

Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your ref: APP/Q4245/W/20/3258552

Our ref: 62261726

12 November 2020

Dear Sir/Madam,

Town and Country Planning Act 1990
Appeal by Accrue (Forum) 1 LLP
Site Address: Former B&Q, Great Stone Road, Old Trafford, Trafford, M32 0YP
Application ref: 100400/OUT/20

We write as agents for Accrue (Forum) 1 LLP, in respect of the above.

An appeal against Trafford Metropolitan Borough Council's non determination of the following development was submitted via the Appeals Casework Portal on 28 August:

“The demolition of existing retail unit and associated structures; erection of buildings for a mix of use including: 333 apartments (use class C3) and communal spaces ancillary to the residential use; flexible space for use classes A1, A3, D1 and/or D2; undercroft car parking; new public realm; and associated engineering works and infrastructure.”

On submission, the appellant stated preference that the appeal be determined by way of and inquiry. However, following a review of the case by an Inspector, Correspondence from PINS dated 18 September 2020, confirmed that the appeal would proceed by way of a hearing.

PINS initially provided an opportunity for the Appellant to submit its full Statement of Case including the supply of further evidence by 2 October 2020. PINS agreed a revised deadline of 12 November 2020 for submission of the revised Statement of Case via email dated 24 September.

Please find enclosed the following:

- 1 Full Statement of Case, plus;**
 - a Exhibit 1: Hemiview 3-D Light Assessment (prepared by STRI Group)
 - i Appendix 1 – STRI CV's
 - b Exhibit 2: Highway Safety Technical Note (prepared by Vectos)

- i Appendix 1 - Personal Injury Accident Record within Vicinity of Site
- c Exhibit 3: Design Report (prepared by O'Connell East)
 - i Appendix 1 – Walkthrough video
- d Exhibit 4: Townscape Assessment and Landscape Design (prepared by TPM)
 - i Appendix 1.1 - Indicative masterplan (ground floor revised)
 - ii Appendix 1.2 - Portrait view wireframe view 5
 - iii Appendix 1.3 - Portrait view wireframe view 1
 - iv Appendix 1.4 - Modelled views from LCCC main stand with and without temporary stand
- e Exhibit 5: Education Impact Assessment (prepared by Alfredson York)
 - i Appendix AYA01 – DfE Guidance on Securing Developer Contributions, November 2019;
 - ii Appendix AYA02 – Site location plan;
 - iii Appendix AYA03 – DfE Guidance on Home to School Transport;
- f Exhibit 6: Viability Report (prepared by Cushman & Wakefield)
 - i Appendix 1: NPG Viability
 - ii Appendix 2: Edmund Shipway Statement
- g Exhibit 7: Daylight Sunlight Viability Report (prepared by AA Projects)
 - i Appendix A – Daylight Sunlight Report for Sale Square
 - ii Appendix B – Daylight Sunlight results for MKM House/Warwick Road
 - iii Appendix C – Daylight Sunlight results for Wharf Road
 - iv Appendix D – Planning Inspectorate Decision - APP/E5900/W/17/3171437
 - v Appendix E – Planning Inspectorate Decision for Wharf Rd - APP/Q4245/W/19/3220262
- h Exhibit 8: WSP (Heritage)
 - i Appendix A – WSP Heritage Report March 2020
 - ii Appendix B - Conservation Officer Comments
 - iii Appendix C – Conservation Area Appraisal
- i Appendix 3.1 – Invalid letter (3 April 2020)
- j Appendix 3.2 – Email chain between LPA and WSP (9-27 April 2020)
- k Appendix 3.3 – Leading Counsel's Opinion (28 May 2020)
- l Appendix 3.4 – email from TMBC to WSP (10 Sept 2020) regarding Use Classes and Consultee feedback
- m Appendix 3.5 – email from WSP to TMBC (29 Sept 2020) providing Section drawings and Accessibility Report, comments regarding Use Classes
- n Appendix 3.6 – email from TMBC to WSP (29 Sept 2020) regarding outstanding information
- o Appendix 3.7 - email from TMBC to WSP (29 Sept 2020) regarding courtyard elevation drawings
- p Appendix 3.8 – email from WSP to TMBC (5 Oct 2020) providing elevation plans
- q Appendix 3.9 – Courtyard Elevation Sheet 2 (ref: PL_205)
- r Appendix 3.10 – email from TMBC to OEA (17 Sept 2020) site accessibility
- s Appendix 3.11 – Accessibility report prepared by OEA
- t Appendix 3.12 – email chain between TMBC and OEA (30 Sept - 1 Oct 2020) regarding accessibility
- u Appendix 3.13 – revised Level 0 plan (ref: PL_102 Rev D) and courtyard elevations (5 Oct 2020)

