

WARD: Longford**94974/OUT/18****DEPARTURE: No**

Outline application sought for the demolition of existing retail unit and associated structures; erection of building for a mix of uses including: 433 apartments (use class C3) and communal spaces ancillary to the residential use; flexible spaces for use classes A1, A3, B1, D1, and/or D2; undercroft car parking; new public realm; and associated engineering works and infrastructure. Consent is sought for access, appearance, layout and scale with all other matters reserved.

Former B and Q Site, Great Stone Road, Stretford, M32 0YP

APPLICANT: Accrue (Forum) 1 LLP

AGENT: Indigo Planning

RECOMMENDATION: REFUSE

SITE

The application site is a vacant retail site, approximately 1 ha in size and is located on Great Stone Road. A single storey retail warehouse unit is located on the site and this unit was formerly occupied by B&Q. Car parking serving this retail unit is located to the front and side of the unit.

The site is rectangular in shape and is bound by Great Stone Road to the south west, the Metrolink to the south east and Lancashire Cricket Club (LCC) to the north east and north west. To the rear of the site (NE) is a single storey building which provides ancillary facilities to LCC and to the side (NW) there is a car park. There are trees within the site along the Metrolink boundary.

The site fronts Great Stone Road which gradually increases in height from 27.15m AOD to 32.69m AOD as it passes the front of the application site and forms a bridge over the Metrolink line. The majority of the site is set at a lower land level than the adjacent public highway and has a site level of between 27.23 m AOD and 27.51m AOD.

To the south-east, south and west of the application site the area is generally residential in character, predominantly characterised by the development of two storey dwellings. To the north and north east of the site, the area is sport and leisure/civic in character, with Trafford College, Stretford Police Station and Trafford Town Hall all being within the wider vicinity of the site.

In terms of scale, development within the immediate vicinity of the site is generally two storeys high, although the height of development does increase within the LCC ground with the spectator stands rising to six storeys in height and the Lancastrian Office Centre which is two and six storeys in height.

PROPOSAL

This outline planning application seeks permission for the development of:

- 433 apartments (a mix of 131 no. 1 bed, 234 no. 2 bed and 68 no. 3 bed apartments);
- 1,181 m² commercial or community space, designed to be adaptable for A1, A2, B1, D1 or D2 uses;
- On site facilities for use by residents comprising a cinema room, roof gardens, post room and communal common room;
- Residents' lobby and concierge facilities at ground floor;
- A management reception;
- Car parking facilities below ground floor providing 226 car parking spaces;
- Cycle parking facilities providing secure cycle storage for 400 bicycles;
- Bin storage facilities at ground floor location at each key node within the building; and,
- Landscaped courtyards and new public realm.

This outline application seeks approval for access, appearance, layout and scale of the development. The only reserved matter is landscaping.

A detailed review of the proposed development is contained in the 'Design and Appearance' section of this Committee report.

DEVELOPMENT PLAN

For the purposes of this application the Development Plan in Trafford Comprises:

- The **Trafford Core Strategy**, adopted 25th January 2012; 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.
- The **Revised Trafford Unitary Development Plan (UDP)**, adopted 19th June 2006; The majority of the policies contained in the Revised Trafford UDP were saved in either September 2007 or December 2008, in accordance with the Planning and Compulsory Purchase Act 2004 until such time that they are superseded by policies within the (LDF). Appendix 5 of the Trafford Core Strategy provides details as to how the Revised UDP is being replaced by Trafford LDF.

PRINCIPAL RELEVANT CORE STRATEGY POLICIES

SL3 – Lancashire 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

PROPOSALS MAP NOTATION

Trafford Inner Area

PRINCIPAL RELEVANT REVISED UDP POLICIES/PROPOSALS

H10 – Priority Regeneration Area – Old Trafford
 S11 – Development Outside Established Centres

OTHER RELEVANT DOCUMENTS

Draft Civic Quarter Masterplan (2018/19) – The Council is bringing forward a Civic Quarter Masterplan (CQM), which was consulted on between 30th October and 21st December. The application site is located within a prominent location in the ‘Leisure Quarter’ of the proposed CQM along with the Lancashire Cricket Club (LCC) ground and the Lancastrian House Office development.

The CQM is consultation draft and therefore afforded limited weight in the determination of this planning application.

Refreshed Stretford Masterplan (2018) – 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 master planning work being undertaken in this area. Although not a Development Plan Document the Refreshed Stretford Masterplan is a material consideration in the determination of planning applications.

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, and following a redraft a further period of consultation commenced in January 2019. The weight to be given to the GMSF as a material consideration will normally be limited given that it is currently at an early stage of the adoption process. Where it is considered that a different approach should be taken, this will be specifically

identified in the report. If the GMSF is not referenced in the report, it is either not relevant, or carries so little weight in this particular case that it can be disregarded.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The DCLG published the revised National Planning Policy Framework (NPPF) which was last updated on 20 February 2019. The NPPF will be referred to as appropriate in the report.

NATIONAL PLANNING PRACTICE GUIDANCE (NPPG)

DCLG published the National Planning Practice Guidance on 6 March 2014 and it is regularly updated. The NPPG will be referred to as appropriate in the report.

RELEVANT PLANNING HISTORY

91337/DEM/17 - Demolition of all buildings including vacant unit. (Consultation under Schedule 2, Part 11 of the Town and Country Planning (General Permitted Development) (England) Order 2015. Prior Approval Approved 08.06.2017.

H04717 – Change of use from entertainment centre to DIY homes & garden centre for supply to the public and trade of home and garden maintenance and improvement materials. Approved 15.11.1978.

APPLICANT'S SUBMISSION

The applicant has submitted the following information in support of this planning application:

- Planning Statement
- Design and Access Statement
- Retail Sequential Test
- Heritage Statement
- Crime Impact Statement
- Wind Microclimate Report
- Air Quality Assessment
- Noise and Vibration Impact Assessment
- Carbon Budget Statement
- Phase 1 Environmental Risk Assessment
- Arboricultural Impact Assessment
- Ecological Assessment
- Flood Risk Assessment and Drainage Strategy
- Transport Assessment
- Travel Plan
- Landscape and Townscape VIA
- Landscape Design Sketchbook
- Daylight and Sunlight Assessment

- Statement of Community Engagement
- Application Summary
- Viability Appraisal

CONSULTATIONS

Cadent Gas – no objection, it is highly likely that there are gas services and associated apparatus in the vicinity.

Environment Agency – no objection in principle, but advise that the site appears to have been the subject of past industrial activity which poses a medium risk of pollution to controlled waters. Advise that reference is made to the EA's 'Guiding Principles for Land Contamination' on managing risks to the water environment and consultation with Pollution and Licensing on generic aspects of land contamination.

Greater Manchester Cycling Campaign - no response received.

Greater Manchester Ecology Unit – a Phase 1 Habitat Survey of the proposed development site was undertaken on 14th December 2017. The survey was undertaken outside the optimum time to conduct such a survey, but given the nature of the site we are satisfied, that the results would not be significantly different if they were undertaken at the optimal time of year. We are therefore satisfied with the survey effort.

The building was assessed in April 2017 for its potential to support roosting bats and again in November 2017. The building together with the trees on site were considered to have a negligible potential to support roosting bats and therefore further survey effort is not required at this time.

The northern leylandi hedgerow and scattered trees on the southern boundary together with the scrub, have the potential to support nesting birds. We would therefore recommend that all hedgerow and tree works together with scrub clearance should not be undertaken in the main bird breeding season (March-July inclusive), unless nesting birds have found to be absent, by a suitably qualified person.

Artificial lighting can affect the feeding and commuting behaviour of bats. Bats are likely to use the retained trees along the railway line for commuting and foraging. We would therefore recommend that a lighting condition (during construction and post development) to ensure that lighting is directed away from any of the retained trees.

In line with the NPPF, we would recommend that opportunities for biodiversity enhancement be incorporated into the new development. These should include bat bricks and/or tubes within the new development, bat boxes, bird boxes and native tree and shrub planting.

Greater Manchester Fire Authority – no response received.

Greater Manchester Police (Design for Security) – a condition to reflect the physical security specifications set out in the Crime Impact Statement should be imposed should planning permission be granted.

Local Highway Authority – initial comments received from the LHA requested that further information was provided with regard to junction modelling, consideration of parking for the proposed commercial units, waste collection and details of the proposed connection to the Old Trafford Metrolink stop.

An addendum to the Transport Assessment was submitted which provided further information, in response to these queries. The highways comments received advise that the LHA have no objection to the proposed development subject to the imposition of conditions, planning obligations and informatives as appropriate. The LHA advised that the proposed development will generate additional traffic in both the morning and evening peaks, which will have a small impact on the Talbot Road/Great Stone Road junction.

As part of the consultation process the LHA note the comments raised by TFGM. The LHA have suggested that improvements to the pedestrian and cycle infrastructure are made and have advised that a contribution of £30,000 should be sought.

The proposed access, car and cycle parking provision is considered to be acceptable for the residential element of the proposed development, however further information has been requested in relation to parking and cycling provision for the commercial units.

Local Lead Flood Authority - It is considered that the proposed works will not cause flood risk to the development or the surrounding area, the application is therefore satisfactory for approval subject to the drainage being designed in accordance with the Flood Risk Assessment and Drainage Strategy.

NHS Trafford (Clinical Commissioning Group) – The proposed development would result in requirement for an additional 0.5 working time equivalent GPs.

Trafford Council, Heritage Development Officer – The development would be conspicuous by virtue of its height, massing, scale, siting and appearance and will harm the significance of Trafford Town Hall, Grade II listed; Longford Park Conservation Area and Old Trafford Cricket Ground. In the absence of a sufficient assessment of views to and from the application site of these heritage assets and within the LVIA it is not possible to quantify the level of harm at this stage of the application. However, it is considered that this would be less than substantial under paragraph 196 of the NPPF.

Trafford Council, Education Admissions – Our average pupil yield is 3 children per year group for every 100 properties. If the one bedroom flats are discounted, that leaves 302 properties with a pupil yield of 9 pupils per year group. The properties will be in the catchment area for Gorse Hill Primary School which is not routinely oversubscribed and could accommodate 9 additional pupils. However, the surrounding schools are all

heavily oversubscribed and the current spare capacity at Gorse Hill is used to accommodate those that cannot achieve a place elsewhere.

Trafford Council, Pollution & Licensing, Air Quality – the submitted Air Quality Assessment is acceptable and follows the methodologies of appropriate national standards and guidelines to reach a conclusion that the development will not have an adverse impact on local receptors due to pollutants from additional traffic movements, nor will future occupiers be exposed to unsatisfactory air pollution conditions once the development is operational.

The provision of electric vehicle (EV) charge points should be required for every new house (minimum 7kWh) with dedicated parking or 1 charge point (minimum 7kWh) per 10 car parking spaces for unallocated car parking. For commercial developments there should be the provision for 1 charge point (minimum 7kWh) per 1000 m² of commercial floorspace.

A Construction Management Plan is required prior to commencement of the development.

Trafford Council, Pollution & Licensing, Land Contamination - The submitted Phase 1 Environmental Risk Assessment report has identified that there may be risk associated with possible contamination from a former gun club, coupled with the potential contaminating activities of B&Q. A condition is recommended to secure the submission of a phase 2 investigation and risk assessment.

Trafford Council, Pollution & Licensing, Nuisance – concerns were initially raised regarding noise impact from concerts at the adjacent LCC ground as this was not adequately assessed in the Acoustic Design Assessment.

Following these initial concerns a Framework Management Plan was provided which proposes a strategy to ensure that tenants are aware of the permitted activities at LCC at the outset through tenancy agreements and that information is provided to them on forthcoming events. The strategy also intends to manage tenants who may be disrupted within their apartments during events by offering a selection of activities elsewhere on the site that could be attended as an alternative.

There is no objection to this proposed development subject to the imposition of recommended conditions.

Trafford Council, Housing Strategy – no objections in principle to the above planning application which will bring much needed residential units into Old Trafford. The scheme proposes to provide 433 units of residential accommodation which is a positive contribution towards addressing the housing needs of the borough.

Trafford Council, Strategic Planning – no objections in principle. The principle of residential development would be supported on this site. Policy SL3 advises that

development in this area would be expected to contribute to necessary public transport, cycle way, footpath and highway improvements and the creation of a strategic processional route.

Policy GM-H 4 of the draft GMSF is relevant in relation to the proposed density of this scheme which would result in a density of approximately 433dph, which is significantly above the GMSF policy requirement of 70dph.

It is considered that the nature of development proposed on this site is such that it will perform differently to generic developments within a specified market location. A site specific viability study is therefore required to determine an appropriate affordable housing contribution.

A Retail Sequential Test was submitted as part of the application and this assessment found that there were no sequentially preferable sites within, or on the edge of the identified centres. From this assessment it is considered that the applicant has satisfied the requirements of the sequential test.

Trafford Council, Arboriculturalist – no objections to the proposed development subject to conditions.

Trafford Council, Waste – based on the number of flats the development would need approximately 50 bins for refuse, 25 for paper and cardboard and 25 for glass, cans and plastic. This does not include any provision for food waste collections which Trafford Council are just starting to actively promote in flats.

Trafford Council collect from flats on the same frequency as normal households in Trafford so refuse is fortnightly; paper/card and glass, cans and plastic on a 4 weekly cycle.

Where bin stores are easily accessed and there is a drop kerb for bins to be safely wheeled to the refuse collection vehicle, Trafford Council will collect refuse from apartments.

Trafford Council - Greenspace Strategy - The application involves residential development with a significant capacity in terms of new numbers of residents, which will place additional pressure on existing open spaces and outdoors sports facilities locally such as Longford Park, Gorse Hill Park, Stretford Sports Village and Turn Moss Playing Fields.

The proposed development would generate demand for open space provision in line with R5 and SPD1. Preference is for open space to be provided on site, although the nature of the site and its constraints may be such that this is not possible, in which case it may be possible to make provision offsite by upgrading the quality of existing open space facilities.

As the scale of the proposed development exceeds 300 dwellings, additional demand for indoor and outdoor sports facilities will be generated in line with R5 and SPD1 (2014). However, as part of the Council's approach through the adopted Playing Pitch Strategy (2017) and collaboration with Sport England, formal outdoor sports provision is directed towards the site most appropriate to accommodate the additional demand, rather than on-site provision necessarily being preferred. This is in keeping with Sport England's most recent facilities planning guidance and its emphasis on making new or upgraded provision at the most suitable location, informed by up to date local assessments of supply and capacity. Sport England have provided figures based on their most up to date facilities costs, which would be spent on a combination of improvements to natural turf pitches (£105,735) at youth and mini soccer levels, as well as contributing to proposed artificial turf pitch (£76,815) and changing facility improvements (£246,982) to be spent at Turn Moss and other similar facilities.

Transport for Greater Manchester – the initial comments from TfGM raised concern with regard to trip distribution and trip generation figures, road safety record and junction assessments. The submitted Transport Assessment also omitted any details of committed schemes in the area. Further information was requested.

An addendum to the Transport Assessment was submitted and TfGM confirmed that they were satisfied with the trip generation and distribution figures and junction modelling, which indicates that there are currently queues/delays at the junction of Chester Road / Greatstone Road in the evening peak and this increases slightly with the development and a number of mitigation measures were requested:

- Improvement of the pedestrian facilities at the Talbot Road / Greatstone Road junction;
- Upgrading of the Talbot Road / Greatstone Road junction to SCOOT to enable more efficient operation of the junction and enable coordination with adjacent junctions on Talbot Road and Chester Road.
- Installation of CCTV camera to Talbot Road / Greatstone Road junction to enable monitoring of junction and intervention if required;
- Funding towards the Mayor's Challenge Fund cycling scheme at the junction of Talbot Road / Greatstone Road.

Transport for Greater Manchester, Metrolink – there is reference in the documentation to provision of a new access route to the Old Trafford Metrolink stop. However, there is no further detail included in the submission in relation to the design and delivery mechanism of this potential access to the stop. TfGM would support the inclusion of this footpath link but there is currently no budget in place to pay for these works which would include:

- Acquisition of LCC land (however not all of it would be required)
- Footpath construction
- Lighting
- CCTV
- Ongoing maintenance

Due to the proximity of the development to the operational Metrolink line, conditions requiring a Construction Management Plan and a scheme for acoustically insulating the proposed development against noise and vibration from the adjacent Metrolink line would be required, should planning permission be granted.

United Utilities – no objection subject to the imposition of recommended conditions

REPRESENTATIONS

Ten letters have been received objecting to the proposed development on the following grounds:

- Traffic congestion from new development will impact on local roads – how will this be managed?
- There are existing parking issues around Gorse Crescent
- Lack of parking within the proposed development – most homes these days have two or more cars
- Parking issues on match day events
- Great Stone Road at certain times of the day is bottlenecked and it can take 20 minutes to get from The Quadrant to Talbot Road – this development will put more pressure on this road.
- Noise and pollution
- The development will impact on the value of property
- A DIY store would be of more benefit to the area than residential development.
- A development of this size is not in keeping with the local area and would put a strain on local infrastructure
- 433 apartments is excessive
- The size of the building is excessive and taller than any building nearby. It is imposing to the extent that it interferes in people's private lives, blocks out lighting and towers above the other largely residential houses in the area. Some of the houses along Great Stone Road will have their front rooms and bedrooms looked into.
- Trent Bridge Walk already suffers from a lack of light, it is dark and intimidating. With a 13 storey tower block shading it as well it will become more so. It will encourage crime and discourage visitors and locals from using it to access public transport.
- Apartments will prevent families from settling and create a transient community
- Great Stone Road is extremely busy with traffic at peak times with four schools, a college and offices in the local area
- The development will not benefit the community
- Would like to see houses on this site
- There are no pedestrian crossings in the vicinity – this would need to be addressed in the new development
- Green communal space should be included
- There are local shops in the area (Quadrant and Talbot Road), any new retail space should only be given to businesses which are not in direct competition

with these existing businesses. There are plenty of chain stores locally and new retail space should go to local independent businesses

- The local transport network is already busy, particularly the tram. How will the local population be serviced?

One of the ten letters of representation is from LCC and Bruntwood, the adjoining land owners and set out the following concerns and comments on the application received:

- Concerns over the methodology and conclusions of the TVIA, Acoustic Design Statement, Vibration Assessment and Plant Noise Limits Report, Daylight and Sunlight Report, Wind Microclimate Report;
- The Screening Report submitted by the applicant was not supported by the necessary technical documents. This approach does not accord with the EIA Regulations (2017) and as such TMBC's decision to issue a negative EIA Screening Opinion could not have been a fully informed one. TMBC should therefore review its Screening Opinion of 26 April 2018 to take account of the relevant technical evidence;
- The proposed scale and massing of the development will have a significantly harmful effect on the existing urban pattern, skyline and character of the locality and as such is contrary to Policy L7 of the Core Strategy;
- The proposal will result in an overbearing development that causes overshadowing and visual intrusion of the existing properties by virtue of the proposed height, increased site levels and proximity of the buildings.
- The submitted noise and vibration assessment does not fully consider the impacts of the proposed development on existing receptors and as such it is not possible to ascertain the full potential amenity impacts of the proposed development.

Following receipt of this letter, a further Screening Opinion exercise was carried out by officers on the basis of the submitted planning application documents. This concluded that the proposed development was not EIA development.

OBSERVATIONS

PRINCIPLE OF DEVELOPMENT AND THE DECISION-TAKING PROCESS

1. S38(6) of the Planning and Compensation Act 1991 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF at Paragraphs 2 and 47 reinforces this requirement and at Paragraph 12 states that the presumption in favour of sustainable development does not change the statutory status of the development plan as a starting point for decision making, and that where a planning application conflicts with an ***up to date*** (emphasis added) development plan, permission should not normally be granted.
2. The Council's Core Strategy was adopted in January 2012, prior to the publication of the 2012 NPPF, but was drafted to be in compliance with it. It

remains broadly compliant with much of the policy in the 2019 NPPF, particularly where that policy is not substantially changed from the 2012 version. It is acknowledged that policies controlling the supply of housing are out of date, not least because of the Borough's lack of a five year housing land supply, but other policies relevant to this application remain up to date and can be given full weight in the determination of this application. Whether a Core Strategy policy is considered to be up to date or out of date is identified in each of the relevant sections of this report and appropriate weight given to it.

3. The NPPF is a material consideration in planning decisions, and as the Government's expression of planning policy and how this should be applied, should be given significant weight in the decision making process.
4. Paragraph 11 d) of the NPPF indicates that where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, planning permission should be granted unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
5. Policies controlling the supply of housing and those relating to design and heritage are considered to be 'most important' for determining this application when considering the application against NPPF Paragraph 11 as they control the principle of the development and are relevant to the impact of this large building on the streetscene and the existing residents living close to the site. The Council does not, at present, have a five year supply of immediately available housing land and thus Policies L1 and L2 of the Core Strategy are 'out of date' in NPPF terms. Policy SL3 of the Core Strategy is out of date insofar as it refers specifically to housing on the site but otherwise this policy is considered to be compliant with the NPPF. Policy L7 of the Core Strategy is considered to be compliant with the NPPF and therefore up to date as it comprises the local expression of the NPPF's emphasis on good design and, together with associated SPDs, the Borough's design code. Policy R1 of the Core Strategy, relating to the historic environment, does not reflect case law or the tests of 'substantial' and 'less than substantial harm' in the NPPF. Thus, in respect of the determination of planning applications, Core Strategy Policy R1 is out of date.
6. Although Policy R1 of the Core Strategy can be given limited weight, no less weight is to be given to the impact of the development on heritage assets as the statutory duties in the Planning (Listed Buildings and Conservation Areas) Act 1990 are still engaged. Heritage policy in the NPPF can be given significant

weight and is the appropriate means of determining the acceptability of the development in heritage terms.

