



CIVIC QUARTER AREA ACTION PLAN

**STATEMENT OF COMMON GROUND
WITH HERITAGE DEVELOPMENT OFFICER**

March 2022

1.0 INTRODUCTION

- 1.1 This Statement of Common Ground (SoCG) relates to the emerging Civic Quarter Area Action Plan (CQAAP). The SoCG has been prepared between parties within the Planning and Development Management Service at Trafford Council. These parties comprise the Heritage Development officer and the Major Planning Projects Team. The Major Planning Projects Team has taken a leading role in preparing the CQAAP. The Heritage Development officer has been consulted on the CQAAP at its various stages.
- 1.2 This SoCG is structured around the representations to the Regulation 19 version of the CQAAP that were made by the Heritage Development officer. This representation was included within the material Submitted to the Secretary of State for Levelling Up, Housing and Communities under the terms of the Planning and Compulsory Purchase Act 2004 (as amended) on 26th November 2021 (see Document E01 in the Examination Library), and its contents are summarised within Document F03 of the Examination Library (with it split into a series of different sub-representations, 16 in total). Document F03 also outlines the Council's response to each sub-representation made by the Heritage Development officer, which may entail: clarification; further justification for its position; or a proposed modification to the CQAAP as a result (which could either be of a 'main' or 'minor' nature).
- 1.3 Where a main modification is proposed, the detail surrounding the modification is contained in Documents G01 to G05 in the Examination Library. The list of proposed minor modifications did not form part of the material Submitted to the Secretary of State but it has since been appended to the Council's hearing statements in response to the Matters, Issues and Questions (MIQs), submitted to the appointed Inspector on 11th March 2022. The list of proposed minor modifications is in two parts: 1. An initial list prepared by the Council at the same time as the proposed main modifications were approved by the Planning and Development Management Committee ahead of the CQAAP's Submission; and 2. A further list of proposed minor modifications to capture issues which have arisen since the CQAAP's Submission, including issues that have arisen out of the MIQs and the preparation of this SoCG.
- 1.4 This SoCG has been prepared by both parties when working through each sub-representation from the Heritage Development officer and the Council's response, and whether it has served to satisfy each individual concern.

2.0 THE SUB-REPRESENTATIONS

Heritage Development officer: Sub-rep 1

- 2.1 *Heritage Assessment is welcomed. The AAP offers a significant opportunity to facilitate the development of Old Trafford with this incredible legacy. Fully support the inclusion of heritage as one of the key themes and welcome the identification of a number of non-designated heritage assets inside the boundary.*
- 2.2 Council Response: Comment noted.
- 2.3 SoCG Response: No further action needed.

Heritage Development officer: Sub-rep 2

- 2.4 *The document recognises the sporting and cultural heritage of Old Trafford and the contribution it could make to the regeneration and place shaping. The history of Manchester Botanical Gardens and subsequent amusement park is not carried through sufficiently in the proposed layout of individual neighbourhoods nor the potential for archaeology or heritage interpretation. The blue prints of White City should be included in the assessment and this layout could have influenced the northern area of the central neighbourhood. Reflect unique history of the area reflected/interpreted in the layout of buildings, height parameters, landscaping, public space, materials and artwork/interpretation. This should also be reflected in Policy CQ5.*
- 2.5 Council Response:
- A: The first response to this sub-rep, as set out in Document F03 of the Examination Library, is as follows: 'With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to'.
- B: Having considered the matter further when having regard to the Heritage Development officer's continued concerns, it is proposed to make some adjustments to the indicative illustrations contained within the CQAAP to show a layout of buildings and spaces which would be more respectful to the setting of the Grade II listed entrance portal and gates to White City (see the plans for the Central Neighbourhood contained within Appendix 1 of the CQAAP, on pages 97 to 99). This proposed change features on the additional list of minor modifications put forward since the Submission of the CQAAP.

2.6 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 3

2.7 *The significance of LCCC is noted in the document and in particular the reference to the ground. This should be included as part of the non-designated heritage asset with the exception of the stands.*

2.8 Council Response: Following the Regulation 19 consultation, it is proposed to amend the document to illustrate that the pavilion and pitch of LCCC is a non-designated heritage asset (but not the stands). An amendment to the CQAAP is proposed (categorised as minor) to the relevant supporting diagrams (see pages 35 and 49 of the CQAAP). This potential minor modification was contained in the list of minor modifications that was reviewed by Trafford's Planning and Development Management Committee ahead of the CQAAP's Submission.

