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By email

31 October 2019

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Dear Bethany

**APPLICATION REF: 98031/OUT/19
LAND AT WARBURTON LANE, TRAFFORD (OUTLINE)**

We write further to our recent discussions with regards progress of the Warburton Lane application which was submitted on behalf of Redrow Homes on 14 June 2019.

We are now in receipt of a number of formal consultation responses and thought it would be of assistance to set out the key points arising thus far and how these are being addressed. Our objective is to ensure that the proposed development can be supported by officers when it comes to determination of the application.

For the avoidance of doubt, this letter addresses responses to the outline application only; separate letters have been prepared in respect of the west and east full planning applications.

Review of consultation responses received

Local Highways Authority

The Local Highways Authority (LHA) is currently objecting to the proposal (16 July 2019) pending the submission of further information in relation to a number of aspects within the submitted Transport Statement (TS) and some detailed design changes.

An initial response letter has been prepared by SCP (Redrow's highways advisor) which was submitted to the Council on 18 September 2019. Further comments have since been provided by the LHA in advance of a meeting which took place on 21 October. The purpose of this meeting was to discuss principle issues arising from the assessment work undertaken to date and agree how these can be addressed.

The meeting was helpful in clarifying a number of areas of the assessment and SCP is now working to provide the additional information required by the LHA to satisfy their concerns.

Highways England

An initial response from Highways England (HE) was received in July which requested that additional information be provided in respect of the submitted TS and, in particular, in respect of the assessment of impacts on the Strategic Road Network. The HE recommended placing determination of the application on hold until 25 October 2019. Whilst an initial response letter has been prepared and submitted by SCP

A response letter has been prepared by SCP (28 August 2019) and a further response from HE was received via the Council on 11 September. We note that this includes a further holding request to the Council, effective until 13 December 2019.

HE helpfully attended the aforementioned meeting with the LHA (and TfGM) and clarified that their main concern is any potential impacts on M60 J8 as a result of further traffic on Carrington Road and the junctions along that route.

SCP is on with collating the necessary information required by HE and we will forward this to you shortly under separate cover.

Transport for Greater Manchester

The letter from Transport for Greater Manchester (TfGM) confirms that it has no objections to the proposal (17 July 2019) however TfGM has requested that additional information is provided. This relates to the raw data utilised and traffic flow outputs which have been re-calculated. Furthermore, it has concerns over the priority junction assessment and the modelling undertaken, especially the cumulative impacts of the committed developments.

In relation to public transport, TfGM has requested that the nearest bus stops to the site on Warburton Lane are upgraded so that they provide 160mm kerb heights and if possible, bus shelters in accordance with TfGM's Design Guidelines for Bus Stops.

Additionally, TfGM is seeking to ensure the provision of continuous 2m wide footways throughout and surrounding the development, the reinstatement of any redundant vehicle access points, installation of tactile paving at junctions/crossing points and renewal of any substandard footways.

With regards to the Travel Plan, TfGM has requested that it includes tailored measures to overcome specific barriers or take advantage of opportunities presented by the site, in order to encourage future employees and visitors to use sustainable modes of travel for appropriate journeys. The imposition of a condition has therefore been requested to ensure the further development, implementation and monitoring of a full Travel Plan is carried out.

A response letter was prepared by SCP taking account of the comments made by the TfGM and this was submitted to the Council on 18 September 2019. A further response has been received from TfGM (2 October 2019) confirming that it is

satisfied with the trip distribution and traffic data provided but still requiring further clarity in relation to the modelling associated with the Heath Farm development and the LINSIG models. For these reasons, TfGM was invited to participate in the scheduled highways meeting on 21 October where issues were able to be discussed in the round.

Warrington Borough Council

The letter from Warrington Borough Council (17 July 2019) confirms that it has no objection to the proposal, however it does raise queries with regards the assessment methodology in the submitted Transport Assessment (TA).

The SCP letter (dated 18 September) addressed the comments of WBC alongside those of the LHA.

