



TRAFFORD COUNCIL

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Date: 24 April 2018

Dear Mr Hard,

Location: Former B And Q, Great Stone Road, Stretford, M32 0YP

Application number: PREAPP/00849/18

Proposal: A build to rent scheme comprising c. 433 residential apartments with various ancillary ground floor uses, arranged in a staggered building up to 13 storeys in height

Applicant: Indigo Planning

Application type: Pre Application Enquiry

Date received: 5th March 2018

I write further to your pre-application enquiry regarding the development of the above site for residential use.

The site is located in Old Trafford and houses a single storey retail warehouse with associated car parking. The site is currently vacant and prior approval has been granted for the demolition of all buildings on the site (91337/DEM/17).

The site fronts Great Stone Road which gradually increases in height along the site frontage to form a bridge over the Altrincham Metrolink line, which forms the south eastern boundary of the site. To the rear (north east) and side (north west), the proposed development site is bounded by the Lancashire County Cricket Club (LCCC). The opposite side of Great Stone Road is occupied by two storey terraced dwellings.

As a result of increase in height of Great Stone Road as it rises to pass over the Metrolink line, the proposed development site is set lower than the adjacent public highway for the majority of the site frontage, approximately 113 metres. The difference in land levels towards the southern end of the frontage is substantial and is estimated to be in the region of 5 – 7 metres above the ground level. The terraced dwellings on the opposite side of Great Stone Road are also set at a lower land level to Great Stone Road.

The site is adjacent to the Altrincham Metrolink line, with the Old Trafford Metrolink stop located approximately 500 metres to the north east, and near to Talbot Road and

Chester Road which provide regular bus links to Manchester City Centre and the surrounding areas.

This pre-application enquiry seeks advice on the submission of an outline planning application, with landscaping and/or appearance reserved for future consideration.

In brief the scheme being considered as part of this pre-application enquiry seeks to provide a mixed-use 13,11, 8, 7 and 6 storey development, comprising approximately 433 apartments (131 x 1 bed, 234 x 2 bed, 68 x 3 bed) with ancillary residents facilities including a cinema room and two common rooms. At ground floor level a retail unit (368 m²) is proposed and at first and second floor levels a coffee shop (155 m²), community gym (276 m²) and medical centre (51 m²) are proposed. Car parking is proposed at ground floor level and associated landscaping.

Vehicular access to the site is proposed from Great Stone Road with access points to the ground floor car park along the north eastern boundary, the vehicular access then wraps around the building to allow servicing to take place to the rear of the building. Soft landscaping is proposed along the south eastern boundary adjacent to the Metrolink line and along the site frontage to Great Stone Road.

The site is located in the LCCC Quarter as referred to in Core Strategy Policy SL3 and the draft Land Allocations Plan.

Limitations of advice

The application site was observed from the public highway. Notwithstanding the above, the following observations are made without prejudice to future on-site considerations which may impact upon the advice given below, should an application be forthcoming.

DEVELOPMENT PLAN POLICY CONTEXT

The proposed development would need to be considered in light of the Core Strategy and the National Planning Policy Framework (NPPF). The Trafford Core Strategy is the first of Trafford's Local Development Framework (LDF) development plan documents to be adopted by the Council; it partially supersedes the Revised Trafford Unitary Development Plan (UDP) – see Appendix 5 of the Core Strategy which can be viewed on the Council's website.

In this case, the following main policies of the Core Strategy would apply:

- SL3 – Lancashire County Cricket Club Quarter
- L1 – Land for New Homes
- L2 – Meeting Housing Needs
- L4 – Sustainable Transport and Accessibility
- L5 – Climate Change
- L7 – Design
- L8 – Planning Obligations
- W1 – Economy

W2 – Town Centres and Retail
 R1 – Historic Environment
 R2 – Natural Environment
 R3 – Green Infrastructure
 R5 – Open Space, Sport and Recreation

The following local guidance documents would also be of particular relevance:

Refreshed Stretford Masterplan (2018)
 Revised SPD1 – Planning Obligations
 SPD3 – Parking Standards and Design
 PG1 – New Residential Development
 Trafford Council – Application Validation Checklist
 Trafford Community Infrastructure Levy: Charging Schedule
 Trafford Council's Strategic Flood Risk Assessment

Greater Manchester Spatial Framework

The Greater Manchester Spatial Framework is a joint Development Plan Document being produced by each of the ten Greater Manchester districts and, once adopted, will be the overarching development plan for all ten districts, setting the framework for individual district local plans. The first consultation draft of the GMSF was published on 31 October 2016; the second draft of the plan will be developed with a view to publish it in June 2018.

The application site is allocated within the Council's emerging Land Allocations Plan as being located within the LCCC Quarter Strategic Location (Policy LAN 2) and within an area identified as Land Release for New Residential Development (Policy HO1).

