4245/W/22/3296154 relating to the Pelican Inn and Motel, Altrincham and Appeal Ref: APP/A3010/A/11/2164722 at Woodfield House, Bawtry⁶.

5.6 Following the validation of the planning application on 6th February 2023, the Appellant was made aware by Mr McGowan on 9th February 2023 that 35 Oakfield is considered to be a non-designated heritage asset. The Appellant instructed a heritage assessment to be undertaken and a Statement of Heritage Significance [undated] by Beardmore Urban was submitted to the Council on 2nd March 2023.

5.7 Given the intervening distance, I consider the appeal site does not contribute to the setting or significance of any designated heritage assets. This includes Moss Cottage; the Church of St Mary or Tatton Cinema, all Grade II listed buildings. I also confirm that the appeal site is not located within a conservation area nor lies within the setting of such a designation.

5.8 For clarification, Moss Cottage, 1, Kenilworth Road [UID: 1356528] Grade II listed, lies approx. 815m metres to the west of the appeal site. The Church Of Saint Mary Magdalene, Harboro Road [UID: 1067895], Grade II listed, lies approx. 655 metres to the west and Tatton Cinema, Washway Road, Sale [UID:1084309], Grade II listed lies approx. 236m to the north east of the appeal site.

⁶ Appendix B

5.9 Trafford's Local Heritage List

Trafford's Core Strategy sets out its intention as the local planning authority to formulate and publish a local list. The Executive Member for Housing and Regeneration approved a recommendation to prepare a local list as a Supplementary Planning Document [SPD] in 2019⁷ which was then delayed by the pandemic.

5.10 In January 2021, Trafford Council was selected as a pilot area as part of the Greater Manchester Local Heritage List for The Local List Campaign funded by the Ministry of Housing, Communities & Local Government (MHCLG); the project is also supported by Historic England and managed by GMAAS & the University of Salford. Trafford Council has been the lead local authority on this project which has provided an opportunity to train officers and members in the identification of non-designated heritage assets and improve the recognition and importance of such assets in the Council's decision making.

5.11 35 Oakfield has been nominated by GMAAS for inclusion on Trafford's draft Local Heritage List and was added to the draft Local List on 6th May 2023⁸ [asset 13960] following agreement at the validation panel on 18th April 2023 . The following justification was provided for inclusion on the draft Local List;

5.12 *Whilst no date of construction for 35 Oakfield has been determined, it is shown on the Ordnance Survey 1st Edition 1:2500 map of 1877 and was seemingly amongst the first wave of residential villas to be erected in the area, marking the important transformation of the area from an agricultural landscape to a desirable residential suburb to Manchester. It is also one of*

⁷ CD-F16

⁸ <https://local-heritage-list.org.uk/greater-manchester/asset/13960>

the oldest surviving buildings on Oakfield, with most of the other villas shown on the 1877 map having been either replaced or subject to considerable remodelling with a resultant loss of significance. Whilst there have been various extensions and alterations to the building, the front elevation seems to be largely unchanged. This is asymmetrical using full-height bays on either side of the entrance porch, with the southern part having its second-floor windows the full width of the bay under a hipped roof; this part features a very large area of window openings for a building of this age. Both gables use red-brown fish scale vertical tile hanging⁹.

5.13 Newstead, [no. 50] & Blythewood, [no. 67] both on Oakfield have also been nominated¹⁰ for the Local List. However, there are currently no entries for other 19th century villas such as Ellesmere House [no. 27], Meadowcroft, [nos. 59& 61] or Wye Bank [no. 40]¹¹ which are similar in age, appearance and form and illustrate the development of Oakfield and Ashton upon Mersey during this period. An initial assessment suggests these buildings and sites would also meet the draft Local Heritage List criteria¹².

5.14 During a period of public consultation at the end of 2021, nominations for the draft Local Heritage List were made to GMAAS. The nominations were then reviewed against a set of criteria by a validation panel of representatives with heritage expertise from local civic societies, the Victorian Society, University of Salford, National Trust & GMAAS. Approvals are then added to the GM Local List¹³ which can be viewed on a publicly accessible digital platform.

5.15 The final draft local list will then be the subject of a second round of public consultation before adoption as a SPD by the Council.

⁹ <https://local-heritage-list.org.uk/greater-manchester/asset/13960>

¹⁰ <https://local-heritage-list.org.uk/greater-manchester>

¹¹ Appendix J

¹² Appendix I

¹³ <https://local-heritage-list.org.uk/greater-manchester>

5.16 Consultations

GMAAS was consulted on the planning application on 8th March 2023 and responded on 28th March 2023¹⁴. GMAAS considers the building to constitute a non-designated heritage asset, noting the building “has some significance as an increasingly rare physical reminder of the area’s residential development during the second half of the 19th century, presumably following the completion of the railway to Sale”. GMAAS has also confirmed the building will be entered on the Greater Manchester Historic Environment Record.

5.17 Sale Civic Society also responded to the application on 11th April 2023, strongly objecting to the demolition of “this significant property which adds much to the character of the surrounding area”. In summary the Civic Society confirmed 35 Oakfield as a large substantial merchants house dating back to the 1860s. Of this design, size and character this Victorian Villa is now becoming quite unique in Sale. It is concluded; “The loss to our local heritage cannot be over stated, the proposed demolition of Oakfield Villa, is of great and wide concern in Sale when one considers (as the Planning Committee must), the number of substantial Victorian Houses which have been lost in Sale, over the last few years alone. This continual loss to the Town’s heritage, is destroying the very thing which makes Sale the place it is”¹⁵.

5.18 Assessment of significance of the affected heritage asset(s) & selection criteria

The starting point for the assessment of significance of a heritage asset is provided in NPPF Annex 2 Glossary. This defines significance as the *value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also*

¹⁴ CD-A63

¹⁵ CD-A63

from its setting. The significance of a heritage asset is the sum of these values and as required by para 040 NPPG, “...it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence”.