Trafford Council Air Quality

The Council's Air Quality team has confirmed it has no objections to the proposal (response dated 4 September 2019), subject to the imposition of suitably wording conditions relating to the operational and construction phases of development.

We have no in principle objection to the suggested pre-commencement condition (relating to the submission of a Construction Environmental Management Plan), however, request that the wording of this condition (and all subsequent pre-commencement conditions) are worded in such a way to allow flexibility and delivery of the site to be phased.

In relation to the operational phase, it has been requested that there is the provision of an electric vehicle (EV) charge point in every new house (minimum 7kWh) with dedicated parking or 1 charge point (minimum 7kWh) per 10 car parking spaces for unallocated car parking.

Whilst Redrow does not object to the principle of charge point provision for properties, it is concerned as to the impact this will have on the existing network and ability of the available infrastructure (in terms of power) to accommodate this further loading. In particular, such a measure would likely require the provision of a new primary sub-station on or near the site (as opposed to secondary as is currently planned), the cost of which is significant (circa £3,200,000 vs. £60,000 for a secondary facility). Such provision will have an impact on the overall viability of the site and will need to be considered further in this regard.

Trafford Council Contaminated Land

The Council's Contaminated Land team has confirmed is has no objections to the proposal, subject to the imposition of suitably wording conditions relating to further site investigation and risk assessment work being carried out.

As set out above, the principle of the condition is acceptable, but the wording will need to allow for phasing of the site.

Trafford Council Nuisance

Trafford Council's Nuisance response (16 July 2019) confirms that it has no objections to the proposal, subject to the imposition of a suitably worded planning condition ensuring the noise insulation measures detailed within the submitted noise assessment (Section 6 of the Hepworth Acoustics Report Reference P17-642-R03-V04) are fully implemented prior to the development being brought into use.

The principle of the condition is acceptable subject to the wording allowing for phasing of the site.

Environment Agency

The Environment Agency (EA) has no objection to the proposal (response dated 12 July 2019), subject to the imposition of suitably wording conditions requiring the submission of details with regards to the management of flood risk; surface water run-off and overflows; landscape and ecological management.

Additionally, with regards to biodiversity, it has requested that a scheme which protects, and where feasible, enhances the riparian open space around the Sinderland Brook waterbody is secured by a planning condition.

Again, provided that the wording of any conditions is flexibly worded to allow for phasing of the development, we have no principle concerns with those that have been suggested by the EA.

Trafford Council Lead Local Flood Authority

The Lead Local Flood Authority (LLFA) has objected to the proposal (dated 17 July 2019) on the basis that, in their view, the submitted documentation had not provided a suitable basis for assessment of the flood risks arising from the proposal.

In response, additional modelling has been undertaken by Betts Hydro and a response issued to the Council (28 August 2019). A further response has been received from the LLFA (26 September) which maintains the LLFA's objection and therefore a second Betts Hydro note has been submitted (11 October 2019) confirming why the approach taken is appropriate and will not give rise to unacceptable risks of flooding. We await further comments from the LLFA accordingly.

United Utilities

United Utilities (UU) response (9 August 2019) requests further information, primarily in relation to the draft GMSF Allocation 45 New Carrington; foul drainage; and water supply.

A response letter has been prepared by Betts Hydro (submitted to the Council on 28 September 2019) and we await to hear further from UU.

Again, provided that the wording of any condition is flexibly worded to allow for phasing of the development, we have no principle concerns with this suggestion by UU.

Greater Manchester Ecology Unit

Greater Manchester Ecology Unit's (GMEU) response (20 September 2019) has confirmed it has no objection to the proposal. Furthermore, it is satisfied that the range of Ecology Surveys and Assessments submitted are sufficient and does not consider that any additional surveys are required prior to determination of the application. This includes in respect of Water Voles where GMEU has subsequently confirmed that the current surveys do not need updating (contrary to the suggestion by Warburton Parish Council).

