

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

**PINS reference APP/Q4245/W/19/3243720**

**LPA reference 98031/OUT/19**

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

**Design**

# 1.0 Introduction

1.1. This rebuttal evidence responds to design matters raised in the evidence of:

- Mrs Bethany Brown (TBC/9/B);
- Ms Elisabeth Lewis (TBC/2/B); and
- Mr Edward Paul Beckmann (WPC/2/B).

1.2. My rebuttal provides clarification in areas of disagreement and I do not respond to every point made in the above evidence.

1.3. This rebuttal should be read in conjunction with my main proof of evidence RH/3/B.

## 2.0 Response to Mrs Bethany Brown Proof of Evidence (TBC/9/B)

- 2.1 The planning evidence of Mrs Bethany Brown (TBC/9/B) makes great play of design matters, focusing on perceived issues relating to character and context; and integration and accessibility.
- 2.2 Further concerns are raised in relation to the density, scale and layout of development; along with the assumption that an outline permission is unacceptable.

### CHARACTER AND CONTEXT

- 2.3 Mrs Brown states at paragraph 4.7 (TBC/9/B) that *'insufficient regard has been paid to this rural character. This failure can be discerned from a review of the parameters plan (CD A46). In supporting 'up to 400 units', this is based on a substantial spread of development. Built form would extend close to the southern and eastern boundaries of Site 1, and to the southern, eastern and western boundaries of Site 2. Mr Folland has identified that the narrow landscape strips that the plan illustrates would not create an effective, robust buffer to a new settlement boundary. The proposed development would present a hard and abrupt built up edge which would not transition well with the adjacent countryside. It would have an unacceptable and substantial suburbanising effect.'*
- 2.4 I explain in detail in my main proof of evidence paragraphs 3.9-3.48 (RH/3/B) how the development has been sensitively integrated into the rural landscape with suitable landscape buffers to create a new settlement boundary.
- 2.5 Where the development forms a new urban edge to the settlement it is my professional opinion that it should create an outward looking positive relationship with the adjoining countryside.

- 2.6 The temptation in such locations is often to totally hide the development from the wider countryside by screening with trees. This approach does not accord with the surrounding character of many of the existing settlements where the settlement edge is often visible in filtered views beyond hedgerows and trees. Whilst it is accepted that the southern boundary of Partington is currently defined by the Red Brook corridor and its associated valley trees and vegetation, I do not consider it appropriate to try and replicate this approach on the sites southern boundary as it would not be consistent with the landscape south of the brook. Instead, the development seeks *'to take more advantage of the chance of overlooking pure countryside to the south'* (as encouraged by the Design review panel (CD I1)) whilst *'utilising the screening effects of existing woodland to integrate development'* and *'using additional planting to soften the urban fringe'* (as per guidance in the Greater Manchester Landscape Character and Sensitivity Assessment (GMLCSA) CD I5 p70). I have not found any design guidance that suggests new urban edges must be screened from their surroundings or include landscape buffers of a specific depth.
- 2.7 I do not consider Mrs Brown's comment that *'the proposed development would present a hard and abrupt built up edge which would not transition well with the adjacent countryside'* to be accurate or true. The landscape buffers within the Revised Parameters Plan provide the opportunity for the built form to be set back behind a traditional boundary treatment (such as a native hedge and Cheshire railings), with the set-back between the site boundary and front gardens to create a landscape transition zone served by a country lane style shared drive. Built form would be further integrated into its setting by utilising existing boundary hedgerows and trees supplemented with new hedgerow tree planting, native tree groupings and wildflower meadows to soften the urban edge.
- 2.8 Development should then utilise a sympathetic materials and colour palette which accords with the local vernacular to aid its integration into its setting. This principle is supported in the Revised DAS.