The Strategic Location

7. The application site is located in the 'Lancashire Cricket Club Quarter' Strategic Location, which is covered by Core Strategy Policy SL3. As the Council no longer has a five year supply of deliverable housing land, Policy SL3 cannot be considered to be up-to-date as it refers specifically to the number of residential units which were considered could be provided within the Strategic Location (400 units). Nonetheless, in other respects the policy is considered to be broadly compliant with the NPPF as it seeks to deliver a strengthened mixed use community centred around the existing sporting and community facilities. The LCC Quarter is one of the most visited places in the Borough containing the sporting attraction that is the Cricket Club and a number of important community facilities such as Trafford Town Hall, Trafford College and Stretford Leisure Centre, the area is however also fragmented by a number of large footprint single uses. CS Policy SL3 identifies a significant opportunity to improve the visitor experience for its sporting attractions and to create a new residential neighbourhood.
8. CS Policy SL3 states that major mixed-use development will be delivered in this Location to provide a high quality experience for visitors balanced with a new, high quality residential neighbourhood centred around an improved stadium at LCC. CS Policy SL3 goes on to state that the Council considers that this Location can deliver:
 - A redeveloped LCC 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.
9. It should be noted that the LCC Strategic Location has already delivered a partially redeveloped LCC sports stadium, a redeveloped and renovated Trafford Town Hall and a superstore. Improvements have also been made to the local highway network including the introduction of cycle route improvements along Talbot Road.
10. Policy SL3 of the Core Strategy indicates that the 400 residential units will be delivered between 2011 and 2021, with the phasing as follows:

2008/09- 2010/11	2011/12 2015/16	2016/17 2020/21	2021/22 2025/26	TOTAL
0	60	300	40	400

As can be seen, it was expected that 60 dwellings would have been built in the Strategic Location by 2015/16 and a further 300 dwellings by 2020/21. To date 377 dwellings have been granted planning permission within this Strategic Location, 245 dwellings are currently under construction and seven have been completed. Although the delivery of housing has missed the 2015/2016 target, it is well on the way to achieving the delivery target for 2020/2021. It is considered that the LCC Quarter Strategic Location has therefore delivered a significant proportion of dwellings against the above schedule.

11. It should be noted however, that the Core Strategy does not limit the number of new dwellings to be provided within this location to 400 and the proposed development of an additional 433 dwellings in this location would contribute significantly to the housing land supply.
12. The Draft Land Allocations Plan (LAP) is at a very early stage in its preparation and has been put on hold, pending the production of the Greater Manchester Strategic Framework, therefore has limited material weight in the determination of this application. Notwithstanding this, the LAP remains the most recent statement of policy published by the Council (2014) in respect of this site. The supporting Land Allocations Consultation Draft Policies Map identifies the LCC Quarter Strategic Location referred to in Core Strategy Policy SL3 as part of policies LAN1 and LAN2.
13. Policy LAN1 identified the LCC Quarter Strategic Location as a location suitable for a mix of residential and supporting commercial and/or community uses to serve the needs of the proposed and existing communities within the Strategic Location. With regard to residential accommodation specifically, LAN 1 states that a minimum of 400 residential units should be delivered in the Plan period 2014 – 2026/27 and residential development will be encouraged at densities of between 30 and 150 dwellings per hectare in the form of a number of apartment blocks varying in height storeys. LAN 1 advises that development within this area should provide a range of 2, 3 and 4-bed dwellings provided in well-designed buildings with approximately two thirds of the units suitable for families. LAN1 further indicates that development within the Lancashire Cricket Club Quarter should be designed to a high quality, reflecting the significance of the Strategic Location as a visitor destination of Regional significance.
14. Policy LAN1 also encourages a mix of uses, including a range of retail uses (Use Classes A1 to A5), commercial, leisure and community facilities (Use Classes D1 and D2) at a scale to serve the needs of the proposed communities within the Strategic Location. This policy also details the provision of new open space and green infrastructure required to support the anticipated residential development in this area.

15. The Draft LAP states in Policy LAN 2 that the Council will support the continued use and improvement of the area identified on the Policies Map for a cricket stadium and associated hospitality, conference, club store, events, hotel and spectator/visitor car park uses by Lancashire Cricket Club. A range of commercial and/or community uses (including use classes A1, A2, A3, A4, A5, B1, C1, D1, D2 and similar appropriate uses) will be encouraged where they support the operation of the Stadium and are consistent with other policies within the Local Plan and relevant criteria within national policy. Residential development will be supported on sites fronting onto Great Stone Road and Talbot Road, including where it is part of a mixed-use scheme, the policy states.
16. It should be noted that the justification for Policy LAN2 states *“The function of the area as a stadium and major tourist destination should not be compromised through significant impact on the operation and/or amenity of the LCC Stadium or other uses in the vicinity of the proposal, including issues of security and overlooking.”*
17. The Civic Quarter Masterplan and Refreshed Stretford Masterplan are not considered to be determinative documents in the assessment of this planning application.

Housing Land Supply

18. The NPPF places great emphasis on the need to plan for and deliver new housing throughout the UK. The Government’s current target is for 300,000 homes to be constructed each year to help address the growing housing crisis. Local planning authorities are required to support the Government’s objective of significantly boosting the supply of homes. With reference to paragraph 59 of the NPPF, this means ensuring that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed, and that land with permission is developed without unnecessary delay. Within the Core Strategy, the first Strategic Objective - SO1 - recognises the importance of promoting sufficient housing across the Borough to meet Trafford’s needs.
19. The responsibility of local planning authorities in supporting the Government’s ambitions include identifying and updating annually a supply of specific deliverable sites to provide five years’ worth of housing against their housing requirement. This is in addition to a new Housing Delivery Test (introduced in November 2018 as part of the revised NPPF) which is intended to measure a local planning authority’s performance in facilitating the delivery – rather than merely planning for – new homes.
20. Policy L1 of the Core Strategy seeks to release sufficient land to accommodate a minimum 12,210 new dwellings (net of clearance) over the plan period up to

2026. Policy L1 is out of date in so far as the calculation of housing need should be based on the more up to date 2014 'Local Housing Need' figures. Using the 2014 LHN calculations, this is 1,335 net homes per annum required. Given Trafford's historic under delivery of housing a 20% buffer is used within the calculation. Moreover, with the introduction of the Government's own figures for housing need, albeit these are yet to be confirmed, the 2019 assessment is now likely to be far in excess of the figures set out in the Core Strategy.
21. Regular monitoring has revealed that the rate of building is failing to meet the housing land target and the latest monitoring (based on 2014 LHN) suggests that the Council's has a housing land supply of 2.6 years. Additionally, the Council is required to demonstrate how many new homes it is actually delivering in the Government's Housing Delivery Test, introduced in November 2018. Therefore, there exists a significant need to not only meet the level of housing land supply identified within Policy L1 of the Core Strategy, but to meet the more up to date LHN figure and also to make up for a historic shortfall in housing completions. A first stage calculation undertaken by the Government (released in February 2019) suggested that, across Trafford 47% of homes have been delivered when compared with the number of homes required over the last three year period.
 22. The use of the Government's housing requirement for Trafford represents a transitional arrangement until the GMSF is in place. The GMSF is an overarching spatial plan aimed at delivering growth and prosperity across Greater Manchester. It will set out a broad framework for the development of Greater Manchester over the next two decades, and this will include the amount of new development that should come forward for residential and employment purposes across the ten authority areas. A further consultation draft of the GMSF has recently been published, with the public consultation ending on the 18th March 2019. Again, this takes an ambitious approach to growth, in line with the NPPF, including providing for a minimum of 201,000 new homes throughout Greater Manchester. In giving a disaggregated (draft) figure for Trafford, a minimum requirement of 19,280 new homes is identified over the plan period (from 2018 to 2037). This equates to an average annual requirement of 1,015, which similarly represents a significant uplift relative to the Core Strategy's position. It is accepted, however, that the figures in the GMSF have yet to be ratified and as such the higher Government-provided figure is presently in force. Upon its adoption, the agreed minimum target set out in the GMSF will be carried through to the new Trafford Local Plan. Clearly, the Government's interim target and the draft GMSF target are both far in excess of that set out in the Core Strategy, and thus it is unequivocal that the required five year supply based upon these new targets is not in place. Nonetheless, that the proposed development of an additional 433 dwellings in this location would contribute significantly to the housing land supply in the Borough is not disputed.
 23. The NPPF requires policies and decisions to support development that makes efficient use of land; including giving substantial weight to the value of using

suitable brownfield land within settlements for homes and to support the development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (paragraph 118). That the proposed development site is a vacant, brownfield site in a sustainable location in a borough that does not have a five year rolling supply of housing land is acknowledged, as is the recognition that the site represents an opportunity to deliver a high density scheme. However, the NPPF also makes it clear, at Paragraph 122 that the requirement to make efficient use of land must take into account, amongst other matters, the desirability of maintaining an area's prevailing character, and the importance of securing well-designed, attractive and healthy places. That the site is suitable for a high density residential led scheme is not disputed. However, the number of units proposed leads to a development which is entirely out of scale with its surroundings. A scheme could be brought forward which makes beneficial use of this brownfield site and delivers a sizeable number of units without the commensurate harm. These matters are discussed later in the report.

Housing Mix

24. The NPPF at paragraph 61 requires local planning authorities to plan for an appropriate mix of housing to meet the needs of its population and to contribute to the achievement of balanced and sustainable communities. This approach is supported by Policy L2 of the Core Strategy, which refers to the need to ensure that a range of house types, tenures and sizes are provided.
25. Policy L2 of the Core Strategy indicates that the proposed mix of dwelling types and sizes should contribute to meeting the housing needs of the Borough as set out in the Council's Housing Strategy and Housing Market Assessment. Policy L2 sets out that the Council will seek to achieve a target split of 70:30; small:large (3+ beds) with 50% of the "small" homes being accommodation suitable for families. For the LCC Quarter Strategic Location, Policy SL3 of the Core Strategy states residential development should provide accommodation suitable for families.
26. The proposed development would provide for a mix of 131 x 1-bed apartments, 234 x 2-bed apartments and 68 x 3-bed apartments. This equates to a split of 86:14 small:large units - a significantly higher proportion of small units than the target set out in Policy L2. It should also be noted that Policy L2.7 states that the development of one bed room dwellings will normally only be considered acceptable for schemes that support the regeneration of Trafford's town centres and the Regional Centre.
27. The applicant has sought to justify the proposed housing mix with a Housing Needs Statement and has explained that three bedroom apartments are not typically provided in high rise apartment schemes, where developers often only providing studios, one and two bedroom apartments, as they seek to maximise

the number of properties in the building to improve viability. However, the provision of 68, three bedroom apartments in this scheme is in direct response to the needs of the market as identified by Policy L2 and the SHMA. Of the smaller apartments provided, the majority are two bedrooms, as required by Policy L2.

28. Consultation with the Council's Housing Strategy officer has been undertaken in the interests of ensuring that the housing mix proposed would meet the particular housing needs of the area as far as can be ascertained at the present time given that there is no up-to-date evidence regarding the specific housing requirements of the area, other than a general sense that family housing is required. Of the small units 64% would be two bed and suitable for families which is in generally accordance with the 50% requirement set out in Policy L2. It is also noted that the size of the proposed units is larger than the nationally described space standards, which means that some of the two bed properties are suitable for four people.
29. In relation to the mix of affordable units proposed (11 x two bed units and 10 x one bed units) 50% are considered to be suitable for families (i.e. two bed) and therefore policy compliant as far as the mix is concerned.
30. Overall the mix of units would provide a range of new homes for families and smaller households and so in terms of housing mix, the scheme is considered appropriate for this Strategic Location.

Affordable Housing

31. The NPPF states that for major development involving the provision of housing, at least 10% of the homes should be available for affordable home ownership. In respect of the provision of affordable housing. At the local level, the requirement to secure an affordable contribution is covered by Core Strategy Policy L2. Core Strategy Policy L2 does not capture the broader range of affordable housing categories advanced by the NPPF and is thus out of date on this point. Nevertheless, L2 seeks to ensure that a range of housing tenures are provided across the Borough which helps to secure the achievement of balanced and sustainable communities in line with the general tenor of advice on this point set out within Paragraph 61 of the NPPF. Policy L2 is clear that – in respect of all qualifying development – appropriate affordable provision should be made. In recognising that the Borough does not perform as a single uniform property market, the policy explains that Trafford is split into three broad market locations which have different percentage requirements for the provision of affordable housing. As corroborated by the accompanying Supplementary Planning Document (Revised SPD1: Planning Obligations, July 2014), which draws upon the recommendations of the Trafford Economic Viability Study (2009 and a 2011 update), the application site is located within a 'cold market location.' In such locations, provision of affordable housing at a lower level is typically sought than in 'moderate' and 'hot' market locations. Policy L2 and SPD1 also recognise that

different market conditions can apply throughout a development plan period which also impact upon the level of affordable provision that a new residential development can successfully sustain. 'Poor market conditions' had been in force since the Core Strategy's adoption which was in recognition of the UK housing market undergoing a period of significant downturn following the 2008 recession. However, in recent years the residential market has shown signs of recovery and has now re-stabilised. It follows that in November 2018 a recommendation of officers to accept a shift to 'good market conditions' for the purposes of negotiating affordable housing and applying Policy L2 and SPD1 was accepted by the Planning and Development Management Committee. The effect, therefore, is that within this 'cold market location' and under present 'good market conditions' a 10% affordable housing target will normally be applied, the SPD advises. However, in addition to the application of the affordable housing policy on the basis of geographical and market conditions, Policy L2 and SPD1 go on to explain 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%"*. SPD1 also states that this approach to the application of Policy L2 and SPD1 will apply in the case of most of the strategic locations.

32. Family housing (generally in the form of terraced and semi-detached dwellinghouses) predominates throughout the Old Trafford area. Whilst there are some examples of apartment developments, these tend to be either fairly recent office to residential permitted development conversions located elsewhere within the ward, generally focussed along Chester Road and Talbot Road to the east of the application site, or otherwise much lower rise and lower density apartments, a high proportion of which have been provided and managed by Trafford Housing Trust as affordable homes. The application proposal, in offering an extremely high density build-to-rent scheme, in a higher-rise development, deviates from the area's conventional housing, and is in fact targeted at a broader audience. It is therefore considered that the proposed development has the potential to outperform – in development value terms - for its market location. On this basis, and in accordance with Core Strategy Policy L2, the appropriate level of affordable housing should be dependent on the findings of a site-specific financial Viability Assessment.
33. Despite the view expressed by the Local Planning Authority at pre-application stage, the planning submission and subsequent correspondence confirms that the applicant proposes to provide just 5% affordable housing on this site, as the applicant maintains that the proposed development is 'generic' in its nature and that the 'generic' market location affordable housing targets apply in this instance. The application was submitted whilst Trafford Council were in 'poor' market conditions and the applicant has been notified that the authority has been operating in 'good' market conditions since November 2018 and that if the market location approach to affordable housing were to be applied to this development,

10% affordable housing would be required to be policy compliant. Their affordable housing offer remains at 5%, which equates to 22 units.

34. The development is proposed to be brought forward as 'Build to Rent' and in accordance with the definition of Affordable Housing in the NPPF Glossary, in this instance it is appropriate to bring forward the required affordable housing as affordable housing for rent. Should the proposed development be considered acceptable, the tenure and mix of any affordable units would be need to be secured via a S106 Agreement to secure the necessary planning obligations.
35. Although the correct application of Policy L2 is disputed by the applicant, a Viability Appraisal was submitted in order to enable validation of this planning application. This appraisal was reviewed by the Council's independent viability advisor who does not consider the appraisal to be robust, having raised queries relating to land value, the ratio of the Net Internal Area (NIA) to Gross Internal Area (GIA), fees, finance rates and fittings, furnishings and equipment costs. Whilst a rebuttal was provided by the applicant's viability consultant, the concerns regarding the appraisal remain. It is not therefore considered that the submitted Viability Appraisal demonstrates unequivocally that if Planning Policy requirements for S106 contributions and Affordable Housing are greater than that proposed (5% affordable housing) that the proposed development would be undeliverable on viability grounds. The proposed development is therefore considered to be contrary Core Strategy Policy L2 in this regard.

Commercial uses

36. The submitted planning application also seeks planning permission for the development of 1,181 m² of flexible commercial floorspace (Use Classes A1, A3, B1, D1, and/or D2) within six units. The permission seeks to keep these uses flexible and interchangeable. The following amounts of floorspace are proposed across the six units:

Unit	Floorspace (m²)	Location
A	155	First floor
B	575	Split across first and second floors (276 and 299 respectively)
C	51	Second floor
D	362	Ground floor – partially double height
E	38	Second floor

37. Paragraph 86 of the NPPF requires local planning authorities to apply a sequential test to planning applications for main town centre uses which are not located within an existing centre. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

38. The use classes proposed as part of this development (A1, A3, B1, D1, and/or D2) fall within the definition of 'main town centre uses' in the NPPF.
39. Policy W2 of the Core Strategy, which is considered to be compliant with the NPPF in supporting the growth of town centres and the role they play in local communities and is therefore up-to-date for the purposes of decision making. It states that outside the established retail centres, there will be 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.
40. A sequential test was submitted in support of this planning application, which assessed the level of floor space on an aggregated basis and assessed the availability of floorspace (ranging between 1,063 m² and 1,299 m², allowing for a flexibility of 10% in floorspace area either way) within an agreed search area.
41. The assessment focused on Great Stone Road Neighbourhood Centre and Gorse Hill and Trafford Bar Local Centres. All vacant sites within the defined centre and within circa 300m (edge of centre) were assessed.
42. The assessment found that there were no sequentially preferable sites within, or on the edge of the identified centres. Officers have analysed the submitted assessment and concluded that the applicant has satisfied the requirements of the sequential test, in that it has been demonstrated that there are no sequentially preferable sites (either within or closer to established retail centres) that could accommodate the proposed retail units.

Conclusion on the principle of development

43. The emphasis placed on local planning authorities by the Government to facilitate the delivery of new homes is clear. This Council was already behind its Core Strategy target in demonstrating a five year supply of deliverable housing land. However, in recent months with the publication of the new NPPF, the annual housing requirement has risen more than two-fold as Government-prepared figures have had to be accepted, and in going forward a similarly elevated figure is expected as part of the GMSF. In the absence of a five year supply, and with housing delivery now also monitored, the effect of paragraph 11 of the NPPF is that local planning authorities are effectively penalised in the decision-taking process since the balance is in favour of granting approval '*unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits*'.
44. This application would provide 433 new homes and as such would make a considerable contribution to the present, uplifted annual requirement. It would help to address the supply deficit and would make some contribution to enabling the Council to move towards a more ordinary approach to decision-taking in time,

which would be beneficial overall. Furthermore, these new homes would be provided on brownfield land in a sustainable location.

45. Officers have been mindful of the policy aim to achieve mixed, balanced and sustainable communities. An acceptable mix of housing is proposed, which would contribute to the needs of Old Trafford's current and future populations. When taking into account the policy position, both nationally and locally it is clear that the principle of residential and mixed use development is acceptable on this site. However, it is not considered that the current affordable housing offer of 5% is acceptable or fully justified. It is not considered that the Viability Appraisal demonstrates unequivocally that if Planning Policy requirements for S106 contributions and Affordable Housing are greater than the 5% proposed that the proposed development would be undeliverable on viability grounds. Therefore in this instance, the scheme is not considered to be compliant with Policy SL3, L2 or L8 and fails to comply with the requirements of SPD1.

DESIGN AND APPEARANCE

Policy Background

46. The promotion of high standards of design is a central narrative within the NPPF. Paragraph 8 of the NPPF outlines three objectives which are key to achieving sustainable development, one of which is a social objective. The delivery of a well-designed and safe built environment is part of achieving that strong social objective. The NPPF continues, at paragraph 124, that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 130 urges local planning authorities to refuse 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. It continues that, when determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help to raise the standards of design more generally in an area.
47. The Core Strategy also attaches importance to the design and quality of the Borough's built environment. The text supporting Policy L7 advises that high quality design is a key factor in improving the quality of places and in delivering environmentally sustainable developments. Design solutions must: be appropriate to their context; and enhance the street scene by appropriately addressing scale, density, height, massing, layout, elevational treatment, materials, hard and soft landscaping, and boundary treatments, the policy is clear. Policy L7 is considered to be compliant with the NPPF as it comprises the local expression of the NPPF's emphasis on good design and, together with associated SPDs, the Borough's design code. It can therefore be given full weight in the decision making process.

48. Both the supporting text to L7 and paragraph 129 of the NPPF also stress the importance of using tools such as Building for Life in the design of development. As part of a suite of independent design review work assessments undertaken on behalf of the Council, a Building for Life assessment of the proposed development was completed. This will be referred to where relevant within the assessment of the design of the proposed development.
49. The site is occupied by a vacant single storey retail warehouse which does not positively contribute to the character and appearance of the area. The ground level of the existing site is generally level, however Great Stone Road rises in height the highway.

Independent Design Review

50. The local planning authority expressed great concerns over the scale and massing of the proposed development during pre-application discussions and advised that the applicant at an early stage that a development of this scale would not be considered acceptable by the Local Planning Authority. The submitted scheme remains the same as that shown to the Local Planning Authority during the most recent pre-application discussions, albeit a scheme for a residential tower of 26 storeys had initially been proposed by the applicant.
51. Due to the scale of the proposed development and initial concerns of the Local Planning Authority over the proposed development it was considered appropriate for an independent review of the scheme design to be instigated. Turley were appointed to complete a design review alongside a TVIA review.
52. The design review by Turley focussed on the DAS to aid understanding of the local character and subsequent design development and analysed the development against Core Strategy policy L7, the NPPF, PG1 and the emerging Civic Quarter Masterplan (which is acknowledged to be of limited weight). The conclusions of these reviews are included within the assessment of the submitted planning application below.

The Proposed Development

53. The proposed development comprises the construction of a residential block of apartments which is between five and 13 storeys in height, including the 'basement' car park.
54. The site is generally level; however it is sited adjacent to the Metrolink line and the part of Great Stone Road which rises in height to create a bridge over the Metrolink line. Much of the site therefore sits below the adopted highway.
55. The site retains the existing vehicular access at the north western corner of the site and introduces a new pedestrian access half way along the sites frontage.