- v Appendix 3.14 – Heritage Officer Comments (9 Sept 2020)
- w Appendix 3.15 - Tree removal and protection plan (D6370.01.002B) (29 Sept 2020)
- x Appendix 3.16 – TfGM (Metro) consultation comments (30 Sept 2020).
- y Appendix 3.17 – email from TMBC to WSP (30 Sept 2020) regarding TfGM comments
- z Appendix 3.18 - email from WSP to TMBC (1 Oct 2020) regarding RPAs of metrolink trees.
- aa Appendix 3.19 – LHA comments (2 Sept 2020)
- bb Appendix 3.20 – Transport Assessment Addendum Note 2 (29 Sept 2020).
- cc Appendix 3.21 – email from TMBC to WSP (29 Sept 2020) parking surveys
- dd Appendix 3.22 – email from TMBC to WSP (5 Oct 2020) – regarding LHA comments
- ee Appendix 3.23 - LHA comments (2 Oct 2020)
- ff Appendix 3.24 - email from WSP to TMBC (5 Oct 2020) – parking surveys
- gg Appendix 3.25 – TfGM comments (30 Sept 2020) - base model amendments
- hh Appendix 3.26 - email from WSP to TMBC (5 Oct 2020) – traffic data
- ii Appendix 3.27 – Full Input Data And Results' prepared by Vectos
- jj Appendix 3.28 - email from TMBC to WSP (7 Oct 2020) – TfGM, Sport England and Contributions
- kk Appendix 3.29 – Vectos Traffic Modelling Response (13 Oct 2020)
- ll Appendix 3.30 - email from TMBC to WSP (14 Oct 2020) - TfGM comments
- mm Appendix 3.31 - email from WSP to TMBC (5 Oct 2020) - contributions
- nn Appendix 3.32 - email from TMBC to WSP (1 Oct 2020) – sports contributions
- oo Appendix 3.33 - email from TMBC to WSP (2 October 2020) corrected sports contributions
- pp Appendix 3.34 - Independent Viability Assessment by Trebbi Continuum
- qq Appendix 3.35 - 100400/OUT/20 Committee report
- rr Appendix 3.36 – Additional Information Report (15 October 2020)
- ss Appendix 3.37 – LCCC Objection Letter (8 October 2020)
- tt Appendix 4.1 – Email from LPA to WSP (9 Nov 2020) Residential Allowance
- uu Appendix 4.2 – Places Matter feedback
- vv Appendix 4.3 – Design Access Statement (OEA Architects)
- ww Appendix 7.1 – Schedule of LCCC Quarter development post 2012
- xx Appendix 7.2 – Draft Land Allocation DPD (Policy SL3)
- yy Appendix 7.3 – Former Kellogg's site location plan, landscape masterplan, maximum heights parameters, land use plan.
- zz Appendix 8.1 – Appeal Decision (APP/Q4245/W/19/3225741)
- aaa Appendix 8.2 – Trafford's Five Year Housing Land Supply Statement (31 March 2020)
- bbb Appendix 9.1 – Advertorial Page 1 (21 March 2019)
- ccc Appendix 9.2 – Advertorial Page 2 (21 March 2019)
- ddd Appendix 10.1 – Cricket Ground note
- eee Appendix 10.2 – Photo of LCCC Pavilion
- fff Appendix 12.1 – B&Q Committee Report (15 October 2020)
- ggg Appendix 12.2 – Email from LPA to WSP (25 June 20) confirming validation
- hhh Appendix 12.3 – Avison Young financial Viability Assessment (Jan 2020)
- iii Appendix 18.1 – Former Kellogg's site Committee Report (24 September 2020)

2 Draft Statement of Common Ground, plus;

- a Appendix 1 – Site Location Plan
- b Appendix 2 – Outline Decision notice (94974/OUT/18)
- c Appendix 3 – TMBC Composite Policies Map

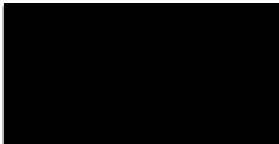
3 Bundle of information submitted between submission of the appeal and reporting the application to committee :

- a Tree removal and protection plan (D6370.01.002B)
- b Accessibility Report
- c 1664_PL_221 Courtyard Section AA
- d 1664_PL_222 Courtyard Section BB
- e 1664_PL_223 Courtyard Section CC
- f Transport Assessment Addendum Note 2 – relating to parking layout, permit system, TRICS exclusions and trip distribution
- g Level 0 Plan (1664_PL_102)
- h Courtyard elevations (1664_PL_205)
- i Talbot Road Great Stone Road Junction input data and results

Should this submission give rise to any immediate queries, please do not hesitate to contact me.

Please advise if you would you like us to provide any hard copies of the listed documents.

Yours faithfully



Matthew Hard

Enc.
As listed above.