5.19 Para 006 PPG provides greater clarity regarding these values which also encompass the values aesthetic, historical, evidential and communal as set out in the English Heritage document “Conservation Principles: policies & guidance for the sustainable management of the historic environment” [2008] which pre-dates the NPPF¹⁶. These values are discussed at a more philosophical level in the document and can assist in deciding the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society. A variety of terms are used in designation criteria (for example, outstanding universal value for World Heritage Sites, national importance for scheduled monuments and special interest for listed buildings and conservation areas), but all of these refer to a heritage asset’s significance¹⁷. There are also various value systems which have been published to assess and quantify significance.

5.20 Annex 2 NPPF also defines the setting of a heritage asset as “*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*”.

¹⁶ CD-F10

¹⁷ CD-F9

5.21 In assessing the significance of 35 Oakfield and its setting, I will refer to the broader values of aesthetic, historical, evidential and communal alongside the definitions provided in the NPPF which are as follows;

5.22 Archaeological interest: As defined in Annex 2, the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

5.23 Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.

5.24 Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

5.25 Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting is very important

5.26 Heritage assets may be affected by direct physical change or by change in their setting. Historic England advocate the importance of assessing the nature, extent and level of

significance of an affected heritage asset and the contribution of its setting¹⁸ in order to understand the potential impact and acceptability of development proposals¹⁹.

5.27 The assessment of significance should be proportionate to the asset's importance²⁰. This should be undertaken by the applicant as an impartial analysis, rather than an advocacy document, which seeks to justify a scheme which has already been designed²¹.

5.28 In the absence of a national methodology to assess the levels of significance and impact on heritage assets, Part 4 of British Standard 7913:2013 Guide to the Conservation of Historic Buildings²² is relied upon. Historic England advocate the use of this Guide and provide a general approach in their Good Practice Advice in Planning Note 2 (Managing Significance in Decision-Taking in the Historic Environment –published 2015)²³. Nevertheless, Historic England also stress that whilst sensitivity matrices and scoring systems may assist to some degree, they should be seen primarily as material supporting a “clearly-expressed and non-technical narrative argument that sets out what matters and why”.

5.29 Local planning authorities are also required to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise²⁴.

¹⁸ CD-F8 para 7-10

¹⁹ CD-C2 para. 009

²⁰ CD-C1 para 194

²¹ CD-F8 para 10

²² Appendix C

²³ CD-F9 Paras 7-10

²⁴ CD-C1

5.30 35 Oakfield and its setting have also been assessed against the overarching statement for Trafford which sets out local historic distinctiveness, including suburban villas, and the draft criteria of the Greater Manchester Local List project. This criteria is based on the Historic England document “Local Heritage Listing: Identifying & Conserving Local Heritage”²⁵. The asset has to reflect at least one of the following criteria to qualify for Trafford’s Local List²⁶;

Age; Asset Type; Buildings; Parks & Gardens; Commemorative Monuments, Artwork, Landmarks and Way finders; Other Sites, Structures & Landscapes; Rarity; Architectural and Artistic Interest; Group Value; Archaeological Interest; Historic Interest; Landmark Status ; Social and Communal Value. An assessment against this criteria is provided in the table in Appendix I.

5.31 In order to assess the significance of the appeal site, a desk based assessment, archival research, on-site evaluation and map regression have been undertaken. This assessment has been informed by the guidance provided in Historic England Advice Note 2: Managing Significance in Decision Taking in the Historic Environment [2015]; Historic England Advice Note 12: Statements of Heritage Significance [2019]; Conservation Principles: policies & guidance for the sustainable management of the historic environment [2008] and Part 4 of British Standard 7913:2013 Guide to the Conservation of Historic Buildings.

5.32 History of Ashton upon Mersey²⁷

Sale and Ashton upon Mersey owe much of their character and development to the suburban growth of the 19th and 20th centuries following the introduction of various transport systems

²⁵ CD-F7

²⁶ Appendix I

²⁷ Appendix K

in the 18th & 19th centuries. The construction of the Manchester, South Junction and Altrincham Railway [1849] created new suburbs for the middle class of merchants and businessmen of Manchester with the construction of villa-type houses centred around railway stations. The MSJ&AR line is one of the country's earliest suburban railways and was the first in Manchester. Residences were constructed from slate, sandstone, terracotta, red brick and the distinctive Bowdon 'white brick' set in spacious gardens with low boundary brick or stone walls

5.33 The construction MSJ & AR had a significant impact on the growth and development of Sale and Ashton in the mid-19th century and the growth of both areas became inter-related. Most construction occurred on previously undeveloped agricultural land. Oakfield was an early example of this and within walking distance of the Station.

5.34 History of the Appeal Site, Oakfield & Map Regression²⁸

A summary of historic map regression of the Appeal Site is provided below and in more detail in Appendix K.

5.35 Historic mapping indicates 35 Oakfield had been established by 1876 and based on the regularity and spacing of neighbouring the plots and the 1871 census it is likely the dwelling was built during the period 1850s-60s. The villa is shown as a large detached building with a separate stable block adjacent to the north west boundary. The footprint suggests a large outrigger to the rear [south west] elevation set in from the south east elevation. Later mapping²⁹ shows the outrigger as a continuation of the south east elevation and in 1908 clearly

²⁸ Appendix K

²⁹ Appendix F; Figures 8 & 9

joining a glass house at the southern corner. It is also noted that the gables to the front elevation are not clearly defined until this period³⁰.

5.36 The OS map 1908³¹ shows an offset entrance to the northern corner of the site with a circular pathway leading to the glasshouse. This suggests the garden was established fronting Oakfield and to the south east. It is not clear from historic mapping whether or not all of the land to the south west was incorporated into the garden to the rear. By the mid 20th century, Ashlands had been extended to the west of Oakfield. This includes the establishment of nos 41 & 48 Ashland's on land to the rear of 35 Oakfield. The rear boundary was then moved north east, but still retained a large garden as it appears today.