Due to the topography of the site the new main site entrance is located at podium level above the car park and level with Great Stone Road. A stepped pedestrian access is also proposed at the southern end of the site, adjacent to the Metrolink line. This provides access to a pedestrian footpath which extends to the east extending around the proposed development to a rear pedestrian entrance. A proposed new pedestrian link to the Old Trafford Metrolink stop is suggested on the drawing but the provision of this link would require third party land. The vehicular access wraps around the building to the north-west and east and provides access to the car park and bin stores.

56. The podium would result in parked vehicles being shielded from the public highway and provides a level development platform for the proposed development. An area of public realm and landscaping is proposed to the front of the site. The separation distance between the front elevation of the proposed development and the adopted footway varies between 8.3 metres and 15.8 metres.
57. The proposed development is sited between 7.25 metres and 7.65 metres from the north western boundary with the LCC car park, approximately 11 metres from the north eastern boundary with LCC and between 8.8 and 9 metres from the south eastern boundary with the Metrolink line. The proposed development has a width of 99 metres across the site and is 65 metres deep.
58. The front elevation of the proposed development is between 5 and 7 storeys, with two storey high set backs at the upper levels of this elevation, the front elevation is also recessed at various points along its frontage. Pedestrian access into the courtyard areas and communal areas of the development is gained through two undercroft access points into each courtyard.
59. The front elevation creates an active frontage to Great Stone Road with commercial units also present at first floor/podium level.
60. The building steps up in height to the rear (north eastern elevation) of the site through gradual stepping of three adjoining elements located at either end of the development and through the centre of the development.
61. The north western elevation which is visible when approaching the site from Talbot Road rises in height in three steps from seven storeys in height to eleven storeys and finally to thirteen storeys. The central section of the proposed development which would also be visible from this approach above the north western end elevation also rises in height from seven to eleven to thirteen storeys, but in a different arrangement to the setbacks on the north western elevation. The south eastern elevation which is visible on the approach from The Quadrant/Chorlton direction steps up in height from nine to thirteen storeys in one change of building height.

62. The façade treatment is contemporary in design. The side and rear elevations have less articulation than the front elevation with no recesses in the elevations, with the exception of some integral balconies. They have a more uniform standard appearance.

Townscape Visual Impact Assessment

63. An initial review of the submitted TVIA produced by TPM Landscapes Ltd was undertaken by Turley which advised on a number of omissions, errors and inconsistencies in the submitted document. A revised TVIA was requested to address the comments raised and this was submitted by the applicant in January 2019. This assessment of the TVIA within this Committee Report is based on a review of the revised TVIA.
64. Visual Impact Assessments provide a useful tool to help identify the effects of new developments on views and on the landscape and townscape itself. They allow changes to views and landscape/townscape to be understood and ultimately inform the design of the proposed development.
65. The submitted TVIA characterised the application site as a mixed urban site with a low landscape sensitivity along with the adjacent car parking area and Lancastrian Office block. LCC is characterised as a recreational/leisure area (medium landscape sensitivity) and the surrounding dwellings as a residential character area (low-medium landscape sensitivity).
66. Fourteen wireframe viewpoints, the location of which can be seen at Appendix 1 were produced to inform the TVIA. The viewpoint images are included at Appendix 1.0 of the submitted TVIA. These viewpoints provide a visual representation of what the proposed development would look like from each viewpoint.
67. The applicant's TVIA concludes that the proposed development will be visible from locations close to the proposal site. They consider that the townscape and visual changes which will result from the development will be contained to a relatively small area with, recorded visual effects over moderate substantial only occurring within 0.6 km from the site, and then only where views of the building are possible. The applicant considers that the nature of change which will result from the scale and appearance of the proposed development will be noticeable and prominent but not always adverse. The applicants TVIA considers that some change from a number of vantage points would be neutral and potentially beneficial in nature. The applicants TVIA also states that *“no notable townscape effects are recorded and no notable effects are assessed for the local conservation and historic assets. For those visual effects that are notable at moderate-substantial or above, the mitigation proposals reduce some of these over time through screening and integration. Those that remain are expected to*

become over time an accepted part of the established urban scene with the nature of change altering from adverse to neutral.”

68. The revised TVIA was independently reviewed by Turley who advised that additional viewpoints should be sought to enable a better understanding of the proposed development. The additional viewpoints sought were
- Great Stone Road to reflect the properties facing towards the Site;
 - In Longford Park to reflect views experienced by park users and within the Longford Conservation Area; and,
 - Within the cricket ground (to reflect views from the non-designated heritage asset and users/visitors of the ground).
69. No additional viewpoints were provided as the applicant’s landscape architect considers that the 14 viewpoints used in the TVIA give a comprehensive geographic coverage and enable understanding of visual impacts. A set of fully rendered viewpoints were also requested during the application process, as it was not considered that the use of wireframe images on a development of this scale is appropriate and that the impact of the proposed development would be easier to assess in either block or fully rendered imaging.
70. It is however considered that the impact of the proposed development on the Lancashire Cricket Club has not been adequately considered either in terms of its visual impact (i.e. impact on views to and from the cricket ground) or in terms of the likely impact on the character and identity of the club. The assessment has also failed to consider the impact of the proposed development on the character of Longford Park, which is a Conservation Area, nor on views into or out of it.
71. Whilst these viewpoints were not initially identified by the Local Planning Authority during pre-application discussions, the request was not considered unreasonable during the determination process.
72. With regard to LCC, it is also considered that the baseline assessment gives insufficient consideration of LCC as a separate townscape receptor and area of townscape importance. This is an internationally important sports venue which makes an important contribution to the character and identity of Trafford and the cultural heritage of the area and is also considered to be a non-designated heritage asset. The impact of the proposed development on Lancashire Cricket Club has not been adequately considered either in terms of its visual impact (i.e. impact on views to and from the cricket grounds) or in terms of the likely impact on the character and identity of the club.
73. It is considered that the TVIA over emphasises the taller buildings to the north of the site and does not provide sufficient consideration of the larger proportion of the surrounding area which has a prevailing height of two storeys. It is also considered that the assessment of the effect of the proposed development on character has generally under-stated the likely scale of the development in

comparison with the existing buildings surrounding the cricket club, Metrolink stop and office developments off Talbot Road. The assessment describes the existing buildings (which are a maximum of six storey) as being 'broadly similar and coherent in scale' as the proposed development which actually extends to the equivalent of 13 storeys. This is an inaccurate judgement on the relative heights of the proposed development and surrounding existing buildings.

74. It is also considered that the predicted magnitude of change for some of the views has been understated and the use of landscape (rather than portrait photography) in visualisations has meant that the upper part of the building is not shown in some images. This gives an incomplete and inaccurate representation of the likely visual impact of the proposals. It should also be noted that 'Visual Representation 1' is not accurate as a large proportion of the building frontage is missing from the wireframe model.
75. It is considered that the conclusion of the TVIA that there would be 'no notable townscape effects' arising from the proposed development is an inaccurate summary of the likely impact of the development and as concluded by Turley the proposals are likely to result in some significant impacts on the local townscape character and key views. Whilst it is acknowledged that some effects will be beneficial such as the introduction of a new active frontage along Great Stone Road and the removal of the existing building on site, the scheme is also likely to result in negative townscape and visual effects. These primarily relate to the scale and massing of the proposed scheme which is out of scale with the character of the surrounding area.
76. The review by Turley concludes that:

"Key impacts on townscape character arising from the development would include a reduction in the prominence and importance of the cricket ground in the local townscape character and a dominating effect on both the cricket ground and the surrounding residential area. The cricket club currently makes a significant contribution to the character and cultural identity of the area and erosion of this has the potential to affect the cultural character and identity of the local area.

In terms of potential impacts on views and visual amenity, the proposed development would appear as an overly dominant feature in many views. Views from within and around the cricket ground are likely to be adversely affected by the introduction of a long, 13 storey high elevation which would be a dominant and intrusive feature in the background of views (currently open sky). Other views likely to be significantly affected are those along Great Stone Road (in both directions) and from surrounding residential areas and open spaces to the south and west. In these, the development would form a prominent feature on the skyline which would be out of character with the local area."

77. Overall the Turley report concludes that the proposed development would result in some harm to the local townscape character and visual amenity. Officers agree with the conclusion of the Turley report and although it is considered that the TVIA fails to robustly assess the impact of the proposed development on the local and wider townscape, the submitted TVIA does provide a sufficient level of information to inform a decision on this application.
78. The visual representations 1-8 and 13 included in Appendix 1.0 of the submitted TVIA demonstrate that the proposed development will be highly visible from a number of viewpoints. Its prominence is exacerbated by the scale, height and massing of the proposed development and it is clear within the viewpoints that there are no developments of a comparable scale which sit within the same viewpoint. This indicates that the scale of the proposed development is out of keeping with the general character of the development area.

Scale and Height of Proposed Development

79. This planning application includes scale as a matter to be determined as part of this outline planning application.
80. The proposed development is 13 storeys in height at its highest, stepping down to four to six storeys in height along the Great Stone Road site frontage. The rear element of the proposed development has a consistent height of 13 storeys across the width of the proposed building (99 metres) and there are no breaks in the massing of the rear element of this development.
81. The Design and Access Statement does not include an explanation as to how the height of the proposed development has been derived, however the scale analysis on page 11 of the DAS illustrates the prevailing scale of the immediate location and indicates that this ranges from 2 to 6 storeys. Some larger office blocks are referenced along Talbot Road such as Oakland House (15 storeys), however this is several hundred metres from the site, it addresses a primary route into the city and also faces another office block. The analysis of existing building heights in the DAS would therefore suggest a lower scale building would be more contextually appropriate in this location than that proposed.
82. The Building for Life 12 Assessment carried out by Turley on behalf of the Council assesses the relationship of the proposed development against the existing development in the area and concludes that the proposed development acknowledges the existing large scale buildings to the north and east, and the domestic scale of the existing residential area to the south east and south west by stepping down in height from 13 to 5 storeys. However the proposed overall height is still significantly out of scale with its surroundings and would present a monolithic elevation to the cricket ground despite the proposed planting along this boundary. It is not considered that the area set aside for planting along the rear boundary of the site would provide adequate space for a landscaping scheme which would soften the appearance of the proposed development. This

large slab of masonry will dominate the skyline when viewed from within the cricket ground and beyond as there will be no other built structures that will be a commensurate height.

83. As seen in the visual representations included within the TVIA the proposed development does not sit within the context of large scale development and is predominantly viewed against a setting of two storey residential dwellings, the cricket spectator stands which are six storeys in height and the adjacent Lancastrian House office development, which is two and six storeys in height. Whilst the floodlighting columns are seen in views these do not dominate the views or local skyline.
84. The design review describes the proposed development as a large, tall, monolithic residential building which has no comparator in the local area and states that the imposing scale of the building also fails to respond sensitively to the adjacent housing. The review notes that there is a transition in height across the site, however it is considered that the storey height of the proposed development is too high throughout and the scheme is not appropriate within its context.
85. Overall it is considered that the proposed scheme results in the development of a large, tall, monolithic residential building which has no comparator in the local area whilst the imposing scale of the building fails to respond sensitively to the adjacent two storey dwellings. It is not clear whether there would be a requirement for roof top plant on the building. In the absence of such information, it has to be assumed that plant will be sited on top of the roof, which will only add to the building's height and mass.

Layout

86. This planning application includes layout as a matter to be determined as part of this outline planning application. The submitted plans are not fully detailed, for example, annotated room layouts are not included on the floor plans. The submitted details are however considered to be sufficient to determine the acceptability of the site layout.
87. The layout retains the existing vehicular access point from Great Stone Road and upgrades this to create an access road around the proposed development which serves entrance points to the lower ground floor car park.
88. The site layout addresses the change in levels of Great Stone Road through the use of a podium across the site which allows the proposed development to address Great Stone Road at a level which is accessible by pedestrians at various points along its frontage. A new pedestrian-only access point is created from Great Stone Road, which is segregated from the vehicular entrance to avoid conflict. Due to the podium style development, this level access is created directly from Great Stone Road. A level pedestrian/cycle access to the ground

floor commercial unit is also provided adjacent to the vehicular access, this footway leads to a set of steps which provides access to the remainder of the development. A further stepped pedestrian/cycle access into the development is located to south of the site, this connects to a path which runs along the boundary of the site adjacent to the Metrolink line and provides a separate access to the rear of the site which avoids conflict with vehicles. The applicant has stated that they intend that this pathway will form a direct link to Old Trafford Metrolink stop to the east. At this time however, this is not possible as the proposed connection would require the use of land which is currently in the ownership of LCC.

89. The proposed development is set back from the back edge of the pedestrian footpath along Great Stone Road by between 9.8 metres to 15.3 metres, as the layout incorporates a number of setbacks along this street scene. The proposed development seeks to create an active frontage to Great Stone Road with pedestrian access points and commercial units at the ground floor. It is considered that this is achieved with a degree of success along Great Stone Road.
90. The remaining three elevations however, have no animation at ground floor level. The design review states that as there are no access points along the south eastern elevation this would make the pedestrian path along this boundary both unpleasant and potentially unsafe. The north eastern and western elevations have only vehicular and service access which would again make the pedestrian experience along these long facades unpleasant and potentially unsafe.
91. The layout of the proposed development results in a single block of development. With the scale and massing of the proposed scheme this results in a form of development which limits permeability through the site, both visually and physically. Whilst the adjacent uses limit the requirement for such a link, it is considered important for a development of this scale to be visually permeable. The layout of the proposed development, by reason of the size of the footprint of the proposed development also leaves insufficient room for appropriate landscaping to soften the appearance of the proposed development. As a result the proposed development appears as a large unbroken and impermeable building mass with an over-dominant visual impact on the surrounding area.
92. The layout of the site, combined with the height of the proposed development results in an overshadowing impact of the building on the internal landscaped courtyards. This is explored in more detail within the 'Amenity' section of this report, but is another indicator that the layout and scale of the proposed development is inappropriate.

Appearance

93. This planning application includes appearance as a matter to be determined as part of this outline planning application. The submitted plans are not fully

detailed and additional details have been requested through the determination process, for example window sets backs and balcony details.

94. The character of the local area is varied and so there is no prevailing character in the area to influence the scheme design. The submitted Design and Access Statement has a limited narrative on the design rationale for the proposed development, commenting that the proposed materials will be brick in response to the local materials in the surrounding area. The submitted documentation does not provide a rationale on design cues or influences for the proposed development.
95. The front façade, although irregular in appearance, appears thoughtfully composed with set-backs at various points along the frontage, integral balconies which create a depth to the façade and a well-balanced frontage. The building design is contemporary in nature, which is considered to be an acceptable approach in this area.
96. Drawing no. PL_230 provides additional design details to the elevation drawings for the front elevation only with a cross section of proposed balcony design, textured brick work detailing and balcony screens and limited recessed brickwork detailing. No window recess details have been provided as part of the application.
97. The rear and side elevations do not benefit from the same design approach as the front façade and there is little relief or detail in these three facades. Small integral balconies are proposed within these elevations, but generally the facades are monotonous in their appearance.
98. Although some additional information was provided with regard to the detail of the front elevation, the overall level of detail provided is considered to be insufficient to determine whether the appearance of the proposed development is acceptable, particularly when the application is seeking planning permission for the appearance of the proposed development. The details provided relate to the front elevation only and there is no indication of the level of detail proposed on the remaining three elevations of the proposed development; therefore it is not possible to determine the design quality of these elevations.
99. Proposed materials have not been discussed as part of the application; however the submitted information indicates that light/medium brickwork with a string course in a feature brick, glazed balconies, terracotta baguettes in a lightweight aluminium frame, and curtain walled glazing at ground floor level is proposed. Overall this use of materials is considered to be acceptable, however there are concerns that the use of brick as the sole material within the development could appear monotonous and exacerbate the scale of the proposed development. This concern however, essentially results from the excessive scale and mass of the building.

100. The sheer scale of the rear façade, combined with the design approach results in a development which appears monolithic and will dominate views around the area.
101. The applicant has failed to demonstrate that appearance of the proposed development will be acceptable and appearance is sought as a matter for approval at outline stage. It is considered that the scale, mass and failure to break up the elevations adequately, together with the absence of drawings to indicate that the proposed development would look anything other than monolithic.

Density

102. The Local Plan does not seek to impose either minimum or maximum densities on proposed development however, the issue of density is referred to in Strategic Objective 1 of the Core Strategy which states that the Council will promote sufficient high quality housing in sustainable locations, of a size, density and tenure needed to meet the Borough's needs and to contribute towards those of the city region. Policy L1.4 states that the Council will seek to ensure the efficient use of land, concentrating higher density housing development in appropriate and sustainable locations where it can be demonstrated that it is consistent with the provisions of L2 (Meeting Housing Needs). These policies can be seen to encourage higher density development in appropriate locations and Policy L7.1 goes further to act as a 'sense check' and states that development should enhance the street scene or character of the area by appropriately addressing density, amongst other criteria.
103. The NPPF addresses the issue of density in paragraphs 122 and 123. Paragraph 123 states that *"Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site"* and at bullet point c) states *"local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework"*
104. Although the NPPF encourages the efficient use of land, paragraph 122 does caveat that development should also take into account the desirability of maintaining an area's prevailing character and the importance of securing well-designed, attractive and healthy places.
105. Throughout the NPPF there is an emphasis on good design, therefore it is clear that although higher density developments are encouraged within the NPPF, they should not be high density to the detriment of development design and development should be appropriate to its location.

106. Although the GMSF is of limited weight in the determination of this application, Policy GM-H 4 is of relevance in terms of density. Increasing the average density of new housing developments in the most accessible locations is an important part of the overall strategy in the GMSF, it will help to ensure the most efficient use of the land, assist in the protection of greenfield land and maximise the number of people living in the most accessible locations. In Policy GM-H 4 this location is within the 'Other rail stations with a frequent service and all other Metrolink stops' category. This states that where sites are within 400 metres of these transport locations, the minimum net residential density should be 70 dwellings per hectare (dph).
107. The Turley design review assessed the density of the proposed development using the Floor Space Index tool, which calculated the proposed development as having a density of 4.6 which is more suited to that of city centre development. As a comparable the recently constructed high density student residential phase of Circle Square in the heart of Manchester city centre has an FSI of circa 4.6. The completed New Union Street residential development by Manchester Life in Ancoats (edge of city core) has an FSI of circa 3.0 and Pomona Phase 2 in Trafford (an isolated residential site within an industrial context) has an FSI of circa 3.0, and a density of circa 400 dwellings per hectare (dph). In terms of a dph figure the proposed development site measures 1 hectare, which results in a housing density of 433 dph.
108. The density of the proposed development is considered to be inappropriate and excessive for the suburban location of this application site, particularly when the density of the immediately adjacent residential development is in the region of circa 30-40 dwellings per hectare and there is no relevant precedent in the surrounding area.

Conclusion on design and appearance

109. Good quality design is an integral part of sustainable development. The NPPF and PPG recognise that design quality matters and that the planning process should be used to drive up standards across all forms of development.
110. The proposed development at 13 storeys in height with a density of 433 dph is considered to be significantly out of keeping with the general character and appearance of the local area in terms of scale, massing and density. There are no comparators within the vicinity of the application site and it is apparent in the representative views contained within the submitted TVIA that the proposed development would appear as an incongruous feature within the local and wider streetscene.
111. The layout of the site results in the development of one single block of development which restricts views through the site and combined with the design approach results in a development which appears monolithic and will dominate views around the area.

112. The layout of the site, in combination with the scale of the development also results in overshadowing of the internal courtyard amenity areas, which is considered to be a further indicator that the scale of the proposed development is not acceptable.
113. The front façade of the proposed development does deliver some positive features with the creation of an active frontage to Great Stone Road and an interesting contemporary design approach which utilises an irregular appearance, set back and recessed balconies to create a well composed elevation. However, it is not considered that this overcomes the harm caused by the sheer scale and width of even this elevation. There are also concerns that the use of just brick as the main building material through the development will intensify the impact of the scale of the proposed development.
114. The rear and side elevations do not benefit from the same design approach as the front façade and there is little relief or detail in these three facades which generally appear monolithic and monotonous.
115. Overall it is considered that the proposed development would not deliver a high quality designed scheme and the proposed development is considered to be contrary to Core Strategy Policy L7 and the NPPF, which indicates at paragraph 130 that 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.

HERITAGE

116. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Local Planning Authority to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.
117. Policy R1 of the Core Strategy states that all new development must take account of surrounding building styles, landscapes and historic distinctiveness and that developers must demonstrate how their development will complement and enhance existing features of historic significance including their wider settings, in particular in relation to conservation areas, listed buildings and other identified heritage assets. This policy does not reflect case law or the tests of 'substantial' and 'less than substantial harm' in the NPPF. Thus, in respect of the determination of planning applications, Core Strategy Policy R1 is out of date and can be given limited weight.
118. Paragraph 193 of the NPPF establishes that when considering the impact of a proposed development on the significance of a designated heritage asset, great

weight should be given to the asset's conservation. The NPPF sets out that harm can either be substantial or less than substantial and there will also be cases where development affects heritage assets but from which no harm arises. Significance is defined in the NPPF as the value of a heritage asset to this and future generations because of its heritage interest, which includes any archaeological, architectural, artistic or historic interest. The significance of a heritage asset also derives from an asset's setting, which is defined in the NPPF as 'the surroundings in which a heritage asset is experienced'.