## Density and Quantum of Development

- 2.9 At paragraph 4.10 Mrs Brown states that *'the submission refers to the developable area of 13.7 hectares, which would provide a density of 29 dwellings per hectare (dph). It is not accepted that 13.7 hectares are properly developable because the figure does not account for meaningful landscape buffers, archaeological mitigation, adequate buffers to listed buildings, mitigation to reflect other landscape assets, and necessary highways infrastructure. Furthermore, whilst this density is lower than the average dph currently suggested by the GMSF over the full allocation, this site warrants a much lower density model. This would involve a more spacious distribution of development, interspersed with landscaping. This would engender appropriate compatibility with the adjacent rural landscape and enable a better appreciation of aspects of the historic landscape that would remain. The concept of spaciousness is not reflected in the illustrative layout within the revised Design and Access Statement (DAS, CD A51), based on 167 residential units (Site 1) and 233 units (Site 2). This shows a cramped and overdeveloped arrangement in accommodating 400 two to four bedroom dwellings across the site and right up to boundaries.'*
- 2.10 I do not fully understand Mrs Brown's concerns. The development density has been quantified using standard procedures taking account of the net developable area and makes efficient use of land in accordance with SPG1: New Residential Development (CD E7) as detailed in my main proof paragraph 3.4. I have explained how meaningful landscape buffers have been provided along with adequate buffers to listed buildings. I do not understand what Mrs Brown means by *'mitigation to reflect other landscape assets'*. The Revised Parameters Plan retains most existing landscape features (comprising trees, hedgerows and watercourses) within landscape buffers and green corridors.

- 2.11 It is also suggested that a *'cramped and over developed arrangement'* is shown in accommodating 400 dwellings. I have explained in my main proof how a policy compliant design has been achieved and how the development density was increased to make more efficient use of land (RH/3/B paragraph 3.4) following feedback from the Council on 03/09/20 and 05/09/20 (see RH/3/C Appendix 1 and Appendix 2 p9). This also involved providing additional open space to create landscape buffers to heritage assets and a third green corridor to link the woodland copse on Site 2 to the Red Brook valley (as recommended by the Design review panel CD I1). Prior to this the Appellants full application planning layouts achieved a net density below 25dph which was considered inefficient by the Council. I am unsure why Mrs Brown now considers that the *'site warrants a much lower density model, involving a more spacious distribution of development, interspersed with landscaping'*. The development already includes 45% open space as detailed in the Revised DAS p59 (CD A51). This is interspersed around the sites edges and along green corridors that break up built form.
- 2.12 Mrs Brown states at paragraph 4.11 *'this is not a site where higher-rise development should be contemplated. Equally, it is recognised that the provision of family homes is consistent with the housing needs of the local area and that a scheme focussed on more one-bed accommodation would not reflect local needs. Overall, it is difficult to envisage how a development of this number of units and of an appropriate housing mix could be successfully provided in a way which would be respectful of the site's character.'*
- 2.13 The application does not seek approval for *'higher-rise'* development and the Revised DAS is clear that building heights should reflect existing built form and be predominantly two storeys in height, with some two and half storey buildings with dormers in pitched roofs. The indicative mix of dwellings provided on page 74 of the Revised DAS does not include one-bed accommodation but a suitable mix of family homes comprising 2, 3 and 4 beds units.
- 2.14 The Revised DAS pages 68-69 clearly outlines the principle of how the development will seek to be respectful of the sites character and identity through the density, layout and arrangement of dwellings, combined with the landscape buffers shown. This is detailed in the Moss Lane character area which covers the southern boundary of Site 1; and the Woodland Edge character area to the southern and western boundary of Site 2.

## Further Design Detail

2.15 At paragraph 4.12 Mrs Brown provides a lengthy list of why she considers this outline proposal is the wrong approach. The list states:

- *A scale of development which represents overdevelopment in this sensitive, transitional landscape location;*
- *Intense development across a significant section of a former deer park;*
- *A coverage of development which would provide limited opportunities for visual permeability and 'glimpsed' or 'through' views to the adjacent countryside;*
- *Landscape buffers of inadequate depth which could not accommodate the required level of tree planting;*
- *No account whatsoever of the need for archaeological mitigation (including of the historic landscape);*
- *Insensitive siting of development in close proximity to non-designated heritage assets and with weak landscape buffers used to provide separation;*
- *Insufficient 'no build' areas within the setting of listed buildings;*
- *An absence of internal landscaping within, and to break up, building groups;*
- *A lack of discernible variety in the design and layout of identified different character areas;*
- *An overly planned and engineered layout centred on a dominant internal estate road with a curvilinear form; and*
- *An overriding suburban feel to the layout which is evidenced by the road structure described above, the use of cul-de-sacs, the regular spacing of dwellings, and the provision of detached garages, lengthy driveways and parking courts.*

2.16 (Bullet point 1) I have explained above and in my main proof of evidence why I consider the scale of development is acceptable and in line with current and emerging policy.