5.37 By the late 20th century, 35 Oakfield had been subdivided into a hotel with an attached three storey extension approved in 1974 and a single storey extension and a covered walkway linking to a detached two storey building in 1980. An additional vehicular access was also created at the eastern corner of the appeal site.

5.38 In contrast to the west side of Oakfield, the east side remained relatively undeveloped until 20th century. By 1897, Wyebank, no.40 Oakfield & no.50 Newstead had been erected. The latter designed in 1890 by architect Robert Cartwright Whitelegg. By the late 20th century, a number of infill and replacement developments occurred eroding some of the historic character and on the west side of Oakfield, several 19th villas were also replaced during this period including Lyndon with Millbrooke Court; Offendene with Rusland Court in 1980; Aysgarth with Walnut Grove in 1993; St Margaret's with Oakfield Mews and Kelvindale with Brentwood in 1974. Dunedin was also replaced in the late 20th century by a RAF club which

³⁰ Appendix F; Figure 9

³¹ Appendix F; Figure 9

was later demolished and replaced in the early 21st century by Michael Court, approved in 2009.

5.39 35 Oakfield was also connected to social activism during the interwar period. The villa was occupied by a number of leading suffragettes in Sale, Ada Hines [1872-1949] and Lucy Fildes who were active in the suffragette movement in the 1920s & 30s and members of the Women's Freedom League. These ladies of social action and social justice contribute to the historic and social significance of the villa³².

5.40 History and Development of Villas & Suburban Housing

Historic England provide a useful synopsis of the history, development and managing change of villas and suburban housing in the documentation "The heritage of suburbs" and "Domestic 3: Suburban and Country Houses Listing Selection Guide" ³³. A summary of the key points is provided in Appendix K.

5.41 Trafford Historic Landscape Characterisation Report³⁴

The report sets out an overview of Trafford's historic character as it evolved over the centuries and contributed to the evidence base for Policy R1 in Trafford's Core Strategy. The appeal site has been identified in the Trafford HLC Survey [HGM6515] dating from AD 19th Century - 1841 AD to 1872 and described as "villas, mid to late 19th century with some later additions/alterations". The HLC project is also referenced in PFE Policy JP-P2 Heritage. A summary of the importance of villas in Trafford is provided below and in Appendix D.

³² Sale Civic Society

³³ CD-F17

³⁴ Appendix D

5.42 Villas and detached houses are a distinctive element of Trafford's historic environment and make a significant contribution to the Borough's character and sense of place; this is also highlighted in the overarching statement for Trafford's Local Heritage List³⁵ and also the Trafford Design Code³⁶. In 2008 they represented 14.4% (5.22km²) of the total area of the Residential broad type in Trafford. Since the 19th century 40% of villas (a 3.40km² area) have been lost or are no longer in their original use.

5.43 The report identifies the housing type is vulnerable to subdivision, conversion and redevelopment and large plot sizes make sites attractive for redevelopment; several modern houses or one or more new apartment blocks can be built in the grounds of a single villa.

5.44 Appeal Site & Surrounding Character

Exterior³⁷

³⁵ Oakfield, is a substantial mid-19th century villa designed in a Domestic Revival style. Anecdotally, the dwelling is understood to be the work of architect Frank Walter Mee [1854-1933] and would be a very early example of his work, however this is not substantiated. Mee was an eminent local architect, designing a number of dwellings in the mid and late 19th century in Ashton and Sale. He was articled to George T Redmayne FRIBA in 1866; Redmayne was an assistant of nationally renowned Alfred Waterhouse RA.

5.45 ³⁵ Oakfield comprises of three storeys and a partial cellar. The original plan form is regular with the principal [north-east] elevation fronting Oakfield and dominated by two, three storey gables which run north-east to south-west. The architectural emphasis of the villa

³⁵ Appendix I

³⁶ <https://trafforddesigncode.uk/trafford-places/>

³⁷ Appendix G

focused on the principal elevation, which is a well-balanced, asymmetrical composition with imposing and distinctive gables. The RHS [northern] gable incorporates a canted bay at ground floor separated from the first floor with a stone string course with painted timber sashes (in a two tone revival decoration) sited on the upper floors diminishing in size to the second floor. A covered porch is sited in front of the gable with steps leading to the entrance. The structure, including wall tiling, steps and an attractive ogee arch, appears to be a later addition, partly obscuring the canted bay.

5.46 The LHS gable [eastern] is advanced and includes a three storey box bay with hipped roof and finial. The bay incorporates five light sash windows also painted in a two tone revival style with painted stone cill at ground floor and white painted render on the first floor. Other architectural details include clay fish scale tiles; large overhanging eaves and a heavy painted stone plinth with semi basement. A south-east to north-west ridge joins the two gables with all pitched roofs clad with brindled clay tiles.

5.47 The north-west and south-east elevations are plainer and have also incurred some alteration with the replacement of windows [window openings remain discernible] and the removal of chimney stacks above eaves level. Both elevations are rendered with evidence of block lines to give the impression of an ashlar finish. The north-west elevation has been painted white with the majority of the south east elevation left unpainted with areas of cracked and missing render. Council records indicate the elevation was in a similar condition in 2021 and has not been maintained in the intervening period. A number of historic, timber vertical sliding sash windows remain on the south east elevation with a small leaded light present at ground floor.

5.48 A late 20th century single storey extension with mono-pitch roof links a two storey building to the south west elevation to provide additional residential accommodation and are not of significance. On the south west elevation (rear), a historic outrigger has been extended with flat roofed two storey and three storey extensions and has diminished to some degree the appearance of this elevation in association with altered and replacement windows and entrance porch. Again there is evidence of a lack of maintenance of the building at first floor with a broken window pane and spalling brickwork. The upper storeys to the historic outriggers have been clad in blue slate, a common treatment used on other villas such as Dunedin³⁸, with Cheshire commons laid in English Garden wall bond to the ground and first floors. Despite the insertion of unsympathetic fenestration, there is some evidence on this elevation of original window openings with cambered brick headers and several historic timber vertical sash windows remain.

