



Accrue (Forum) 1 LLP

CQAAP

Hearing Statement – Matter 1



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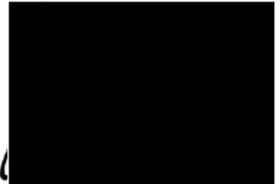
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1.3 POLICIES MAP **3**

(i) I am assuming that the Land Uses Parameters Plan is another name for the Policies Map, which is required by the Act and Local Planning Regulations; in which case, is it better to refer to it as the Policies Map, for clarity and compliance with national policy? **3**

(iii) Whilst I do not have an issue with using the word ‘predominantly’ before each of the land uses in the key (legend), there needs to be more detail on the Policies Map regarding the housing quantum proposed to be allocated. It would be helpful for the Plan to refer to specific housing allocations along with any essential information relating to each site allocation. The Policies Map would also express key highways policies, such as the Wellbeing and Processional Routes and any other relevant transport policies included in the Plan. **3**

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APPENDIX A

REPRESENTATIONS TO REFRESHED STRETFORD MASTERPLAN 2017

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INTRODUCTION



1 INTRODUCTION

- 1.1.1. WSP has prepared this Hearing Statement on behalf of Accrue (Forum) 1 LLP (“Accrue”). Accrue own the former B&Q site located on Great Stone Road, within the Civic Quarter (“CQ”).
- 1.1.2. Accrue have made representations at each stage of the CQ Area Action Plan (“CQAAP”), including prior to Trafford Council (“the Council” or the “LPA”) deciding that the CQ Masterplan needed to carry the weight of a development plan document. Indeed, Accrue previously made representations to the CQ Masterplan to this effect.
- 1.1.3. Accrue’s representatives have also attended several stakeholder events, including:
- A public session at Trafford Town Hall hosted by the Leader of the Council
 - A session at Trafford Town Hall in March 2020 for landowners, hosted by Avison Young
 - An online session regarding viability, hosted by Continuum
- 1.1.4. Accrue’s representations to date can be summarised as follows:
- December 2017 (**Appendix A**): general support for the vision and objectives of the Refreshed Stretford Masterplan, but objection to the former B&Q being identified as part of a Campus Quarter
 - December 2018 (**Appendix B**): support for the aim of regenerating the Civic Quarter; objection to the intended status of the CQ Masterplan as an Supplementary Planning Document and objection to the proposal for a multi-storey car park on the site of the former B&Q
 - March 2020 (**Appendix C**): support for some of the visions and objectives of the CQAAP, but objection to the proposed allocation of a leisure centre and multi-storey car park on the former B&Q
 - March 2021 (**Appendix D**): support for the residential allocation of the former B&Q, but reservations about the absence of any detail on phasing and delivery of the 4,000 homes, objection to the infrastructure policies and objection to the imposition of a six-storey height limit to development on the former B&Q site
- 1.1.5. Accrue have been promoting the redevelopment of the former B&Q for residential purposes since 2017. An appeal against the Council’s non-determination of a planning application for 332 homes on the site is pending determination, following a public inquiry in January and February 2022.
- 1.1.6. That appeal was originally subject to seven putative reasons for refusal. By the opening of the inquiry, two reasons for refusal had been withdrawn, two modified and one added.
- 1.1.7. By the time that the inquiry closed, one further reason for refusal had been withdrawn by the Council.
- 1.1.8. A series of concise Hearing Statements are now provided. We append our previous representations for completeness, but only the Hearing Statement for Matter 1.

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MATTER 1



2 MATTER 1

MATTER 1 - LEGAL REQUIREMENTS, SCOPE OF THE LOCAL PLAN, POLICIES MAP AND DUTY TO CO-OPERATE

1.3 POLICIES MAP

(i) I am assuming that the Land Uses Parameters Plan is another name for the Policies Map, which is required by the Act and Local Planning Regulations; in which case, is it better to refer to it as the Policies Map, for clarity and compliance with national policy?

- 2.1.1. Yes, there needs to be a Policies Map that conforms to legislation and policy. The Policies Map should not be ambiguous or unclear, so that readers can understand the Plan's expectations and the likely future developments that will happen.
- (iii) Whilst I do not have an issue with using the word 'predominantly' before each of the land uses in the key (legend), there needs to be more detail on the Policies Map regarding the housing quantum proposed to be allocated. It would be helpful for the Plan to refer to specific housing allocations along with any essential information relating to each site allocation. The Policies Map would also express key highways policies, such as the Wellbeing and Processional Routes and any other relevant transport policies included in the Plan.**
- 2.1.2. Accrue do not agree with the use of the 'predominantly' for matters of land-use. Whilst 'predominantly' could be a reasonable word to be used within a land use (for example, 'predominantly family homes' or 'predominantly convenience retail'), it is not sound to have a development plan proposing "predominantly residential and sport/leisure" as is the case on the latest Parameters Plan for the former B&Q.
- 2.1.3. That is a vague, imprecise and uncertain designation, which will give rise to confusion and problems. It is not clear if a planning application for the site must comprise both residential and sport/leisure, or whether a planning application can propose solely residential, or indeed solely sport/leisure.
- 2.1.4. Furthermore, there is no evidence to confirm deliverability of such a land use parameter, or how such a proposed land use contributes to the strategy and objectives of the Plan. There is no indication of how many homes the site is expected to deliver, if indeed there is such an expectation, or what the rationale for a sport/leisure use on the site is.
- 2.1.5. Finally, taking a practical example: it is not clear whether the proposed development subject of the recent appeal would comply with this parameter or not, given it is predominantly residential but does not include sport/leisure use.

Appendix A

REPRESENTATIONS TO REFRESHED STRETFORD MASTERPLAN 2017



Stretford Refreshed Masterplan

Accrue Capital Representations
Private and Confidential

indigo.

**Stretford Refreshed Masterplan
Accrue Capital Representations
Private and Confidential
December 2017**

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Stretford Refreshed Masterplan Accrue Capital Representations Private and Confidential

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Stretford Refreshed Masterplan Accrue Capital Representations Private and Confidential

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Appendix 1

Responses to GMSF consultation

Appendix 2

Trafford Vision 2031

1. Executive Summary

- 1.1. Indigo Planning has prepared these representations on behalf of Accrue Capital. They are submitted alongside a response to the Council's survey on the Stretford Refreshed Masterplan.
- 1.2. Please note that this report includes sensitive information and must be treated as private and confidential, and must not be made public.
- 1.3. Accrue Capital owns land adjacent to Old Trafford Cricket Ground – the site of the former B&Q. The Refreshed Masterplan should identify this site for high-density residential development, whereas the current suggested use for the site is a missed opportunity that is not based on any evidence.
- 1.4. Firstly, we comment on the purpose and role of the Masterplan within the context of land-use planning.
- 1.5. We generally support the vision and objectives set out in the Refreshed Masterplan, but there are opportunities for strengthening it, in particular setting out measures to ensure the masterplan area can play a stronger role in delivering growth and development to meet the needs of the area and borough. In particular the Masterplan can help boost housing delivery in the borough which has historically been characterised by a shortfall. Our representations set out suggestions on rewording in this regard.
- 1.6. We also support the principle of rejuvenating Stretford town centre and we support the principle of UA92.
- 1.7. However, we have several general concerns and some specific objections.
- 1.8. These concerns include the apparent reliance on UA92 to justify the Refreshed Masterplan, and the lack of focus on other types of development which can deliver significant benefits to achieve the vision and objectives, particularly new housing.
- 1.9. The Refreshed Masterplan notes benefits associated with UA92, but many of these benefits can also be attributed to other development, such as residential, for example:
 - Additional activity and spending;
 - Support for the evening and day-time economies;
 - Job opportunities;
 - Regenerating vacant land; and
 - Triggering new investment.
- 1.10. Stretford and Old Trafford need to accommodate new residential development as part of the borough's future housing requirements, within the context of a recent history of under-supply across the borough. The private-rented sector has an important role to play in this, not only in increasing housing supply, but also in meeting the demands and needs of contemporary and future populations.
- 1.11. Specifically, these representations challenge the suggested uses for Accrue Capital's land, as they represent a missed opportunity for what the site can deliver for the masterplan area: the site is in a highly sustainable, accessible and strategic location. We propose new wording that will make this part of the Refreshed Masterplan more deliverable and consistent with other spatial policies and frameworks. The Council has previously agreed that residential development on the site is acceptable in principle, and Accrue Capital are currently preparing a planning application for residential development of the site, along with

ancillary ground-floor uses and a new pedestrian / cycle connection to Old Trafford Metrolink.