- 2.17 (Bullet point 2, 5, 6 and 7) I defer built heritage and archaeology matters relating to the former deer park, archaeological mitigation, listed buildings and non-designated heritage assets to Miss Kelly.
- 2.18 (Bullet point 3) I defer matters relating to landscape and views to Mr Grimshaw. However, I do not understand what Mrs Brown means at bullet point 3. I have not seen any design requirement outlining a need for ‘*glimpsed*’ or ‘*through*’ views to the adjacent countryside’ and I do not understand who needs to experience these views. The layout breaks up built form through four substantial green corridors and landscape buffers to the development edges. Views of the countryside would be available in places, beyond tree planting. The layout of development has been designed to be outward looking, ensuring most dwellings overlook a green space or the countryside with the network of footpaths and cycleways also allowing outward views.
- 2.19 (Bullet point 4) I have explained in detail in my main proof of evidence why I consider adequate landscape buffers are provided. The Revised DAS illustrates how tree planting could be accommodated within these buffers as illustrated on the Illustrative Masterplan and in Section 7.9 Scale and Appearance where illustrative cross sections are provided. I have explained above why I do not consider screening the development from its surroundings through woodland planting is an appropriate response. There is no policy or design guidance that specifies a requirement to screen residential development or that details a required level of planting. Guidance in the GMLCSA (CD 15) page 70 suggests woodland planting can be used to soften the urban fringe and to reintroduce hedgerow trees where appropriate.
- 2.20 (Bullet point 8) The Revised Parameters Plan and the Landscape Strategy in the Revised DAS Section 7.10 illustrate internal landscaping that will break up building groups. This is formed by four green infrastructure corridors and series of ‘village green’ open spaces with dwellings forming perimeter blocks facing outwards onto the streets and open spaces around it. I consider this is a substantial amount of internal landscaping to break up building groups.



- 2.21 (Bullet point 9) The application is in outline and seeks to set out the principles for how development will come forward. The illustrative proposals are indicative and clearly further detailed work is required at reserved matters stage in order to fine tune the design and layout of identified character areas. I do not see any reason why a design and layout of suitable variety cannot be achieved within the maximum parameters set out and based on the illustrative guidance put forward.
- 2.22 (Bullet point 10 and 11) The illustrative proposals have been designed to ensure an efficient use of land with a strong hierarchy of streets. The layout has sought to minimise access roads through open space and along the development edges near countryside to ensure the impact of cars is minimised in these locations and a greater sense of pedestrian priority. The layout and internal estate road seeks to follow highways requirements for residential development and includes shared drives to the development edges. If the site is to be developed for residential development then naturally a more urban feel will be experienced given the site is presently arable land.

### **Landscape Characteristics**

- 2.23 I have set out in my main proof of evidence (RH/3/B p14) the policy guidelines for the Settled Sandlands LCT of relevance to design. I do not consider that the proposal is fundamentally at odds with this guidance, as suggested by Mrs Brown at paragraph 4.13. I agree with Mrs Brown's opinion that the relatively modern development at Top Park Close is a poor response to the local context and that it should not be replicated on the site. It is a gated, inward facing development that turns its back on the surrounding context. The Revised DAS does not seek to replicate the development at Top Park Close or reflect this in any of the guiding principles put forward.

### **Most Sensitive Locations**

- 2.24 At paragraph 4.15 Mrs Brown highlights that the '*appellant has sought to apply a lower density of development*' to the southern and western edges of Site 2 '*where principally detached dwellings would be located*'. She continues that '*even this arrangement would be overly dense for an edge of settlement location since there would still be a row of very substantial houses*'.

- 2.25 This area is defined as the Woodland Edge character area in the Revised DAS (CD A51 p68-69) and comprises 31 detached dwellings along the southern and western boundaries. The net density of this character area is 16.5 dwellings per hectare which I consider very low. Indeed at this density the illustrative proposals indicate that the frontage of only 12 of these dwellings would be visible along the southern edge, due to screening from the existing woodland copse. Along the western boundary of Site 2 an even reduced number of 7 dwelling frontages would be visible where they overlook adjacent fields. I am not aware of any design policy or guidance that states a specific density requirement should be applied for an edge of settlement location.
- 2.26 The southern boundary to Site 1 is identified as the Moss Lane character area in the Revised DAS (CD A51 p68-69). This area also applies a lower density to development where 22 dwellings define the southern boundary with Moss Lane, at a net density of 18 dwellings per hectare. Dwellings are grouped in small clusters of up to 5 units, often set around rural courtyards, with localised access from Moss Lane.
- 2.27 In response to Mrs Brown's proof of evidence (TBC/9/B) paragraph 4.16 the design rationale for this was based on officers requesting the Appellant to explore the potential for smaller individual access points from Moss Lane; and guidance from the Design Review panel (CD I1) which stated:
- 'Moss Lane will become the new settlement edge, so it is critical in the manner in which you present the housing development. There needs to be a better relationship between the new houses and the lane itself. You might consider forming housing groups, using farm building clusters as a typology.'*
- 2.28 I was not aware that the TBC concept for this was intended to include a reduction in development density surrounding the courtyards in order to reinforce rural characteristics. This conflicts with feedback from TBC Strategic Planning and Growth in relation to increasing the development density to make efficient use of land (RH/3/C Appendix 2 p9). No design detail is provided for the localised vehicle access points on Moss Lane, as this is a reserved matter, therefore it is not clear how Mrs Brown has managed to determine that *'visibility splays, hedgerow removal, external lighting, and hard surfacing would all overly dominate and undermine the rural character'*. The design scenario outlined by Mrs Brown risks another Top Park Close type development coming forward with inward facing dwellings that turn their back on the surrounding context.