119. The application site lies within the setting of Trafford Town Hall which is Grade II listed, Longford Park Conservation Area and Old Trafford Cricket Ground, which is considered to be a non-designated heritage asset.
120. Trafford Town Hall is significant for its aesthetic, historical illustrative and communal values. The clock tower in particular is an important local and distinctive landmark and views of this contribute greatly to its aesthetic value. Its landmark quality orientates residents and visitors and provides a focal point within the locality. A clock face is intentionally visible on all four elevations of the tower emphasising the importance and visibility of this civic building at the time of construction in 1933 and this remains the case today. Currently there are glimpses of the clock tower from within and across the application site; these views therefore contribute to the significance of this Grade II listed building. It should be noted that Core Strategy Policy SL3 also references the requirement for new development to protect, preserve and enhance the listed Trafford Town Hall.
121. The site will be visible from Longford Park Conservation Area. The significance of the Conservation Area derives from the site of the former Longford Hall and its association with John Rylands. During the 20th century, the Estate was designated as a public park and a key aesthetic value of the site comes from its green spaces, mature trees and planting. The layout of the spaces reflects both the park's historic estate use and changes made during its use as a park. The central and southern parts of the Conservation Area are defined by the estate buildings, formal gardens and tree lined paths, whereas the northern end of the park is much more open in character, with wide expanses of fields. In the 1930s a number of buildings and structures were added to the park including the former Firwood Library and entrance from the Quadrant to the north. The park, which is also highly valued as a recreational facility, provides vistas across to the open space to the north of the Conservation Area and beyond from the former Firwood Library towards the application site.
122. The Old Trafford Cricket Ground and pavilion are identified as a non-designated heritage asset. The pavilion was designed by Thomas Muirhead architect also of the pavilion at the Oval. Despite being altered and rebuilt after WWII bomb damage as well as a comprehensive redevelopment in recent years, the building maintains its original layout and relationship with the cricket pitch. The building

remains an iconic image of LCC and has remained in its intended use since 1895. Similar to Trafford Town Hall, there are glimpses of the pavilion and cricket ground from Great Stone Road across and from within the application site.

123. Viewpoint 5 of the LVIA demonstrates the impact of the proposed development on views across the application site which will be completely obscured, by the single block approach to the proposed development. The proposed development will result in the loss of views of Trafford Town Hall and LCC and based on the submitted information, it is considered that the proposal will harm the significance of Trafford Town Hall, Grade II listed and LCC as a non-designated heritage asset for this reason.
124. Despite the potential impact on the Longford Park Conservation Area identified in the submitted Heritage Statement, there are no viewpoints included in the TVIA taken from either the Park or former Firwood Library. It is considered that there is intervisibility between the application site and the Conservation Area and the height, scale and massing of the proposed development has the potential to impact on the aesthetic significance of the Conservation Area. In the absence of these additional viewpoints it is difficult to ascertain the level of harm to that significance. It should be noted that an additional viewpoint from Longford Park was requested during the application process however the applicant's landscape architect did not consider it necessary for further viewpoints to be provided.
125. It is considered that the development would be conspicuous by virtue of its height, massing, scale, siting and appearance and would harm the significance of Trafford Town Hall, Grade II listed; Longford Park Conservation Area and LCC. The level of harm that would arise in relation to Trafford Town Hall and LCC is considered to be less than substantial. In the absence of a sufficient assessment of views to and from the application site and Longford Park Conservation Area it has not been possible to quantify the level of harm to this heritage asset. In the absence of this information the applicant has failed to demonstrate that any impacts on Longford Park Conservation Area would comply with NPPF policy or guidance in the Conservation Area Appraisal and Conservation Area Management Plan.
126. Where a development proposal will lead to less than substantial harm to a designated heritage asset, paragraph 196 of the NPPF indicates that this harm should be weighed against the public benefits of the proposal.
127. It is acknowledged that the proposed development would provide a number of public benefits, most notably 433 apartments on a vacant brownfield site in a sustainable location, and at a time when the Council cannot demonstrate a rolling five year housing land supply. This would represent a significant contribution to the Council's housing land supply figures and targets for delivering residential development on brownfield sites. The proposal would provide 22 affordable

homes, and is also likely to provide increased spending in the local area and a benefit to local shops. Considerable weight must therefore be given to these benefits, albeit that the scale of benefit in terms of housing numbers only arises as a direct result of the inappropriate design, height, scale and mass of the proposed building and the consequential harm identified here and elsewhere in this report. It is also noted that many of these benefits would also result from the provision of an alternative scheme that appropriately addressed these matters. However, the harm caused to the significance of Trafford Town Hall, a designated heritage asset, as a result of the design, excessive height, scale and mass of the proposed development, and the consequential loss of views of the clock tower, is such that the public benefits identified are not considered to outweigh this harm.

128. With regard to the impact of the development on the significance of the LCC ground, a non-designated heritage asset, paragraph 197 of the NPPF indicates that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Turley's assessment of the development proposal concluded that the development would result in a reduction in the prominence and importance of the cricket ground in the local townscape character and a dominating effect on the cricket ground itself. The cricket ground currently makes a significant contribution to the character and cultural identity of the area, adding further to its significance. Harm resulting from the erosion of this significance, as a result of the proposed development, is considered in the planning balance section at the end of this report.
129. In relation to the consideration of the development proposal against paragraph 11d) of the NPPF, it is considered that the adverse impacts to designated heritage asset resulting from the scheme provide a clear reason for refusal of the application. The public benefits of the scheme are not considered to outweigh the less than substantial harm identified. The proposed development is also contrary to Core Strategy Policy R1.

AMENITY

130. In addition to ensuring that developments are designed to be visually attractive Para 127 of the NPPF advises that planning decisions should create places that provide a high standard of amenity for existing and future users.
131. Policy L7 of the Core Strategy contains similar requirements and requires development to be compatible with the surrounding area and not prejudice the amenity of future occupiers of the development and/or occupants of adjacent properties by reason of, amongst others, overbearing, overshadowing, overlooking, visual intrusion, noise and/or disturbance. It has already been concluded earlier in this report that L7 is considered to be up to date for decision making purposes and that full weight can be attached to it.

132. A range of issues have been considered under the broad topic of residential amenity in this case. All issues are considered in turn below, and with the impacts on both existing and prospective residents discussed.

Overlooking

133. An important consideration in seeking to deliver and maintain good standards of residential amenity is associated with avoiding adverse overlooking. This is ordinarily achieved by ensuring that an appropriate degree of separation exists, particularly between habitable room windows of facing properties, and also when bearing in mind the prospect for private amenity space to be overlooked.
134. The Council's New Residential Development Planning Guidelines document (PG1) does not include specific distance guidelines for tall buildings, other than stating that for development of four or more storeys where there would be major facing windows, flats should retain a minimum distance of 24m across public highways and 30m across private gardens. These guidelines were not written with high density developments in mind and carry limited weight in these circumstances.
135. Habitable room windows are located in all elevations of the proposed development with all flats within the development having a single aspect outlook.
136. The nearest existing residential properties are located opposite the site on Great Stone Road. The front façade of the proposed development is located between 36.5 metres and 39.5 metres from the front elevation of the existing residential dwellings on Great Stone Road. It should be noted that these dwellings are set at a lower ground level than Great Stone Road rising in height in front of these dwellings.
137. The application site is also located adjacent to the existing residential dwellings on Trent Bridge Walk which is located on the opposite side of the Metrolink line adjacent to the site. These dwellings are located between 45 metres and 49 metres away from the side elevation of the proposed development. The remaining external facing elevations will overlook the LCC ground and car parking area.
138. In terms of the internal layout, the courtyards achieve interface distances of 35 metres by 23 to 26 metres in the eastern courtyard and 32 metres by 27 metres in the western courtyard. Oblique views may be possible within the courtyard, however given the nature of the proposed development within a residential block and courtyard setting, this interface is considered to be acceptable.
139. The proposed development exceeds the separation distances set out within PG1. The proposed development would however result in the introduction of a significant number of new habitable room windows and balconies overlooking the existing dwellings on Great Stone Road and Trent Bridge Walk. Whilst these

residents are likely to feel overlooked as a result of this, particularly as these dwellings are not currently overlooked to their front elevations, the separation distances are considered to be acceptable and it is not considered that the proposed relationship would result in an unacceptable level of overlooking. The internal relationships within the proposed development are considered to be acceptable.

Overbearing impact

140. The need to ensure that the proposed development would not have an overbearing impact is a further, important residential amenity consideration. The term 'overbearing' is used to describe the impact of a building on its surroundings, and particularly a neighbouring property, in terms of its scale, massing and general dominating effect.
141. The existing situation of the dwellings located on Great Stone Road and Trent Bridge Walk must also be considered in assessing whether the proposed development would result in an overbearing impact to existing occupiers.
142. This proposal would introduce a building of significant height, scale and mass to the application site, which is not comparable to the scale of any development within the vicinity, which in itself is generally dominated by two storey residential dwellings.
143. Whilst SPD4 is not directly of relevance to a development of this nature as it focuses on residential alterations and extensions, it does advise on appropriate separation distances between developments to prevent an unacceptable overbearing impact. These are different to the privacy distances previously mentioned. Acknowledging the chief purpose of the SPD in informing householder planning applications, it recommends a distance of 15 metres between the principal elevation of one dwelling and a blank (i.e. no windows) elevation of another (assuming two-storey properties). For each additional storey, an additional three metres may be required, it continues.
144. The adjacent two storey residential dwellings will be most impacted upon by the proposed development and an assessment has to be made to understand whether the proposed development would result in an unacceptable overbearing impact on existing residents.
145. In assessing the proposed development against the criteria of SPD4 the proposed development would be expected to achieve a separation distance of 24 metres from the existing dwellings where it is five storeys in height, 30 metres where the development is seven storeys in height, 33 metres where the development is eight storeys in height and 48 metres where the proposed development is 13 storeys in height. The development achieves these distances.

146. Whilst the proposed development meets the standards set out in SPD4, it must be acknowledged that SPD 4 was written for house extensions and is not readily applicable in this scenario. Furthermore it is considered that the proposed development by reason of its sheer scale and mass will form a continuous block of development which would be readily visible from the windows, gardens and streets of the surrounding area. The proposed development would introduce a dominant and intrusive feature which would significantly affect existing views and appear completely at odds with the scale, form and character of the area. It is also considered that the proposed development would have a dominating effect on LCC. It is considered that attempts to break up the scale and mass of the building have been unsuccessful and have made little difference to the dominating and overbearing effect that the proposed development will have.

Outlook

147. The issue of outlook is also a consideration in the determination of impact on amenity. A satisfactory outlook should be maintained for existing properties and ensured for future occupiers of the proposed development.
148. Occupiers of the flats located at first and second floor level in the rear elevation of the proposed development would directly overlook a building which provides ancillary facilities to LCC and is located within the LCC ground. The building is industrial in design being clad in corrugated metal cladding. This building has an eaves height of approximately seven metres and is located approximately 12.5 metres away from the rear elevation of the proposed development where habitable room windows would be located.
149. Thirteen flats with single aspect outlooks would directly face this unit and a further three units would also look onto this elevation. Two of these units would result in bedrooms having a sole outlook onto this building and the living area of a third would also have a main outlook directly onto this elevation.
150. The issue of poor outlook of these rear elevation units was raised with the applicant who stated that *“the habitable rooms are essentially at first-floor level (3m above ground level). From this elevated position, the eaves of the LCC building would only be 4m above the first-floor floor level, which justifies a reduced offset than is set out in SPG1. It is also likely that the detailed landscaping scheme (reserved matter) will provide tree planting along this boundary.”*
151. Whilst this is true with the eaves being located 4.4 above the first floor level, the submitted Courtyard Sections AA and BB clearly demonstrate that the outlook of the units at first floor level would be poor. The outlook for the units at second floor level is slightly improved with the eaves being set approximately 1.6 metres above second floor level. Nonetheless an outlook over the service road onto a blank elevation for so many units is not considered to be ideal. Whilst the applicant indicates that this outlook would be softened with tree planting, the reality

is that the relationship of the development to the rear boundary is so tight that there would be very little room for tree planting which would provide any meaningful softening.

Daylight and Sunlight

152. With specific regard to amenity in terms of daylight and sunlight paragraph 123 c) of the NPPF states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site, the NPPF goes on to state that local planning authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
153. As previously noted Policy L7 also seeks to ensure that development must not prejudice the amenity of future occupiers of the proposed development and existing occupiers of adjacent properties.
154. New residential development should also be designed to ensure that adequate levels of natural light can be achieved. With this in mind, the application is accompanied by a specialist study which has sought to establish the extent of any sunlight and daylight loss on surrounding properties, and whether any overshadowing would occur and the level of daylight and sunlight serving the units within of the proposed development. For the sake of clarity, daylight is defined as the volume of natural light that enters a building to provide satisfactory illumination of internal accommodation between sunrise and sunset. Sunlight refers to direct sunshine, and overshadowing is a consequence of the loss of sunlight.
155. The report is based on the methodologies set out in the Building Research Establishment (BRE) report 'Site layout planning for daylight and sunlight - A guide to good practice'.
156. The report focuses on the nearest sensitive receptors, listed below. These 35 residential properties are located in the immediate vicinity of the site. No commercial receptors have been considered by this report.
 - No.s 9-21 Trent Bridge Walk (all inclusive)
 - No.s 47-61 Gorse Crescent (odd no.s only)
 - No.s 44 – 50 Great Stone Road (even no.s only)
 - No.s 54 – 58 Great Stone Road (even no.s only)
 - No. 55 Great Stone Road
 - No. 1 - 4 Gorse Avenue (all inclusive)
 - No.s 6 & 8 Gorse Avenue

157. The report also assesses the impact of the proposed development on future occupiers to establish whether a satisfactory level of daylight would be received internally.
158. The report refers to three measures of diffuse daylight: Vertical Sky Component (VSC), No-Sky Line (NSL) and Average Daylight Factor (ADF). Sunlight is measured as Annual Probable Sunlight Hours (APSH). Each of these is explored in further detail below.
159. The VSC method measures the amount of sky that can be seen from the centre of an existing window and compares it to the amount of sky that would still be capable of being seen from that same position following the erection of a new building. The measurements assess the amount of sky that can be seen converting it into a percentage. *If the VSC within new development is :*
- *At least 27% conventional window design will usually give reasonable results;*
 - *Between 15% and 27% special measures such as larger windows and changes to room layout are usually needed to provide adequate daylight;*
 - *Between 5% and 15% it is very difficult to provide adequate daylight unless very large windows are used;*
 - *Less than 5% it is often impossible to achieve reasonable daylight, even if the whole window wall is glazed.*
160. When assessing the VSC of existing developments, if the VSC, with the new development in place, is less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear gloomier and electric lighting will be needed more of the time. It should be noted that the 27% VSC target value is derived from a low density suburban housing model.
161. NSL is a measure of daylight distribution within an existing building/room. The NSL divides points on the working plane which can and cannot see the sky. In housing, the working plane is assumed to be horizontal and 0.85 metres above the floor. If from a point in a room on the working plane it is possible to see some sky then that point will lie inside the NSL contour. Conversely, if no sky is visible from that point then it would lie outside the contour. As areas beyond the NSL receive no direct daylight, they usually look dark and gloomy compared with the rest of the room, however bright it is outside. Supplementary electric lighting will be needed if a significant part of the working plane lies beyond the NSL.
162. When comparing the NSL for existing buildings against that proposed following development, BRE guidelines state that if the no-sky line moves so that the area of the existing room which does receive direct skylight is reduced to less than 0.8

times its former value, then this will be noticeable to the occupants, and more of the room will appear poorly lit from those that cannot.

163. Average daylight factor (ADF) is a measure of the overall amount of daylight provision in new rooms. The BRE guidelines advise that the acceptable minimum ADF target value depends on the room use and advises an ADF of 1% for a bedroom, 1.5% for a living room and 2% for kitchens. It should be noted that the BRE guidance advises that an ADF of 5% would provide a well daylight space and 2 % would provide a partly daylight space, where electric lighting is likely to be turned on.
164. Annual Probability of Sunlight Hours is a measure of sunlight that a given window may expect over a year period. BRE guidance recommends that at least one main window wall should face within 90 degrees of due south and the APSH received at a given window in the proposed development should be at least 25% of the total available, including at least 5% in winter.
165. BRE guidance notes that a dwelling with no main window wall within 90 degrees of due south is likely to be perceived as insufficiently lit. In large residential developments the number of dwellings whose living rooms face solely north, north east or north west should be minimised, unless there is some compensating factor such as an appealing view to the north,
166. When assessing the impact of APSH in existing developments, if a living room of an existing dwelling has a main window facing within 90 degree of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window, then the sunlighting of the existing dwelling may be adversely affected. This will be the case if the centre of the window fails to meet the criteria outlined above and received less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of APSH.

Daylight and sunlight impact on existing properties

167. Existing properties should be assessed against the BRE guidelines for VSC, NSL and ASPH.
168. Of the 35 properties assessed, 25 are 100% compliant in terms of VSC. Of the remaining ten properties (located on Trent Bridge Walk and Great Stone Road) 25 windows were assessed and all windows bar one achieved a value of 25% or more (27% being a good level of daylight). The one window which fell below this level serves a bedroom in No. 14 Trent Bridge Walk and this achieved a value of 18.72%.
169. The VSC also needs to be measured against its former value as daylight will be noticeably reduced if, after a development, the VSC is both less than 27% and

less than 80% of its former value. In terms of former value, the applicant's assessment indicates that the reduction in VSC when compared against its former value for these ten windows varies between 68% and 76%.

170. In total ten properties would be detrimentally affected by the proposed development in terms of VSC, where post development they would have a VSC which fails to comply with the BRE guidelines. The table at Appendix 2 outlines the impact that the proposed development would have on the existing dwellings.
171. 18 of the properties assessed fail to meet BRE criteria on NSL, which has a target of attaining 80% of their former value. Seven of the properties which fail to meet these guidelines do so minimally, i.e. achieve a NSL target between 70% and 80%. The remaining 15 properties which fail to meet the BRE NSL do so to a much more significant degree. The table at Appendix 3 outlines the No Sky Line data and the comments within the submitted Daylight Sunlight Report.
172. All of the windows assessed in terms of Annual Probability of Sunlight Hours passed the BRE criteria.
173. 19 of the 35 existing properties assessed failed to meet the BRE guidelines for both VSC and NSL, however the applicant's submitted assessment concludes that although there are some measures of daylight / sunlight to the windows/rooms examined in the surrounding properties which do not fully meet the individual BRE criteria, they find that on the whole the calculations are acceptable and that where there are deviations from the BRE guidance, their significance is offset by the following:
 - It is inevitable when constructing buildings in an urban environment that alterations in daylight and sunlight to adjoining properties can occur;
 - Deviations from the BRE guidelines are generally very minor/marginal and good levels of natural light are retained by most properties/windows when taking into account the existing environment;
 - The BRE guide states that for No Sky Line (NSL) "bedrooms should be analysed although they are less important" and the majority of rooms that experience any impact are bedrooms;
 - The BRE guidelines indicate that in interpreting the results of an assessment, a degree of flexibility is required;
 - The BRE tests are based on a typical (two storey) suburban model of development and it is reasonable to assume that expectations of levels of daylight sunlight will be different in developing larger properties such as this. This is noted in the guide itself.

Conclusion on daylight / sunlight impact on existing properties

174. The Local Planning Authority acknowledges that some flexibility should be applied in the consideration of daylight and sunlight as set out in paragraph 123 of the NPPF in order to facilitate the delivery of higher density developments.

However, it should be borne in mind that this application site is located within (and impacts upon) a low density suburban area and not an urban environment as implied within the submitted assessment, therefore it is considered that the proposed development should generally comply with the figures set out in BRE guidance.

175. The impact of the proposed development is such that it fails to comply with the relevant BRE daylight criteria standards in relation to nineteen existing properties. It is considered that the infringement of the guidelines with regard to VSC is minimal, with all properties bar one achieving a figure above 25%. However the non-compliance with the NSL guidelines is of greater concern with eleven properties achieving a NSL figure of less than 70%, where the target is 80%. Four windows achieve less than 30% compliance, three between 31-40% compliance, one between 41-50% compliance, seven between 51-70% compliance and six between 61-70% compliance. The submitted Daylight/Sunlight Report acknowledges that where the NSL is at the lower end of the range, this is a major impact, however the report quantifies that as it bedroom windows which are affected the impact is of less significance. Whilst it is acknowledged that the vast majority of the affected windows serve bedrooms, the degree of non-compliance is nonetheless concerning and a number of properties will have to rely more on electric lighting to achieve adequate internal lighting levels. This is considered to be an unacceptable impact on residential amenity, caused by the height and layout of the proposed development.

Daylight and sunlight impacts on proposed units

176. Residential units within proposed developments should be assessed against the BRE guidelines for VSC, ADF and ASPH.
177. As with existing developments a VSC of 27% should be achieved for the proposed units. The applicant's study shows that 189 out of 661 windows assessed have a VSC of greater than 27% and pass the BRE guidelines. A further 88 windows have a VSC of between 22% and 27%, which the submitted assessment concludes are only marginally below the required level. 110 of the remaining 384 windows have a VSC between 17% - 22%, which the submitted assessment concludes is reasonable and the other and the remaining 274 have a VSC below 16%.
178. The submitted report indicates that only 384 windows out of 1,357 (28%) in the whole development are outside being classed as fully compliant or a minor fail of the BRE guidelines for VSC and the results for the proposed building can therefore be considered acceptable, the applicant's consultant concludes.
179. An analysis of the figures shows that the majority of the 274 windows which have a VSC below 16% are located on the first to fifth floors of the proposed development and 89 (6%) of these windows achieve a figure of less than 10%. A

review of the figures shows that one window serving a bedroom achieves a value of only 0.04%.