5.49 Architectural motifs are focused on the principal elevation with plainer and more functional elevations to the side and rear. A clear hierarchy took shape within the house, with the principal reception rooms and formal circulation spaces being accorded greater attention to architectural effect than is generally found in more private upper floors and service areas³⁹. This is typical of mid-19th century villas in Trafford and reflects the focus and orientation of the building historically towards the garden to the front and Oakfield. Historic photographs of Oakfield from the 1870s indicate much plainer side and rear elevations⁴⁰. In the latter half of the 19th century there was a greater emphasis on designing houses in the round and providing greater architectural interest on all elevations visually connecting private gardens to the rear.

³⁸ Appendix F; Figure 10

³⁹ CD-F17

⁴⁰ Appendix F; Figures 4-6 & 9-11

5.50 The appeal site also retains two historic brick outbuildings with pitched roof clad with slate and are present on 19th century mapping. The outbuilding to the northwest of the villa is the original stables and present on the 1876 OS map. The building has been partly extended and altered to form a garage but retains the cart opening and a pitching eye to the front with ventilation holes to the rear. The building is set back from Oakfield and aligns with the original off set cart opening, albeit the apron walls have been altered. A second outbuilding/garden store erected in the late 19th century is located to the south and appears to have been associated with a group of glasshouses now removed. The villa and outbuildings are linked with an area of stone setts which also contributes to the setting of the group. Together the villa and outbuildings form an important hierarchal group which illustrate how the domestic site functioned during the 19th century.

5.51 It is acknowledged that the villa and outbuildings have been subjected to a number of alterations however these have not diminished the aesthetic and historic interest of the villa to such an extent, that the historic appearance, style, plan form and materiality of the villa is not recognisable and readily understood. This is further enhanced by the spacious plot, grouping with historic outbuildings and hard landscaping as well as mature vegetation, boundary treatment, relationship with street layout and neighbouring plots. As set out in the Historic England Domestic 3: Listing Selection Guide these attributes positively contribute to the character and appearance of a villa. Many houses undergo change, and the alteration of houses of this type and age is not uncommon. The changes undertaken to 35 Oakfield have allowed the building to remain in the intended residential use. Furthermore, alteration to secondary areas, such as side and rear elevations, can more easily be overlooked than the loss of major

features⁴¹. Some of these alterations such as the removal of chimney stacks and windows can be reinstated sympathetically to enhance the building [197 (a); NPPF] as well as mitigate harm [195; NPPF] through the removal of later extensions such as the single storey link.

5.52. Setting & Context

The immediate setting of 35 Oakfield is provided by a spacious plot to the north east, south east and south west. The villa is set back from the street scene separated by an area of car parking, mature landscaping and trees as well as an historic brick boundary wall with shaped stone coping. The original off set cart entrance is sited to the northern corner of the site with a later vehicular entrance formed at the eastern corner. Evidence of the historic brick boundary walls also remains to the side boundaries.

5.53 To the south east and south west, with the exception of the 20th century extensions, the appeal site comprises of garden areas. As map regression has shown the rear boundary has increased and decreased since the 19th century⁴². The surrounding garden positively enhances the villa and its associated historic outbuildings, resulting in a picturesque quality to the site and contributing to the asset's aesthetic significance. The mature planting along the perimeter of the site provides a verdant backdrop to the villa and is visible in key views of the building and stables from Oakfield. Whilst the late 20th century extensions are visible from the street scene and diminish some of the spaciousness of the site, they sit much lower in keys views of the villa and therefore do not significantly compete with the appearance of the historic building. The hedging and trees forming the north eastern (front) boundary partially obscure the villa and extensions contributing to an air of privacy. Further glimpses of the distinctive

⁴¹p. CD-F17 p.23

⁴² Appendix E

gables and historic form of the building are possible through the vehicular entrance to the eastern corner of the site.

5.54 In longer views to the north west and south east along Oakfield, only glimpses of the villa are possible and it is the boundary wall, mature planting and spaciousness which dominate the streetscene and contribute to the character and appearance of the area. There is coherence with a number of surviving historic villas and their substantial spacious plots along Oakfield. The adjoining Forest Prep School [formerly Ellesmere], Meadowcroft [nos 59 & 61], Blythewood [no.67]; Newstead [no.50] and Wyebank [no.40] are all of a similar period and amplify the aesthetic and historic significance and experience of one another. The Appellant's Design & Access Statement also acknowledges this historic local character and identifies⁴³ "the overwhelming character of Oakfield is one of substantial Victorian dwellings sat behind a tree lined street with brick boundary walls and railings prevailing".

5.55 Nos 63 & 65 Oakfield were erected during the interwar period and whilst they are a pair of semi-detached dwellings, the houses are two storey in height, set back from the road and retain the historic stone boundary wall with mature hedging. The retention of these historic buildings, their spacious plots, mature planting and boundary treatment is particular important when taking into account the loss of 19th century suburban villas in the area. In particular the strong vertical emphasis of a villa set back within a spacious plot with mature planting and low historic boundary wall is a defining characteristic of Oakfield. The interrelationship of built form with spaciousness which and the prevalence of trees and hedging along Oakfield contributes strongly to the setting of 35 Oakfield. The winding of the

⁴³ CD-A7

road adjacent to the appeal site adds to the sylvan quality of the street scene in views of 35 Oakfield in both directions.

5.56 As the map regression identifies, a number of 19th century villas have been demolished and the plots developed in the late 20th and early 21st centuries⁴⁴. The replacement of these historic buildings with large apartment schemes, removal of vegetation and areas of surface car parking has eroded the character and appearance of Oakfield to some degree, particularly to the southern end of the road. None of them are considered to contribute to the character of the streetscene or the wider area in a positive way. This is discussed in more detail in the evidence of Mrs S Lowes.