In relation to 'Great Crested Newts and other amphibians', Bats and Badgers GMEU has requested imposition of conditions associated with Reasonable Avoidance Measures and pre-construction surveys, to avoid any harm throughout any pre-commencement work which may be required. Again, the principle of such conditions is accepted provided that the wording is sufficiently flexible to reflect the likely phased delivery of the site.

Additionally, GMEU has asked that a comprehensive Landscape and Habitat Creation and Management Plan is a pre-commencement requirement to be secured by condition. The principle of such a condition is acceptable subject to careful wording.

Greater Manchester Archaeological Advisory Unit

In the letter received from Greater Manchester Archaeological Advisory Unit (12 July 2019) concern was raised about the report findings of the archaeological desk-based assessment. GMAAU is of the view that there is considerable potential for prehistoric, Romano-British and medieval archaeology at the site. It recommends that the site should be subjected to a detailed, phased evaluation designed to identify this type of archaeology. It suggests that this work (as also proposed in respect of the full applications) is carried out prior to determination of this application. Nevertheless, GMAAS also proceeds to recommend that the proposed requirement for further survey work is dealt with by way of a suitably worded condition.

The applicant is in agreement with this recognition i.e. that it is not essential that the surveys are undertaken pre-determination, not least as there is no suggestion from the GMAAS that the findings of any further surveys would fundamentally change the overall conclusions of the survey work already undertaken.

Furthermore, the sites are actively crop farmed and due to recent weather conditions, the crops are yet to be harvested. To this end, the ability of the applicant to instruct surveys of the site is limited.

The applicant is, in this instance, willing to accept a condition requiring further surveys to be undertaken pre commencement of development on this basis.

Sport England

As the site is not considered to form part of or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), Sport England has confirmed that it is a non-statutory consultee. Nevertheless, it has reviewed the proposals and confirms that it has no objections (16 July 2019).

Footpath Groups

The responses received from the Peak and Northern Footpath Society (3 July 2019), Pedestrian Association (16 July 2019) and Ramblers Association (16 July 2019) confirm that the proposals are acceptable to each of these groups and they welcome the retention of routes within and surrounding the development once it is complete.

Trafford Council Strategic Planning

Trafford Council's Strategic Planning Response (5 September 2019) raises concern with regards the principle of development not being in accordance with current adopted policy as set out in the Core Strategy and UDP. The Council is of the view that this position needs to be weighed against the identification of the site in the Draft GMSF 2019 and the Council's current housing land supply position.

The planning statement, in particular sections seven to 11, outline in detail the planning case for development. It concludes whilst the land is allocated as Protected Open Land, Trafford does not have a five year supply of housing land and therefore this policy is out of date in NPPF terms. Therefore the weight which can be attributed to this policy is significantly reduced, whilst the weight to be attributed to the delivery of new housing to address the significant shortfall should be increased.

Trafford Council Heritage

The Council's Heritage Officer has objected to the proposal (12 September 2019) as the Officer is of the view that the development proposal will cause substantial harm to the significance of a number of designated and non-designated heritage assets.

As the Council is aware, work is ongoing to address the Council's heritage comments and we will be making a further submission in this regard shortly.

Trafford Council Housing Strategy / Viability

The Council's Housing Strategy and Growth Manager has confirmed they have no objection to the proposal (19 June 2019) but has requested that the submitted viability assessment is scrutinised by the Council given that no affordable housing contribution either on-site or in the form of a commuted sum is proposed.

Separate feedback on the submitted viability appraisal has been received (dated 8

August 2019) and Cushman & Wakefield (Redrow's viability advisor) has since issued comments back to the Council addressing the concerns raised. A further more detailed response has since been received from the Council (dated 6 September) and Cushman & Wakefield is currently reviewing this with a view to responding again shortly.

Greater Manchester Police Design for Security

Greater Manchester Police Design for Security's response (11 September 2019) confirms that it has no objections to the proposal, subject to the imposition of a condition which reflects the physical security specifications set out in the submitted Crime Impact Statement. Provided that the condition is suitably worded and flexible, we have no in principle objection to this approach.