180. Although the figure of 27% is based upon a low density suburban model and some flexibility should be applied, BRE guidance states that where VSC figures are between 5% and 15% it is very difficult to provide adequate daylight unless very large windows are used and where less than 5% it is often impossible to achieve reasonable daylight.
181. Average Daylight Factor (ADF) is also considered within the submitted Daylight Sunlight Report. The ADF for 244 out of 604 rooms assessed exceed the minimum BRE guideline requirement.
182. The ADF levels to a further 128 rooms was assessed as being between 0.75% and 1% (bedrooms where 1% is the target value), 1.25% and 1.5% (living rooms where 1.5% is the target value) and 1.75% and 2.0% (kitchens where 2.0% is the target value). These are considered within the report to be only marginally below the target level.
183. 130 of the remaining 232 rooms return ADF values of between 0.5% and 0.75% (bedrooms where 1% is the target value), 1.0% and 1.25% (living rooms where 1.5% is the target value) and 1.5% and 1.75% (kitchens where 2.0% is the target value). The remaining 102 rooms have ADF levels that are below 0.5% (bedrooms where 1% is the target value), 1.0% ((living rooms where 1.5% is the target value) and 1.5% (kitchens where 2.0% is the target value). All of these windows fall below the target level.
184. In reviewing these figures it should be remembered that where the ADF is below 2% rooms will look dull and electric lighting will likely be turned on to provide adequate internal lighting levels and the figures within the guidance are the minimum values recommended. The submitted report sets out the position that only 232 of the 1,230 rooms assessed are outside being classed as fully compliant or a minor fail of the BRE guidelines for ADF. Technically 360 rooms comply with the minimum ADF guidance levels, which equates to 71 % of the rooms within the development not complying with the BRE guidance. An analysis shows that dwellings on all floors will be affected by poor ADF levels, however the majority affected are located on the lower floors of development, particularly the first to fifth floors.
185. In terms of APSH, 310 of the 661 windows assessed did not fall within 90 degrees of due south and were not assessed for APSH.
186. Where measured, the APSH calculations to 260 of the 351 windows are well above the BRE recommended levels of 25% in *summer*. Of the remaining 91 windows, 46 have summer APSH levels of between 20% and 25%, 30 have

summer APSH levels of between 15% and 20% and the remaining 15 windows have summer APSH levels of below 15%.

187. Where measured, the annual probable sunlight hours calculations to 260 of the 351 windows are well above the BRE recommended levels of 5% in *winter*. Of the remaining 91 windows, 33 have winter APSH levels of between 3% and 5%, 35 have winter APSH levels of between 1% and 3%, and the remaining 23 windows have winter APSH levels of below 1%.
188. Analysis by officers shows that the rooms which would suffer from a poor level of APSH are primarily located on the first to fifth floors.

Conclusion on daylight / sunlight for the proposed units

189. From an analysis of the data contained within the submitted report it is clear that residents of the units on the lower floors of the proposed development, in particular the first to fifth floors would be subject to daylight and sunlight levels which are below the BRE guidance levels set out for VSC, ADF and APSH measurements. Whilst each impact on its own may not be considered to be an issue, when taken collectively, it is considered by the Local Planning Authority that a considerable number of the residents of the proposed development, would not benefit from an adequate level of daylight or sunlight and this would be detrimental to their residential amenity. These adverse impacts have arisen as a result of the height and layout of the proposed development.

Wind Microclimate

190. A Wind Microclimate Report was submitted in support of the planning application. The report assesses the effect of the proposed development on the local microclimate against best practice guidelines for pedestrian comfort and safety. These two aspects are associated with pedestrian use of public open spaces.
191. Wind environment is defined as the wind flow experienced by people and the subsequent influence it has on their activities. It is concerned primarily with wind characteristics at pedestrian level.
192. The study has been produced using the widely applied wind environment criteria for pedestrian comfort and safety developed by T.V. Lawson (Lawson, 2001) from Bristol University.
193. The Lawson Criteria have been applied to determine the acceptability of wind conditions for pedestrian safety and comfort.
194. Pedestrian comfort is assessed against wind speed and duration and is split into five 'comfort categories':

Sitting	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods.
Pedestrian Standing	Gentle breezes suitable for main building entrances, pick-up/drop-off points and bus stops.
Pedestrian Leisure Walk	Moderate breezes that would be appropriate for strolling along a city/town centre street, plaza or park.
Business Walk	Relatively high speeds that can be tolerated if one's objective is to walk, run or cycle without lingering
Uncomfortable	Winds of this magnitude are considered a nuisance for most activities, and wind mitigation is typically recommended.

195. The Lawson criteria identifies a safety criterion to identify those areas where someone could find walking difficult, or even stumble and fall. The Lawson criteria define threshold wind speeds not to be exceeded for more than 0.025% of the year.

Safety Rating	Threshold Mean-hourly Wind Speed Exceeded Once Per Annum (0.025%)	Wind conditions as experienced by people
Unsuitable for the general public	>15 m/s	Less able and cyclists find conditions physically difficult.
Unsuitable for able-bodies	> 20 m/s	Able-bodied persons find conditions difficult. Physically impossible to remain standing during gusts.

196. A baseline scenario model was produced to ascertain the existing conditions on the site before the proposed development was modelled. This baseline model identified a number of sensitive receptors which were assessed. These are identified on the figure included at Appendix 4 which is an extract from the submitted Wind Microclimate Report.
197. The assessment of the existing site conditions found that in terms of pedestrian comfort there were some areas where wind speeds tend to accelerate, particularly in the winter months. Windier conditions were also noted at receptors 1, 39 and 10. Conditions here are identified as suitable for standing. Receptor 9 was also shown to have some local wind acceleration. This area shows localised exceedance of the sitting criteria during winter but is generally suitable for standing.

198. In terms of pedestrian safety, the baseline scenario model indicates that the wind environment within and outside the site in the baseline condition is within the recommended criteria for safety on the basis that the wind speeds are unlikely to exceed 15m/s for 0.025% of the year, in line with the Lawson criteria guidance.
199. The proposed scenario was then modelled and the pedestrian comfort and safety assessed.
200. The proposed scenario model indicated that in terms of pedestrian comfort most areas remain suitable for sitting and standing. Some areas suitable for standing in the baseline scenario would only become comfortable when leisure walking, such as the north, and west corners part of the site. The proposed development would also create wind acceleration at the eastern corner of the site (receptor 98). This area would become suitable for business walking only, however the receptor is located along the proposed footpath to the side of the development site and is expected to be suitable for leisure walking. The report advises that mitigation measures in the form of landscaping and tree planting would be required to reduce wind speeds in this area.
201. Increased wind acceleration is also anticipated at the south-eastern corner of the proposed building (receptors 95 and 96) and to the east of the site (receptor 97). This area lies outside of the application site and forms part of the Metrolink line and is not intended for pedestrian use.
202. The proposed amenity spaces within the site would not be adversely affected by wind and would be suitable for their purpose during the whole year.
203. LCC was included within the assessment, which identified that the wind conditions on the cricket ground would slightly change during the winter season. Cricket matches are played during the summer season, when the wind conditions remain unaffected and the impact of the proposed development on the LCC is therefore negligible.
204. In terms of pedestrian safety the model indicates that the majority of the areas remain within the safety thresholds. However there would be an area of increased windiness in strong wind events at the north and south corner of the site (receptors 100 and 4) and the safety criteria would be exceeded at these receptors.
205. The Wind Assessment notes at paragraph 7.1.3 that receptors 100 and 4 are both exceeded in terms of pedestrian safety and comfort, and mitigation would be required to ensure that these areas are acceptable in terms of pedestrian safety and comfort.
206. The results of the assessments carried out as part of the Wind Report were based on a model which did not incorporate proposed or existing trees or

landscape features. However the report concludes that wind mitigation, in the form of landscaping and evergreen tree planting should be provided in the areas of receptors 4, 98 and 100 to provide a satisfactory environment in terms of pedestrian safety and comfort.

207. This planning application does not include landscaping as a matter to be dealt with at outline planning stage; however a Landscape Design Strategy was submitted as part of the planning application. The recommended wind mitigation measures have not been included in the Landscape Design Strategy and it is not clear what level of landscaping is required to mitigate these impacts, what impact landscaping will have and whether the necessary level of planting can practically be implemented within the proposed development. There are concerns that there is very little room to introduce planting given the footprint of the proposed development and site size.
208. Further information was requested from the applicant with regard to the level of landscaping required to mitigate these wind impacts. In response to this request, the applicants' agent advised that evergreen tree planting is one option to reduce wind microclimate effects. The authors of the Landscape Design Strategy have also advised that the required planting can be accommodated in any final landscape design and detailed landscaping at reserved matters stage would be accompanied by an updated assessment and the local authority would retain control to ensure this was implemented.
209. Additional information from WSP, authors of the Wind Microclimate Report, advises that a number of wind mitigation measures can be considered to mitigate any potential impacts, however there are concerns associated with each of these.
- A vertical fin attached to the façade
 - Scattered screens/baffles
 - Evergreen trees and planting
 - Other hard/soft landscaping measures
210. Should the use of vertical fins, screens and baffles be considered to mitigate wind microclimate impacts, these should form an integral part of the building design and be considered at outline planning stage as the application only seeks to reserve landscaping as a reserved matter. At this stage it is not known what design, size or location of fins, baffles or screens would be required to adequately mitigate any wind microclimate impacts.
211. The use of evergreen trees is of concern in terms of what species would be utilised and how they would form part of a successful landscaping scheme. Native evergreen trees tend to be slow growing and may not be appropriate to this location. The planting of evergreen trees and other landscaping measures may be considered acceptable subject to landscape design, but it is noted that because of the extensive footprint of the building there are very few areas of the

site capable of accommodating tree planting. However as with the use of baffles/fins/screens it is not known what level of landscaping is required to adequately mitigate any wind microclimate impacts.

212. Whilst the Local Planning Authority acknowledges that it is possible to mitigate any wind microclimate impacts, it is considered that insufficient information has been provided to determine whether the proposed mitigation measures are likely to be considered acceptable and thus whether the proposed development is acceptable in terms of wind microclimate. In this sense the applicant has failed to demonstrate that the wind microclimate would provide an acceptable level of amenity for future occupiers of the development.

Amenity Space

213. PG1: New Residential Development sets out the Council's standards and states that most new dwellings should provide some private outdoor space and that this is necessary for a variety of functional requirements such as sitting out and children's play. The guidance sets out recommended garden area sizes and advises that for flats, 18 m² of adequately screened communal area is generally sufficient for these functional requirements, with balconies counting towards this area of amenity provision.
214. In line with the standards set out in PG1, this development should provide 7,794m² of communal amenity space. However it is acknowledged that these standards should be applied flexibly.
215. The proposed development provides a total of 5,278m² amenity space in three areas: courtyards and forecourt (1,992 m²), roof gardens (2,100 m²) and private balconies (1,186 m²).
216. A total of 226 apartments with balconies are provided within the development and the majority of these balconies are located on the external facades. 38 balconies are provided within the internal courtyard areas. Although the balconies are small in size, generally measuring approximately 4m² and many being irregular in shape, they do provide enough space for a small table and chairs to be placed outside and an area for residents to sit.
217. The proposed site layout provides two internal courtyard areas which are overlooked by all units which face onto these courtyard areas. The internal separation distances within the eastern courtyard are 35 metres by 23 to 26 metres and the western courtyard measures 32 metres by 27 metres, which as previously covered within the report ensures a reasonable separation distance between apartments or balconies.
218. It is clear however that the courtyard areas would be cast in shadow throughout much of the year and overshadow each other as demonstrated in the solar

studies included in the Design and Access Statement. The solar studies included at Appendix 5 show the impact of the proposed development at 09:00, 12:00, 15:00 and 18:00 hours in March, June and September.

219. The study indicates that in March the majority of the courtyard areas will be in shadow for much of the day with the exception of a small area in the north-west corner of each courtyard at 15:00 and a smaller slither to the west of the courtyard at 12:00.
220. In June the courtyards will be cast entirely shadow at 09:00 and 18:00. Various parts of the courtyard will benefit from some sunlight throughout the rest of the day, although the study does indicate that the southern and eastern areas of the courtyard will remain cast in shadow all day.
221. In September the courtyards are shown to be in shadow all day with the exception of one small area in the north eastern areas of each courtyard at 15:00.
222. The BRE guidelines advise that for external amenity areas to appear adequately sunlit throughout the year, at least half of an amenity area should receive at least two hours of sunlight on 21 March.
223. The submitted solar studies do not include specific details of what date they are modelled to represent, however it is assumed that these have been produced in line with best practice guidance and that the March solar study represents the proposed situation of the spring equinox, with the September and June studies representing the autumn equinox and summer solstice.
224. As noted above, the March study indicates that the majority of the courtyard areas will be in shadow all day and it is clear that the courtyards would not meet with BRE guidelines.
225. The roof top gardens by their nature will benefit from sunlight all year around and are considered to be an acceptable form of amenity space. It should be noted that it is not clear what form of landscaping is proposed at roof top level as landscaping does not form one of the matters to be dealt with at outline stage.
226. Concern was raised over the quality of the space which would be provided within the courtyard areas as a result of the submitted solar studies. The applicant advised that *“Having areas of external amenity space that are regularly shaded does not inherently render them unusable or unacceptable. It is important to recognise that the rooftop gardens provide a greater area of external amenity space than the two courtyards do; together, they will offer variety of space. Indeed, faced with the trend of hotter summers, refuge from the sun and other extreme weather events would be welcome.”*

227. Overall, it is considered that the amount of amenity space provided is acceptable, however there are concerns that the quality of the space provided within the internal courtyards will be poor due to a lack of sunlight. Nonetheless there is sufficient private amenity space provided within the roof top garden areas for residents to access and it is considered that the level of amenity space provided on site is acceptable.

Noise and Disturbance

228. A Noise and Vibration survey was submitted with the application. The application site is located adjacent to Great Stone Road and the Metrolink which are the predominant noise sources which would affect occupiers of the proposed development. The site is also located adjacent to LCC which would be a noise source with regard to cricket matches and occasional concert events. The adjacent Metrolink line is also a potential source of disturbance in terms of vibration.
229. A noise survey was carried out which established the underlying background noise level in the vicinity for use in setting plant noise limits and assisting in the production of a noise map which predicts the noise level at each façade, each level and at external amenity spaces of the proposed development. The predicted noise levels fall into the low to medium risk category, and so further assessments were undertaken.
230. This assessment assumes that the sound insulation of the building fabric is significantly higher than the glazing or ventilation. This assessment indicates that indoor ambient noise levels for dwellings will be met.
231. The external amenity areas were also assessed and this demonstrated that the balconies on the Great Stone Road façade and balconies on part of the north and tramline facades will exceed the 50-55 dB LAeq,16hr criterion, however these residents will also have access to the external amenity areas in the proposed scheme, i.e. the outdoor spaces located within the courtyard areas at the centre of the proposed building and roof top areas. This exceedance is therefore considered to be acceptable.
232. The impact of cricket matches and concert events from the adjacent LCC was also assessed. Noise from cricket events exceeds that of the predicted road noise on the rear façade and it is recommended that acoustically rated trickle vents are fitted to these windows to allow the residents to close them during matches to reduce noise exposure.
233. With regard to concert events the license agreement for this venue permits a maximum of seven outdoor concert events per annum, although typically only one or two events tend to be held per annum. Premise License conditions also ensure that events of this nature are subject to a curfew of 10.30pm. A

Framework Management Plan was submitted which proposes a strategy to ensure that tenants are aware of the permitted activities at LCC at the outset through tenancy agreements and that information is provided to them on forthcoming events. The strategy also intends to manage tenants who may be disrupted within their apartments during events by offering a selection of activities elsewhere on the site that could be attended as an alternative. It is noted that the likely impact on concert sound would be variable depending on the position of each apartment in relation to LCC.

234. Overall the impact of noise on proposed residents is considered acceptable and the majority of noise impacts can be overcome through the use of acoustically rated trickle vents and adequate sound insulation from the building fabric. This can be conditioned if planning permission were to be granted.
235. With regard to occasional noise from concert events, residents would be aware, by virtue of the site's location and as part of their tenancy agreement that noisy events will occur and the proposed Framework Management Plan will ensure relevant information is distributed appropriately. This approach is considered to be acceptable to address this issue.
236. A vibration assessment was also undertaken which assessed the adjacent Metrolink line, upon which trams run between 05:24 and 23:48 Monday to Thursday and 05:24 to 00:48 on Fridays and Saturdays and 06:29 to 23:48 on Sundays and bank holidays. It was found that vibration impacts are significantly under the 'Low Probability of Adverse Comment' criteria in the relevant BS criteria.
237. TfGM have requested that a condition is attached requiring the proposed development to be acoustically insulated against noise and vibration from the tramline, should planning permission be granted.
238. Fixed plant would be required as part of the proposed development and it is currently proposed that this is located in the ground floor plant room, however this is subject to change and detailed plant specification is not available at this stage of the design. Should planning permission be granted it is considered appropriate for a condition to be attached requiring details of any fixed plant to be submitted to the LPA for approval.
239. It is not considered that occupiers of the proposed development would suffer from poor amenity as a result of noise or vibration, with the exception of occasional events at LCC, however tenants would be aware prior to moving in of this possibility.

Conclusion on amenity

240. The NPPF and Policy L7 of the Core Strategy requires development to provide places where high levels of amenity for future and existing residents are provided. The assessment of this scheme demonstrates that the proposed development would not provide a satisfactory level of amenity for future residents. in terms of noise and vibration despite the occasional outdoor concert events held at LCC and proximity of the proposed development adjacent to the Metrolink and Great Stone Road.
241. It has been established that the proposed development would have an overbearing and dominating effect on surrounding residential properties, LCC, and the area in general. The amenity of existing and future residents in terms of daylight and sunlight also causes serious concern. The proposed development would in particular detrimentally impact on the NSL measurement to the extent that occupiers of existing properties on Trent Bridge Walk and Great Stone Road would have to rely more on electric lighting to achieve adequate internal lighting levels. Residents of the proposed development, particularly those at the lower levels would also suffer from substandard daylight and sunlight levels which are below the BRE guidance, which when assessed collectively is considered to result in an environment where occupiers would suffer from inadequate levels of daylight or sunlight which would be detrimental to their residential amenity. Officers have borne in mind the requirement for a flexible approach in applying policies or guidance relating to daylight and sunlight.
242. Furthermore, the applicant has failed to demonstrate that adequate measures to mitigate the harmful impacts identified in the submitted Wind Microclimate Report can be satisfactorily implemented. Without such measures the proposed development would have a harmful impact on the amenity of residents and visitors.
243. The footpath along the south eastern boundary of the site is not considered to provide a welcoming and pleasant environment for future occupiers choosing to use the rear entrance of the building, again to the detriment of their amenity.
244. The outlook over the service road and blank elevation of the adjacent LCC building is not considered to provide an acceptable outlook for the future occupiers of these units.
245. It is considered that the proposed development fails to comply with Core Strategy Policy L7 and paragraph 127 f) of the NPPF.

Air Quality

246. The existing and proposed entrance to the site lies within the GM Combined Authority Air Quality Management Area (AQMA) (2016), however the remainder of the application site lies outside of the AQMA.
247. Paragraph 181 of the NPPF advises that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
248. Paragraph 110 also required applications for development to be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
249. The Greater Manchester Combined Authority (GMCA) has published a joint Air Quality Action Plan (AQAP) (2016-2021) which seeks to improve air quality across Greater Manchester and to embed low-emission behaviours into the culture of our organisations and lifestyles by 2025, whilst supporting the UK Government in meeting all EU thresholds for key air pollutants at the earliest date to reduce ill-health in Greater Manchester. In managing new development the GMCA AQAP sets out a number of controls. Of relevance to this particular application are assessment of local air quality impacts from the proposed development; construction management; encouraging travel planning; and, green infrastructure.
250. Policy L5 requires developers to adopt measures identified in the Greater Manchester Air Quality Action Plan, to ensure that their development would not have an adverse impact on the air quality. In this respect, L5 can be considered to be up to date for the purposes of decision making and full weight attributed to it.
251. An Air Quality Assessment was submitted in support of the proposed development and it has been reviewed by the Pollution and Licensing team who confirmed that the submitted report is acceptable and follows the methodologies of appropriate national standards and guidelines. The submitted Assessment concluded that the proposed development would not have an adverse impact on local receptors due to pollutants from additional traffic movements, nor will future occupiers be exposed to unsatisfactory air pollution conditions once the development is operational.
252. If planning permission were to be granted a condition would be recommended to secure the submission of a Construction Management Plan prior to commencement of the development, which would include details of dust management measures during the demolition and construction phases of the

development and waste handling and disposal measures, amongst others to minimise any potential amenity issues.

253. A Framework Travel Plan has been produced which encourages the use of sustainable travel options. The proposed development itself provides 226 car parking spaces for 433 residential units, which will also encourage the use of sustainable travel options for future residents. Furthermore, the Pollution & Housing Team have requested that electric vehicle (EV) charge points (minimum 7 kWh) are provided within the development. As this application proposes the provision of unallocated car parking spaces for a limited number of tenants, one charge point per ten car parking spaces would be required. The provision of 24 charging points exceeds the residential standards, which would require 23 EV charging points to be provided.
254. For commercial developments, one charge point per 1,000 m² of commercial floorspace should be provided. The non-residential uses on site would generate a requirement for two charging points to be provided, bringing the total required across the site to 25. However it is not proposed that the non-commercial uses would benefit from dedicated on-site car parking; therefore the provision of 24 EV charging points on site is considered to be acceptable.
255. Some on-site green infrastructure is proposed in the form of on-site landscaping and roof top gardens. Landscaping is however a reserved matter so limited details are available at this stage.
256. Overall it is considered that the proposed development is acceptable in terms of air quality impacts and the proposed development would contribute to the aims of the Greater Manchester AQAP. The proposed development is therefore considered to comply with the aims of the NPPF and Policy L5 in this respect.

LAND CONTAMINATION

257. A Phase 1 Environmental Risk Assessment was submitted in support of the proposed development. The report identified that there may be risk associated with possible contamination from a former gun club, coupled with the potential contaminating activities of B&Q. There are also railway sidings that may have contributed to contamination. The Phase 1 report recommended that a Phase 2 Intrusive Assessment is completed to obtain further geotechnical and geo environmental information. The submission of this report could be secured via condition should planning permission be granted.

HIGHWAY MATTERS

Accessibility and Public Transport

258. Policy L4 of the Core Strategy states that the Council will prioritise the location of development within the most sustainable areas accessible by a choice of modes of transport. The site is within a highly sustainable and accessible location given its proximity to the Old Trafford Metrolink stop, bus services and cycle infrastructure. The site is within walking distance of Old Trafford Metrolink stop (within a 10 minute walk) providing frequent services between Altrincham, Manchester and Bury). Trafford Bar is located within a 20 minute walk from the application site and provides additional links to the whole tram network providing links to Manchester Airport, Eccles, Bury, Rochdale Town Centre and Ashton – under-Lyne
259. The nearest bus stops are located on Great Stone Road, Talbot Road, Kings Road and Chester Road. Metrolink services will likely be the most utilised giving future residents' access to a choice of travel mode which should help to reduce the amount of car travel otherwise generated by this development. There are also nearby services, amenities and employment opportunities available which will make walking and cycling genuine alternatives to travelling by car or public transport.