5.57 Interior⁴⁵

Internally the building has incurred a degree of alteration and reconfiguration of layout to subdivide the villa to flats in the late 20th century. It was noted that the insertion of walls and entrance doors has occurred at all levels of the building to provide additional accommodation. Notwithstanding this, the central hallway and staircase still provide the main access to accommodation and the historic plan form and features are discernible to some degree. Separate stairs lead to the cellar which incorporates a stone flagged floor. This in turn leads to the single storey extension [laundry] on the south east elevation. Internal walls, floor and ceilings have also been extensively decorated as part of successive refurbishments.

5.58 With the exception Flat D at first floor (within the late 20th century extension), the building is understood to be fully occupied and in a habitable condition. Access was only

⁴⁴ Appendix K

⁴⁵ Appendix H

provided to Flat D which is dated and showed signs of water ingress, a broken window pane and partial failure of roof timbers. The accommodation did not appear to have been occupied or maintained for a number of years, however it was unclear why the remedial works had not been addressed.

5.59 The late 19th century outbuilding remains in use as store. As the building is not designated as a listed building, it is acknowledged that internal works can be undertaken without the need for planning permission, therefore there is no control over works which may affect the internal significance of the historic building. As such the assessment has focused on the exterior and setting of 35 Oakfield.

5.60 Greater Manchester Local Heritage List Criteria

35 Oakfield has been assessed against the draft Local List criteria and the borough's overarching heritage statement. In order to qualify for Trafford's Local Heritage List, the asset has to reflect at least one of these criteria to qualify. This assessment is provided in Appendix I and confirmed that 35 Oakfield met a number of the criteria.

5.61 Summary of significance

A summary of the architectural, archaeological and historic [illustrative and associative] interest of 35 Oakfield is provided below and based on the table included in Appendix I.

5.62 The assessment of significance has been undertaken utilising these values taking into account the criteria of the Greater Manchester Local List Project⁴⁶ and the broader inter-related values as set out in Conservation Principles. The level of significance for each value has

⁴⁶ Appendix J

been quantified using Figure 2 in the BSI Guide to the Conservation of Historic Buildings⁴⁷ and ranges from **low to medium**.

Architectural Interest

5.63 Despite some alteration, the appearance, style, historic plan form, detailing, proportions, massing, scale, silhouette of the mid-19th century villa is still legible. There is a still good level of architectural integrity with a well-balanced composition, palette of traditional materials and distinctive architectural features focused on the principal elevation. The villa, its spacious setting, mature landscaping, relationship with historic outbuildings and historic boundary walls make an important contribution to the street scene and sense of place. The interrelationship of the villa with the surrounding spacious plot is significant. The hierarchal relationship with the former stables to the north east further reinforces the fortuitous aesthetic quality of the group along with the out building to the north west, spacious garden, mature landscaping and boundary wall illustrates how the site originally functioned.

5.64 The architectural emphasis of the building is primarily focused on the principal elevation incorporating features typical of 19th century villas in the area although the two large gables are a distinctive feature of the north east elevation. The appearance is complemented with a traditional palette of materials. The remaining elevations are plainer in design and typical of houses from this period on Oakfield and Trafford.

5.65 35 Oakfield has some limited landmark presence in the streetscene and this is emphasised by its orientation, silhouette and distinctive north east elevation. There are key views of the building from the north east and south east along Oakfield which contribute to some degree to

⁴⁷ Appendix C

its landmark presence, however the prevalence of mature landscaping allows only glimpses and adds to an air of privacy. The openness of the appeal site is reminiscent of the wider spacious historic character of the area and contributes to the setting of the building. There is a strong visual connection with the verdant setting and historic character of those 19th century and early 20th properties remaining on Oakfield. The villa, its spacious setting and historic boundary walls make an important contribution to the street scene and sense of place. The hierarchal group value of the villa, stables and outbuilding also contributes to its significance.

5.66 I acknowledge that some of the extensions and alterations to the building and wider site have marred the appearance and setting of the non-designated heritage asset to some degree however the historic form and appearance of the villa is still discernible and contributes to significance. Furthermore, I consider the aesthetic value of 35 Oakfield is amenable to a degree of restoration and enhancement which would reinforce its aesthetic value.

5.67 A summary of appeal decisions relating to NDHAs and their alteration are included in Appendix B. This includes the Pelican Inn and Motel [Appeal Ref: APP/Q4245/W/22/3296154]. The Inspector agreed with the Council that the building is a NDHA despite its extensions and found that its significance stems from the history of the site, including its local connections, the rarity of this once common style of public house, and the extent to which the building still retains its important architectural features. At Highbury Barn [Appeal Ref: APP/D3505/A/13/2190852], the Inspector noted “notwithstanding the fact the building has not been particularly well maintained and various alterations/extensions have been carried out to the side and rear of the premises, I consider that it makes a positive contribution to the street scene. The building also makes an important contribution to local distinctiveness and provides one of the few historic links to the rural past of this area”. At The

Fourways [Appeal Ref: APP/X3025/A/12/2182226], the Inspector concluded, “there was no dispute that much of the interior has been lost through conversion and alteration, that some of the alterations have resulted in the loss of interesting features, or that some of the additions are unsympathetic” however it was still agreed with the Council to be a NDHA.

5.68 Based on my assessment above, the overall level of architectural interest is considered to be **medium** and is sufficient for the appeal site to be considered as a non-designated heritage asset.

5.69 Historic Interest

35 Oakfield is significant for illustrating the historic development of Ashton Upon Mersey from an agricultural settlement to a predominately suburban area during the mid-19th century following the arrival of the railway in 1849, one of the earliest in the country and the first in Manchester. The residential use of the appeal site contributes strongly to our understanding of the historic development of this area as an early suburban settlement. Sufficient historic fabric survives which indicates the plan form and the original layout of the asset. Whilst there have been alterations internally and externally, these changes have enabled the continued historic residential use of the building and how it has adapted over time.