2.9 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 4

2.10 *The assessment also includes the significance of the Police Station, this should also be identified as a non-designated heritage asset.*

2.11 Council Response: The Heritage Assessment does not in fact suggest that the police station should be identified as a non-designated heritage asset, and the Heritage Development Officer is, on reflection, in agreement with this.

2.12 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 5

2.13 *The setting of Trafford Town Hall, GII & Entrance portal and lodges to White City GII [White City Gates] needs to be expanded.*

2.14 Council Response:

A: The first response to this sub-rep, as set out in Document F03 of the Examination Library, was that the matter would be explored as part of the SoCG process.

B: Accordingly, a number of minor modifications to the CQAAP are proposed in response, as follows:

- The plan on page 35 of the CQAAP is proposed to be amended to show a widened setting for Trafford Town Hall and for the entrance and portal to White City; and
- To include a reference to protecting the setting of listed buildings/structures to the text on page 36 of the CQAAP.

These proposed changes feature on the additional list of minor modifications put forward since the Submission of the CQAAP.

2.15 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 6

2.16 *An analysis of views of all the designated and non-designated heritage assets should be included in the HA. In particular further analysis of Trafford Town Hall. There are key views of the clock tower along Brian Statham Way from the south east; across the car park at LCCC and from the north west along Warwick Road. There are also views outside the AAP along Chester Road and the junction of Talbot Road and Chester Road. Key views should be identified to ensure they are sufficiently protected.*

2.17 Council Response:

A: The first response to this sub-rep, as set out in Document F03 of the Examination Library, was that the matter would be explored as part of the SoCG process.

B: Having considered the matter further when having regard to the Heritage Development officer's continued concerns, it is proposed to make a change to Policy CQ5: Conservation and Heritage, comprising a reference to a fourth bullet point which would refer to the importance of protecting key views of the clock tower of Trafford Town Hall, and with it making clear that all applications for new development which have the potential to affect key views of heritage assets would need to be accompanied by a detailed views analysis. This proposed change features on the additional list of minor modifications put forward since the Submission of the CQAAP.

2.18 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 7

- 2.19 *There is no recognition of the former Warwick Road Station, now Metrolink, and the contribution this has made. The former railways station lies on the boundary of the AAP and redundant platforms are within the boundary. The existing platforms afford views of TTH.*
- 2.20 Council Response:
A: The first response to this sub-rep, as set out in Document F03 of the Examination Library, was that the matter would be explored as part of the SoCG process.
B: Accordingly, a minor modification is proposed in response in which the redundant platforms of the former Warwick Road Station are identified as a non-designated heritage asset (see page 35 and 49 of the CQAAP). This proposed change features on the additional list of minor modifications put forward since the Submission of the CQAAP.
- 2.21 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 8

- 2.22 *General concerns about proposed height parameters. Whilst there is scope to increase heights in the area, up to 20 storeys is exceptionally tall. It is not clear how this will preserve the area's unique characteristics when the majority of heritage assets identified are two storeys, nor integrate the fragmented townscape. Buildings of this height on Talbot Road will impact on TTH. A more sensitive scale such as 3 storeys would be welcomed in certain areas. In particular along Talbot Road & Warwick Road and also adjacent to White City Gates. There is also a significant jump from 20 storeys to 6 along Talbot Road and this should be more gradual. Not clear what a gateway opportunity is and how this will impact on heritage assets such as Trafford Bar, Trafford Hall Hotel and White City Gates. The heights proposed adjacent to White City Gates are also a concern.*
- 2.23 Council Response: Following the Regulation 19 consultation, some adjustment to the building heights parameter plan is proposed. A gradation of build heights along Talbot Road is proposed and a new location showing building heights of up to 6 storeys only is proposed around the White City entrance portal. In addition, 'gateway opportunities' are proposed to be removed from the building heights parameter plan and 'gateway locations' are added to the improved permeability and greenspace parameter plan. These are intended to illustrate gateway locations in accessibility terms and do not automatically translate into a location for a tall building. Locations which could accommodate a

development of up to 20 storeys continue to be limited. The detail would be confirmed at planning application stage. These changes form part of the proposed main modification (see Documents G01 to G05 in the Examination Library).