- 1.12. We trust that the Council will take these representations into account in a revised plan.

2. Introduction

- 2.1. Indigo Planning has prepared these representations on behalf of Accrue Capital.
- 2.2. Indigo has also completed the Council's consultation questionnaire. The purpose of this report is to provide a more detailed response.
- 2.3. As this report contains sensitive information, we request that this report is not disclosed to the public and is treated as private and confidential.

About Accrue Capital

- 2.4. Accrue Capital is a property company whose top team has a collective industry experience in excess of 100 years.

Approach to Consultation

- 2.5. Accrue Capital own land adjacent to Old Trafford Cricket Ground, which was previously a B&Q store. They have been in discussions with local stakeholders for the past 12 months with the intention of bringing forward residential led development on the site. Initial meetings were held with officers from the Council, including the Chief Executive and officers from the regeneration and planning departments. Accrue Capital has also met with Lancashire County Cricket Club.
- 2.6. As owners of land within Old Trafford, Accrue Capital has read the Refreshed Masterplan with great interest. This report provides their consultation response. Chapter 3 provides the context for their representations, including both the context to the Masterplan itself, and the economic, environmental and social context of the local area. Chapter 3 summarises the existing and future policy framework that the Masterplan will sit within, which is critical because the Masterplan cannot be separated from other spatial policy and guidance documents.
- 2.7. Chapter 4 sets out Accrue Capital's specific comments on the Refreshed Masterplan, including areas of support and areas of where the plan can be improved.
- 2.8. Chapter 5 recommends rewording of the Refreshed Masterplan; Chapter 6 provides the concluding comments on the representations.

3. Context

- 3.1. Section 1 of the Refreshed Masterplan explains its purpose. The original Masterplan (2013) was prepared in response to the Trafford Core Strategy. The Refreshed Masterplan aims to:

“provide the strategic framework for the delivery of the emerging opportunities for the Town Centre and wider Stretford area. It seeks to build on the progress made to date, identify areas for future development and set out the key actions required to deliver major regeneration and development. The delivery of the refreshed Masterplan will continue to be dependent on effective partnership working with the community, businesses, landowners, developers, investors and operators.”

- 3.2. This quote positively identifies that collaborative working with landowners is essential to delivering regeneration and the plan’s objectives. This is supported. However there had been no mention of the imminent publication of this Refreshed Masterplan in Accrue Capital’s discussions with the Council in 2017, indeed they have not been formally consulted on it directly. We identified the document through local monitoring.
- 3.3. Nevertheless, the status and purpose of the plan needs clarification. The masterplan intimates that it will be a land use plan to determine use across sites. However, the strategic framework for the purposes of S38(6) of the Act for Stretford and Old Trafford is already provided by the adopted Core Strategy and will be reinforced by the forthcoming Greater Manchester Spatial Framework, and land-use plans should be prepared in accordance with the appropriate Town and Country Planning Regulations.
- 3.4. We therefore request the Masterplan’s status be explicitly stated, so that all future users of the document understand its role, purpose and influence.

Planning Policy Context

- 3.5. It is vital that the Refreshed Masterplan is grounded in planning policy. Development proposals are assessed against a formal set of policies (the development plan) and material considerations.
- 3.6. The development plan comprises documents that have been adopted or approved in relation to the specific area; namely the Core Strategy (adopted 2012) and saved policies of the Unitary Development Plan (adopted 2006).
- 3.7. The preparation of local plans is governed by the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.8. A local plan must be subject to specific consultations, must be informed and accompanied by a Sustainability Appraisal and Strategic Environmental Impact Assessment and must be subject to examination.
- 3.9. A supplementary planning document should build upon and provide more detailed advice or guidance to the policies in the Local Plan.
- 3.10. Therefore, the Refreshed Masterplan cannot be development plan policy and in its current guise cannot be given the status of SPD. Its weight in the determination of planning applications will therefore be limited.
- 3.11. Therefore the Refreshed Masterplan as proposed cannot formally allocate land uses. Instead, the function of the Refreshed Masterplan should be advisory and suggestive, to be

used as a material consideration in the determination of planning applications. It will be for the decision-maker (ie the Local Planning Authority) to determine how much weight to place on the Masterplan, if any, in the determination of planning applications.

Core Strategy

Strategic Locations

- 3.12. The Core Strategy identifies an area named the LCCC Quarter, which is situated within the larger Old Trafford spatial area. It should be noted that Stretford is a different spatial area within the Core Strategy. The LCCC quarter is identified through policy SL3 for mixed-use developments including an indicative 400 residential units.

Housing Supply

- 3.13. The Core Strategy expects a minimum of 12,210 new dwellings to be delivered by 2026, with an indicative target of 80% to be provided on brownfield land. 40% of the dwellings are expected to be situated within the Regional Centre and Inner Area (which includes North Trafford).
- 3.14. Trafford has suffered a persistent under-supply of housing, and the Council are failing to meet their minimum requirement of a five year supply. Consequently, the Councils need to ensure that housing supply is boosted significantly, with sustainable brownfield sites well placed to deliver.

Spatial context

- 3.15. The Refreshed Masterplan needs to better explain the spatial context of the area and how the plan takes account of and responds to this.
- 3.16. An important matter to consider is the relationship to the emerging GMSF, which will as a statutory development plan be of significant weight. Mayor of Greater Manchester Andy Burnham is advocating a substantial re-writing of the GMSF, to drastically reduce the amount of future greenfield development across the conurbation, replacing such proposed allocations with a significant increase in the amount of development to take place on brownfield land and within city, town and suburban centres.
- 3.17. It is therefore reasonable to assume that the GMSF will identify ways to increase the density of development in accessible and sustainable locations, particularly in areas with good connectivity. The spatial approach is likely to support the vision for increased development in Stretford and Old Trafford.
- 3.18. Stretford is a town in its own right, but also part of the wider conurbation, whilst Old Trafford is an inner urban area with excellent public transport, jobs, facilities and acts as a nodal point for a variety of other purposes, such as sport and leisure and civic functions. This must be recognised.
- 3.19. By bringing Old Trafford into the area covered by the Stretford Masterplan, it recognises that the two areas are well-connected with a degree of interdependence. This interdependence should become stronger with the Refreshed Masterplan, and the emerging GMSF should also assist with this.
- 3.20. However, both Stretford and Old Trafford are well connected with Manchester city centre, along with other strategically important locations such as the Trafford Centre and Media City / Salford Quays. The Refreshed Masterplan should recognise the strengths and weaknesses associated with this connectivity.
- 3.21. What is evident is that Stretford and Old Trafford function as a corridor (Metrolink and A56), a destination (sport, leisure, retail) *and* as a home (36,000 people within the wards of

Stretford, Longford and Gorse Hill). This spatial context is crucial to inform how the area covered by the Refreshed Masterplan should be shaped in the future.

- 3.22. The other spatial factor influencing the Refreshed Masterplan is the character of the rest of Trafford. The borough has satellite towns beyond the M60, some with very strong identities of their own. Beyond these towns is an expansive Green Belt. Many consultation responses to the GMSF objected to the proposed release of land from the Green Belt, instead encouraging greater levels of brownfield development. Any masterplan must recognise this and seek opportunities to look at increased densities of development on brownfield sites in the masterplan area, in particular on accessible sites. Indeed, at least seven responses to the GMSF consultation identified the B&Q site on Great Stone Road as a prime candidate for residential development (**Appendix 1**).
- 3.23. With the GMSF being re-drafted to place less pressure on the Green Belt, and increasing densities of development across the urban area (as encouraged by national policy), the Refreshed Masterplan should acknowledge the need to accommodate significant levels of development hitherto assumed to be directed to greenfield sites.
- 3.24. An appraisal of planning applications in the past five years demonstrates that higher-density development is spreading south and west from the Regional Centre (ie Manchester city centre and Salford Quays), making use of brownfield opportunities. These proposed developments range in scale, from strategic locations such as Pomona Island, to smaller, infill sites such as schemes on Chester Road / Bridgewater Way, Lucy Street and Seymour Grove and are located within the Old Trafford area.
- 3.25. Meanwhile, areas further south and west, in and around Stretford itself, have been the location for more suburban-style housing, at a lower density.