5.70 The villa and its setting is one of the last surviving early villas on Oakfield. There is coherence with the adjoining Forest Prep School [formerly Ellesmere] and several other substantial dwellings of a similar period along Oakfield which amplify this significance and experience of one another. The villa, stables, outbuilding and cart entrance illustrating how site was used in mid 19th century.

5.71 The site has been in continual residential for over 150 years and further significance is derived from its survival as an early suburban villa. First wave of residential villas to be erected in the area, marking the important transformation of the area from an agricultural landscape to a desirable residential suburb.

5.72 There is a historical associative value with the social action and justice of the suffragette movement in the late 1920s to mid 1930s.

5.73 The overall level of historic [illustrative & associative] interest of the appeal site is considered to be **medium** and sufficient to be considered as a non-designated heritage asset.

5.74 Archaeological Interest

The appeal site is significant for its archaeological interest. There is potential for historic fabric and plan form relating to the original phase of the building and relationship with outbuildings and later added and removed glasshouses.

5.75 The overall level of archaeological interest of the appeal site is considered to be **low** and sufficient to be considered a non-designated heritage asset.

5.76 In conclusion 35 Oakfield and its setting has **medium [moderate] significance overall** for its architectural, archaeological and historic [illustrative and associative] interest and makes a positive contribution to its surroundings. The building and wider site therefore hold sufficient significance to merit consideration in determining this planning application.

5.77 Appellants Heritage Assessment

Following the validation of the application on 6th February 2023, a heritage statement [undated] by Beardmore Urban to accompany the application on 2nd March 2023.

5.78 The application is accompanied by a heritage statement undertaken by Beardmore Urban. It is noted that a general description of the building has been undertaken, including map regression. However, the report is narrow in focus and advocates the proposal rather than minimising harm and offering options for how significance can be retained and enhanced.

5.79 In their consultation response GMAAS⁴⁸ considered the Beardmore Urban report contrary to para 194 NPPF and note the limitations of the assessment; "...the application is not supported by either a heritage statement per se or an archaeological assessment, and the Greater Manchester Historic Environment Record has not been consulted. The application is supported by a document entitled 'Statement of Heritage Significance', which focuses attention initially on the definition of a 'non-designated heritage asset' and the criteria employed when determining a statutory listing...The Statement of Heritage Significance affords a few paragraphs to the historical development of the building but does not explore all the avenues of documentary research available that may inform a rounded understanding of the building's significance".

5.80 The assessment focuses on judging the significance of the building against statutory listing criteria, which the author acknowledges is a higher bar than local listing. The assessment

⁴⁸ CD-A63

concludes “the significance of this building (even if it is regarded as a non-designated heritage asset) is marginal at best”.

5.81 The author considers the building has been “severely affected by later changes such as the loss of the main chimney stack and the proliferation of inappropriate windows and external drainpipes. It is noted that the assessment focuses solely on the architectural interest of the building with limited assessment of any other significance such as historic or archaeological as defined by Annex 2; NPPF. No regard is given to the building as a detached 19th century suburban villa in the local context, the remaining historic outbuildings, spacious plot, landscaping or boundary walls nor the contribution made to the wider street scene. Limited acknowledgement is made of the group value with remaining historic villas along Oakfield.

5.82 The assessment identifies the building is in “extremely poor physical condition”, however the application is not supported by any conservation accredited condition survey to substantiate this claim. Furthermore, at para 3.03 it is claimed that *“The likelihood of a viable scheme that would allow the original villa (with or without its outbuildings) to be retained, and its setting improved is negligible. This factor is critical in weighing the heritage balance that the Council must strike in reaching its decision on whether to regard the building as a non-designated heritage asset, particularly if, in doing so, it then seeks to use this as a reason to prevent redevelopment of a scheme that in every other way would be considered acceptable”*. It is not clear what viability assessment Beardmore Urban are relying on to form this conclusion. Notwithstanding this, the issue of viability is not a determining factor, as suggested by the author, “on whether to regard the building as a non-designated heritage”.

5.83 It is noted at section 4.0 in the Valuation Report Property, by Fisher German on 9th October 2023⁴⁹ it is confirmed that the building is in reasonable condition with the exception of Flat D. Fisher German agreed with the Appellant to, *“not carry out a structural survey. However, during the course of our inspection, we noted that the Property generally appeared to be in reasonable condition however it would benefit from some modernisation. The exception to this being Flat D which is in an unhabitable [sic] condition which requires immediate capital expenditure on it. Our opinion of value is based on the assumption that no further major expenditure would be required to rectify any wants of repair, and we reserve the right to revise our figures should this prove to not be the case”*.

5.84 At para 3.05, the assessment concludes, “Preventing redevelopment would do nothing to secure investment in the site”. Again it is unclear what evidence this statement is based on and appears to go beyond the remit of the heritage assessment. The author suggests that without the redevelopment of the site, the building will deliberately not be maintained and there is no viable future of the building and its wider setting; *“the Council ...would condemn the site to further decline as there would be no incentive for any owner to invest in the extensive works required to bring about its sympathetic conversion and restoration. In those circumstances preventing redevelopment of the site would do little or nothing to secure a viable and revitalised future for this building and its wider setting, merely condemn it to suffer further decline of the sort that is already apparent from a full (as opposed to merely looking at the front elevation) inspection of the building and its extensions and outbuildings”*. The suggestion by the author that the building would be condemned to further decline and deterioration is contrary to para 196;

⁴⁹ CD-B4

NPPF, “Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision”. The issue of viability will be assessed in more details in the evidence of Mr M Lloyd and Mr C McGowan.