Trip Generation and Traffic Impact

260. Policy L4 of the Core Strategy states that *“when considering proposals for new development that individually or cumulatively will have a material impact on the functioning of the Strategic Road Network and the Primary and Local Highway Authority Network, the Council will seek to ensure that the safety and free flow of traffic is not prejudiced or compromised by that development in a significant adverse way”*.
261. Paragraph 109 of the NPPF states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*. Given the more stringent test for the residual cumulative impacts on the road network set by the NPPF, it is considered that Core Strategy Policy L4 should be considered to be out of date for the purposes of decision making.
262. The development has been assessed in terms of its impact on the surrounding network using the TRICS database. TRICS contains a collection of national surveys of similar development types which through interrogation is able to calculate trip rates for persons and vehicles. The proposal will generate additional traffic in both the morning and evening peaks. The increase will be 57 two way trips in the morning and 43 two way trips in the evening onto the

surrounding network, which will have a small impact on the Talbot Road/Great Stone Road junction.

263. TfGM have suggested the following mitigation measures in response to the queues/delays at the junction of Chester Road / Great Stone Road in the evening peak which will increase as a result of the development:
- There is a lack of pedestrian facilities in the area, in particular the facilities at the junction of Talbot Road / Great Stone Road are currently across one arm only. Given the quantum of development, which is likely to result in an increase in pedestrian movements, UTC recommend that consideration is given to improving the facilities at this junction.
 - UTC recommend that the junction is upgraded to adaptive SCOOT control to enable more efficient operation of the junction and enable coordination with adjacent junctions on Talbot Road and Chester Road.
 - UTC recommend that a CCTV camera is provided at the junction of Talbot Road / Great Stone Road so that the traffic at the junction can be monitored and interventions made as required;
 - Consideration could also be given to contributing towards the proposed Mayor's Challenge Fund cycling scheme at the junction of Talbot Road / Great Stone Road.
264. The LHA have advised that asking the applicant to provide most the suggested measures could not be justified. However, given the applicant's reliance on the importance of pedestrian and cycle movements to and from the site it is considered reasonable to ask the applicant to contribute towards junction improvement measures for pedestrians and cyclists at the Great Stone Road / Talbot Road junction. A scheme has been identified which includes the replacement of the signal equipment and the realignment of this junction and includes pedestrian crossing facilities at each arm of the junction. Currently there is only crossing arm providing safe access at this junction. It is estimated that the cost of these works will be in the region of £350,000. The LHA consider that a contribution of £30,000 represents an appropriate contribution towards the overall cost of these works in order to provide a safe pedestrian environment for the additional pedestrian and cycle movements generated by the proposed development.

Appropriateness of Access

265. Core Strategy Policy L7 requires development to incorporate satisfactory vehicular access and egress points. Vehicular access to the proposed development would be via the existing access from Great Stone Road, which provides a suitable visibility splay of 2.4 x 43 metres. The Local Highway Authority has confirmed that the use of this existing access is acceptable.

Car and cycle parking

266. The Council's car parking standards for this location are 1 space for 1 bedroom dwellings and 2 spaces for 2 to 3 bedroom dwellings, which results in a maximum requirement for 866 spaces based on the proposed number and mix of units. The proposed level of car parking at 226 spaces is significantly below this standard. The applicant has considered car ownership levels across the ward using 2011 Census data as suggested in the SPD3 and this data indicates that across the ward 50% of people living in apartments do not own a motor vehicle. Therefore, this would suggest that a level of 212 spaces would be adequate in this instance. Given that 226 spaces are proposed the LHA have no objection to the proposed level of car parking for the residential element.
267. In support of the proposed reduced level of on-site parking it is also acknowledged that the site is located in a sustainable location as the site is within walking distance of both Old Trafford and Trafford Bar Metrolink stops.
268. The Council's standards require one cycle space per dwelling where communal cycle parking is proposed, which results in a requirement for 433 cycle spaces to be provided. The scheme proposes the provision of 400 secure, indoor cycle spaces at ground floor level and although the provision of 400 cycle spaces is below the standard set out in SPD 3 and Core Strategy Policy L7, this level of provision is considered to be acceptable given the sustainable location of the site.
269. The submitted parking layout doesn't indicate any motorcycle parking spaces, however there is scope within the car park to provide a number of spaces.
270. Concern was initially raised that the Transport Assessment has not taken into account the requirement for off street car parking to serve the proposed commercial units. The applicant provided a Transport Assessment Addendum which stated that the small amount of ancillary non-residential floor space would be designed to serve residents on site, and would have no dedicated parking. They have considered that it is not appropriate to derive a separate trip generation for these uses as they are not expected to generate external trips in their own right.
271. The development proposes 1,181m² of commercial floorspace and seeks permission to use this space flexibly for uses falling within A1, A3, B1, D1 and/or D2 use classes. This level of floorspace is considered to be too great to be used solely for purposes used ancillary to the residential development proposed. If planning permission were to be granted it would be unreasonable to attach conditions restricting this amount of floorspace solely for use by residents of the development. It is considered that these units would rely on a wider customer base to be commercially successful and are therefore likely to require additional car parking provision to support them. Therefore it is considered necessary for

car parking spaces to be provided to support these uses to ensure that customers are not tempted to park outside the commercial units and to equally ensure that parking does not overspill into the adjacent residential areas. No consideration has been made with regard to staff car and cycle parking provision.

Travel Plan

272. The application is accompanied by a Framework Travel Plan which represents a long term strategy for reducing the dependence of residents on travel by private car to and from the site. The developer has also stated that a Travel Plan Coordinator would be appointed one month prior to the first occupation, which would promote sustainable travel modes from the outset. Future residents will therefore have access to a choice of travel mode which should help to reduce the amount of car travel otherwise generated by this development.
273. If planning permission were to be granted a condition requiring the submission of a full Residential Travel plan would be required.

Conclusion

274. The proposed development is considered to be acceptable in terms of access, trip generation and overall accessibility. The proposed level of residential car and cycle parking is also considered to be policy compliant.
275. It is considered that due to the increase in pedestrian and cycle movements to and from the site, infrastructure improvements are required to the Talbot Road / Great Stone Road junction. A financial contribution of £30,000 would be required to contribute towards a safe pedestrian and cycle environment for the development. The submitted viability appraisal does not include the provision of any developer contributions other than 5% affordable housing; therefore the Local Planning Authority assumes that no money is available to support this contribution.
276. However, there are significant concerns over the lack of car and cycle parking provision to serve the commercial units on site for both staff and customers. Therefore the proposed development is considered to conflict with requirements of Core Strategy Core Strategy Policies L4, L7 and SPD 3.

WASTE MANAGEMENT

277. Bin stores are proposed within the basement car parking area of the development, with the submitted plans indicating that the stores will accommodate 63 bins. Three refuse chutes are proposed within the building cores which are accessible on all floors. The bin stores would be maintained by on-site staff and servicing would occur from the rear of the site.

278. Trafford Council's Waste Management Team has advised that a development of this scale would be required to provide approximately 100 bins. This is based on the provision of 50 bins for refuse, 25 bins for paper and cardboard and 25 for glass, cans and plastic.
279. Given the location of the proposed bin stores and that the access road to them would not be adopted by the LHA the proposed development would instead have to rely on private bin collections to serve this site.

FLOODING AND DRAINAGE

280. The NPPF sets strict tests in order to protect people and property from flooding, which all local planning authorities are expected to follow. In summary these tests are designed to ensure that if there are better sites in terms of flood risk, or if a proposed development cannot be made safe from the risks of flooding, then it should not be permitted. A similar approach is embodied in Core Strategy Policy L5 (and thus this aspect of Policy L5 is also up-to-date for the purpose of decision-taking). The application site is located within Flood Zone 1 and is thus categorised as having the lowest probability of river or sea flooding. The site also sits within a Critical Drainage Area as defined by the Council's Strategic Flood Risk Assessment (SFRA). The Local Lead Flood Authority have reviewed the submitted Flood Risk Assessment and Drainage Strategy and have concluded that the proposed works will not cause flood risk to the development or the surrounding area and the application is considered to be acceptable, subject to the drainage being designed in accordance with the Flood Risk Assessment and Drainage Strategy with a max surface water discharge of 5 l/s.
281. The submitted Drainage Strategy assessed a number of options for surface water disposal and proposes to utilise underground attenuation tanks and connection to the public sewer system for the storage and disposal of surface water. Other attenuation options have been assessed and subject to final design it may also be possible to utilise rainwater harvesting, green roofs, and permeable paving for the storage and disposal of surface water.
282. Having regard to flood risk and drainage matters, the development is considered to be acceptable and compliant with Core Strategy Policy L5 and the NPPF.

TREES AND LANDSCAPING

283. An Arboricultural Impact Assessment was submitted in support of the proposed development. 19 individual trees, four groups of trees and one hedge were recorded within influencing distance of the site. The surveyed trees are primarily located outside the site boundary, except those on the south-eastern boundary and the occasional young self-seeded tree. None of the trees surveyed were classified as being Category A (high value), eight trees were classified as Category B (moderate value) and a further eight trees were classified as Category C (low value). Seven trees were classified as Category U (unsuitable).

for retention). One single Leyland cypress hedge on the north eastern boundary was also recorded but this was not assigned a quality category.

284. Notable trees within the site comprise planted individuals on the south east boundary at the edge of the existing car park hard surfacing, adjacent to the Metrolink link. These trees were likely planted as part of the area's original landscaping and are made up of a range of species. Tree condition varies but the group contains several trees that have been subject to mechanical damage which has instigated overall deterioration. Three trees along the south eastern elevation are in reasonable condition with good form.
285. Nine individual trees and two tree groups would be removed to facilitate the proposed development. Of these however, eight are in poor condition and would be recommended for removal irrespective of development to remove the risk of future failure onto high value targets, these trees are located along the south eastern and south western boundaries.
286. Two trees (T3 and T4 – both Common Ash and Category B and C respectively) located within the pavement of Great Stone Road are also proposed to be removed to facilitate the creation of a pedestrian access to the proposed development. These trees are owned by Trafford Council.
287. Whilst the principle of the removal of these trees is considered to be acceptable in terms of planning to support the construction of an acceptable scheme, separate consent from Trafford Council would be required to fell these trees.
288. Landscaping is not included within this outline application for consideration at this stage and is a 'reserved matter'. A Landscape Design Sketch Book has been submitted in support of the proposed development, which suggests further planting along the slopes adjacent to Great Stone Road and replacement planting along the eastern boundary with the Metrolink line would be provided, which is welcomed. However, it is not considered that the proposed site layout allows for sufficient space to accommodate a satisfactory landscaping scheme which would adequately soften and screen the development, particularly along the north western and north eastern boundaries.
289. As part of any reserved matters submission a detailed landscape plan, tree protection plan and method statement for all proposed works within tree protection areas would be required.
290. There are no arboricultural objections to the proposals as the majority of the higher quality trees are proposed for retention, following the removal of the suppressed and poor quality specimens.

ECOLOGY AND BIODIVERSITY

291. Core Strategy Policy R2 seeks to protect and enhance biodiversity of sites and their surroundings and protect the natural environment throughout the construction process. Policy R2 of the Core Strategy is considered to be compliant with the NPPF and therefore up to date as it comprises the local expression of the NPPF's emphasis on protecting and enhancing landscapes, habitats and biodiversity. Accordingly, full weight can be attached to it in the decision making process.
292. Section 15 of the NPPF requires planning decisions to contribute to and enhance the natural and local environment. Specifically paragraph 175 d) of the NPPF requires developments to take opportunities to incorporate biodiversity improvements in and around developments.
293. Phase 1 Habitat Survey of the proposed development site was submitted in support of the proposed development. This survey was considered to be acceptable and assessed the presence of bats and birds on the site.
294. The existing building on site was assessed in April 2017 for its potential to support roosting bats and again in November 2017. The building together with the trees on site was considered to have a negligible potential to support roosting bats.
295. Artificial lighting can affect the feeding and commuting behaviour of bats. Bats are likely to use the retained trees along the railway line for commuting and foraging and a condition would be recommended, in the event that planning permission were granted, requiring a lighting plan to be submitted.
296. The northern leylandi hedgerow and scattered trees on the southern boundary together with the scrub, have the potential to support nesting birds. In the event that planning permission were granted a condition would be recommended to restrict the timings of hedgerow works, tree works and scrub clearance to ensure they are only undertaken outside of the main bird breeding season.
297. Paragraph 175 d) of the NPPF encourages developments to incorporate biodiversity improvements in and around developments. Therefore opportunities to encourage biodiversity enhancement such as bat bricks and/or tubes within the new development, bat boxes, bird boxes and native tree and shrub planting would be required within any final scheme. It is considered that if planning permission were granted, this could be secured through the use of an appropriately worded condition.
298. The proposed development is considered to be acceptable in terms of impacts on ecology and biodiversity.

CARBON BUDGET

299. Core Strategy Policy L5 requires applicants to demonstrate how they have sought to minimise their contribution towards and / or mitigate their effects on climate change. It is considered that Policies L5.1 to L5.11, which addresses the issue of carbon emissions, are out of date as they do not reflect NPPF guidance on climate change.
300. With regard to climate change and carbon emissions the NPPF states that new development should be planned for in ways that:
- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
 - b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
301. A Carbon Budget Statement was submitted in support of this application, which details that the development design will focus on promoting a highly efficient façade. It is anticipated that the final design will incorporate the following energy efficient measures:
- 100% high efficiency low energy lighting;
 - A full suite of heating controls to allow occupants to efficiently use their heating system;
 - Energy efficient mechanical ventilation systems with heat recovery; and
 - Where appropriate, specification of high energy efficient rated appliances that use less energy and water.
302. Whilst Core Strategy Policy L5 is out of date, this policy requires development to achieve a 5% improvement over the 2013 Building Regulations, when located in a Low Carbon Growth Area, such as this application. The above measures would achieve a saving of 3.7%. In addition to the above measures, generating low-carbon energy on site can reduce reliance on fossil fuels, minimises energy lost through transmission, contributes to security of supply and better connections between energy demand and generation. Based upon the calculated 3.7% reduction in emissions there is a potential to make up the remainder with renewables. A renewables feasibility assessment was completed which concludes that Photovoltaic Solar Panels would be the most suitable solution on site due to the electrical heating dependence. To achieve the necessary saving, approximately 94 panels (150 m² of panels) would be required. There is sufficient roof space to accommodate these.

303. In summary, based on the estimated carbon emissions, the development would deliver a circa 7.8% reduction in carbon emissions beyond the 2013 Building Regulations and would comply with Policy L5 and the NPPF in this respect.

CRIME PREVENTION AND SECURITY MEASURES

304. The NPPF advises at paragraph 127 that planning decisions should create places that are safe, inclusive and accessible where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. A Crime impact Statement was submitted as part the planning application submission, which assesses the scheme with regard to layout, physical security measures, landscaping, lighting and CCTV and advises on crime prevention methods which should be incorporated into the development.
305. The scheme has been reviewed by Greater Manchester Police who have advised that a condition requiring the physical security specifications set out in sections 4 and 5 of the submitted Crime Impact Statement should be implemented as part of the development.

IMPACT UPON LOCAL SERVICES

306. New development often creates new demands on local infrastructure, and the NPPF also recognises that it is right that developers are required to mitigate this impact. Core Strategy Policy L2 identifies that all new development should be appropriately located in terms of access to existing community facilities and/or it would deliver complementary improvements to the social infrastructure (including schools and health facilities) to ensure the sustainability of a development. Core Strategy Policy SL3 states that in order for development in this Strategic Location to be acceptable the provision of ancillary community facilities may be required. This would include the provision of health and education facilities. Revised SPD 1 also indicates that the provision of healthcare facilities may be required in the vicinity of Strategic Locations.
307. An Education and Health Capacity Assessment has been submitted by the applicant. This confirms that although the local GP practices are operating in excess of their capacity, all of the GP practices are accepting new patients and the assessment concludes that the additional demand, which is calculated to be 781 residents, can be dealt with through existing capacity. Two NHS dentists within 1km of the site are accepting new patients and there is an additional private practice accepting new private patients.
308. Trafford CCG have commented on the proposed development and advised that the scheme would create a requirement for an additional 0.5 working time equivalent GP. They have also advised that it is a contractual requirement that GP lists are open and that they must accept new patients. The Local Planning

Authority will provide an update on the requirement for a financial contribution within additional information report once further information is received.

309. Policy SL3 of the Core Strategy also states that in order for development in this Location to be acceptable a contribution may be required towards increasing the intake of the existing Old Trafford Primary School and the provision of a new 1-form primary school to serve the new residential community in this and the Trafford Wharfside Strategic Location. However, since the adoption of the Core Strategy the Council has identified the requirement for a school to serve Pomona Island, Trafford Wharfside, Old Trafford and Lancashire Cricket Club Quarter on the CIL Regulation 123 List and this is the mechanism by which a new school in this location could be provided in the future. Where infrastructure is included in the CIL Regulation 123 List there is no scope to require a financial contribution through a S106 obligation from individual development proposals to contribute towards this infrastructure.
310. Although a primary school is identified as being necessary to serve future development in the Pomona, Wharfside and LCC Strategic Locations, there is likely to be a period where proposed developments may generate a demand on existing school places without actually requiring the provision of a new school. Of the 433 apartments proposed, 234 are two bed and 68 are three bed, therefore a proportion are likely to be occupied by families with children of school age. The applicant has provided an Education and Health Capacity Assessment that presents two pupil yield scenarios which indicate a potential pupil yield of 84 or 163 primary school age pupils. In this instance it is considered to be appropriate to apply the yield of 84 pupils due to the nature of the proposed development being a built to rent scheme, as the figure of 163 is based on a low density traditional suburban housing scheme. The report concludes there is a deficiency of 98 primary school places within 1 km of the site, a surplus of 512 places within 3-5 km of the site and a surplus of 230 places within Trafford Borough overall. The application site does however fall within the catchment area of Gorse Hill Primary School which the submitted report indicates has a current deficit of 23 places.
311. A consultation with the School Admissions team advised that the average pupil yield is three children per year group for every 100 properties, with the one bedroom flats discounted that leaves 302 properties with a pupil yield of nine pupils per year group, i.e. the development is likely to generate a demand for 63 primary school places overall. Contrary to the submitted Education Capacity Assessment the School Admissions team have advised that Gorse Hill Primary School is not routinely oversubscribed and could accommodate the demand expected to be generated by the proposed development.

Conclusion on the impact on local services

312. Whilst it seems that doctors' surgeries in the area are operating at their physical limits, new patients would not be turned away, however the CCG have identified that the development will generate a requirement for additional GP capacity. Whilst there appears to be a general shortfall of local primary school places within a 1km radius of the site, the Educations Admissions team have confirmed that Gorse Hill Primary School is not routinely oversubscribed and could accommodate the demand expected to be generated by the proposed development. On this basis the development is considered to be acceptable in terms of its impact on these two key local services.

DEVELOPER CONTRIBUTIONS

Community Infrastructure Levy (CIL)

313. This proposal is subject to the Community Infrastructure Levy (CIL). In terms of residential development the site is located in the 'cold zone', consequently apartments will be liable to a CIL charge rate of £0 per square metre, in line with Trafford's CIL charging schedule and revised SPD1: Planning Obligations (2014).
314. This proposal also includes development under the following categories 'public/institutional facilities', 'office', 'leisure' and 'all other' development. This application seeks permission for these Use Classes to be flexible and it is not known at this stage what uses would occupy which unit. These non-residential elements (1,181 m²) of the proposed development are liable for CIL and the following charge rate would be applied in line with Trafford's CIL charging schedule and revised SPD1: Planning Obligations (2014):

Public/institutional facilities – £0 per square metre

Offices – £0 per square metre

Leisure – £10 per square metre

All other development – £0 per square metre

315. As the application seeks a flexible use for the commercial units, it is possible that all of the commercial floorspace could be used for leisure purposes, therefore all of the commercial floorspace would be subject to the leisure CIL rate of £10 per square metre.

SPD1: Planning Obligations

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

317. Affordable Housing – as out lined in paragraphs 45 to 69, it is considered that the appropriate level of affordable housing required to serve the proposed development should be determined through the submission of a Financial Viability Appraisal, and that the level of provision should not normally exceed 40%. The applicant proposes the provision of 5% affordable housing on site. It is not considered that the submitted viability appraisal demonstrates unequivocally that the proposed development cannot deliver more than 5% affordable housing.
318. Health – Trafford CCG have identified that the proposed development will generate a requirement for an additional 0.5 working time equivalent GP. The Local Planning Authority will provide an update on the requirement for a financial contribution within additional information report once further information is received.
319. 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. The SPD advises what level of green infrastructure provision is required within developments. Tree planting is the predominant form of Green Infrastructure provision on development sites and is achieved through an appropriate landscape planning condition as the Council prefers to achieve planting on development sites, the SPD outlines that 1 tree per residential apartment should be provided. The provision of alternative green infrastructure treatments can also be provided in lieu of, or in combination with tree provision. Or relevance to a scheme of this nature, other Green Infrastructure that could be provided includes 5m of preferably native species hedge, per two apartments, and/or green roof/ green wall provided at 1/10th of the area of the building footprint.
320. Although landscaping is a reserved matter it is clear that 433 trees could not be provided on site. The development does however provide 2,100 m² green roof space as part of the amenity offer and the footprint of the proposed development is circa 4,313m². The level of green roofspace offered would therefore meet the green infrastructure requirement set out in SPD 1.
321. Spatial Green Infrastructure - Spatial green infrastructure is the open and natural green space function 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. Clearly the proposed development site would not be able to accommodate the proposed NEAP and a developer contribution is required in this instance. Based on the proposed mix of 433 apartments, £411,621 would be required as a commuted sum towards facilities at Longford Park.