Trafford Vision 2031

- 3.26. Although very much in draft and not actually published yet, the Refreshed Masterplan acknowledges this document, noting the seven “overarching interventions.” We provide the principles of the Vision 2031 in **Appendix 2**. These include “accelerating” housing and economic growth so that “everybody benefits.”

Conclusion

- 3.27. Any Masterplan needs to be informed by the existing context for the area, and influenced by existing plans, proposals and frameworks. Although the Refreshed Masterplan is disappointingly not underpinned by much evidence, it is crucial that it has regard to the planning policy framework (against which planning applications will be considered) and the social, environmental and economic context.
- 3.28. Therefore, the Refreshed Masterplan should be aligned with the emerging GMSF and seek to bring all vacant brownfield sites back into beneficial use that help address the social, environmental and economic matters affecting the area.

4. Representations

Vision and objectives

Vision

- 4.1. We generally support the vision for the Refreshed Masterplan.
- 4.2. However, the precise wording should be changed to acknowledge the specific geographic area covered. The wording should also replace the word “destination” with either “place”, “home” or “community”, as “destination” implies that the aim is to get people travelling to Stretford, rather than a modern town where people also live.
- 4.3. We also suggest that the vision needs to support “growth” and “new development”, as this is fundamental to addressing some of the social, economic and environmental problems affecting Stretford and Old Trafford.
- 4.4. We support the recognition on page 2 of the benefits associated with UA92, **but** the Refreshed Masterplan needs to recognise that these benefits will also be delivered in association with other kinds of development in the area. For example, new residential development will:
 - Bring additional activity and spending to the area;
 - Support the evening and day-time economies;
 - Provide job opportunities;
 - Bring vacant land back into use; and
 - Be a catalyst for new investment.
- 4.5. It would be incorrect and misleading to imply that these benefits can only be derived from UA92. The regeneration of the Old Trafford area is not entirely dependent on UA92 and to plan for such would be dangerous. A positively prepared plan which accords with national policy must draw on all the regeneration opportunities of the area, with residential development on other sites, such as B&Q able to play a strong role also.
- 4.6. We support the recognition that new facilities and new housing will be developed (page 14).

Objectives

- 4.7. We welcome the identification of sites for development, including that the Council has recognised that the former B&Q site has an important role to play. In particular, we support MO1 that gives the objective to “*develop unused, under-used or derelict land for a mix of uses.*”
- 4.8. Although we support MO3’s aim to provide “*new residential development and a range of house types*”, the objective should be widened to ensure this is not limited to sites within the town centre. The connectivity of Old Trafford with Stretford (and vice-versa), and the ongoing improvements to the ‘innovation corridor’ between the two, will give further justification for new housing in Old Trafford that can support Stretford town centre. Indeed, the majority of “unused, under-used or derelict” land is within the Old Trafford area, rather than in Stretford itself.
- 4.9. We welcome the objective set out in MO4 to enhance the pedestrian and cycle routes, improve connections (including to recreational assets and green spaces) and provide a strong sense of place.

Challenges

Housing Supply

- 4.10. One challenge facing the local area is how to increase housing supply, as required by central Government and confirmed in planning policy, in a manner that recognises local needs but also that is deliverable in light of market conditions.
- 4.11. With Stretford and Old Trafford well-suited to a step-change in housing supply, the Refreshed Masterplan should identify that there is a need for a mix of housing types and tenures. Although there is a need for small family homes that can help local people get on the housing ladder, there is also a role for the private-rented sector, which can provide a good standard of living aimed at a different market, ie those not yet ready to own their own home, or those who are down-sizing due to family or personal circumstances. This could include graduates and young professionals, key-workers and retirees.
- 4.12. We welcome the comment on Page 22 that:
- Ensuring sufficient housing supply to meet demographic trends has become an increasing issue, particularly in light of the low number of residential units delivered over the last 10 years.*
- 4.13. However, the second part of that paragraph needs to be altered, as giving attention only to “town centre living” could temper the potential for other brownfield sites to come forward for residential development. Although town centres are understandably a focus, they are only a small proportion of all built-up areas across the city-region. Therefore, the renewed focus should be on “urban” living.
- New ways of ensuring sufficient housing supply is becoming an increasing priority with renewed focus on town centre urban living.*
- 4.14. We also welcome the commitment on page 24 that Trafford will meet its identified requirement for new homes set out in the draft GMSF.

Movement

- 4.15. A related challenge is improving connectivity and accessibility across the Stretford and Old Trafford area. The Metrolink is a significant advantage as it gives quick, convenient access to Manchester city centre and its job opportunities (and, with one change of tram, Salford Quays, Manchester Airport and other regional nodes), but this can also be a weakness, as it results in more competition for Stretford and fewer reasons to use the town centre as a leisure destination (eg shopping, recreation, food and drink). Therefore, opportunities for increasing the population mass should be encouraged to help counter the ‘pull’ of the city centre, Salford Quays or the Trafford Centre.

Opportunities

- 4.16. Accrue Capital is preparing a planning application for residential led development on its land. The plans will include non-residential uses at ground-floor, to be made available to the community.
- 4.17. The proposed development will also pursue a pedestrian and cycle connection parallel to the tramline, to the rear of the cricket ground, to enable better access to Old Trafford Metrolink from Great Stone Road and areas to the west.
- 4.18. The proposals can improve the environment for pedestrians, with new public realm and a connection from Great Stone Road through the site to the rear of the cricket ground and onto the Metrolink station.

- 4.19. The proposals will help support the town centre, by being one stop away on the tramline and by providing additional population. The benefits of the scheme will not be dissimilar to the benefits that the Refreshed Masterplan attributes to UA92, and will include:
- A new pedestrian and cycle route;
 - Additional activity and spending to the local area;
 - Support for the evening and day-time economies;
 - Job opportunities including temporary construction and permanent service jobs; and
 - Bringing vacant land back into use.

Areas of support

Housing

- 4.20. Page 21 notes that a low number of new homes have been delivered in the past 10 years. Greater emphasis needs to be placed on this. We support the recognition on page 24 that “*sufficient housing*” is delivered in the right locations, however this is not positively prepared or ambitious and the reference ought to be for ‘increased housing’, this will ensure it aligns with NPPF and the emerging GMSF which place greater emphasis on the use of brownfield land and the regeneration of town centres.

LCCC Quarter

- 4.21. We support the identification that the LCCC Quarter provides a significant opportunity. The opportunity should allow for a mix of uses across the Quarter, befitting its strategic location on the innovation corridor and on the Metrolink route.
- 4.22. We support the idea of a Processional Route linking the two stadia; the intention to provide a pedestrian and cycle link parallel to the tramline from Great Stone Road to Old Trafford Metrolink will complement this Processional Route.

UA92

- 4.23. We support the principle of UA92.
- 4.24. We support the provision of leisure uses on the UA92 site.

Town centre

- 4.25. We support in general the 18 development sites in the town centre.
- 4.26. Although lacking a lot of detail, the proposal for student accommodation at Lacy Street is also supported. Purpose-built student accommodation should assist in delivering the vision for the town centre.

Leisure

- 4.27. We support the enhancement of Turn Moss Playing Fields with increased and enhanced leisure facilities. Accrue Capital also support the provision of leisure facilities on the UA92 campus.
- 4.28. We feel strongly that the leisure uses should be provided for the public as well as for UA92, but that the best location for these uses are to be concentrated on the new leisure centre on the Kellogg’s site and at Turn Moss.