5.85 Based on the comments provided by Beardmore Urban, limited weight should be given to the Appellant’s heritage assessment.

ii) Whether the proposed development will cause unacceptable harm to the significance of the non-designated heritage asset and the character and appearance of the surrounding area

5.86 The planning application proposed the full demolition of 35 Oakfield and associated buildings. The site would be redeveloped to deliver the erection of a part three storey part four storey building comprising 25no. retirement flats, closure of both existing vehicular accesses and formation of new vehicular access onto Oakfield with associated landscaping and car parking. Whilst there is no demolition plan submitted with the application, it is clear from the proposed site layout that no element of the existing villa or outbuildings will remain.

5.87 Policy R1.1 of the Core Strategy requires that all new development must take account of surrounding building styles, landscapes and historic distinctiveness. In addition to the loss of the NDHA, the proposed redevelopment will also impact on the setting of the villa resulting in the partial demolition of the front boundary wall, the loss of spaciousness and the substantial removal of mature landscaping. This will in turn impact on the wider historic character and appearance of Oakfield and the group value of the remaining 19th century villas.

5.88 The design of any new development intended to stand alongside historic buildings, needs very careful consideration and must form a harmonious group as well as making a positive contribution to local character and distinctiveness. The proposed development would result in a significant increase in built form with any remaining open space utilised for car parking leaving little scope for landscaping. It is not clear what in the local area has influenced the style of architecture proposed; the proposed design is non-descript in its form, appearance, style and materiality. Such infill and piecemeal redevelopment alters the grain of suburban and

urban areas, greatly increasing the characteristically low density of dwellings and reducing the area of green space. The proposed redevelopment is assessed in more detail in the evidence of Mrs S Lowes.

5.89 For the reasons above 35 Oakfield has been identified as a non-designated heritage asset in accordance with Annex 2 of the NPPF and is *“considered to be a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes... assets identified by the local planning authority (including local listing)”*.

5.90 Para 189 NPPF recognises “these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”.

5.91 Para 197 NPPF requires “In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness”.

5.92 Para 203 NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced

judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

5.93 The effect of the proposed development will result in the total loss of significance of 35 Oakfield and its setting as a non-designated heritage asset. As such the impact of the proposed development will result in major harm to the significance of 35 Oakfield. Taking this into account along with the medium [moderate] significance of the non-designated heritage asset, the magnitude of impact will be moderate/large⁵⁰. The loss of the non-designated heritage asset and its setting will also cause harm to the wider historic character and appearance of the surrounding area defined by the remaining historic villas and their spacious plots.

5.94 Heritage policy in Trafford’s Core Strategy and the NPPF can be given significant weight and is the appropriate means of determining the acceptability of the development in heritage terms.

5.95 S08 -Protect the historic built environment is one of the Strategic Objectives of the Trafford Core Strategy 2012⁵¹ and specifies the Council’s aspiration “to protect, enhance and value the borough’s heritage to contribute to the attractiveness and distinctiveness of the borough”. Policy R1⁵² Historic Environment of the Trafford Core Strategy is also of relevance.

5.96 The supporting text at para 21.1 of Policy R1 states;

“Trafford’s historic environment makes a major contribution to the attractiveness and local distinctiveness of the Borough. Heritage assets are buildings, monuments, sites, or landscapes

⁵⁰ Appendix C

⁵¹ CD-D2

⁵² CD-D2

of historic, archaeological, architectural or artistic interest whether designated or not. The significance, character, and appearance of these heritage assets are qualities that will be protected, maintained and enhanced”.

5.97 Policy R1.2 requires that developers must demonstrate how the development will complement and enhance the existing features of historic significance; in particular in relation to conservation areas, listed buildings and other areas of identified heritage assets.

5.98 Policy R1.5 necessitates that the Council will identify, preserve, protect and enhance the positive features and characteristics of Trafford’s historic environment, through the Land Allocations DPD, the maintenance of the Historic Environment Record, the preparation of local lists, Supplementary Planning Documents and development briefs, as appropriate.

5.99 Policy R1.6 states that developers will be required, where appropriate, to demonstrate how their development will protect, preserve and enhance the following heritage assets including their wider settings which includes buildings and structures identified on a local list which make a significant contribution to the townscape by reason of their architectural or historic interest.

5.100 Given the advanced stage of PfE it now has substantial weight in the planning balance. Policy JP-P 2 Heritage is of relevance and requires that “we will proactively manage and work with partners to positively conserve, sustain and enhance its our historic environment and heritage assets and their settings”. Furthermore, the heritage significance of a site or area should be considered in accordance with national planning policy in the planning and design process, providing and opportunities for interpretation and local engagement are optimised.

5.101 A number of appeal decisions included in Appendix B conclude that the demolition of a NDHA and its replacement would result in the complete loss of significance. This includes the recent decision of The Pelican Inn & Motel [Appeal Ref: APP/Q4245/W/22/3296154]. The Inspector concluded that the proposed demolition would cause the complete loss of its associated historic interest and significance. “Therefore, the loss of the Pelican Inn, a NDHA of architectural merit with historic connections to the area, would result in unacceptable harm to the historic character of the area. Moreover, the size, appearance and detailing of the proposed replacement buildings would result in incongruous additions to the street scene, which would have unacceptable and detrimental effects on the character and appearance of the area. The proposal would therefore conflict with Policies L7 and R1 of the Trafford Local Plan”.

5.102 In the recent decision by the Secretary of State for Levelling Up, Housing & Communities for 456-472 Oxford Street, London W1 [ref: 3301508 - 20 July 2023]⁵³, the Secretary of State concluded [with regard to para 203; NPPF] that the scale of the harm or loss would be at the highest level as, apart from the aspiration to reuse some materials and to replace a few decorations, Orchard House would be completely lost. The Secretary of State has concluded at paragraphs 16-17 Orchard House has significant value in its own right and in its context. He has attached substantial weight to its loss. The Secretary of State also considered the application of paras 152 & 189; NPPF. It was noted that there should generally be a strong presumption in favour of repurposing and reusing buildings, as reflected in para 152 of the NPPF. In the circumstances of the case, where the buildings in question are structurally sound and are in a location with the highest accessibility levels, he considered that a strong reason would be needed to justify demolition and rebuilding.