On the 25th March 2015, the Council's Executive agreed to a delay in the production of the Land Allocations Plan until such time that the production of the Greater Manchester Spatial Framework is further advanced together with an amendment to the Trafford Local Development Scheme (LDS) indicating this (The LDS is the Council's timetable for producing the Local Plan).

Summary of main Core Strategy Policies

Policy SL3: Lancashire County Cricket Club Quarter – This core policy outlines that a major mixed-use development will be delivered in this strategic location to provide a high quality experience for visitors balanced with a new, high quality residential neighbourhood centred around an improved stadium at Lancashire County Cricket Club.

Policy L1: Land for New Homes – This core policy seeks to protect and promote cohesive, mixed and thriving communities, offering the right kind of homes in the right locations. The scale of housing provision and its distribution is designed to meet the needs of the existing community and to support the economic growth of the City Region.

Policy L2: Meeting Housing Needs – This core policy outlines the Council's requirement to ensure that sufficient land is made available to maintain a rolling five-year supply of

deliverable land for housing, but also to ensure that there is an adequate mix of housing types and sizes to meet the needs of the community. Appropriate provision should be made to provide affordable housing on development of 15 or more dwellings in “cold” locations.

Policy L4: Sustainable Transport and Accessibility – This core policy recognises the importance of improving accessibility to building sustainable communities and creating a competitive and efficient labour market within the sub-region. Accessibility to housing, employment, health, education, shopping, culture, sports and leisure and other essential facilities is influenced by two factors; where development is located and the quality and choice of transport links available to serve that development.

Policy L5: Climate Change – This core policy identifies the importance of the effects of climate which need to be considered at all stages of the development process in order to ensure that all development minimises impacts and mitigates effects.

Policy L7: Design – This core policy identifies a number of criteria upon which proposed development must adhere to and include; design quality; functionality; protecting amenity; security and accessibility.

Policy L8: Planning Obligations – If a proposed development would, if implemented, create a need for a particular facility or generate specific adverse impacts that cannot be provided for, or mitigated against through the use of planning conditions, the Council will seek to negotiate appropriate planning obligation(s) to make the development acceptable and sustainable.

Policy W1: Economy – Trafford seeks to remain competitive and contribute to the growth of the economy of the sub-region and in order to do so it needs to continue to diversify its range of employment types. The aim of this policy is to facilitate the continued modernisation and revival of industrial and commercial activity through the release of sufficient land.

Policy W2: Town Centres and Retail – This policy prioritises the development of town centre and retail uses within the defined town centres, district centres and local centres in the Borough. Outside of these centres, there is a presumption against the development of retail, leisure and other town centre-type uses except where it can be demonstrated that they satisfy the tests outlined in current Government Guidance.

Policy R1: Historic Environment – This policy requires all new development to take account of surrounding building styles, landscapes and historic distinctiveness and developers must demonstrate how the development will complement and enhance the existing features of historic significance including their wider settings, in particular in relation to conservation areas, listed buildings and other identified heritage assets.

Policy R2: Natural Environment – The protection and enhancement of the environment is a key element of the Council’s Sustainable Community Strategy and this policy requires development to protect and enhance the natural environment of the Borough.

Policy R3: Green Infrastructure – Trafford contains a range of physical environmental assets, collectively referred to as green infrastructure (GI), which provide multiple social, economic and environmental benefits. The Council is committed to working with local communities, developers and partners to develop an integrated network of high quality and multi-functional green infrastructure.

Policy R5: Open Space, Sport and Recreation – This policy seeks to ensure that where necessary the Council will secure the provision and maintenance of a range of sizes of good quality, accessible, play, sport, leisure, informal recreation and open space facilities to ensure that appropriate facilities are available to meet the needs of its residents across the whole of Trafford.

Refreshed Stretford Masterplan (2018)

The Refreshed Stretford Masterplan (2018) is a strategic framework for the delivery of the emerging opportunities for the Town Centre and wider Stretford area, identifying areas for future development and the key actions required to deliver major regeneration. It is a non-statutory planning guidance document to inform the development of planning policy, guide investment and development, and provide clear advice to people wanting to develop in the area. It will be used by the Council as a material consideration when determining applications for planning permission and other related matters. This document identifies the proposed development site as being within the UA 92 Campus Quarter

National Policy Considerations

The DCLG published the National Planning Policy Framework (NPPF) on 27 March 2012. The NPPF sets out the Governments planning policies for England and how these are expected to be applied. DCLG published the National Planning Practice Guidance on 6 March 2014, which replaced a number of practice guidance documents.

The NPPF highlights the desirability of new development making a positive contribution to local character and distinctiveness.

Of note, but not exhaustive to this proposal are the following paragraphs:

17 – Planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings and conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations

32 – Plans and decisions should take account of whether safe and suitable access to the site can be achieved for all people.