Design and Sustainability

- 4.29. We support the comment on page 52 that larger scales of development may be appropriate in certain locations. The LCCC quarter is one such location, as are sites close to public

transport nodes. Old Trafford is being characterised by higher-density development as the city centre model of living spreads along the Metrolink corridors.

- 4.30. Accrue Capital welcome that the Refreshed Masterplan acknowledges the acceptability of high-density living; introducing further tall buildings at certain locations across the area covered by the Refreshed Masterplan can help deliver existing and emerging objectives to regenerate brownfield land, whilst significantly boosting the supply of new homes in the area. A mix of urban forms can add variation to a place, and create a new character of its own.
- 4.31. The Refreshed Masterplan's identification of key sites for taller buildings, such as Lacey Street, demonstrate the potential acceptability for tall buildings in close relationship with low-rise housing. The B&Q site ought to be identified as a site for taller buildings.
- 4.32. We agree that taller buildings and "variation in building heights can create a more interesting townscape and distinctive skyline."

Areas of concern

Evidence

- 4.33. We note that there is little evidence accompanying the Refreshed Masterplan, even though to plan for the future, the current position needs to be understood. For example, an accessibility audit could have been undertaken, identifying how well each part of the Masterplan area is covered by sustainable transport options. Equally, there has been no audit of services and facilities, so it is not clear what may need to be planned for in conjunction with expected increases in population (especially student population).

UA92

- 4.34. Residential development on the UA92 campus could restrict the future growth of the University Academy.
- 4.35. The campus is already intended to be a mixed-use scheme, including offices, the Microsoft Hub and the academic buildings associated with UA92, alongside the new leisure centre. Given the limited size of the site (especially compared with other higher education institutions across Greater Manchester; we note that since the publication of the Refreshed Masterplan, Manchester Metropolitan University and Manchester City Council are in discussions to create a 'sports university' at Eastlands), it would be better to safeguard any residual land on the Kellogg's site for future UA92 development (potentially creating public space in the meantime), than to introduce private residential development. Student accommodation would seem a more compatible use than private residential, if further development is required for viability reasons.

Development sites

- 4.36. We note that there are several former employment or retail sites that the Council has identified as being potentially suitable for residential use. We are concerned that the B&Q site has not been identified as such, despite it being in a highly sustainable, accessible and strategic location adjoining the Metrolink station, and close to existing residential communities. It should be noted for such use, to accord with the thrust of the adopted Core Strategy which supports such use on the site and area.

Site 3

- 4.37. The B&Q site is in the Core Strategy's strategic location (LCCC Quarter) and situated close to the Metrolink station. Plan policy seeks residential use in the area. In discussions with the Council earlier in 2017, the Council confirmed that a residential use of the site would be acceptable in principle.

- 4.38. The site presents an opportunity to significantly boost housing supply in the area (important where the Council cannot demonstrate an adequate supply), to help meet local need and demand. A build-to-rent model would suit a large local market.
- 4.39. The text ought to be amended to state that the site be identified for high density residential led development. The ground-floor can provide uses open to the public for community or leisure use. The plan should also set out that a new scheme should look to include new public realm, a pedestrian / cycle connection to the Metrolink station and amenity space.
- 4.40. We object to Figure 5 denoting the former B&Q site as part of the UA92 campus quarter. The policy text is ambiguous as it refers to the site being part of the campus quarter offer.
- 4.41. Page 46 states:

The former B&Q warehouse is bounded by LCCC to the north and east, the Metrolink line to the south and fronts onto Great Stone Road. Prior to its use by B&Q the building was occupied by a bowling alley and then the 3,000 capacity Hardrock Concert Theatre. The B&Q store closed in 2016 and in 2017 a planning application was submitted for its demolition. Further proposals for the redevelopment of this site should form part of the UA92 campus quarter offer with the opportunity for new development linked to LCCC site, including the provision of shared sporting facilities.

- 4.42. There is no indication as to what part of the campus offer could be sited here, as the site is physically detached and in separate ownership. There has been no discussion with Accrue Capital in this regard. The text should be modified to confirm that the site can be developed for residential led development which can complement the UA92 scheme.
- 4.43. The proposals for UA92 include residential development, and it would make far more sense to locate this at the B&Q site to save the Kellogg's site for leisure and education uses.
- 4.44. The opportunity for shared sporting facilities on the B&Q site is limited; Accrue Capital has previously consulted with LCCC and there was no suggestion of additional sporting facilities being required. The forthcoming application will include indoor sport, leisure or recreation (eg a gym or space for health and fitness classes), but there are no further opportunities available.
- 4.45. Nonetheless, residential development of the site would not prejudice or inhibit the delivery of UA92 and would be consistent with development plan policy.
- 4.46. The text should read:

*The former B&Q warehouse is bounded by LCCC to the north and east, the Metrolink line to the south and fronts onto Great Stone Road. Prior to its use by B&Q the building was occupied by a bowling alley and then the 3,000 capacity Hardrock Concert Theatre. The B&Q store closed in 2016 and in 2017 the Council approved its demolition. **It represents a significant development opportunity site where high density and high quality residential led development can take advantage of its accessible location and relationship to the stadium. It can complement the education and leisure focus of the UA92 campus quarter with opportunities for ground floor uses which complement that offer, which could include the provision of sporting facilities, leisure or community uses.***

- 4.47. There is no basis for seeking "shared sporting facilities" on the site, because there is no identified need for any further provision – particularly as the Refreshed Masterplan identifies a site for the new leisure centre and a site for new outdoor recreation, leisure and sporting facilities.

Deliverability

- 4.48. When reading the Refreshed Masterplan, it appears that many of its proposals are dependent on UA92. We understand from the recent consultation events that the intention is for the first intake of students to attend UA92 from September 2019. This is ambitious and likely to be challenging, given the need to secure planning permission, procure the development team, prepare the site and construct the development. We understand that further delivery will be phased into the next decade.
- 4.49. Whilst we support the principle of UA92, it would be wrong for delivery of the Refreshed Masterplan to be largely contingent upon UA92. The Refreshed Masterplan needs to recognise that other developments can contribute to the vision and objectives, providing similar benefits to those associated with UA92. The former B&Q is one such site.
- 4.50. Furthermore, UA92 should not be used to resist other development proposals within the area.

Economic Impact Assessment

- 4.51. Accrue Capital also provide the following comments on the Economic Impact Assessment (EclA) that has been prepared by SQW.
- 4.52. Overall it focusses on UA92 and the student campus proposed at Lacey Street. Many of the stated benefits of student population to the rejuvenation of Stretford Town Centre would also be attributable to residential development. Indeed, the benefits could be greater, given the increasing provision of purpose-built student accommodation in Manchester city centre, which could provide competition to Stretford / Trafford, particularly given the connectivity of the city centre to Trafford and the attractions already existing in Manchester.
- 4.53. Paragraph 1.11 of the EclA notes that UA92 will support around 6,000 students by 2025, with around 320 staff. Paragraph 1.15 notes that around 150 apartments will be included as part of the UA92 development, on the Kellogg's site.
- 4.54. As set out above, we question the need for apartments to be provided on the Kellogg's campus; it would be sounder planning to safeguard any remaining land on the campus for further UA92 uses.
- 4.55. We do however agree that apartment accommodation in the area will be important, and at a greater scale than suggested. The B&Q site can deliver a greater quantum of apartment development easily accessible to the UA92, Metrolink and wider area.

5. Conclusion

- 5.1. Accrue Capital generally supports much of the Refreshed Masterplan, including the vision and objectives. However, these should be refined to be more consistent with the existing and emerging context applicable to the area, for example the new GMSF and the adopted development plan.
- 5.2. The Refreshed Masterplan should be an opportunity to help significantly boost (and accelerate) housing supply, in accordance with the National Planning Policy Framework, the GMSF and Vision 2031, especially following years of under-supply across the borough.
- 5.3. In particular, we support:
- The principle of UA92;
 - The aim to regenerate and rejuvenate the town centre;
 - Improvements in connectivity;
 - The provision of student accommodation in Stretford town centre;
 - The provision of publicly-accessible leisure and sporting facilities at Turn Moss and on the former Kellogg's site;
 - The recognition of the need for and benefits of high-density residential development in Old Trafford; and
 - The support for taller buildings.