2.24 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 9

2.25 *Entrance portal and lodges to White City Gates are in poor condition. The structure requires remedial work and some restoration of lost architectural features. This and need for enhancement should be recognised by the AAP.*

2.26 Council Response: Following the Regulation 19 consultation, it is intended to amend the document to refer to the repair and restoration of the entrance portal and lodge (within the vision for the Central Neighbourhood, see page 97 of the CQAAP). This potential minor modification was contained in the list of minor modifications that was reviewed by Trafford's Planning and Development Management Committee ahead of the CQAAP's Submission.

2.27 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 10

2.28 *A series of blocks up to 12 storeys behind White City Gates with public realm to the west is a missed opportunity. The public realm should form the setting to the Grade II listed structure referencing the former pleasure grounds and linking through to Talbot Road. The proposed height of up to 20 storeys will have an impact on White City Gates and a more sensitive scale should be sought surrounding the Grade II listed structure and public realm.*

2.29 Council Response:

A: The first response to this sub-rep, as set out in Document F03 of the Examination Library, is as follows: 'With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to. The neighbourhood plans are illustrative only and show a new public park in the vicinity of the entrance gates, which is supported in principle. Its location would be confirmed at planning application stage. Following the Regulation 19 consultation, some adjustment

to the building heights parameter plan is proposed; a new location showing building heights of up to 6 storeys only is proposed around the White City entrance portal.' These changes form part of the proposed main modification (see Documents G01 to G05 in the Examination Library).

B: Having considered the matter further when having regard to the Heritage Development officer's continued concerns, it is proposed to make some adjustments to the indicative illustrations contained within the CQAAP to show a layout of buildings and spaces which would be more respectful to the setting of the Grade II listed entrance portal and gates to White City (see the plans for the Central Neighbourhood contained within Appendix 1 of the CQAAP, pages 97 to 99). This proposed change features on the additional list of minor modifications put forward since the Submission of the CQAAP.

2.30 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 11

2.31 *Proposed block in front of UA92 and the up to 20 storey block on Talbot Road will have most impact on openness and the contribution this area makes to the setting of Trafford Town Hall. The proposed up to 20 storeys appears excessive. The existing Oakland House is 15 storeys and there is scope to reflect this. Potentially buildings of this height could impact on Old Trafford Bowling Club. Existing design principles along Talbot Road needs greater recognition these include the set back and depth of buildings, spaciousness between blocks, grass verges, street trees, soft landscaping such as hedging.*

2.32 Council Response: With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to. The building heights parameter plan limits developments in close proximity to Trafford Town Hall to a maximum of six storeys, and this is proposed to be retained. Following the Regulation 19 consultation, some adjustment to the building heights parameter plan is proposed including a gradation of build heights along Talbot Road on approach to the Old Trafford Bowling Club. Some adjustment to the relevant neighbourhood guidance is also proposed (for the southern, eastern and western neighbourhoods, see pages 107, 115 and 133 of the CQAAP) in order to reinforce the existing character of Talbot Road. These changes: form part of the proposed main modification (see Documents G01 to G05 in the Examination Library); and the proposed minor modification to the neighbourhood guidance was contained in the list of minor modifications

that was reviewed by Trafford's Planning and Development Management Committee ahead of the CQAAP's Submission.