49 - Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

56 – Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

58 – Planning policies and decisions should aim to ensure that development will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation and are visually attractive as a result of good architecture and appropriate landscaping.

60 – Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirement to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

61 – Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

64 – Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

OBSERVATIONS

It has been indicated that the proposed development will be submitted as an outline planning application with landscaping and/or appearance reserved for future consideration. Depending on what the form the application takes, the following key issues may be considered as part of an outline planning application.

- The principle of residential accommodation on this site;
- The scale, massing, design and appearance of the proposed development;
- The impact of the proposed development on the residential amenity of existing and future occupiers of the application site and surrounding sites;
- The impact of the proposed development on heritage assets;
- The acceptability of the proposed highway works and parking matters.

Nevertheless, it is considered, given the potential visual impact of the development, that an outline application which did not include appearance and / or landscaping as a matter to be considered is unlikely to provide sufficient information to adequately demonstrate the impact of the proposals. The scale and mass of the development would be significant and its appearance would play a large part in how this is articulated. The images of the development we have seen rely significantly on landscaping as mitigation and substantial rooftop planting is proposed.

If an outline application is submitted the Local Planning Authority is likely to use its powers under Article 5(2) of the Town and Country Planning (Development Management Procedure) Order 2015 (as amended) to require further information to be submitted on any or all of the reserved matters. Both detailed floorplans and detailed landscaping proposals have been provided at pre-application stage and it appears that design development has progressed to a point at which a full application would be feasible. We are therefore of the view that a full application should be submitted for the proposals.

Principle of Development

The Refreshed Stretford Masterplan (2018) identifies the proposed development site as being within the UA92 Campus Quarter. The masterplan states that the intention is for the proposed development site to be incorporated into the wider masterplanning work being undertaken in this area. The Refreshed Stretford Masterplan will be material to the consideration of any planning application. The Council is bringing forward a Civic Quarter Masterplan which includes the application site and which will also be material to the determination of the application. The appropriate weight will be given to both of these documents depending on their status at the time of determination.

The proposed development site is located in the LCCC Quarter Strategic Location (Policy SL3) and currently benefits from an authorised retail use. There are however restrictions on the use of the site the extant permission H/04717 restricts the unit to be used “as a ‘Do-it-Yourself’ Homes and Garden Centre for the supply of home and garden maintenance and improvement materials and for no other purpose”.

Policy SL3 outlines that a major mixed-use development will be delivered in this strategic location and it is considered as part of Policy SL3 that the wider LCCC Quarter can deliver:

- A redeveloped LCCC sports stadium with ancillary sports and leisure facilities;
- 400 residential units comprising predominantly accommodation suitable for families;
- A redeveloped and renovated Trafford Town Hall providing new accommodation for Trafford Council’s and administrative functions;
- Improvements to education, community and commercial facilities (including a superstore); and,
- Improvements to the local highway network and better linkages with public transport infrastructure.

Policy SL3.4 examines in further detail the requirement for development in this area. In order for development in this Location to be acceptable the following will be required:

- The provision of community facilities to support the new community, including school provision, health facilities;
- A contribution to the provision of a strategic processional route, suitable for a variety of users with a high quality public realm area incorporating green

infrastructure along Warwick Road and Brian Statham Way to enhance visitor experience and to link to existing and future public transport improvements;

- A Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and that it will where possible reduce flood risk overall;
- To protect, preserve and enhance the listed Trafford Town Hall and its setting and secure its use for civic and community purposes;
- To contribute towards the provision of additional utility capacity, including the reinforcement of the local waste water treatment works;
- To incorporate features to enhance the level of biodiversity in the area, such as green roofs and appropriate landscaping; and,
- Provision of affordable housing in accordance with Policy L2 (detailed below).

Funding towards these requirements may be sought through a Section 106 Agreement with the applicant.

Policy L1 of the Core Strategy is relevant to the proposed development and seeks to release sufficient land to accommodate 12,210 new dwellings (net of clearance) over the plan period up to 2026.

The Council does not, at present, have a five year supply of immediately available housing land. Given the lack of a demonstrable five year supply, the proposal should be considered in light of paragraph 49 of the NPPF. Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development.

The current scheme proposes 31% of the development to be one bed dwellings. Any application will need to be specifically considered against Policy L2.7 which states that, “1 Bed, general needs accommodation will normally only be acceptable for schemes that support the regeneration of Trafford’s Town Centres and the Regional Centre. In all circumstances the delivery of such accommodation will need to be specifically justified in terms of a clearly identified need.”

The Council will seek to secure Affordable Housing in accordance with Policy L2 of the Trafford Core Strategy and SPD 1 as more than 10 dwellings are proposed.

Policy L2 and SPD 1 states that in areas where the nature of the development is such that, in viability terms, it will perform differently to generic developments within a specified market location, the affordable housing contribution will be determined via a site specific viability study, and will not normally exceed 40%.