Specific concerns

- 5.4. There is a lack of evidence accompanying the Refreshed Masterplan, for example any assessment of accessibility or housing demand. We are also disappointed at the lack of communication with affected landowners in the preparation of the document.
- 5.5. Much of the Refreshed Masterplan is focussed on the role of UA92 to deliver benefits. Although UA92 no doubt will have benefits, at this stage there is uncertainty over its phasing – the intended first intake in September 2019 seems very ambitious. There needs to be measures in the Refreshed Masterplan, so that its vision and objectives can be achieved even if UA92 comes onboard at a slower rate than anticipated. At present, it reads as if the success of the Refreshed Masterplan is contingent upon UA92, when that is not, and should not, be the case.

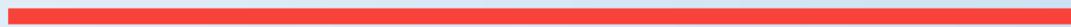
Objections

- 5.6. In particular we object to the suggested use of Site 3 (the former B&Q) as either part of the UA92 campus quarter or for “shared sporting facilities”.
- 5.7. Within this report we set out several suggested changes to improve the Refreshed Masterplan, including measures to increase the certainty that the growth and development required can actually be delivered. We trust that the Council appreciates these positive comments, which we would be pleased to discuss further if requested.
- 5.8. However, we fundamentally disagree with the suggested use for Accrue Capital's land; the Council has previously agreed that a residential use is acceptable in principle. The suggested re-wording set out in Chapter 4 will increase the prospects of the desired benefits being delivered: the site is an appropriate location for higher-density residential development and ancillary uses. The forthcoming planning application will include plans for new pedestrian access to Old Trafford Metrolink stop, thus improving local accessibility. It will provide new population to help support Stretford town centre's rejuvenation and compliment the ongoing regeneration of Old Trafford into a place to work, learn, play and, importantly,

live.

Appendix B

REPRESENTATIONS TO CIVIC QUARTER MASTERPLAN 2018



Trafford Civic Quarter Masterplan Representations

indigo.

**Trafford Civic Quarter Masterplan
Representations
December 2018**



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Trafford Civic Quarter Masterplan Representations

Appendices

Appendix 2.1

Representations on Refreshed Stretford Masterplan

Appendix 2.2

Representations on the Trafford Local Plan Issues and Options

Appendix 4.1

Leisure Centre Investment Strategy

Appendix 4.3

Cushman and Wakefield supporting note on viability

Appendix 6.1

Email from Trafford MBC regarding TVIA

Appendix 6.2

TPM supporting note on TVIA

1. Executive Summary

- 1.1. Accrue Capital (“Accrue”) is the owner of the former B&Q, located on Great Stone Road. Accrue is therefore an important stakeholder in the Civic Quarter.
- 1.2. Accrue support endeavours to regenerate Old Trafford and Stretford. It is reassuring that the Council has ambition to provide this part of Old Trafford with greater identity, to improve the public realm, to improve connectivity and permeability and to deliver new development that brings significant environmental, economic and social benefits.
- 1.3. However Accrue cannot support the Civic Quarter Masterplan in its current form.
- 1.4. The Council intends to adopt the Civic Quarter Masterplan as a Supplementary Planning Document. However Accrue object to this, because under the Local Planning Regulations it should be a statutory Local Plan.
- 1.5. Accrue has minor concerns with inconsistencies in the Civic Quarter Masterplan, that can be rectified before it is adopted.
- 1.6. Accrue has minor concerns with procedural matters associated with the Civic Quarter Masterplan’s preparation.
- 1.7. Accrue has very strong objections to the recommendation that a 900 space multi-storey car park be provided on the B&Q site, unless the car park forms part of a larger mixed-use, residential led development.

2. Introduction

- 2.1. Indigo Planning (“Indigo”) has prepared these representations on behalf of Accrue Capital (“Accrue”). Accrue own the former B&Q on Great Stone Road.
- 2.2. In June 2018, Indigo submitted a planning application to redevelop the B&Q site, on behalf of Accrue. Trafford Metropolitan Borough Council (“the Council”) is currently considering this application. The application followed a formal pre-application process with the Council, a formal environmental impact assessment screening process and a public consultation.
- 2.3. Indigo has previously submitted representations on behalf of Accrue to the Refreshed Stretford Masterplan, which are provided herewith in **Appendix 2.1**.
- 2.4. In September 2018, Indigo submitted representations on behalf of Accrue to the Local Plan Issues and Options consultation, provided in **Appendix 2.2**.

Preparation of Civic Quarter Masterplan

- 2.5. Indigo and Accrue have engaged with the Council and its consultants during the preparation of the Civic Quarter Masterplan, in the following ways:
 - Met with the Council, Bruntwood, Fielden Clegg Bradley and How Planning on 1 May 2018; and
 - Attended the drop-in session on 14 August 2018.
- 2.6. Indigo and Accrue also attended the Council’s consultation event on 6 November.

Representations

- 2.7. These representations are set out in the following manner:
 - Procedural matters (Chapter 3);
 - General comments (Chapter 4);
 - Parking and highways (Chapter 5);
 - Townscape and visual impact assessment (Chapter 6);
 - Strategic Environmental Assessment (Chapter 7); and
 - Concluding comments (Chapter 8).
- 2.8. Unless specific to a certain point, we use the terms Masterplan, SPD and Strategic Regeneration Framework interchangeably.

3. Procedural Matters

- 3.1. Accrue supports the purpose of the Civic Quarter Masterplan insofar as we agree with the Council that this part of the borough which requires regeneration and efforts to improve the area economically, socially and environmentally.
- 3.2. However Accrue objects to the SPD in principle, because an SPD is not the correct process for the Civic Quarter Masterplan. The draft Civic Quarter Masterplan contains statements regarding the development and use of land, the allocation of sites for a particular type of development or use, objectives that are relevant to the development and use of land, and policies intended to guide the determination of planning applications. Therefore the SPD is clearly a Local Development Document (as defined in Regulation 5 of the Local Planning Regulations (2012) and S17 of the Planning and Compulsory Purchase Act) but also a Local Plan as defined by Regulation 6 - ie it is a document referred to in Regulation 5(1)(a)(i), (ii) or (iv).
- 3.3. The Local Planning Regulations (2012) confirm a “local plan” means a “development plan document” as per S17(7)(a) of the Act. S20 of the Act requires development plan documents (ie local plans) to be independently examined.
- 3.4. S19 of the Act says DPDs must be prepared in accordance with the Local Development Scheme, other LDDs and the Statement of Community Involvement.

Boundary

- 3.5. Section 1.2 says the SPD boundary is not intended to be a ‘hard’ boundary and that the Council is committed to the regeneration of the wider area; the SPD is mindful of the close proximity of the surrounding area. Moreover 1.1 refers to guiding development which may come forward adjacent to or just outside the boundary.
- 3.6. Accrue objects to this statement as it is imprecise and unclear. It is ambiguous as to whether or not the SPD is a material consideration in the determination of planning applications outside of the boundary.
- 3.7. Accrue also believe that the proposed student accommodation for UA92 should be included within the boundary of the SPD. According to the report to Executive on 17 September 2018, this is likely to include Westpoint, which lies more than 500m beyond the existing boundary. Including within this the boundary would enable better management and planning of the linkages between the accommodation and the main campus.

Preparation

- 3.8. Accrue notes that Greater Manchester Police’s Crime Impact Statement is based on the draft Strategic Regeneration Framework dated 7 August 2018. This predates the public drop-in session on 14 August 2018, at which attendees were advised that the masterplan is still in preparation.
- 3.9. Accrue is concerned that the SRF had been drafted at this stage but that the exhibition boards displayed to the public did not provide the details that would have been in front of Greater Manchester Police. Furthermore, the consultation document differs from the plans provided on the display boards in August, for example the leisure centre was not shown on Great Stone Road. Accrue therefore objects on the basis that the Crime Impact Statement is not based on the masterplan that is subject to the current consultation.