2.33 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 12

2.34 *The Old Trafford Bowling Club is a fascinating remnant of sporting heritage. The adjacent proposed height parameters should be reduced to adequately respond to non-designated heritage assets such as Trafford Bar, Trafford Hall Hotel and the OT Bowling Club. The bowling green is orientated to receive the afternoon sun; concerned that the proposed height parameters along Talbot Road could impact on this important aspect of the design.*

2.35 Council Response: The building heights parameter plan shows a reduced height of development (up to 6 storeys) towards Trafford Hall Hotel and Trafford Bar. Following the Regulation 19 consultation, some adjustment to the building heights parameter plan is proposed; a gradation of build heights along Talbot Road on approach to the Old Trafford Bowling Club is now proposed. These changes form part of the proposed main modification (see Documents G01 to G05 in the Examination Library);

2.36 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 13

2.37 *TVIA doesn't take account of kinetic views. Views identified do not take account of all heritage assets identified in AAP nor includes heritage assets potentially affected outside the boundary such as Longford Park CA; Empress Conservation Area or Gorse Hill Park including associated group of listed structures. A greater analysis of TTH or White City Gates is required.*

2.38 Council Response:

A: The first response to this sub-rep, as set out in Document F03 of the Examination library was: 'With the exception of the plans supporting Policy CQ1, other plans and illustrations within the CQAAP are illustrative only and Policy CQ1 is clear on this. The detail surrounding any new development would be confirmed at development management stage subject to the principles of the CQAAP being adhered to.'

B: Having considered the matter further when having regard to the Heritage Development officer's continued concerns regarding views of the clock tower of Trafford Town Hall in particular, it is proposed to make a change to Policy CQ5: Conservation and Heritage, comprising a reference to a fourth bullet point

which would refer to the importance of protecting key views of the clock tower of Trafford Town Hall, and with it making clear that applications for new development which have the potential to affect key views of heritage assets would need to be accompanied by a detailed views analysis. This proposed change features on the additional list of minor modifications put forward since the Submission of the CQAAP.

2.39 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 14

2.40 *Design Code. The AAP should encourage interesting silhouettes and varied rooflines to tall buildings; a good quality palate of materials; well articulated buildings with detailed principal elevations and active frontages at street level. A specific design codes for tall buildings would be welcomed and for each neighbourhood.*

2.41 Council Response: It is considered that the design code as contained within Appendix 2 of the CQAAP already meets this objective.

2.42 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 15

2.43 *The current set back and depth to buildings along Talbot Road should be recognised and also include the importance of spaciousness between blocks, grass verges, street trees and hedging which all add to the quality of the street and should be retained and incorporated into the design code for elsewhere in the AAP. The setback in particular has helped reduce the prominence of existing tall buildings along Talbot Road. This is not sufficiently included in the design code or public realm principles.*

2.44 Council Response: Following the Regulation 19 consultation, it is intended to amend the document to place greater emphasis on the need to retain and establish trees and verges to Talbot Road, and to maintain the set back and sense of spaciousness within the design and layout of new development. This would involve revisions to the Neighbourhood guidance (for the southern, eastern and western neighbourhoods) within the CQAAP (see pages 107, 115 and 133). This potential minor modification was contained in the list of minor modifications that was reviewed by Trafford's Planning and Development Management Committee ahead of the CQAAP's Submission.

2.45 SoCG Response: No further action needed

Heritage Development officer: Sub-rep 16

2.46 *The processional route to MUFC should be included in the AAP boundary to link the two sporting grounds.*

- 2.47 Council Response: MUFC is outside of the boundary of the Civic Quarter. However, the document builds on, as much as it can, the potential for physical and functional links to be reinforced between MUFC and LCCC through the establishment of the Processional route.
- 2.48 SoCG Response: No further action needed

3.0 CONCLUSIONS

3.1 When having regard to the Council's response to the 16 sub-representations made by the Heritage Development officer to the Regulation 19 consultation, it is agreed that there are no matters remaining in dispute on the topic of heritage. This is when having regard to the Council's further justification for its position, and the effect of: the proposed main modifications to the CQAAP (see Documents G01 to G05 in the Examination Library); the proposed list of minor modifications that was reviewed by Trafford's Planning and Development Management Committee ahead of the CQAAP's Submission; and the additional minor modifications, the need for which has arisen more recently in response to the Inspector's MIQs and this Statement of Common Ground.

3.2 Signatures:

1. For Trafford Council (Planning and Development Management Service, sub-section Major Planning Projects Team)

Name: Bethany Brown

Position: Major Planning Projects Officer

Signed: 

Date: 07.03.2022

2. For Trafford Council (Planning and Development Management Service, sub-section Heritage Development)

Name: Elisabeth Lewis

Position: Heritage Development Officer

Signed: 

Date: 09.03.2022