It is considered that this proposed scheme, given its scale and nature, would perform differently from other “generic” housing development in this area. Therefore the extent of any affordable housing contributions associated with this scheme should be determined by a site specific viability appraisal.

The formal application would need to include an Affordable Housing statement which includes a site specific viability appraisal and a Housing Needs Statement to justify the housing mix.

It is considered that this proposal could make a positive contribution to the Council's housing land supply and in addition the proposal will contribute to meeting targets for the development of brownfield land. On the basis that the applicant can provide sufficient justification with regards to housing mix and an affordable housing scheme to the satisfaction of the LPA, it is considered that there would be no objection in principle to this site being developed for residential use.

The proposed development also proposes to incorporate a retail unit (368 m²), coffee shop (155 m²), community gym/fitness suite (276 m²), which are all main town centre uses.

The site falls outside of the defined town centres, district centres and local centres listed in Policy W2 of the Core Strategy. Where the development of town centre uses is proposed outside of these areas, there is a general presumption against the development of these uses, except where it can be demonstrated that they satisfy the tests outlined in the NPPF and NPPG, i.e. the Retail Sequential Test and if necessary a Retail Impact Assessment.

Due to the sites location outside a defined town, district or local centre, a Retail Sequential Test will be required in support of this planning application to demonstrate that there are no sequentially preferable sites available. The Retail Sequential Test should assess the Great Stone Road Neighbourhood Shopping Centre and the Gorse Hill and Trafford Bar Local Shopping Centres.

Subject to the proposed development passing the Retail Sequential Test, the principle of the development of town centre uses in this location would be considered acceptable.

A medical centre (51 m²) is also proposed to be provided as part of the development. As no information has been provided detailing the proposed use, e.g. GP, Dentist, Community Nurse, no comment is offered on this proposed use. Further information will be required as part of any future planning application detailing the proposed use of this unit. The local Clinical Commissioning Group (CCG) will be consulted as part of any planning application including a medical centre use on this site to determine whether this proposal would deliver appropriate health facilities in line with the CCG's current and future strategies to build new facilities to meet the health needs of the existing population as well as those arising as a result of new and future development. You are advised to consult the CCG directly to determine whether this proposed use would be of interest to the NHS.

Scale, Massing, Layout and Design

Limited information has been provided as part of this pre-application enquiry and the following comments are based on the submission of elevations and floorplans only. A CGI run through was viewed on the 17th April, however no images have been provided

to Trafford Council except for the snapshot images included on the four elevation drawings.

Existing Site Context and Character

The site is located adjacent to the LCCC which has a general height of six storeys, with the exception of the lighting columns, which measure 60 metres in height. Whilst the development of the LCCC is up to six storeys in height, where the development is at this height it is set back within the site by approximately 30 metres along Talbot Road and it is broken up into blocks with views through the site. The rear of the site is bounded by a single storey building providing ancillary facilities to LCCC, which has an eaves height of approximately seven metres. Vehicular access and car parking serving the LCCC sites adjoins the site along the north western boundary.

To the west of the site is the Lancastrian Office Centre, which is a series of 6 storey offices, linked with two storey elements. On the opposite side of Great Stone Road and surrounding the Metrolink, the predominant form of development is two storey dwelling houses.

Set in the wider context, Great Stone Road and the cricket ground form a transitional boundary between an area of mixed use development (mainly office and residential) running in a north-easterly direction towards Manchester and what is otherwise an almost wholly residential area to the south and west. The area to the north is characterised by a number of high rise buildings, the highest of which is Oakland House on Talbot Road, which is 15 storeys in height. The height of buildings then steps down as one travels in a south-westerly direction along Talbot Road towards the cricket ground and the Lancastrian offices buildings, at an approximate maximum height of six storeys, and then steps down again to a large area of two storey housing on the western side of Great Stone Road. The largely open (the cricket ground car park) and low rise (existing B&Q building) character on Great Stone Road and the extent to which the cricket ground stands are set back into their site creates a comfortable transition between these two areas.

Where mid-rise buildings exist in the immediate locality i.e. the cricket ground and the Lancastrian office buildings, there are views through the adjacent sites which results in the area having a generally open character.

Whilst the site is located in an area where mid-rise buildings are located, there are views through the adjacent sites which results in the area having a generally open character.

The Proposed Development

The proposed development would comprise a single building of 13, 11, 8, 7 and 6 storeys. The proposed development takes the form of a perimeter block within the site with a finger of development through the centre running from front of the site to the rear, to create two internal courtyard areas.

The proposal seeks to provide a six storey building along the Great Stone Road frontage, which steps up towards the rear of the site at 7, 8 and 11 storeys in height, culminating in a 13 storey block running along the rear boundary. The proposed development would have a width of approximately 104 metres to the front, 93 metres to the rear and a depth of 57 metres along the north western side elevation (LCCC) and 63 metres along the south eastern side elevation (Metrolink).