4. General Comments

Current Land Use

- 4.1. Accrue objects to the division of the masterplan area into four distinct areas, which have been named as quarters. These are new terms and it is misleading to use the title 'current land use' in proposing these four quarters.
- 4.2. There is clearly a lot of overlap between the four quarters, which proves that the areas are not 'distinct' as referred to in the introduction to 1.3. For example, the Town Hall Quarter includes a large leisure use. The Leisure Quarter includes a large retail store that is subject to a mixed-use application for redevelopment. Both the Campus Quarter and the Leisure Quarters include major office locations, meaning that it is not just the Commercial Quarter that includes substantial office buildings.
- 4.3. This section of the Masterplan therefore needs revising so that it genuinely reflects the current land uses.

Background and Policy Context

- 4.4. Section 2.1 rightly refers to Old Trafford being a regeneration priority for the Council, but the Civic Quarter Masterplan fails to acknowledge the inequalities that exist in the area as mentioned on page 13 of the Core Strategy. Accrue objects to the Masterplan insofar as social and economic issues are not duly considered.
- 4.5. The Masterplan fails to recognise all contextual documents, for example there is no reference to the Trafford Housing Strategy. Accrue objects on this basis, because if the Masterplan had due regard to the Trafford Housing Strategy, it may have had different objectives, policies and land uses.
- 4.6. Page 10 correctly refers to Policy SL3 of the Core Strategy. This is important because the Lancashire County Cricket Club Quarter is development plan policy, although its boundaries were only drawn on the unadopted policies map accompanying the draft Allocations Plan. The LCCC Quarter is described in the Core Strategy as:

“strategic location for major mixed use development to provide a high quality experience for visitors balanced with a new, high quality residential neighbourhood centred around an improved stadium.”

- 4.7. Accrue objects to the Masterplan insofar as it contradicts Policy SL3. If the Masterplan is delivered, the majority of residential development within LCCC Quarter (as drawn on the Allocations Plan) would be at the furthest point from the stadium, and not “centred around an improved stadium.”
- 4.8. Residential development is earmarked for three of the four new quarters within the SPD, with the exception of the Leisure Quarter (which undeniably forms part of the LCCC Quarter). The only potential for residential development within the Leisure Quarter, ie “around an improved stadium” is as part of mixed-use development on the former B&Q site. This is reassuring, given the Council’s consistent advice to Accrue over the past 18 months that residential development on this site is acceptable in principle.
- 4.9. Accrue objects to the wording on page 10 that “Core Strategy Policies are also of relevance to this SPD and any future planning applications”, because the Core Strategy is the development plan for the purposes of S38(6) of the Act. It is misleading and incorrect to state that the Core Strategy is only “of relevance” to planning applications, because this

implies that the SPD is of greater weight.

- 4.10. Accrue questions why other Core Strategy policies are not referenced, including L2 (Meeting Housing Needs) and L8 (Planning Obligations), particularly given the chronic shortage of housing in Trafford.
- 4.11. The Masterplan states that the area will include new “commercial office space” (page 6), which is contradictory to Policy W1 of the Core Strategy, which aims to focus employment uses in seven locations, none of which are within the Masterplan area. Accrue therefore objects to the Masterplan which is not consistent with overarching policy; this gives further cause for the Masterplan to be adopted only following independent examination as a Local Plan.
- 4.12. Page 11 refers to the Refreshed Stretford Masterplan. The role and status of the Refreshed Stretford Masterplan has always been unclear and it is even less clear when the draft SPD states that the SPD will “build on the principles set out in the Refreshed Stretford Masterplan”, when the SPD is a planning document and the Refreshed Stretford Masterplan is not.

Engagement and Key Stakeholders

- 4.13. Paragraph 2.20 of the Statement of Community Involvement states that “the process for adopting SPDs is similar to that for Local Plan documents in that there is a preparation/scoping phase, and a formal consultation prior to adoption.”
- 4.14. Paragraph 2.40 of the SCI confirms that “all consultation documents” will be on the consultations webpage and that the “website will be used extensively for all elements of the Planning Framework evidence base and at all stages of document preparation.”
- 4.15. As of 5 December, the full evidence base for the Civic Quarter Masterplan had not been uploaded to the website, with the full TVIA only being made available on 6 December.

Key Themes

- 4.16. No. 7 “Creating Value” states that Placemaking is “composing the setting to encourage density in the area through the offer of modern business opportunities and a range of homes across the spectrum of ownership.”
- 4.17. Accrue supports the reference to encourage greater densities, modern business opportunities and a range of homes.
- 4.18. Accrue objects that this refers only to home ownership, failing to reflect the Trafford Housing Strategy that explicitly refers to the need for increased supply of homes to rent.
- 4.19. No. 9 “A Quarter is Not an Island” sums up some of our reservations about the SPD; its boundaries are defined yet stated not to be ‘hard’, and the Civic Quarter is divided into four sub-quarters (none of which reflect the statutory Lancashire Cricket Club Quarter designation).
- 4.20. No. 6 “The Quarters” wants people to live, work and play in areas with strong identity and variety, but fails to recognise the residential opportunity “around the stadium” (as specified in the Core Strategy), ie in the Leisure Quarter.
- 4.21. No. 8 “Engagement” aims for “the big buy-in”, however the preparation of the Masterplan and draft SPD has spectacularly isolated one of the key landowners.

Key Issues

- 4.22. The former B&Q is described as occupying a prominent location within the Masterplan area.

This statement needs more clarity. The site is not visually prominent, being located on the edge of the Masterplan area and with a limited zone of visible influence. It is however an important location bookending the Masterplan area and signalling the change from a residential area to the west and the regeneration area of the Civic Quarter.

- 4.23. Accrue supports the observation that the area suffers from poor pedestrian connectivity, particularly around the LCCC stadium. This is why the pending planning application to redevelop the B&Q makes provision for public access parallel to the Metrolink so that people can walk from Great Stone Road to Old Trafford Metrolink without crossing the tracks. This was reflected on the display boards in the August drop-in session. The Council, Bruntwood or their advisors have not approached the owner of the B&Q to ascertain if any other route could be created through the site to help improve pedestrian connectivity.
- 4.24. Accrue supports the observation that surface car parking dominates several parts of the Masterplan area. In general terms, stakeholders should be working to reduce the need for car parking, and specifically, efforts should be made to provide car parking in locations out-of-sight from the streetscene, such as the undercroft car parking proposed as part of the planning application to redevelop the B&Q.
- 4.25. Accrue notes the 'lack of identity' and would support efforts to create a density and mass of development that signposts the area as a Priority Regeneration Area, Strategic Location and Civic Quarter.

Opportunities

- 4.26. Accrue notes that the Masterplan now confirms the intention to build a new leisure centre on LCCC land off Great Stone Road, rather than provide it on the UA92 campus. Noting the Leisure Centre Investment Strategy (**Appendix 4.1**) that was taken to Executive in October 2018, the SPD needs to take account of the 300 car parking spaces that are costed as part of the new leisure centre. The same Strategy excludes, but refers to, land assembly costs, which need to be scrutinised by the public.
- 4.27. The SPD states that the B+Q site "has been identified as an optimal location for consolidated car parking" but does not say by whom, when and why.
- 4.28. Accrue notes that the SPD acknowledges this could "possibly" be as part of a mixed-use scheme, but given the lack of engagement between the Council and its partners and the owners, there is no telling as to what this mixed-use scheme may be, and whether it is viable.
- 4.29. Accrue objects to a 900 space multi storey car park on the former B&Q site but recognise that there is potential to accommodate some of this requirement as part of a residential led, mixed-use development.
- 4.30. Accrue supports the creation of a wellbeing route and improved environments for pedestrians and cyclists. Indeed, Accrue supports improvements to the public realm and streetscene across the masterplan area in general. The Council should not be fixated on building height, but pay close attention to how buildings relate with the street.

Spatial Development Framework Plan (5.1)

- 4.31. Accrue supports the principles of improved permeability, particularly improving pedestrian permeability around LCCC.
- 4.32. Accrue objects to the idea of a Multi-Storey Car Park being the solution to the problem of surface car parking dominating the masterplan area.
- 4.33. Accrue objects to the subdivision of the Civic Quarter into four further quarters.