## INAPPROPRIATE OUTLINE APPLICATION

- 2.29 Many of the assumptions detailed in Section 5 of Mrs Brown's proof of evidence focus solely on the Revised Parameters Plan (Core Document (CD) A46) and do not appear to fully consider the guiding principles established within the Revised Design and Access Statement (DAS) (CD A51).
- 2.30 It is an outline application with all matters reserved with the exception of access. The Parameters Plan identifies the principles of development (use, amount and access) for which planning permission is sought. However, this must be considered alongside the Illustrative Masterplan contained within the Revised DAS as this sets out the principles that the development will follow and provides an indication of what it will look like. Whilst it is accepted that this provides one way that the development could come forward it is not the only way that a suitable design could be achieved on the site. The purpose of the illustrative masterplan is to provide a template for the detailed design stage of reserved matters applications, setting out the aims for the whole design, even if many of the details still have to be drawn up.
- 2.31 Whilst the Appellant must keep within the parameters set out in the Revised DAS, it is accepted that the outline permission will need to include conditions to make sure the ideas and aims in the Revised DAS are followed through as the design progresses.
- 2.32 At paragraph 5.3 of Mrs Brown's evidence the items listed as '*not shown*' on the Revised Parameters Plan are all detailed within the Revised DAS to a sufficient level for an outline application. The Revised Parameters Plan submitted is to a recognised scale of 1:2000 and is suitable for measurement.

## INADEQUATE BASELINE ASSESSMENT

- 2.33 At paragraph 5.11 Mrs Brown states that "*within the revised DAS, a confused picture is presented regarding whether the deer park is within or adjacent to the site. It follows that the parameters plan, submitted prior to both, makes no allowance for this historic landscape.*"
- 2.34 The Revised DAS pages 35 and 41 quite clearly identify the extent of the deer park in relation to the application boundary.

## **A SENSITIVE SITE**

2.35 At paragraph 5.14 Mrs Brown states that *“The appellant identified a key amendment of the revised plan being the ‘pulling back’ of development areas from adjacent listed buildings. This may seem reasonable in principle, however it is simply not possible to form an accurate or meaningful view on the basis of a crude illustration on a basic parameters plan. It cannot be discerned if the area left undeveloped is of sufficient scale and depth or of the appropriate configuration. This revision was not accompanied by a further modification involving a reduced scale of development; the implications of the adjustment could be to increase densities immediately within the re-sited development area which could worsen the extent of harmful impact. There is simply too much flexibility within the parameters plan to be able to ensure that any such offer of mitigation would be successful.”*

2.36 I have already confirmed that the Revised Parameters Plan is to a recognised scale of 1:2000 that measures can be taken from. Therefore, if required, Mrs Brown can identify the scale and depth of the area left undeveloped. Indeed, the Revised DAS quite clearly sets out the principles of development in the vicinity of listed buildings, where I have already detailed how a lower density of development has been applied in order to respect the wider context and heritage assets. In addition, the proposed scale and dwelling type is illustrated, with maximum storey heights defined, in order that the extent of impact can be reasonably understood. I do not consider Mrs Brown’s statements regarding this to be accurate or true.