The submitted elevations indicate that the proposed rear block would be formed by a thirteen storey block which would be set off the rear boundary of the site by approximately 10 metres and run along the rear boundary for a length of 93 metres, with no relief in the height of the block. The front block at six storeys appears to be broken up slightly with two smaller sections, creating an element of relief, where the development drops to a height of four storeys. The north western elevation is seven storeys (due to land levels this maintains the same height as the six storey frontage) stepping up to 11 storeys, whilst the south eastern elevation is eight storeys stepping up to 13 storeys in height.

It is considered that the height of the proposed development, particularly the side and rear elevations are inappropriate in this location where development is generally open in nature and mid-rise with a maximum height of six storeys. This site and location does not lend itself to buildings of the height proposed which would appear as an incongruous feature in the immediate and wider area.

The proposed development at this height would be highly visible in the wider area and it has not been adequately demonstrated that a development of this scale is appropriate in this context or enhances the street scene or character of the area.

In addition to concerns over the height the development of a single mass of thirteen storeys for a length of 93 metres is not considered to represent good design and exacerbates the imposing nature of the proposed development.

Whilst the front 'block' at mainly six storeys incorporates an element of four storeys, this does not go far enough to break up the bulk and mass of the front façade, which as with the rear elevation, runs the full width of the site.

On the basis of the information provided it is considered that the scale and massing of the proposed development would be wholly inappropriate in its context and would seriously detract from character of the street scene and the wider area. Whilst the building incorporates a degree of modelling including recessed balconies, it is not considered that this can overcome the concerns relating to scale and mass. The Local Planning Authority is of the opinion that the maximum height of development likely to be considered acceptable on this site is six storeys. However, a single mass of six storeys would not be appropriate.

The combined footprint, height, mass and scale of the proposed development are completely at odds with its surroundings despite the fact it includes other high rise development and an international sports stadium.

To enable the development to sit more comfortably with the existing urban grain (even that of the office, sports and institutional buildings in the vicinity, let alone the two storey development to the west of Great Stone Road) it is considered that it would be more appropriate to accommodate a number of smaller buildings on the site, allowing for the creation of gaps between the buildings.

The CGI run through viewed on the 17th April only served to emphasise the concerns that the LPA has on this issue. Any application for development should include a Townscape Visual Impact Assessment which incorporates views along Great Stone Road from both directions, Gorse Avenue, Gorse Hill Park, Talbot Road and Ayres Road, Trent Bridge Walk and the Kings Road/ Warwick Rd South junction.

Notwithstanding the LPA's significant concerns about the scale and massing of the development, limited detail has been provided on its detailed appearance. For a development of such scale, it is vital that the LPA can properly assess its appearance. However if an appropriately scaled scheme were to be brought forward, it is considered that a contemporary design approach is appropriate although it should be of exceptionally high quality design and utilise high quality materials, due to its location in the LCCC Quarter.

Amenity

Policy L7 of the Core Strategy requires development to ensure that adequate amenity is provided for the future occupiers of the development and occupiers of adjacent properties.

The application site is located adjacent to Great Stone Road and the Metrolink and LCCC and there is the potential for occupiers of the proposed development to be adversely affected by noise from vehicular traffic, the Metrolink line and the adjacent cricket ground. In addition to potential noise from cricket matches, LCCC has permission to host outdoor concerts and licensable events.

LCCC are licensed to hold an unrestricted number of outdoor concerts and other licensable outdoor events with a capacity of less than 5,001 ticket holders, including concerts and events staged in whole or in part in temporary buildings or marquees.

LCCC are also licensed to hold outdoor concerts and other licensable events with a capacity of more than 5,000 ticket holders on up to 7 days per annum, subject to certain licensing restrictions.

As the proposed development would introduce sensitive noise receptors into an area where there are noise sources nearby, a noise impact assessment, following appropriate national standards and guidelines is required to be submitted that identifies the impact of the existing noise climate and the impact of any new noise sources that are introduced by the development. Any mitigation measures that are found necessary to address any adverse impact should be detailed in the report.

On the opposite side of Great Stone Road there are two storey dwellings which are set below the street level of Great Stone Road which increases in height to provide a bridge over the Metrolink line. The height which the dwellings sit in relation to Great Stone Road varies and a topographical survey is required to confirm the difference in land levels.

The CGI run through indicated that the proposed development would not be visible from the street level outside no.s 44 – 58 Gorse Avenue, however the proposed development would be highly visible and dominate the outlook from the first floor windows of these dwellings. The proposed development will have a greater impact on the outlook of the occupiers of no.s 44 - 48 Great Stone Road, which benefit from an outlook at ground floor level. It is considered that the outlook and level of daylight serving these properties would be significantly compromised by the development of a 13 storey development and would ultimately be harmful to the amenity of the occupiers of these dwellings.

