

**Appeal by Redrow Homes Ltd
Land at Warburton Lane, Trafford**

PINS reference APP/Q4245/W/19/3243720

LPA reference 98031/OUT/19

**Summary Proof of Evidence of Narada Haralambous
BA(Hons) DIPLA CMLI**

Design

- S1. My name is Narada Haralambous and I am the Appellant's expert witness on matters of design. I have a BA (Hons) First Class in Landscape Architecture and a Diploma in Landscape Architecture with Distinction. I have been a Chartered Member of the Landscape Institute (Design) since 2007 and I am a member of the Urban Design Group. I am an Associate Landscape Architect and Urban Designer at The Environment Partnership (TEP) Ltd with over 15 years' experience in landscape and urban design.
- S2. The appeal is made against the non-determination by the local planning authority of application ref. 98031/OUT/19 which proposes: *Residential development of up to 400 dwellings, including the creation of new points of access, provision of formal and informal open space, ancillary landscaping, car parking and highway and drainage works. It is an outline application with all matters reserved with the exception of access.*
- S3. Design is a reserved matter, however a number of objections are intrinsically linked to matters of design and focus on the two full applications (ref. 98029/FUL/19 and ref. 98030/FUL/19) now withdrawn.
- S4. My evidence presents design matters detailing the evolution of the scheme in the application and its subsequent further development.
- S5. Following consultation with Trafford Council and their concerns regarding the original designs submitted with the application, Redrow Homes Ltd appointed TEP as lead designer in August 2019. My work has been to develop matters of design taking into account the concerns of other parties. My evidence is to demonstrate that a policy compliant design can be achieved on the site.
- S6. In Section 2.0 of my evidence I outline relevant planning policy relating to design and summarise this into a number of guiding principles. I explain how the Revised Parameters Plan (Core Document A46) and the Revised Design and Access Statement (DAS) (Core Document A51) address the guiding principles relating to design policy, outlining maximum parameters within which a suitable development can be established. My evidence demonstrates that the proposed development has been developed in accordance with relevant design policy.
- S7. In Section 3.0 I consider Trafford Council's reasons for refusal relating to design, as outlined in the Officer Report to Committee (Core Document A62) and detailed in the TBC Statement of Case (Core Document C3). These can be summarised as:
- An outline permission is unacceptable because it is not possible to assess the impacts and determine whether an appropriate form of development can be delivered;
 - A parameters plan and indicative drawings are not sufficient in seeking to establish the acceptability of the scheme as a whole, in particular the amount, nature and location of on-site mitigation required;
 - The development boundaries do not have suitable landscape buffers, development would not be well-integrated into the rural landscape or provide a robust Green Belt boundary;
 - The northern boundary severely inhibits the scope for successful integration with Partington;

- The outline submission and the Parameters Plan does not presently account for future road connections; and
 - The proposed development fails to respond to the site's context and character, and it would not deliver an accessible, integrated, outward-looking and inclusive residential development; and contrary to Policy L7 of the Core Strategy, the National Planning Policy Framework and the National Design Guide.
- S8. I explain why I disagree and consider that a suitable development can be established within the maximum parameters set for the development to be designed within and shows worst case. I address each of Trafford Council's reasons for refusal explaining with reference to the Revised Parameters Plan (Core Document A46) and the Revised DAS (Core Document A51) why I disagree; referencing relevant planning policy relating to design and landscape guidance.
- S9. I explain how I consider suitable landscape buffers have been incorporated within the Revised Parameters Plan (Core Document A46) to ensure development can be well-integrated into the rural landscape and with Partington to the north, in line with landscape guidance.
- S10. I address how I consider that the Revised Parameters Plan (Core Document A46) creates the framework for a well-integrated development to provide a sensitive rural transition and detail why I do not agree with Trafford Council's objection that the proposed development fails to respond to the site's context and character.
- S11. I outline why I consider that the Revised Parameters Plan (Core Document A46) provides the framework to create an accessible, integrated, outward-looking and inclusive residential development with off-site linkages provided where feasible; in keeping with the National Design Guide (Core Document D3) and Policy L7 (Core Document E2).
- S12. In Section 4.0 I address representations relating to design from the Rule 6 party Warburton Parish Council. These are detailed in their Statement of Case Item 5 (Core Document C4) and can be summarised as:
- Contention that every single point mentioned in NPPF Part 12 paragraph 127 (Core Document D1) has been ignored in the design with particular reference to the approach to townscape character;
 - The Warburton Village Design Statement (Core Document E12) has been entirely ignored; and
 - Concerns regarding the outline Building for Life 12 (BfL12) assessment in the Revised DAS (Core Document A51).
- S13. My evidence sets out how the analysis section of the Revised DAS (Core Document A51) considers the local townscape character of the surrounding area. I explain how the proposals outline that scale and appearance of new development should reflect the existing traditional local vernacular and continue the use of a restricted palette of materials, whilst highlighting that scale and appearance is a reserved matter.

- S14. I explain how it is at the reserved matters stage that I consider the design of house types should include consideration of the Design Guidelines outlined in the Warburton Village Design Statement (Core Document E12). However, the Revised DAS (Core Document A51) has considered many of these design guidelines within the illustrative proposals.
- S15. In response to criticism of the outline BfL12 assessment I explain my understanding of the aim of BfL12 and the purpose of the outline assessment in helping to identify targets for a proposed outline application.
- S16. In Section 5.0 I consider other representations relating to design of which there are few. This section focuses on addressing design concerns in Mr Paul Beckmann's representation dated 15th July 2019. I summarise the main points as:
- Concerns related to guidance provided in SPG 30: Landscape Strategy (Core Document E9) and the Greater Manchester Landscape Character and Sensitivity Assessment (Core Document I5); and
 - the house types proposed in relation to the local vernacular of Warburton, consideration of the Warburton Village Design Statement (Core Document E12), and the height and scale of the proposed houses.
- S17. I note that Mr Beckmann's objections relate to the original submission of the outline application and do not consider the Revised Parameters Plan (Core Document A46) and the Revised Design Access Statement submitted December 2019 (Core Document A51). In relation to Mr Beckmann's concerns related to landscape guidance I defer matters to Mr Grimshaw.
- S18. In Section 6.0 of my main evidence I make conclusions, noting that the proposals have been developed in accordance with relevant design policy. I consider that the Revised Parameters Plan (Core Document A46) and Revised Design and Access Statement (Core Document A51) have addressed guiding design principles in outlining maximum parameters within which a suitable development can be established. This is in keeping with national, local and best practice design guidance.
- S19. The application is in outline with all matters reserved except for access. I consider that all other matters including layout, scale, landscaping and appearance can be suitably addressed as part of reserved matters and the illustrative design principles provided within the Revised DAS (Core Document A51) are sufficient in demonstrating a policy compliant design can be achieved.
- S20. The Revised Parameters Plan (Core Document A46) has been informed by analysis of the application site and its context, planning policy context and consultation with Trafford Council and Places Matter Design Review. The Revised Parameters Plan (Core Document A46) sets out the maximum parameters for the development to be designed within and shows worst case. I conclude that it is my opinion that a suitable policy compliant development can be established within these parameters as detailed in the Revised DAS Section 7 Indicative Layout (Core Document A51).
- S21. I conclude that I have not found anything to substantiate Trafford Borough Council's objection to the appeal proposals on design grounds.