322. Very large developments (300 units and above) will also be required to provide mitigation measures for semi-natural greenspace. This issue is still under consideration and will be considered in the additional information report.
323. Sports Facilities – SPD1 states that very large developments in the region of over 300 units will need to provide on-site facilities, in line with the standards in Policy R5 and the deficiencies and needs identified as part of the Outdoor Sports Assessment of Need Study, and/or in line with the deficiencies and needs identified as part of any future needs assessments. The proposed development exceeds this threshold for on-site sports facilities to be provided. The SPD also states that in exceptional circumstances it may be more appropriate to pay a commuted sum towards the provision of outdoor sports facilities and provides the example of where large development is phased so the provision can be delivered as part of a later phase, or provide the required provision on land outside of the boundary for planning permission but close to the development. It is considered this development site would be subject to a commuted sum for outdoor sports facilities.
324. Sport England advises that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. They advise that the development is likely to require improvements to youth and mini turf football pitches at an indicative cost of £105,735, artificial grass pitches at an indicative cost of £76,815 and a contribution to either new or improved changing facilities at an indicative cost of £246,982.
325. In the absence of any proposed on-site sports facilities and such facilities not being delivered through CIL, it is considered appropriate for this development to pay a commuted sum towards the provision of off-site sports facilities. The formula in SPD1 generates a sum of £395,980 whilst Sport England has provided an indicative cost of £429,532. The Sport England figures are based on their most up to date facilities costs, which are provided as a starting point for further detailed assessment in line with the Council's adopted Playing Pitch Strategy Assessment and Action Plan. These monies would be spent at Turn Moss and other similar facilities.

Transport and Highways

326. The LHA have identified that due to the increase in pedestrian and cycle movements to and from the site, infrastructure improvements are required to the Talbot Road / Great Stone Road junction. A financial contribution of £30,000 would be required to contribute towards a safe pedestrian and cycle environment for the development.

PLANNING BALANCE AND CONCLUSION

327. This planning application seeks outline planning permission for the development of 433 residential units and 1,181 m² of commercial floorspace. The only matter reserved for future consideration is landscaping and this application seeks permission for the scale, layout, appearance and access of the development.
328. S38(6) of the Planning and Compensation Act 1991 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF at Paragraphs 2 and 47 reinforces this requirement and at Paragraph 12 states that the presumption in favour of sustainable development does not change the statutory status of the development plan as a starting point for decision making, and that where a planning application conflicts with an **up to date** (emphasis added) development plan, permission should not normally be granted.
329. The Council's Core Strategy was adopted in January 2012, prior to the publication of the 2012 NPPF, but drafted to be in compliance with it. It remains broadly compliant with much of the policy in the 2019 NPPF, particularly where that policy is not substantially changed from the 2012 version. It is acknowledged that for example, policies controlling the supply of housing are out of date, not least because of the Borough's lack of a five year housing land supply; as are heritage policies in that they do not reflect case law or the tests of 'substantial' and 'less than substantial harm' in the NPPF; and highway policies in that the NPPF sets a more stringent test for the residual cumulative impacts on the road network. However, other policies relevant to this application, for example those relating to design and impact on amenity, remain up to date and can be given full weight in the consideration of this application. Whether a development plan policy is considered to be up to date or out of date has been identified for each of the policies in the relevant section of the report.
330. The NPPF is a material consideration in planning decisions, and as the Government's expression of planning policy and how this should be applied, it should be given significant weight in the decision making process.
331. Paragraph 11 d) of the NPPF indicates that where there are no relevant development plan policies or the policies which are most important for determining the application are out of date planning permission should be granted unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

332. It has been established that the policies which are 'most important' for determining this application i.e. those relating to housing land supply and heritage which are considered to be out of date; whilst conversely those relating to design and amenity are considered to be up to date.
333. Paragraph 11 d) (i) of the NPPF indicates that even where the policies which are most important for determining the application are out of date, where policies in the Framework that protect assets of particular importance (this includes heritage assets) provide a clear reason for refusal, then permission should be refused.
334. Analysis in the Heritage section of this report concludes that the development will result in less than substantial harm to Trafford Town Hall, a Grade II listed building. In such circumstances, NPPF Paragraph 196 advises that this harm should be weighed against the public benefits of the scheme. The analysis already undertaken in the Heritage section of the report identifies that the scheme will provide a number of public benefits which can be summarised as: the provision of 433 apartments on a vacant brownfield site in a sustainable location, and at a time when the Council cannot demonstrate a rolling five year housing land supply. This would represent a significant contribution to the Council's housing land supply figures and targets for delivering residential development on brownfield sites. The proposal would provide 22 affordable homes, and is also likely to provide increased spending in the local area and a benefit to local shops. Considerable weight must therefore be given to these benefits, albeit that the scale of benefit in terms of housing numbers only arises as a direct result of the inappropriate height and mass of the proposed building and the consequential harm identified in this report. It is also noted that many of these benefits would also result from the provision of an alternative scheme that appropriately addressed these matters. However, the harm caused to the significance of Trafford Town Hall, a designated heritage asset, as a result of the excessive height, scale and mass of the proposed development, and the consequential loss of views of the clock tower, is such that the public benefits of the scheme are not considered to outweigh this harm. It is considered that this harm provides a clear reason for the refusal of the proposed scheme.
335. A full analysis of the impact of the development on Longford Park Conservation Area, also a designated heritage asset, has not been possible as the applicant has refused to provide the necessary views to and from the application site to enable this assessment to be undertaken. In this regard, it must be concluded that the applicant has failed to demonstrate that the proposed development would not adversely affect the significance of the designated heritage asset.
336. Notwithstanding the conclusion reached in relation to designated heritage assets, the second limb of Paragraph 11 d) still requires an exercise to be undertaken to assess whether the remaining adverse impacts of the scheme would be

significantly and demonstrably outweighed by the benefits, when assessed against the policies in the NPPF taken as a whole.

337. Core Strategy policies indicate that the principle of a residential led mixed use development is acceptable on this site. Such a scheme could contribute to meeting Strategic Objectives which are set out in the Core Strategy and could comply with the over-arching aim of the NPPF to deliver sustainable development. The proposed scheme is considered to be acceptable in a number of respects, subject to appropriate mitigation, such as those relating to noise and vibration impact, air quality, land contamination, waste management, flood risk, ecology and biodiversity, specific green infrastructure, crime prevention, and impact on local services.
338. The proposed would provide a mix of apartment sizes, which does not strictly comply with the requirements of Core Strategy Policy L2. However, the scheme does provide a mix of units that will provide a range of new homes for families and smaller households which are considered appropriate for this Strategic Location.
339. Notwithstanding the elements of the scheme which are considered to be acceptable, a significant number of serious concerns have arisen from the analysis in the report and which represent conflict with the development plan. These are summarised below.
340. The applicant proposes the provision of 5% affordable housing. The submitted Viability Appraisal has been independently assessed and despite a request for additional information there remain a number of unanswered queries and it is considered that the submitted Viability Appraisal does not demonstrate unequivocally that if Planning Policy requirements for S106 contributions and Affordable Housing are greater than that proposed (5% affordable housing) that the proposed development would be undeliverable on viability grounds. The proposed provision of 5% affordable housing is therefore not considered to be policy compliant.
341. The promotion of high standards of design is a central narrative within the NPPF. Due to initial concerns over the scale and massing of the proposed development, it was considered appropriate to seek independent advice with regard to the design of the scheme and the accompanying TVIA.
342. The proposed development, at between five and thirteen storeys high, will be considerably larger than development within the surrounding area which is predominantly residential and two storeys in height. Exceptions to this include the adjacent LCC ground in which the spectator stands rise to a height of six storeys and the nearby Lancastrian Office Suite which is two and six storeys in height. It is considered that the proposed development would highly visible from a number of viewpoints and its prominence is exacerbated by the scale, height and

massing of the proposal. It is clear within the viewpoints that there are no developments of a comparable scale which sit within the same viewpoint and this indicates that the scale and massing of the proposed development is out of keeping with the general character of the area. The layout of the proposed development results in a single block of development which combined with the scale and massing of the proposed scheme results in a form of development which limits permeability through the site, both visually and physically. As a result the proposed development appears as a large unbroken and impermeable building mass which has an over-dominant visual impact on the surrounding area. It is considered that the proposed development fails to represent good design by reason of its design including layout, height, scale and massing will impact to an unacceptable degree upon the character and appearance of the area and would be contrary to the requirements of Core Strategy Policy L7 and the NPPF which recognises that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

343. The overall level of detail provided with the application submission is considered to be insufficient to determine whether the appearance of the proposed development is acceptable, particularly when the application is seeking planning permission for the appearance of the proposed development. However, based on the information submitted there are concerns about the external built form, particularly the side and rear elevations which are likely to appear monotonous, monolithic and will dominate views around the area.
344. The density of the proposed development at 433 dwellings per hectare is considered to be inappropriate and excessive for the suburban location of this application site, which sits in an area where residential development is in the region of circa 30-40 dwellings per hectare and there is no relevant precedent in the surrounding area.
345. With regard to the impact of the development on the significance of the LCC ground, a non-designated heritage asset, paragraph 197 of the NPPF indicates that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Turley's assessment of the development proposal concluded that the development would result in a reduction in the prominence and importance of the cricket ground in the local townscape character and a dominating effect on the cricket ground itself. The cricket club currently makes a significant contribution to the character and cultural identity of the area, adding further to its significance. It is considered that the harm resulting from the erosion of this significance weighs significantly in the balance against the proposed development.
346. The NPPF and Policy L7 of the Core Strategy requires development to provide places where high levels of amenity for future and existing residents are provided.

347. It has been established that the proposed development would have an overbearing and dominating effect on surrounding residential properties, LCC, and the area in general.
348. There is concern with regard to separation distances, primarily associated with the outlook of the future residents of thirteen single aspect units and three dual aspect units located on the first and second floors of the rear elevation of the proposed development which would directly overlook a building which provides ancillary facilities to LCC and only have a separation distance of 12.5 metres.
349. It is considered that the proposed development would detrimentally impact on the daylight level of existing properties on Trent Bridge Walk and Great Stone Road. Whilst the infringement of the VSC measures guidelines is minimal, the impact which the proposed development would have on the NSL measure is of great concern. The proposed development would result in eleven properties achieving a NSL figure of less than 70%, where the target is 80% of the former value. Whilst it is acknowledged that the vast majority of the windows which will suffer from a poor NSL measure are bedroom windows, the degree of non-compliance is nonetheless concerning and a number of properties will have to rely more on electric lighting to achieve adequate internal lighting levels. This is considered to be an unacceptable impact on the residential amenity of existing occupiers. Residents of the units on the lower floors of the proposed development, in particular the first to fifth floors would be subject to daylight and sunlight levels which are below the BRE guidance levels set out for VSC, ADF and APSH measurements. When taken collectively, it is considered that the residents of the proposed development, would not benefit from an adequate level of daylight or sunlight and this would be detrimental to their residential amenity.
350. The Wind Microclimate Report indicates that the proposed development would detrimentally impact on pedestrian safety and comfort and mitigation measures Mitigation measures would need to include evergreen planting but there are concerns that the use of evergreen planting is not possible or practical in this instance and no information has been provided on the scale necessary to mitigate any impact. It is therefore considered that insufficient information has been provided to demonstrate that the impacts of the development in terms of wind can be adequately mitigated.
351. External amenity space is proposed within courtyard areas, roof top gardens and private balconies. Overall, it is considered that the amount of amenity space provided is acceptable; however there are concerns that the quality of the space provided within the internal courtyards will be poor due to a lack of sunlight.
352. The proposed development will result in additional peak highways movements in comparison to the authorised use of the site and this will have a small impact on the operation of the Talbot Road / Great Stone Road junction. The impact is

however considered to be minor and acceptable. The access to the site and levels of proposed car and cycle parking provision for the residential units are also considered to be acceptable. However, there is concern that no car or cycle parking has been provided for the commercial units.

353. In line with SPD1, in addition to a contribution towards affordable housing, the proposed development also attracts a developer contribution requirement of £411,621 towards spatial green infrastructure and £429,532 towards sports facilities. The applicant submitted a Viability Appraisal in support of the application which proposes a developer contribution of 5% affordable housing only. It is not considered that the submitted appraisal demonstrates unequivocally that if Planning Policy requirements for S106 contributions and Affordable Housing are greater than that proposed that the proposed development would be undeliverable on viability grounds. Therefore this application fails to comply with SPD1 and Core Strategy Policy L8.
354. The proposed development would provide 433 residential dwellings which it is acknowledged would contribute to Trafford Council's five year housing supply. However it is considered that the harm to the local character by way of the scale, massing, layout and design of the proposed development, together with the other harm identified, would not be outweighed by the benefits of the proposed development, which arise largely from the excessive scale of the proposed scheme. An alternative mixed use scheme on this site could deliver many of the benefits without the harm identified. It is considered that the proposed development would conflict with the Core Strategy and NPPF by failing to provide a well-designed built environment which provides an acceptable level of amenity for existing and future residents. The proposal also fails to adequately demonstrate that the proposed development would be unviable if planning obligations in excess of 5% affordable housing was provided on site. The application is therefore recommended for refusal.

RECOMMENDATION: REFUSE

1. The proposed development would represent poor design as its height, scale, layout, density, massing and monolithic appearance are inappropriate in its context and would result in a building which would be significantly out of scale and keeping with its surroundings. This would have a highly detrimental impact on the street scene and the character and quality of the area. This would be contrary to Policies SL3, R3 and L7 of the adopted Trafford Core Strategy and the National Planning Policy Framework.
2. The proposed development would not provide a development plan policy compliant level of planning obligations in relation to affordable housing; local open space, outdoor sports and semi-natural greenspace provision; healthcare facilities; and site specific highways improvements to suitably and appropriately mitigate the impacts of the development. The applicant has failed to demonstrate

that there is a robust viability case to demonstrate that the scheme could not offer a policy compliant level of obligations. The proposed development is therefore contrary to Policies SL3, L2, L4, L5, L7 and L8 of the adopted Core Strategy and the Council's adopted Revised Supplementary Planning Document 1 (SPD1) – Planning Obligations and the National Planning Policy Framework.

3. The proposed development by virtue of its height, massing, scale and layout would result in a poor level of amenity and unacceptable living standards for future occupiers of the development, by virtue of inadequate daylight, sunlight and outlook in both apartments and amenity areas. The proposed development is therefore contrary to Policies SL3, L3 and L7 of the adopted Core Strategy and the National Planning Policy Framework.
4. The proposed development by virtue of its height, massing, scale and layout would result in harm to the amenity of existing residential properties on Great Stone Road and Trent Bridge Walk by virtue of noticeable reductions in the amount of daylight and sunlight that they receive, and would also have an overbearing impact on these properties and other residential properties in the wider 'Gorses' area. The proposed development is therefore contrary to Policies SL3, L3 and L7 and the National Planning Policy Framework.
5. The applicant has failed to demonstrate, through the submission of sufficient information, that the adverse wind related impacts of the development can be adequately mitigated. Based on the information before the Council the proposal would result in an unacceptably windy environment for future occupiers of the development, to the detriment of their amenity and which would not provide acceptable living conditions, contrary to Policy SL3, L3 and L7 of the adopted Core Strategy and the National Planning Policy Framework.
6. The proposed development would have a harmful impact on the setting of Trafford Town Hall equating to 'less than substantial' harm in National Planning Policy Framework terms. The benefits of the scheme are not considered to outweigh the identified harm to a designated heritage asset. The proposed development is therefore contrary to Policies SL3, L3 and R1 of the adopted Core Strategy and the National Planning Policy Framework.
7. The applicant has failed to provide requested information to allow an informed assessment to be made of the impact of the proposed development on the setting and therefore significance of Longford Park Conservation Area, a designated heritage asset. The applicant has therefore failed to demonstrate the development would not harm the significance of the designated heritage asset. The proposed development is therefore contrary to Policy R1 and Place Objective STO22 of the adopted Core Strategy and the National Planning Policy Framework.

8. The proposed development would have a dominating and adverse impact on Lancashire Cricket Club (LCC) as well as its setting and cultural character and identity. LCC is a non-designated heritage asset and internationally significant visitor attraction, cultural and tourism venue. The scale of the harm and the significance of the asset, as well as the potential impact on the visitor experience are considered to be sufficient to weigh strongly against the proposals. The development is therefore contrary to Policies SL3, R1 and R6 of the adopted Core Strategy and the National Planning Policy Framework.
9. No dedicated car or cycle parking is provided for the 1,181 sq metres of retail and commercial floorspace proposed and the applicant has not demonstrated that reasonable and enforceable planning conditions could be used to limit the use of this floorspace to occupants of the proposed development. Failure to provide adequate car and cycle parking provision for these uses would result in ad-hoc on street parking to the detriment of highway and pedestrian safety, contrary to Policy L4 of the adopted Core Strategy, SPD3: Parking Standards and Design and the National Planning Policy Framework.

DH

94974/OUT/18 – Former B&Q Appenices

Appendix 1

TVIA Viewpoints

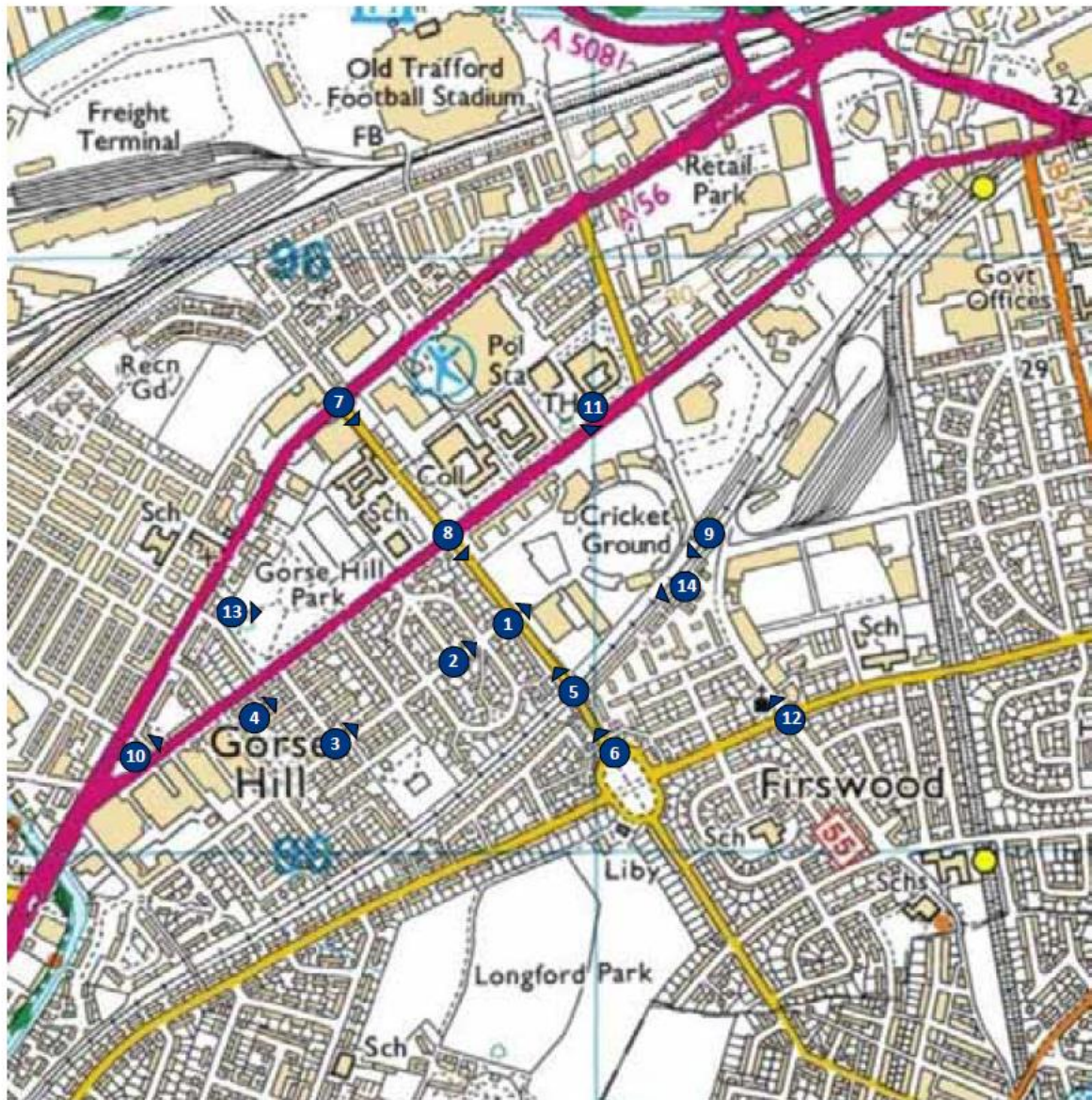


Figure 17. OS Map and Viewpoint / Receptor Location Plan (Source: Bing Maps)

94974/OUT/18 – Former B&Q Appenices

Appendix 2

Vertical Sky Component figures for existing dwellings on Great Stone Road and Trent Bridge Walk

Unit	Achieves (Target 27%)	Former Value (Target 80%)	Room	Impact attributed in the submitted Daylight Sunlight Report
16 Trent Bridge Walk	26.8%	76%	Bedroom	Negligible
14 Trent Bridge Walk	26.42% 18.72%	72% 68%	Bedroom Bedroom	Minor significance Minor impact taking into account the room use
13 Trent Bridge Walk	26%	71%	Bedroom	Negligible
12 Trent Bridge Walk	26.81%	72%	Bedroom	Minor significance
58 Great Stone Road	25.92% 26.35% 26.40%	76% 72% 72%	Lounge Bedroom Bedroom	Minor significance. Two of the three windows provide light to bedrooms, which the BRE guide indicates are less important.
56 Great Stone Road	25.85% 26.55% 26.52%	76% 72% 72%	Lounge Bedroom Bedroom	Minor significance
54 Great Stone Road	25.92% 26.66% 26.78%	74% 72% 72%	Lounge Bedroom Bedroom	Minor significance
55 Great Stone Road	26.06% 26.92%	74% 72%	Lounge Bed	Minor significance
50 Great Stone Road	26.32% 26.81% 26.95%	73% 73% 73%	Lounge Bedroom Bedroom	Minor significance
48 Great Stone Road	26.58%	73%	Lounge	Minor significance

94974/OUT/18 – Former B&Q Appenices

Appendix 3

No Sky Line figures for existing dwellings on Great Stone Road and Trent Bridge Walk

Unit	Achieves (Target 80% of former value)	Existing lit area	Room	Comment in submitted Daylight / Sunlight Report
14 Trent Bridge Walk	60% 51%	98% 95%	Bedroom Bedroom	Of minor to moderate significance taking into account the room use – both bedrooms.
13 Trent Bridge Walk	53%	100%	Bedroom	The room pre development is 100% well-lit and thus the room remains 53% well-lit post development. aap considers this to be acceptable
12 Trent Bridge Walk	63%	100%	Bedroom	Of minor to moderate significance taking into account the room use
58 Great Stone Road	68% 30% 44%	99% 98% 98%	Lounge Bedroom Bedroom	One of the three rooms assessed the lounge retains 68% of the pre-development value against a target of 80%, which is of moderate significance. The remaining two rooms are bedrooms and retain 30% and 44% of their pre development value. The BRE guide notes that “bedrooms should be analysed although they are less important” and these results can therefore be considered of moderate significance.
56 Great Stone Road	67% 36% 27% 21%	100% 99% 98% 97%	Lounge Bedroom Bedroom Bedroom	Moderate significance Whilst this is a major impact, it is of less significance owing to the room use – all bedrooms.
54 Great Stone Road	62% 27% 36%	99% 98% 96%	Lounge Bedroom Bedroom	Moderate significance Whilst this is a major impact, it is of less significance owing to the room use – both bedrooms.
55 Great Stone Road	65% 35% 25%	100% 99% 98%	Lounge Bedroom Bedroom	Minor significance Whilst this may be classed as a major impact, it is of less significance owing to the room use – both bedrooms.
50 Great Stone Road	51% 71% 86%	98% 100% 91%	Bedroom Bedroom Lounge	A moderate impact but is of less significance owing to the room use – both bedrooms.