As a minimum we expect window to window distances to achieve a minimum interface of 18 metres and where a window looks onto a blank façade we expect a minimum interface distance of 15 metres. Where windows have outlooks at oblique angles these will need to be assessed on a case by case basis where they fall short of these distances.

The layout of the proposed development appears to achieve these distances with courtyard interface distances measuring between 22 and 26.5 metres. High quality landscaped courtyards should be provided in any internal courtyards to ensure an interesting and pleasant outlook is provided for occupiers. Care should be taken to ensure that overlooking between units does not occur, particular where apartments are sited adjacent to each other in the internal courtyard areas.

The interface distances at the rear of the site do however fail to meet these distances. To the rear of the site, there is a single storey building with an eaves height of approximately seven metres sited on the LCCC site. This unit provides ancillary facilities to LCCC and is located approximately 10 metres away from the proposed rear elevation where habitable room windows would be located. This relationship is not considered to be acceptable and the site layout should be amended to ensure that a minimum separation distance of 15 metres is provided between the rear elevation of the proposed development and the existing building in this location.

Private amenity space should be provided for each unit in the form of balconies and from a design perspective it is preferable to see these integral to the building design.

Impact on Heritage Assets

The proposed development site is located near to Trafford Town Hall, Gorse Hill Park entrance portal and lodges, the Great Stone at the entrance to Gorse Hill Park and Stretford War Memorial, which are all grade II listed. The Local Planning Authority also considers LCCC to be a non-designated heritage asset.

Due to the site's location near to designated heritage assets, an application for development in this area will need to be assessed against S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, part 12 of the NPPF and the Local Development Framework.

In summary, this policy and legislative framework requires the Local Planning Authority to have special regard to the desirability of preserving the setting of these heritage assets.

An application for development on this site should demonstrate how the development will protect, preserve and enhance the heritage assets including their wider settings. This should be demonstrated through the submission of a Heritage Assessment.

Landscaping

Limited landscaping detail has been provided, a high quality hard and soft landscaping will be required as part of the proposed development with details provided as part of the full planning application package.

SPD 1 - Planning Obligations requires specific green infrastructure to be provided as on site enhancements, it advises that one tree per residential apartment should be provided, or, alternative green infrastructure treatments could be provided in lieu of, or in combination with tree provision as follows:

- 5m of preferably native species hedge, per dwelling/2 apartments;
- Green roof/ green wall provided at 1/10th of the area of the building footprint;
- 100m² of wildflower meadow per dwelling;
- Additional biodiversity or landscaping elements to a SUDS scheme;
- 50m² of woodland/orchard per dwelling;
- 10m² of food growing space per dwelling.

Enhancements of this type should be provided as much as possible on site, where it is not possible to implement a green infrastructure scheme on site, developer contributions may be secured through the use of a S106 legal agreement to implement a scheme close to the development to make the development acceptable in planning terms.

The south eastern boundary of the site is lined with trees, a tree survey will therefore be required as part of any application submission.

Highways

The site is located in a sustainable location, adjacent to Old Trafford Metrolink station and within walking distance of bus stops on Great Stone Road, Talbot Road and Chester Road which all provide good bus links to Manchester and the surrounding areas.

In summary, vehicular access to the proposed the development is proposed off Great Stone Road, with car parking provided at ground level underneath the proposed development.

The proposed access onto Great Stone Road may have restricted visibility in the north westerly direction and the applicant will need to demonstrate the requisite visibility splay can be provided. The required visibility splay should relate to the speed of the road. The Local Highway Authority have advised that any proposed boundary walls on the back of pavement of Great Stone Road (as shown) have the potential to significantly impede visibility and to a much greater extent than the existing situation. Full details of access arrangements and visibility splays will be required with any future planning application but the proposals as currently put forward risk danger to highway safety.

The application will need to consider if a right turn lane into the site should be provided along with provision for pedestrian refuge on Great Stone Road.

The application will need to provide details of site servicing and deliveries such as waste collection and deliveries to retail / F&B units. This should include tracking of larger vehicles to ensure that movements can take place safely.

Parking is proposed to be provided for 226 vehicles. Based on the proposed mix of 433 units, the proposed development would be expected to provide 735 car parking spaces, according to the standards set out in SPD 3 – Parking Standards. The 226 spaces proposed equates to a provision of 31%. It is noted that the ground floor layout does not account for supporting pillars and the structure that is likely to be required to support the proposed development will further restrict the number of car parking spaces available for use by future occupiers.

Whilst the site is located in a sustainable location, the proposed level of car parking will need to be justified as it is a significant under provision when compared against the requirements of SPD 1.

Cycle parking is proposed at ground floor level of each building. Overall the proposed development should provide either 735 allocated cycle spaces or 433 communal cycle spaces.

Due to the scale of the proposed development a Transport Assessment and Travel Plan will be required as part of the application package. You are advised to contact the Local Highway Authority to determine the scope of the required Transport Assessment before any work is undertaken.

