FORMER B&Q SITE, GREAT STONE ROAD, STRETFORD M32 0YP

Rebuttal

STEPHEN MILES, MRICS MRTPI

30th December 2021

On Behalf of: Accrue (Forum) LLP

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1. Introduction

1.1. This document comprises a rebuttal in response to the proof of evidence prepared by Mr Lloyd on behalf of Trafford Council in relation to the appeal by Accrue against non determination of the planning application for residential-led development of the former B&Q site on Great Stone Road. The document does not address all the various matters raised in Mr Lloyd's evidence in respect of which I disagree with him; instead it addresses the discrete argument made by Mr Lloyd that the appeal scheme is not efficient in respect of the gross to net ratio of Gross Internal Building (GIA) area and Residential Net Sales area (NSA).

2. Trebbi Continuum evidence

- 2.1. The ratio of gross to net areas is expressed as a percentage in the property industry to enable assessment of the efficiency of a property. The higher the percentage that the net sales area represents as a proportion of the gross area, the more efficient the building will be to build and operate.
- 2.2. In his proof of evidence, Mr Lloyd presents the floor areas of the appeal scheme in terms of the following gross to net ratios:
 - Apartments only (i.e. the apartments are the only part of the building counted in the NSA calculation) = 68.29%
 - Apartments and retail spaces included in NSA = 69.42%
 - Excluding car park (where the car park is excluded from the GIA calculation) = 76.43%
 - Excluding car park, retail, plan, refuse, amenity and cycle space = 78.80%.
- 2.3. He then presents evidence of the gross to net ratios of other recently developed apartment schemes in Trafford which produce a range of 74.77% to 84.73%, with an average of 79.22%. He uses this average to argue that the appeal scheme is inefficient.

3. Rebuttal

3.1. As explained in my proof of evidence, I do not consider that the appeal scheme is inefficient taking into account the inclusion of the car parking area within the GIA. In this regard, and in particular, the basement car park (which is included in the GIA calculation) has a significant impact on the gross to net ratio. The inclusion of a basement car park (which is deemed to be necessary to enable an optimum design and delivery of the site as a whole), distinguishes the scheme's gross to net ratio from many other developments which do not include such a large basement car park provision, making it difficult to compare efficiency on a like for like basis. To enable an accurate comparison of the appeal scheme's efficiency, it would be necessary to either compare against genuinely comparable schemes with a similar proportion of basement parking, or make adjustments to that evidence to account for this difference.

- 3.2. Mr Lloyd has failed to fully take into account the impact of the appeal scheme car park on the gross to net ratio in his analysis of comparable evidence. Whilst he has presented a gross to net ratio that excludes the car park (76.43%), in his subsequent analysis of comparable schemes, he has not made any allowance for the basement car park. The information on which the table (at para 7.4 of Mr Lloyd's proof) is based does not appear to be publicly available on the planning portal and therefore I have not been able to interrogate it. However, based on the notes that Mr Lloyd provides in the table it appears that the majority of the schemes do not include such a significant provision for basement car parking and are thus not directly comparable with the appeal scheme. Mr Lloyd has taken the overall average gross to net ratios of these schemes and compared those against the gross to net of the appeal scheme.
- 3.3. To demonstrate the point, if one was to take the gross to net ratio of the appeal scheme that excludes the basement car park (76.43%), this would place the appeal scheme's efficiency ratio within the range of evidence presented by Mr Lloyd (74.77% to 80.83%).
- 3.4. Further, I have identified additional evidence of gross to net ratios of apartment schemes in the Manchester area which establishes a larger range of efficiency ratios being evident in the market. The table below lists 15 schemes that C&W has intelligence of based on viability appraisals that have been produced through the planning process. All of these schemes have come through the planning process over the last two years, and most are either already constructed/in construction, or due to commence imminently. The table details the unadjusted gross to net ratios (i.e. I have not made any adjustment for parking or other scheme specific elements) which range from 64.55% to 77.06% and produce an overall average of 71.38%. This evidence demonstrates that the appeal scheme gross to net of 68.29% is within the range of gross to net ratios of the comparable schemes and is close to the average. Further, of the 15 schemes included in this evidence, over a quarter have similar or lower gross/net efficiency ratios than the appeal scheme, those being:
 - St Geoge's Place, Arundal St, a scheme of 355 apartments by Logik Developments (gross to net of 65.60%). The scheme does not include basement car parking but does include a modest provision of commercial floorspace of 5468 sq ft
 - Osborne Yard, Miles Platting, a scheme of 90 apartments by Heatley Developments (gross to net of 69.04%). The scheme has 53 under-croft car parking spaces.
 - Great Jackson St, a scheme of 1037 apartments by Great Jackson Street Developments (gross to net of 64.55%). This scheme has a significant element of parking incorporated into the GIA area.
 - Eliza Yard, a scheme of 118 apartments by Manchester Life and Manchester City Council (gross to net ratio of 68.74%). This scheme does not include any on site parking.

Site	BTR/Sales	Site Area (Acres)	Units	Density	Storeys	Gross:Net
Arundal St, Manchester	Sales	1.05	355	338	22	65.60%
Bowlers Yard	Sales	0.22	64	291	10	72.99%
Victoria House, Great Jackson St	BTR	0.39	177	454	25	72.17%

Rebuttal: Stephen Miles Former B&Q, Great Stone Road, Trafford December 2021

Site	BTR/Sales	Site Area (Acres)	Units	Density	Storeys	Gross:Net
Islington Wharf, Manchester	Sales	0.44	106	241	11 / 16	75.37%
Victoria Riverside, Manchester	Sales	2	637	319	18 / 26 / 37	70.49%
Heyrod Street, Manchester	BTR	1	352	352	7 / 14 / 20 / 25	72.12%
Gould Street, Manchester	Sales	6.89	1202	174	4 x 7 / 2 x 11 / 15 / 18 / 31	73.78%
Osborne Yard, Miles Platting	Sales	0.52	90	173	6	69.04%
Great Jackson St, Manchester	BTR	1.49	1037	696	56	64.55%
Laystall St, Manchester	Sales	0.37	89	241	9	71.70%
Eliza Yard, Manchester	Sales	0.59	118	200	7	68.74%
87 Rochdale Road, Manchester	Sales and BTR	1.22	237	194	13	70.18%
Renaissance, Deansgate	Sales	0.49	300	612	27	74.39%
Ferrous, Chapeltown St	BTR	0.42	107	255	15	77.06%
Trinity Islands	Sales	4.40	1950	443	39 to 60	72.52%
					Average	71.38%

4. Conclusion

4.1. In conclusion, the appeal scheme's efficiency ratio is significantly impacted by the inclusion of a substantial basement parking provision and I do not consider that Mr Lloyd's evidence has sufficiently accounted for this in the conclusions he has drawn from the limited comparable evidence that has been presented in his proof of evidence. I have identified further alternative evidence that shows the appeal scheme's efficiency ratio to be within the parameters of market schemes, taking account of the basement parking provision included.