- 4.34. Accrue objects to the vision that three of these four new quarters could include residential development, but not the Leisure Quarter.
- 4.35. Accrue objects to the application of storey heights across the masterplan area without sufficient evidence that the LPA have taken an iterative process to test alternatives.
- 4.36. Accrue objects to the use of ‘maximum’ storey heights across the Civic Quarter and instead recommend that a range of suitable or ‘illustrative’ building heights be applied to the masterplan.
- 4.37. The scale and height of any development within the masterplan boundary should be considered through the determination of any future planning application on a site by site basis. Accrue request that this be clarified within the text of the masterplan.
- 4.38. The Spatial Development Framework should take more of a promotional / opportunistic stance to development and seek to maximise the sustainable use of sites. The masterplan should not seek to constrain development but provide flexibility to allow evolution and change in the area over time to ensure that the masterplan does not become quickly out dated.
- 4.39. There is an inconsistent approach to the application of storey heights identified across the Civic Quarter on the plan on page 27. Tall buildings are identified at all corners of the masterplan with a 10 storey building at the north west corner, 14 and 20 storey buildings at the north east corner and 12 and 14 storeys at the south east corner, apart from the south west corner.
- 4.40. This is a significant omission as tall buildings at all four corners frame the area, fit in with the Civic Quarter narrative and form ‘book ends’ signifying growth and transformational change.

Development Management Policies (5.2)

- 4.41. Accrue objects to the fifth bullet point on page 28. There is no justification for “supporting residential uses” to UA92. If this is meant to refer to student accommodation, it should be more specific.
- 4.42. Accrue objects to this wording:
- Planning applications that are not in compliance with the SPD will not be acceptable.*
- 4.43. This is a drastic overstatement of the weight that should be attached to the SPD as a material consideration in the determination of planning applications.
- 4.44. Accrue objects to Policy CQM1. It is ironic that this policy refers to proposals that would “prejudice the viability or deliverability of the Development Framework”, because the Masterplan / SPD / Development Framework is devoid of any consideration of its own viability or deliverability. **Appendix 4.2** contains a note from Cushman and Wakefield setting out objections to the Masterplan on the grounds of viability, including that:
- There has been no assessment of the viability and deliverability of the Civic Quarter Masterplan as a whole; and
 - Without the Local Planning Authority undertaking viability assessments for a range of alternative uses to demonstrate what is viable or not, we question how the LPA can determine that a car parking led development is the most suitable alternative use for the site which generate a sufficient return to incentivise the landowner to release their site for development.
- 4.45. Accrue objects to Policy CQM2’s fifth bullet: the locations and height parameters are not

justified or supported.

- 4.46. Accrue supports Policy CQM3 insofar as public realm improvements will be beneficial to the area. The viability and deliverability of these improvements do however need consideration.
- 4.47. Related to the improvement of public realm, Accrue questions how the proposed multi-storey car park on the former B&Q site will be able to interact with the street without forming part of a larger mixed-use development.
- 4.48. In respect of Policy CQM4's, Accrue supports all measures to reduce the reliance on the private car and to reduce the amount of car parking in the area, whilst also encouraging modal shifts to public transport, walking and cycling. We therefore question the rationale for multi-storey car park(s). The policy states that the Council will support:

Creation of new multi-storey car park solution(s) located on the periphery of the Development Framework area to discourage traffic from utilising Talbot Road.

- 4.49. Firstly, the masterplan on page 27 shows only one MSCP. By locating this in the south-western corner of the masterplan area, it will inevitably serve a smaller part of the masterplan than if it were more centrally located.
- 4.50. Secondly, it will be very difficult to control how cars will access the proposed MSCP, let alone discourage drivers from using Talbot Road, given Great Stone Road connects directly with Talbot Road.
- 4.51. The fourth bullet point to Policy CQM4 is ambiguous and needs rewording. It currently states:

Consolidation of existing surface car parking where:

a) replacement car parking is secured on sites identified within the Development Framework; or

b) it can be demonstrated that the existing car parking is surplus to requirements.

- 4.52. This should be reworded to:

All development proposals should demonstrate how they reduce the reliance on the private car and how they encourage walking, cycling and the use of public transport.

All development proposals that generate a need for car parking will need to provide that parking on site, in a manner that hides the majority of the parking from view from the street or other public areas.

Proposals for new or replacement non-private car parking provision must form part of a mixed-use development and be provided in a manner that hides the majority of the parking from view from the street or other public areas.

Wellbeing Route – Talbot Road

- 4.53. De-engineering Talbot Road should be encouraged, but Accrue has concerns over creating a shared surface along its length (as implied by the indicative section).

New Civic Square

- 4.54. There is merit to creating some kind of active, usable space in the front of the cricket ground and Accrue would welcome more detail on how this might be designed, procured and delivered, including who would be responsible for paying for it.
- 4.55. It is evident that the Civic Square would result in the loss of LCCC's car parking. We therefore question why phasing and deliverability has not been considered within the SPD. Indeed, with both the Ashes and the Cricket World Cup coming to LCCC in 2019, it is a shame that the Civic Square will not be ready for next summer. Nonetheless, early provision of replacement car parking is essential if the Civic Square is to be delivered.

Movement and Car Parking (6.2)

- 4.56. Accrue object to the parking strategy, particularly that a proposed MSCP should meet the needs of the leisure centre, LCCC and Lancastrian House.

Leisure Quarter (6.4)

- 4.57. The first bullet point bizarrely proposes “the UK’s first indoor-outdoor nets facility, prominent and accessible from the Talbot Road corner.” This is not reflected in the accompanying illustrative layout and is presumably a further example of the poor drafting of the SPD, as the nets facility must surely be located at the leisure centre’s rear, contiguous with the existing outdoor nets, rather than at the corner of Talbot Road.
- 4.58. Accrue objects to the suggested height parameters and particularly those for the B+Q site. An inconsistent approach is taken to the rationale for suggested building heights across the masterplan as a whole. In particular, the design principle state that “The scale of development on the western boundary must take into account the existing low-rise residential development on the opposite side of Great Stone Road; building heights will therefore be most limited in this Quarter”.
- 4.59. However, this is a different approach taken to that for development within the Town Hall Quarter where the existing leisure centre site is earmarked for 3, 4, 6, 8 and 10 storey development. This site is immediately bound to the west by low rise two storey residential development. If development is brought forward in this area in accordance with the masterplan, the gardens and rear of these properties will be directly overlooked by a 4 and 10 storey building.
- 4.60. There are similarities between this location and the B+Q site however, dwellings on the neighbouring side of Great Stone Road are set back from the site, at a much lower level to the road whereas the leisure centre site is on the same level as adjacent properties. Accrue therefore question why greater storey heights are suggested and considered acceptable in this location.
- 4.61. Accrue objects to the use of ‘maximum’ storey heights.
- 4.62. Development surrounding key regeneration nodes situated in highly accessible locations should not be constrained by prevailing building heights. Indeed, national policy seeks to raise density at sites close to transport nodes. Similarly, there are many instances across the region and country, particularly in urban locations and close to transport nodes/sports stadiums where building heights have been maximised to make the most efficient use of land. Limiting the development to 5-6 storeys in height would therefore represent a waste of valuable brownfield land and a significant missed opportunity to deliver much needed homes in this area of Trafford.
- 4.63. Accrue supports measures to improve pedestrian access around LCCC and to the Metrolink.
- 4.64. Accrue objects to “consolidated parking provision to the well-connected former B&Q site

corner.” In terms of road access, which is surely of paramount importance to the location of a car park, the B&Q site is only accessible from Great Stone Road, and then to Talbot Road. Other parts of the area are better connected to the road network and to the main nodes that would require car parking.

Campus Quarter

- 4.65. The second design principle bullet point is ambitious in its prose (“encouraging natural daylight to flood in by controlling development height and scale around sun and day light particularly evening sun which residents can enjoy”), but not supported by any analysis or indeed by the height parameters. For example 12, 14 and 10-storey developments towards the southern part of the site could potentially limit natural light to development to the north and east.
- 4.66. Accrue objects to the statement that new taller buildings on Talbot Road provide a “unique opportunity to create a metropolitan feel without impacting the heritage assets” (our emphasis), because there are several locations across the masterplan that have similar potential, due to the heritage assets tending to be clustered. For example, the redevelopment of the B&Q site will not have any impact on heritage assets.