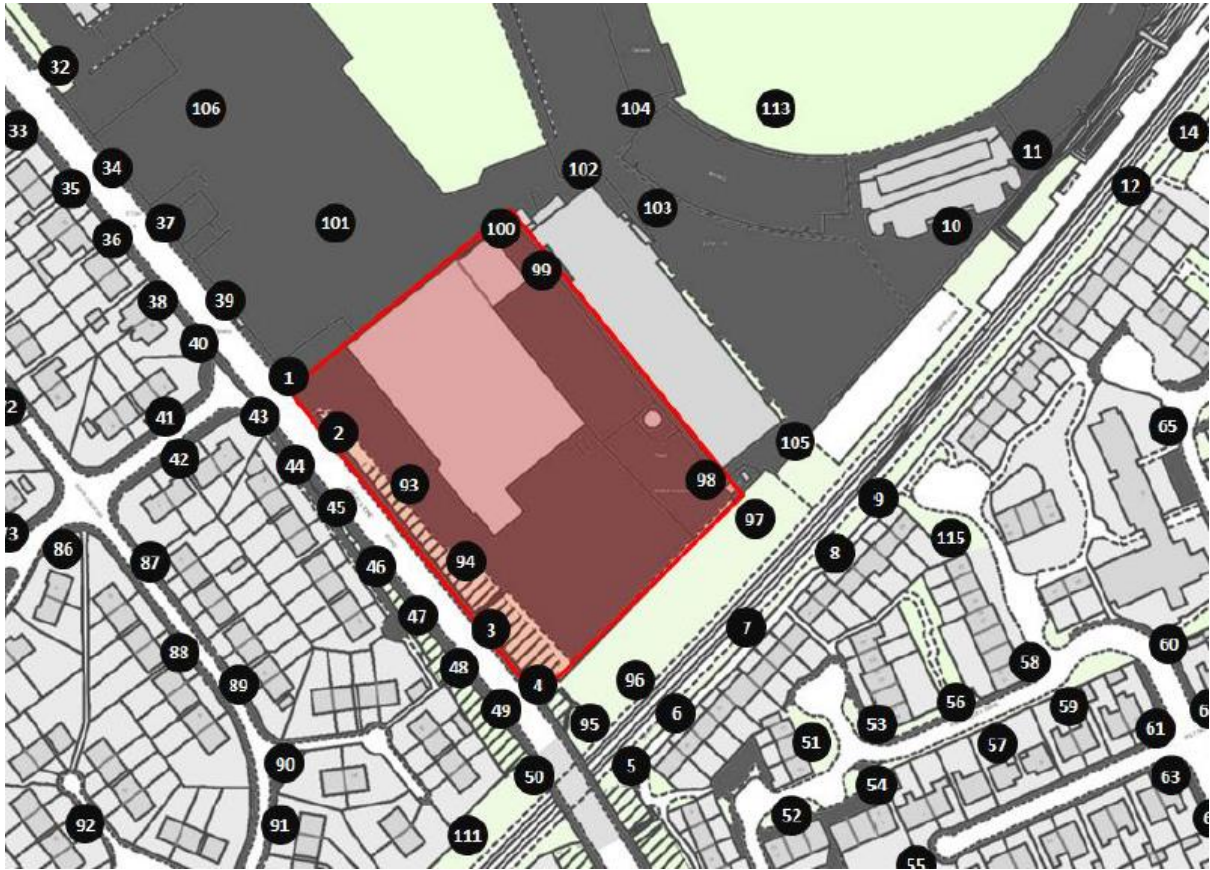
94974/OUT/18 – Former B&Q Appenices

48 Great Stone Road	51% 70% 65% 83%	98% 100% 87% 98%	Bedroom Bedroom Bedroom Lounge	A moderate impact but is of less significance owing to the room use – all bedrooms.
46 Great Stone Road	76% 55% 88%	99% 98% 98%	Bedroom Bedroom Lounge	Whilst this could be classed as a moderate/major impact, it is of less significance owing to room use – all bedrooms.
44 Great Stone Road	60% 81% 84%	98% 100% 98%	Bedroom Bedroom Lounge	A moderate impact but is of less significance owing to the room use.

94974/OUT/18 – Former B&Q Appenices

Appendix 4

Relevant Wind Microclimate receptors

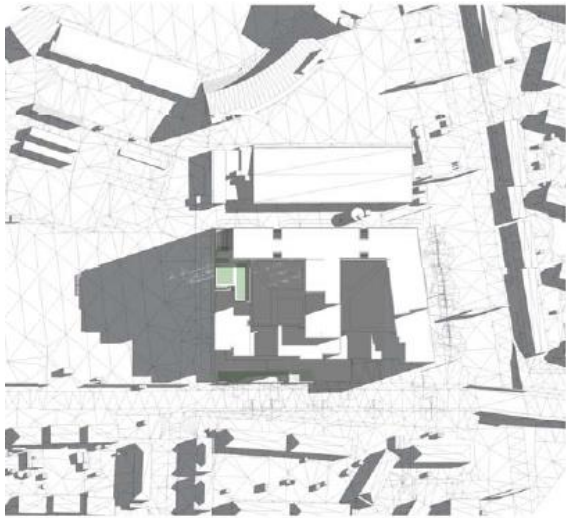


Extract from submitted Wind Microclimate Report

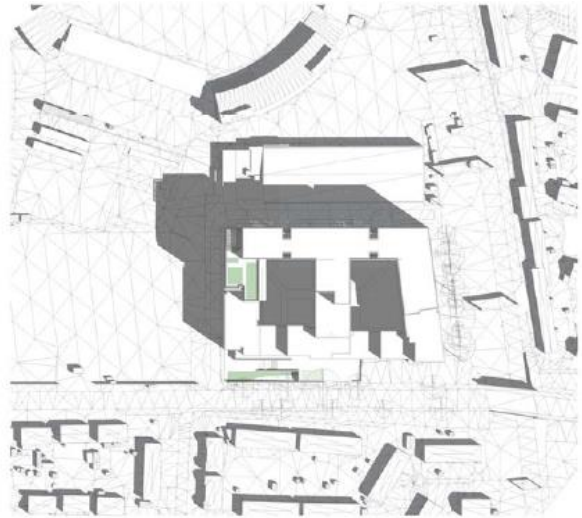
94974/OUT/18 – Former B&Q Appenices

Appendix 5

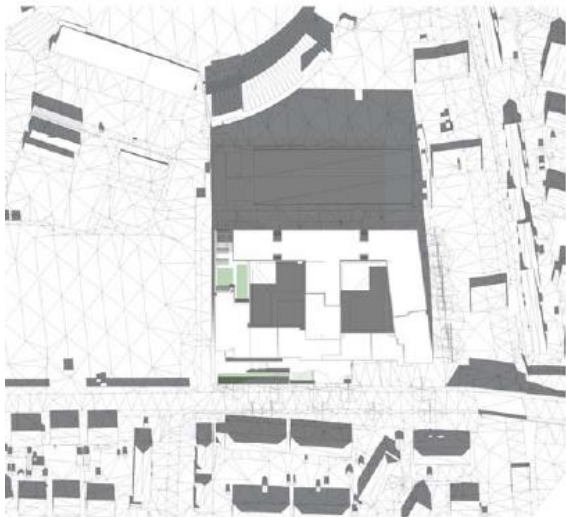
March



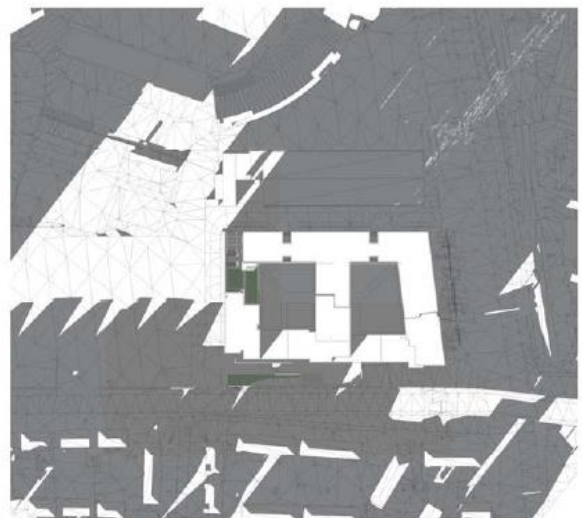
① Sun Study_March_9.00
1:1000



② Sun Study_March_12.00
1:1000



③ Sun Study_March_15.00
1:1000

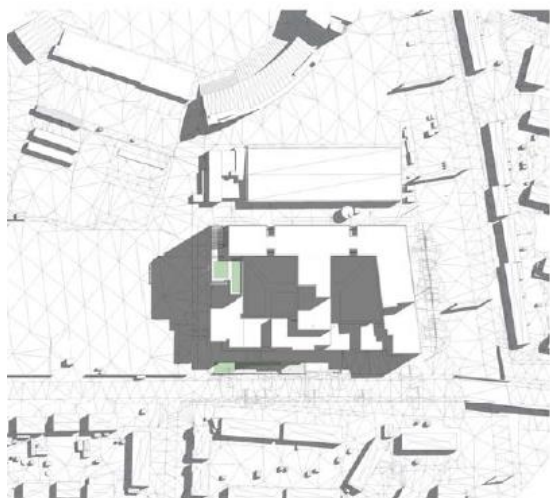


④ Sun Study_March_18.00
1:1000

Extract from Design and Access Statement

94974/OUT/18 – Former B&Q Appenices

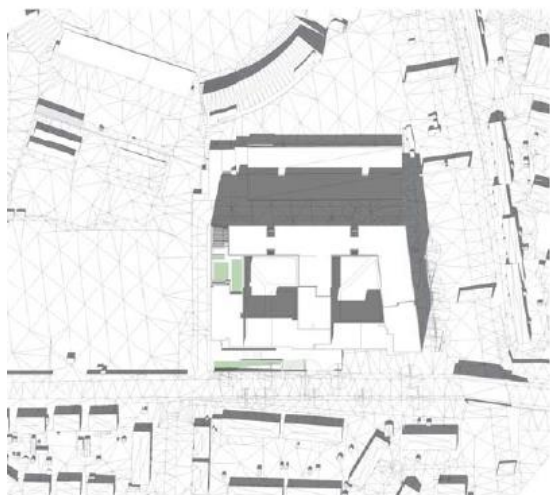
June



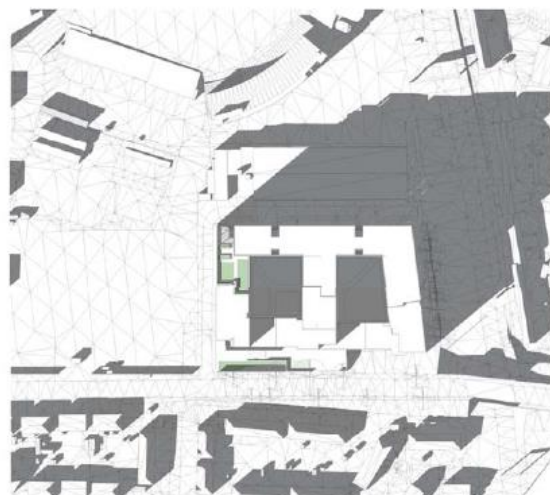
① Sun Study_June_9.00
1:1000



② Sun Study_June_12.00
1:1000



③ Sun Study_June_15.00
1:1000

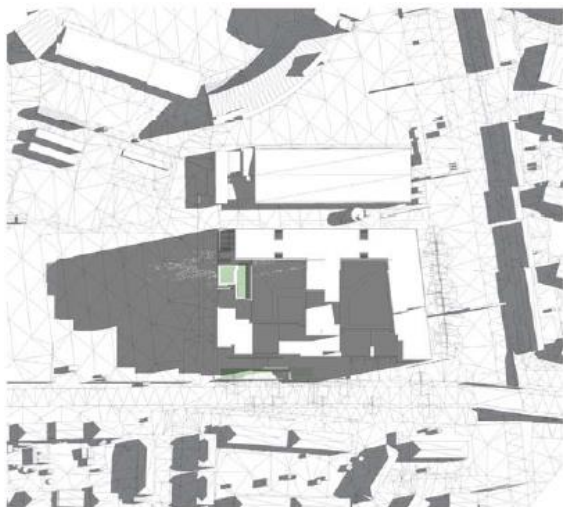


④ Sun Study_June_18.00
1:1000

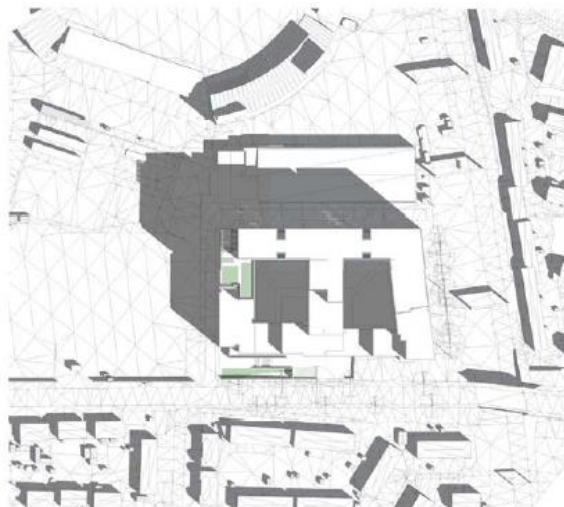
Extract from Design and Access Statement

94974/OUT/18 – Former B&Q Appenices

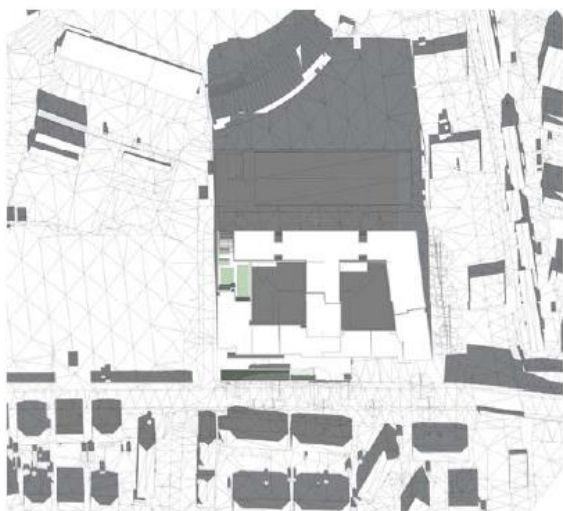
September



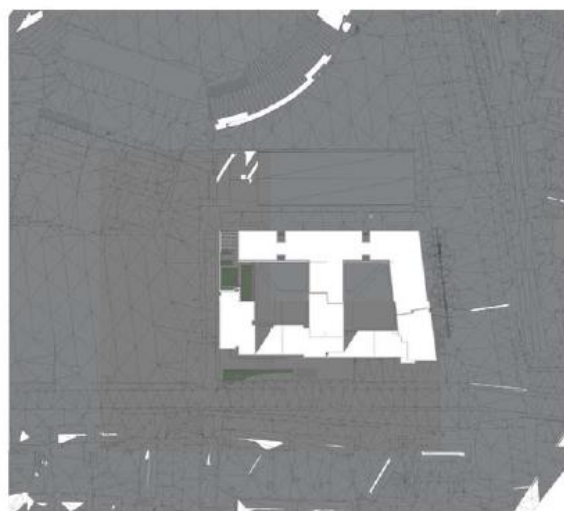
① Sun Study_Sept_9.00
1:1000



② Sun Study_Sept_12.00
1:1000



③ Sun Study_Sept_15.00
1:1000



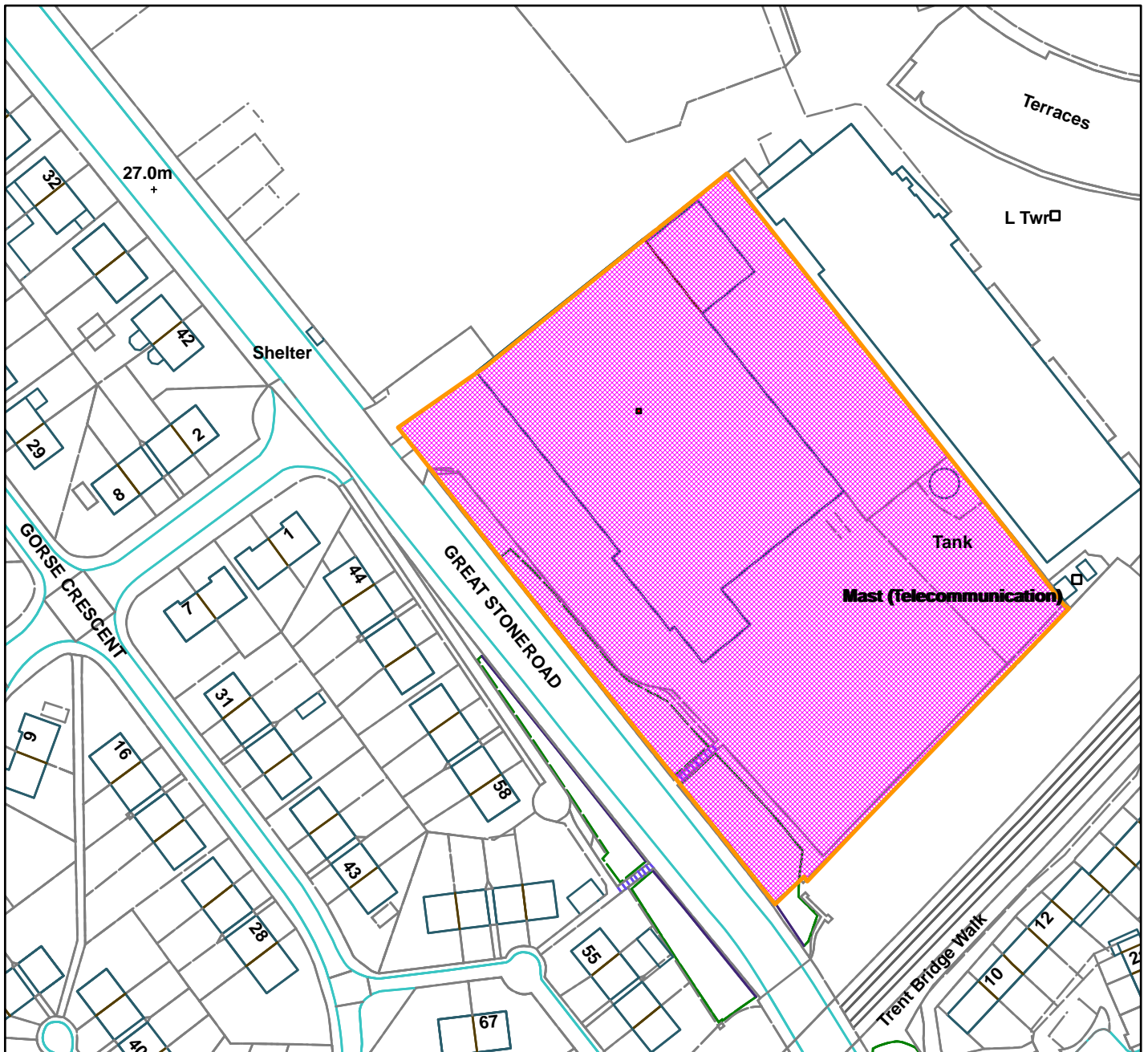
④ Sun Study_Sept_18.00
1:1000

Extract from Design and Access Statement

94974/OUT/18


**TRAFFORD
COUNCIL**

Former B And Q Site, Great Stone Road, Stretford, M32 0YP (site hatched on plan)



Scale: 1:1,250

Reproduced from the Ordnance Survey map with permission of the Controller of Her Majesty's Stationery Office © Crown Copyright 2012.

Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings.

Organisation	Trafford Council
Department	Planning Service
Comments	Committee Date 28/03/2019
Date	18/03/2019
MSA Number	100023172 (2012)