## **Landscape, Green Infrastructure and Green Belt**

2.37 At paragraph 5.15 Mrs Brown states *“it is not possible to establish with accuracy the depth of the landscape buffers since this is not a plan that can be used for measurement. What the buffers would be comprised of is not revealed, and thus the height, density and effectiveness of any planting is not known. It cannot be assumed that these issues can be resolved through approval of conditions because it first needs to be demonstrated that the landscape strips are of adequate scale to accommodate the necessary amount of planting. The adequacy of buffers would also depend on the scale of the buildings behind them, which again is unknown. The result is that it is not possible to adequately understand from the plan the critical relationship between the site, the adjacent countryside (including parts of the deer park beyond the site) and the Green Belt, and if sufficient mitigation could be provided.”*

2.38 I have detailed the depth of landscape buffers in Section 3 of my main evidence. The illustrative proposals within the Revised DAS show the principal of what the landscape buffers would comprise (in plan form and through indicative sections) and I have confirmed above that these buffers provide the opportunity for the built form to be set back behind a traditional boundary treatment (such as a native hedge), with the set-back between the site boundary and front gardens creating a landscape transition zone served by a country lane style shared drive. Built form would be further integrated into its setting by utilising existing boundary hedgerows and trees supplemented with new hedgerow tree planting, native tree groupings and wildflower meadows to soften the urban edge.

2.39 The Revised DAS states on page 76 that proposed building heights will reflect existing built form and be predominantly two storeys in height, with some two and half storey buildings with dormers in pitched roofs. Similar scale development is evident in the sites immediate surrounds on Warburton Lane, Moss Lane and within Partington. The Revised DAS p74 indicates an indicative dwelling mix that illustrates buildings along the southern boundary as being 2 storeys in height. As stated at the start of my rebuttal, the Revised Parameters Plan should be read with the Revised DAS in order to fully understand the development principles.

### **3.0 Response to Ms Elisabeth Lewis Proof of Evidence (TBC/2/B)**

- 3.1. In relation to Heathlands Farmhouse and barn at paragraph 6.13 Ms Lewis states *“Despite the provision of a small buffer zone, the treatment of this is not clear. The indicative layout proposes a village green at the edge of the settlement, ‘with feature buildings to define the entrance to Partington’. This suggests a degree of built form; in the absence of details it is difficult to imagine how this will preserve the setting of Heathlands Farm or views to the other NDHAs identified such as Warburton Toll Bridge & Warburton Park.”*
- 3.2. The proposed buffer zone will be retained as an open space that maintains separation to the listed building and barn and retains views towards Warburton Toll Bridge. There will not be any built form proposed within the buffer zone and the reference to feature buildings relates to focal buildings within the development area overlooking the open space, as illustrated in the Revised DAS p69. Miss Lewis appears to have misunderstood the description of the buffer zone and the reference to feature buildings.

## 4.0 Response to Mr Edward Paul Beckmann Proof of Evidence (WPC/2/B)

4.1. Mr Beckmann's evidence focuses on landscape and design matters. I defer rebuttals on landscape matters to Mr Grimshaw.

### Site 2 Southern Landscape Buffer

4.2. Paragraph 32 of Mr Beckmann's proof of evidence (WPC/2/B) discusses 'screening' of Site 2 and states *"screening appears to comprise of the existing hedges (approximately 1.5m high) supplemented by a very narrow margin of soft landscaping – estimated at 5 – 10m width. Based on my own experience I suggest that 20m should be a minimum width for such screen planting and that 30m would be considerably more effective. This is not simply an issue of planting a visually impenetrable screen, but of achieving substantive height in the planting, sufficient to screen buildings of up to 13.2m in height, standing in some cases in Site 2 on locally higher ground and with higher density. This would suggest trees of up to 20m in height, effectively large trees such as oak, lime, beech etc. which will require significantly large areas in which to grow to full effect.*

4.3. I have already set out in my main proof of evidence that the depth of landscape buffer shown to the southern and western boundary of Site 2 is 10-12m wide. Mr Beckmann refers to this landscape buffer as screen planting and suggests in order to achieve suitable screening this must be 20-30m wide. I do not agree and have already explained in my main proof and at paragraph 2.5-2.8 above, that the intention is not to screen the development, but to soften the urban edge and create an outward looking positive relationship with the adjoining countryside. I have not found any design guidance that suggests new urban edges must be screened from their surroundings or include landscape buffers of a specific depth.

### Appearance

4.4. At paragraph 38 Mr Beckmann states *"the development as proposed does not indicate good architecture, it merely proposes standard house types which ignore the local vernacular and perpetuate the plethora of bland, characterless estates which ultimately destroys any sense of place all over the UK."* The application is in outline and appearance is a reserved matter; the application does not propose any house types. The Revised DAS p76 (CD A51) does identify principles for the appearance of new

development and states that the scale and appearance of new development should reflect the existing local vernacular and continue the use of a restricted palette of materials. It goes on to list key factors that should be considered in the scale and appearance of new developments.