Waste Management

The Council's Waste Management response (27 June 2019) raised concern about the proposed distances between the proposed collection points to likely refuse vehicles and has recommended that the collection points be located at the edge of the proposed adopted highway.

The applicant has since sought further clarity on this (14 August) and the Council has advised that 30m is typically regarded as the maximum distance for a householder to wheel their bin to the highway. In some instances, it is difficult for the layout to achieve this suggested standard i.e. for the collection point locations to be within 30m of households in addition to the refuse vehicles accessing the collections points on an adopted highway. We are therefore of the view that one of the above guidelines has to give.

We are awaiting further clarification from the Council's Waste Management team as to the extent to which the suggested requirements can be flexible.

Warburton Parish Council and Cllr Sean Anstee

Warburton Parish Council has objected to the proposal (dated 22 July 2019) primarily on the grounds of planning policy; sustainability / permeability; traffic; and landscape issues.

The subsequent letter from Cllr Sean Anstee (18 August 2019) suggests that there are a number of obstacles to be overcome before the application could be considered to be in accordance with planning policy. The concerns he has specifically raised relate to potential conflict with the emerging Neighbourhood Plan; the impact of development on the local highway network and public transport; the extent of engagement with Warburton Parish Council; flooding and affordable housing.

As the Council is aware, the technical points raised in the Parish Council's letters are being addressed separately alongside the comments of statutory consultees.

We note the concerns raised regarding limited engagement with Warburton Parish

Council however the Statement of Community Involvement shows significant and in-depth engagement was had with Warburton Parish Council prior to submission of the application. This includes an invitation to the public consultation held on 26 July 2018 followed by a meeting to discuss details on the proposed development on 17 September 2018. Since then, the proposals have been submitted and we will be looking to re-engage with the Parish Council once the current technical concerns have been overcome.

HIMOR Group Ltd

HIMOR's letter raises a Group objection on the basis that they do not consider that the submitted TA properly reflects the current traffic situation and on this basis, it is their view that inadequate highway mitigation has been put forward as part of the proposal.

A response letter prepared by SCP, taking account of the comments made by the Himor Group Ltd (alongside those of others including TfGM) was submitted to the Council on 18 September 2019. We are awaiting a response back from the Council to establish if this sufficiently addresses their concerns. In the meantime, we note that a further note has been received from Himor Group Ltd commenting specifically on the ability to implement off-site mitigation measures.

As discussed in the highways meeting on 21 October, a number of options are currently being explored.

Outstanding issues

From our verbal discussions and monitoring of application responses online, we are yet to receive comments from the following:

- Trafford Council Strategic Growth;
- Health and Safety Executive;
- Trafford Clinical Commissioning Group;
- Trafford Council Sustainability Officer (Strategic Planning);
- Trafford Council Education;
- Trafford Council Public Health; and
- Electricity North West.

Please could you confirm when the responses are likely to be received, in order to ensure that we have sufficient time to be able to address any issues arising and understand the timescales moving forward.

Next Steps

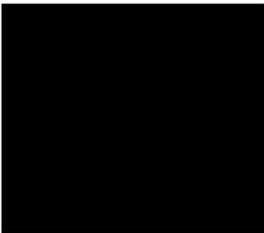
As you are aware, following the Places Matter Design Review which took place on 4 September 2019 we are in the process of revisiting the design of the scheme to reflect this feedback and that of others, including the Council's heritage officer.

We have since met with planning officers (15 October) to table the work undertaken to date and we will continue to keep you updated as this progresses.

In the meantime, we are keen to work to resolve the outstanding technical points and the highways meeting of 21 October was helpful in this regard.

However, we'd be grateful if you could obtain the outstanding consultation responses in order that we can ensure that any resubmitted information and/or technical notes consider the issues in the round.

Yours sincerely



Sarah Wozencroft

Enc: Redrow Homes