⁵³ Appendix B

5.103 I conclude therefore that the complete demolition of 35 Oakfield and the redevelopment of the site will cause unacceptable and irreversible harm to the significance of the non-designated heritage asset, its setting and the character and appearance of the surrounding area and therefore fail to protect, preserve and enhance the borough's heritage. As such the proposal is considered to be contrary to SO8 & Policy R1 of the Trafford Core Strategy, Policy JP-P 2 Heritage of PfE and the NPPF in this respect and this will be weighed against the scheme in the planning balance by Mr C McGowan.

iii) Whether the Appellant has sought to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

5.104 Historic England set out in Advice Note 2⁵⁴ that successful sustainable development achieves economic, social and environmental gains jointly and simultaneously through planning decisions [para 8; NPPF]. If there is any apparent conflict between the proposed development and the conservation of a heritage asset then the decision-maker might need to consider whether alternative means of delivering the development benefits could achieve a more sustainable result, before proceeding to weigh benefits against any harm. Sustainable development can involve seeking positive improvements in the quality of the historic environment. .

5.105 In summary this means to avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF and look for opportunities to better reveal or enhance significance. Conservation Principles⁵⁵ identifies that some elements of a place may actually mar or conceal its significance. Eliminating or mitigating negative characteristics may help to reveal or reinforce heritage values of a place and thus its significance.

5.106 Of particular relevance to this Inquiry is para 195; NPPF. This requires local planning authorities to take into account the particular significance of any heritage asset that may be affected by a proposal “when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal”.

⁵⁴ CD-F9

⁵⁵ CD-F10

5.107 The Appellant has not explored any options such as the adaptation, conversion or extension of the existing building or enhancement of the wider attributes of the site in order to minimise the impact of the proposed development on the significance of the non-designated heritage asset, its setting and the character and appearance of the area. The documentation submitted in support of the planning application the subject of this appeal, fails to provide any alternatives or considered options of how the impact / loss of the heritage asset could be minimised or avoided. Furthermore, the new development makes no reference to or take no cues from the heritage asset, either through use, appearance, scale or siting of the proposals. The proposed development's undistinguished and nondescript appearance would not contribute to the distinctive historic character of Oakfield when compared to the architectural and historic significance of 35 Oakfield.

5.108 In order to address the requirements of para 195, the Appellant should seek to avoid, minimise and mitigate the impact in a way that meets the objectives of the NPPF and justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change.

5.109 In the decision of 456-472 Oxford Street, the SoS highlights the importance of para 152 of the NPPF. The SoS's interpretation of the paragraph concludes a "*strong presumption in favour of repurposing and reusing buildings*", meaning that "*a strong reason would be needed to justify demolition and rebuilding*". Therefore it is up to the Appellant to demonstrate that considered refurbishment options as part of their design process, and to explain in detail why those options are not being pursued.

5.110 Policy JP-P 2 Heritage (5) of PfE also requires exploring opportunities to reduce greenhouse gas emissions that restoration of historic buildings offer. Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm.

5.111 It is not clear from the documentation, submitted with the planning application, why the existing building cannot be retained, converted and if required extended. In their consultation response⁵⁶, Sale Civic Society strongly requested that “if the developers are to be permitted to develop this site then we would strongly request that the front part of the historic Villa is retained in character in its entirety. Any such re-development of the site must explore fully the option of converting the existing property, with innovative design, and a possible sympathetic extension to the rear”. A number of local examples are included in Appendix B. Lennox Lea on Charlton Drive in Sale was granted permission for conversion to provide three town houses [102797/FUL/20], York Lodge Residential Home 54 - 56 Crofts Bank Road in Urmston [03020/FUL/20] and Chesham House [100987/FUL/20] are examples of the retention and conversion of Victorian villas.

5.112 It is concluded therefore that the Appellant has not sought to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal and as such is contrary to SO8 & Policy R1 of the Trafford Core Strategy, Policy JP-P 2 Heritage of PfE and the NPPF.

⁵⁶ CD-A63

6.0 Summary and Conclusions

6.1 35 Oakfield has been identified as a non-designated heritage asset by the local planning authority in accordance with NPPF Annex 2 Glossary and is *“considered to be a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes... assets identified by the local planning authority (including local listing)”*.

6.2 The effect of the proposed development will result in the total loss of significance of 35 Oakfield and its setting as a non-designated heritage asset. As such the impact of the proposed development will result in major harm to the significance of 35 Oakfield. Taking this into account along with the medium significance of the non-designated heritage asset, the magnitude of impact will be moderate/large.

6.3 It is my firmly held view, as the Council’s Heritage Expert and as demonstrated in this evidence that 35 Oakfield has sufficient significance to be identified as a non-designated heritage asset. Contrary to para 195 NPPF, the Appellant has not sought to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal. The proposed development will therefore result in major harm to the significance of the non-designated heritage asset and this should be taken into account in determining this application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset [203 NPPF]. This balancing exercise will be undertaken in the evidence of Mr C McGowan.

Appendices

Appendix A – Heritage Consultations

Appendix B – Legislation & Policies

Appendix C - BSI Standards Publication BS 7913:2013 Guide to the Conservation of Historic buildings (2013).

Appendix D - The Trafford Urban Historic Landscape Characterisation Project Data

Appendix E –Historic Mapping

Appendix F –Historic Photographs

Appendix G Site Photographs External

Appendix H Site Photographs Internal

Appendix I - Greater Manchester Local Heritage Listing Project

Appendix J - Demolished and Remaining Historic Houses on Oakfield

Appendix K – History of Ashton upon Mersey, Map Regression & History of Suburban Villas