



Mr Inspector Mike Fox
c/o Programme Officer
programmeofficer@carmeledwards.com

Your Ref: .
Our Ref: 70093931
14 April 2022

Dear Sir,

Trafford Civic Quarter Area Action Plan

Thank you for giving us the opportunity to comment on the additional material circulated by the Local Authority during last week's hearing sessions. These comments are provided on behalf of Accrue (Forum) 1 LLP, the owners of the former B&Q on Great Stone Road.

I should first advise that the S78 appeal associated with the site's redevelopment has still not yet been determined.

Proposed revisions to Policy CQ6

2ND BULLET

We disagree that private external amenity space should be provided to all apartments. There is no evidence to justify why this is needed. Proposed developments should certainly have communal amenity space and some private external space, but an insistence on private spaces for all properties is excessive.

Whilst Mr Pearson did say that such space does not need to be balconies and could be roof terraces (for example), most roof spaces are difficult to design to be exclusively private (ie dedicated to the occupiers of a single property) and tend to be communal (ie shared by the occupiers of that building).

Mr Pearson also said that the expectation is probably not 'bolt on' balconies, rather balconies integral to the building. We are not satisfied that the viability evidence accounts for balconies of any sort, including the impact on build cost and sales/rental revenue.

When questioned about the appropriateness of balconies at high levels, Mr Pearson advised that winter gardens could be included instead of exposed balconies. We understand these to be quasi-balconies that are enclosed by glazing and that can be opened and closed accordingly. These can have implications on build cost, general design and appearance and on internal climate. Further evidence would be required to demonstrate that winter gardens are suitable and justified and will be acceptable at development management stage.

We therefore conclude that there should not be an insistence on private external amenity space to all apartments.

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However we wouldn't object to a general encouragement of private external amenity space.

3RD BULLET

We object to the proposed fourth paragraph. References to “overly long frontages” and to “appropriate spacing” are too vague. The development management process will require an array of assessments to justify any proposed development, including in terms of residential amenity, townscape, microclimate and heritage, such that there is no need for policy CQ6 to include vague requirements, especially as the Local Authority are intending for all development proposals to be design and context led.

Proposed revisions to Appendix 2 Design Code

FORM AND MASSING 6TH BULLET

We object to the term “positive daylight conditions”. This has no meaning. “Suitable” would be a better phrase than “positive”.

Flexibility versus certainty within the plan

We still have strong reservations about the use of “predominantly”, and the Local Authority's change to the Policies Map to define this better is still problematic. It would be better to reword and set out acceptable primary uses and acceptable supporting uses for different sites or areas, such as:

The following sites are identified as having major development potential. None of these sites should be exclusively developed as one single land-use (although single phases, parcels or buildings may, depending on context and circumstance).

Former B&Q, Great Stone Road:

- *Acceptable primary uses: residential (Use Class C3).*
- *Acceptable supporting uses: Use Class E (a, b, c, d, e, f, g(i))*

Should the Inspector consider it is appropriate to refer to both residential and sport/leisure as the predominate land use for the former B&Q, an “or” must be inserted so that the AAP says “predominantly residential and/or sport/leisure.” Otherwise the plan envisages a mixed-use proposal including both uses, for which there is no evidential support.

Implementation and Windfall Note

We make the following observations.

Firstly, 160 dwellings pa equates to 32 per annum, not 26.

Secondly, as raised during the examination hearings, the windfall rates in Trafford as a borough have been reasonably high because of the absence of any specific allocations in the Core Strategy.

Heights Justification and changes in approach to gateway locations

We disagree with 1a, insofar as it applies to the former B&Q. There is no evidence given to explain why building heights across the site must not exceed the height of the LCCC stadium. We refer to paragraphs 51-55 of the appellant's closing submission to the B&Q appeal (a copy of which



was provided to the Inspector) and also to the fact that the appeal proposal was originally refused partly due to an unacceptable impact upon LCCC, but this reason for refusal was withdrawn by the Council ahead of the inquiry.

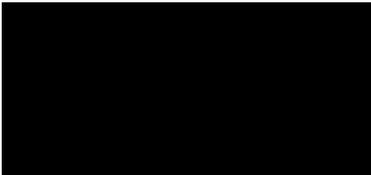
Matter 4 Housing: Appendix 1 – Trajectory 2021-2037+

We heard during the hearings that the Audi garage site has not been promoted for any residential use, whether through a call for sites, through the SHLAA or through pre-application discussions. This should be removed from the trajectory.

We also reiterate that only sites at 94a and 94b Talbot Road are additional sites that the Local Authority do not already rely upon in its housing supply (as presented at the B&Q public inquiry). We understand that the Local Authority are not intending to use the CQAAP to demonstrate a five-year supply upon adoption, but for the avoidance of doubt, the adoption of the CQAAP will not result in such a supply.

If I can assist further, please do not hesitate to contact me.

Yours faithfully



Matthew Hard
Associate Director

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