The Local Highway Authority can be contacted at Geoff.Evenson@amey.co.uk.

Air Quality

As the site is adjacent to an AQMA (Air Quality Management Area), the application should include an air quality assessment, following appropriate national standards and guidelines, to determine the significance of the exposure of receptors to air quality

impact during the construction and operational phases of the development. The assessment should consider both the impacts of the development on the local area, and the impact of local air quality on the development, with mitigation measures detailed where appropriate. The application should also confirm a commitment to installing low emission vehicle charging points in line with IAQM guidelines.

Drainage

As per the guidance issued by the Department of Communities and Local Government (DCLG), all 'major' planning applications, must provide sustainable drainage systems (SuDS), unless demonstrated to be inappropriate. It is therefore important that SuDS are properly planned at the onset of planning for a particular development. The site is located in a Critical Drainage Area and the proposed development should incorporate SuDS.

The Level 2 Hybrid Manchester, Salford, Trafford Council Strategic Flood Risk Assessment should be referred to in any Drainage Statement and can be found via this link:

http://www.manchester.gov.uk/downloads/download/3871/strategic_flood_risk_assessment-manchester_salford_trafford

A drainage strategy will be required as part of the formal planning application submission.

Climate Change

Core Strategy Policy L5 requires new development to mitigate and reduce its impact on climate change factors and maximise its sustainability through improved environmental performance of buildings, lower carbon emissions and renewable or decentralised energy generation. The formal application would need to include a Carbon Budget Statement.

Ecology

The proposed development includes the development of derelict land and the demolition of the existing building. An Ecological and Biodiversity Survey will be required to accompany a planning application for the development of this site.

DEVELOPER CONTRIBUTIONS

Community Infrastructure Levy (CIL)

The proposed development would be CIL (Community Infrastructure Levy) liable. However, the proposed development is for apartments located in a 'cold charging zone', the charge for which is currently set at £0 per square metre.

SPD1: Planning Obligations

This supplementary document sets out Trafford Council's approach to seeking planning obligations for the provision of infrastructure, environmental improvements and affordable housing required as a result of new development. Contributions sought through SPD1 will be through the established mechanism of a Section 106 agreement.

Affordable Housing

The Council will seek to secure Affordable Housing in accordance with Policy L2 of the Trafford Core Strategy as more than 10 dwellings are proposed.

SPD 1 states that in areas where the nature of the development is such that, in viability terms, it will perform differently to generic developments within a specified market location, the affordable housing contribution will be determined via a site specific viability study, and will not normally exceed 40%.

It is considered that this proposed scheme, given its scale and nature, would perform differently from other "generic" housing development in this area. Therefore the extent of any affordable housing contributions associated with this scheme should be determined by a site specific viability appraisal.

When you are in a position to begin the preparation of the viability appraisal, please contact the Local Planning Authority so that the scope and approach to the viability appraisal can be agreed.

Affordable housing is expected to be delivered on site with at least 50% of the affordable housing provision required to be accommodation suitable for families. A split of 50:50 in the affordable housing units to be provided between intermediate (commonly shared ownership) and social/affordable rented housing units would normally be sought.

More information on the Council's approach towards affordable housing can be found within SPD1: Planning Obligations (2014).

The formal application would need to include an Affordable housing statement which includes a site specific viability appraisal.

Transport and Accessibility

At this stage, without the benefit of a Transport Assessment, it is not known whether the proposal will be liable for any requirements under this element of the SPD.

Specific Green Infrastructure

This section of the SPD relates to appropriate tree planting and other forms of Green Infrastructure that would be appropriate to mitigate the impact of the development. Provision will usually be required by all development and will be in the form of on-site enhancements such as tree planting, advice within the SPD identifies provision of one tree per residential apartment. Alternative measures such as green roofs, green walls, hedging or other habitats may be more relevant in to particular developments and

areas. These specific Green Infrastructure facilities planned as part of a development should be submitted as part of the planning application with a statement explaining their Green Infrastructure contribution to allow assessment of the suitability of the scheme to meet the green infrastructure needs of the development.

In exceptional circumstances where it is not possible to implement a GI scheme on site, a contribution may be secured through the use of a S106 legal agreement to implement a scheme close to the development to make the development acceptable in planning terms.

Spatial Green Infrastructure

Spatial green infrastructure is the open and natural green space functions of GI associated with the needs of residents of the development and includes Local Open Space and Semi Natural Green Space.

Local Open Space should be provided on site and a development of this size would be expected to provide an on-site local equipped area of play (LEAP) with a minimum size of 400m² and 'buffer zone' of 3,600 m².

In exceptional circumstances, it may be more appropriate to pay a commuted sum towards the provision of open space. Based on the proposed mix of 433 apartments, £411,621 would be required as a commuted sum towards spatial green infrastructure.

Clearly the proposed development site would not be able to accommodate the proposed NEAP and a developer contribution is required in this instance.

Very large developments (300 units and above) will also be required to provide mitigation measures for semi-natural greenspace.

Sports Facilities

On site facilities are generally expected to be provided on sites of 300 dwellings or more, however in exceptional circumstances, it may be more appropriate to pay a commuted sum towards the provision of outdoor sports facilities. Based on 433 apartments £395,980 would be required as a commuted sum towards sports facilities.

Processional Route

As previously mentioned in Policy SL3, the development of this site may be required to provide developer contributions towards a strategic processional route with a high quality public realm area along Warwick Road and Brian Statham Way.

CONCLUSIONS

The development of the proposed site would make a positive contribution to the Council's housing land supply; the proposal will also contribute to meeting targets for the development of brownfield land.

Nevertheless, it is considered that the scale and massing of the proposed development is inappropriate in this location and would not enhance the street scene or character of the area. It is also considered that the scale of development proposed would unacceptably impact on the residential amenity of nearby dwellings. It is considered that the harm which would arise to the character and appearance of the area would be substantive and would not be outweighed by the benefits of the scheme in respect of any contribution it might make to housing land supply. A contribution to housing land supply could also be secured from a more appropriately scaled residential development. A lack of 5 year housing land supply does not equate to development at any cost and in this case it is considered that the adverse impacts of development would significantly and demonstrably outweigh the benefits.

In terms of layout there are concerns with the proposed interface distances between the proposed development and the single storey LCCC unit along the rear boundary. The layout should ensure that a minimum interface distance of 15 metres is achieved between windows and blank façades and 18 metres between habitable room windows (this includes living rooms, kitchens and bedrooms).

The development as proposed would not be supported by the Local Planning Authority and you are advised to reduce the scale and mass of the proposed development significantly. It is considered that it would be more appropriate to accommodate a number of smaller buildings on the site, allowing for the creation of gaps between the buildings. The maximum height of development that is likely to be considered acceptable on this site is six storeys; however, this is subject to the submission of a Townscape Visual Impact Assessment which adequately demonstrates that the proposed development would not detrimentally impact on the character and appearance of the immediate and surrounding area.

Developer contributions as detailed above will be required to mitigate the impacts of this proposed development.

SUBMISSION REQUIREMENTS FOR PLANNING APPLICATION

Any subsequent planning application should be on a Full planning application form. Details of what is required to be submitted with a planning application of this nature can be found on the Trafford Council website www.trafford.gov.uk/planning, which also provides guidance on the completion of application forms. The following information would be required to be submitted as part of a formal planning application:

- Site Location Plan

- Existing and proposed site layout
- Existing and proposed elevations (inc. streetscene and roof plans)
- Existing and proposed floor plans, site sections and finished floor and site levels
- Townscape Visual Impact Assessment
- Design & Access Statement
- Planning Statement
- Heritage Assessment
- Affordable Housing Statement
- Housing Need Statement
- Retail Sequential Test
- Air Quality Assessment
- Flood Risk Assessment
- Drainage Strategy/Statement
- Noise Assessment
- Transport Assessment
- Travel Plan
- Ecology and Biodiversity Survey (this should include a Bat Survey, Bird Survey and Invasive species survey)
- Ground Contamination Report
- Tree survey
- Green Infrastructure Supporting Statement
- Crime Prevention Plan
- Statement of Community Involvement
- Community Infrastructure Levy (CIL) – Question Form
- Planning Obligation Draft Heads of Terms
- Summary Report for all major developments where the supporting information exceeds 100 pages
- Planning application fee

The Council also offer Planning Performance Agreements (PPA) which are an agreement between the Council and the applicant and detail pre-arranged timescales/commitments (as an example if the applicant required the reassurance that the application is determined at a particular planning committee that would be detailed within the PPA, however it ultimately can include any appropriate detail). There is an additional cost for a PPA which is reflective of the scale of the proposed development. Further details on PPAs can be provided on request.

In developing a scheme ready for the submission of a planning application, you may also wish to consider contacting the Council's Building Control Services, who can provide advice on and process applications relating to Building Regulations. Further information on the Council's Building Control Services can be found on the Council's website at www.trafford.gov.uk/buildingcontrol and they can be contacted directly at building.control@trafford.gov.uk or (0161) 912 3015.

Please also note that if a planning application was submitted, other factors would also need to be taken into consideration, such as the final design/external appearance/layout of the proposed development, comments received from neighbouring residents during the statutory consultation period and any further information found during the routine site visit.

The advice relates only to the Town and Country Planning Act and does not convey any determination or permission required under any other Act, Regulation, Byelaw etc. It is your responsibility to obtain all other permissions, approvals, consents or agreements to the proposal whether from the council or any other person, body, group or organisation.

Yours sincerely,



Head of Planning and Development
Rebecca Coley