5. Parking

- 5.1. The Highways and Transportation Feasibility Report (HTFR) contains several unfounded claims.
- 5.2. The HTFR proposes new car parking on Great Stone Road that “should be appropriately sized to meet the needs of the cricket club, the new leisure centre and the Bruntwood offices.” (paragraph 5.3.7)
- 5.3. Paragraph 5.3.2 states that there will be a significant reduction in car parking at Lancastrian Office Central. However, the existing parking is to the rear of Lancastrian Office Centre, and is not subject to any development proposals within the draft Masterplan.
- 5.4. The Council’s Leisure Centre Investment Strategy (reported to Executive on 29 October 2018) confirms that the intended new leisure centre will include 300 parking spaces: a 100% increase over the existing leisure centre provision. However, we understand that no parking spaces are proposed as part of the leisure centre site itself rather, it is intended that parking will be provided elsewhere within the Masterplan area. Easily accessible parking is an important part of a leisure centre particularly for the elderly, less mobile and disabled. It is not therefore appropriate to propose parking to serve the leisure centre at a remote location detached from the site.
- 5.5. At paragraph 5.3.5, the HTFR states that a facility of approximately 900 spaces would appear reasonable to meet maximum occupancies within the masterplan area. It adds that approximately 600 spaces would be sufficient for average parking occupancies. The SPD states that the former B+Q site “...has been identified as an optimal location for consolidated car parking.”
- 5.6. Given the scale of the masterplan area, it is not sustainable to focus the delivery of parking provision requirements for the entire area on a single site on the edge of the masterplan area. The site is not close to the centre of the Civic Quarter nor the majority of proposed uses and at present, does not benefit from direct links to the UA92 Campus and Metrolink station.
- 5.7. The HTFR analysis shows that an MSCP of 900 spaces on Great Stone road cannot be accommodated in capacity terms on the highway network. The report also concludes that severe impacts will be experienced at both the Great Stone Road / Talbot Road and Chester Road / Great Stone Road junctions should that level of development come forward.
- 5.8. On this basis, it is clearly more appropriate to propose a higher number of localised parking hubs spread evenly throughout the area that are convenient to serve the proposed uses and which place less pressure on the highway network. A more logical location for a multi-storey car park is on the former Kellogg’s site close to the heart of the Civic Quarter and transport links.
- 5.9. A suitable parking solution to mitigate the significant reduction in provision across the masterplan area is key to unlocking development within the masterplan area.
- 5.10. Accrue object to a 900 space MSCP on the former B+Q site but recognise that there may be potential to absorb some, but not all of this requirement as part of a residential led, mixed-use development. The delivery of some of the identified requirement on the B+Q site, directly facilitates early delivery of masterplan objectives.

6. Townscape and Visual Impact Assessment

- 6.1. Firstly, Accrue is concerned that the TVIA was still being prepared – or at least amended – by the relevant consultant whilst the consultation period had already commenced, as confirmed by the email provided in **Appendix 6.1**.
- 6.2. Paragraph 1.2 of the TVIA states:
- The intention is to utilise the TVIA to establish an appropriate scale and form that tests and advances the footprint and massing framework for the proposed development blocks within the Civic Quarter Masterplan SPD.*
- 6.3. This implies that the TVIA is being used proactively to define footprints and massing, rather than being used to assess defined parameters. However from reading the TVIA in full, the opposite is true. The TVIA assesses the building heights shown in the SPD, but does not explain how those building heights are established.
- 6.4. Accrue objects to a team of individual assessors being used in the preparation of the TVIA, without them being named, especially if – as implied – this team of individuals is comprised from outside the appointed consultants.
- 6.5. Accrue objects to the absence of any of the iterative work. It is claimed that the TVIA was produced alongside the Development Framework iteratively (paragraph 1.37), but there is no description or explanation of any evolution of the Development Framework, or the testing of any alternatives. Given that the Council intends to adopt this Development Framework as SPD (on which it will place great weight in the determination of planning applications) – regardless of the above objection that it should be a local plan – stakeholders deserve to understand the process that has led to the shown heights and massing being established.
- 6.6. Accrue objects to paragraph 1.42, because it refers to meetings from June to October 2018. Accrue and Indigo met the consultant team in May 2018 and the discussions in that meeting have not even been mentioned or considered in the TVIA, let alone included.
- 6.7. Accrue objects to paragraph 1.49, because the proposed four new quarters are not based on the existing character of the buildings or land/use. For example, the campus quarter does not yet have a campus.
- 6.8. Accrue questions why the projects listed under Cumulative Effects in paragraph 1.66 include the Hampton by Hilton hotel on Chester Road, but not other pending applications within the Masterplan area, including the redevelopment of the former B&Q. The application on Chester Road was only validated on 2 November, after the consultation on the Civic Quarter Masterplan as launched.
- 6.9. Accrue notes and supports that the application by Hampton by Hilton is for up to 16 storeys, in a location earmarked for eight storeys in the Masterplan, and that the TVIA finds that the cumulation of this scheme with the Development Framework “does not result in a further significant effect.”
- 6.10. Accrue supports the finding in Appendix 1.1 that the character of the townscape is compromised by the vacant former B&Q site, and that the vacant former B&Q site is a poor quality land use.
- 6.11. These representations should also be read alongside the supporting note prepared by TPM on the TVIA included at **Appendix 6.2**.

7. Strategic Environmental Assessment

- 7.1. It is noted that paragraph 15 of the SEA explains that suggestions have been made that would influence the SPD. None of these have been included in the SPD.
- 7.2. Accrue notes the SEA (paragraph 1.19) refers to the SPD guiding development over the next 15-20 years. This is longer than the span of the extant Core Strategy, which this SPD is meant to be in conformity with. The SPD itself does not give any time period for its coverage.
- 7.3. Paragraph 1.25 refers to the Campus Quarter providing leisure uses. There are no leisure uses proposed for the Campus Quarter, albeit early proposals for the campus included the replacement leisure centre.
- 7.4. Accrue notes that footnote 14 refers to Enfusion and How Planning's instruction from Liverpool City Council associated with the Ten Streets SPD. Accrue therefore questions what else has been lifted from a completely separate instruction or has not been checked.
- 7.5. The SEA does not have any regard to the Highways and Transportation Feasibility Report.

Appendix C

REPRESENTATIONS TO CQAAP (2020)



Civic Quarter Area Action Plan

Accrue Capital Representations

Civic Quarter Area Action Plan
Accrue Capital Representations
March 2020

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Civic Quarter Area Action Plan

Accrue Capital Representations

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1. Executive Summary

- 1.1. WSP | Indigo has prepared these representations on behalf of Accrue Capital, the owners of the former B&Q on Great Stone Road.
- 1.2. The representations support some of the visions, objectives and ideas behind the Civic Quarter Area Action Plan, including the Council's belated realisation that this area should accommodate and deliver a significant number of new homes. We welcome the idea of 4,000 homes on brownfield land on sites in this highly accessible area of change.
- 1.3. The representations object to the proposed allocation of a leisure centre and multi-storey car park on the site of the former B&Q.
- 1.4. Such an allocation is not viable.
- 1.5. Nor is the allocation deliverable.
- 1.6. Nor is the allocation supported with any evidence, let alone sound and justifiable evidence.
- 1.7. The allocation will cause traffic congestion at the local junctions, as set out in the Transport Assessment.
- 1.8. The allocation is contrary to previous masterplans for the area, including the adopted Refreshed Stretford Masterplan, which proposes the leisure centre be sited on the UA92 site already owned by the Council.
- 1.9. The allocation is contrary to the Council's Leisure Investment Strategy. The allocation is contrary to the assessment work underpinning its previous masterplans and the intention to redevelop the former Kellogg's building into UA92 and associated office and leisure spaces.
- 1.10. The allocation would require additional funding (presumably from the taxpayer) to take into account land acquisition and demolition costs.
- 1.11. It is incomprehensible that this site should be earmarked for a leisure centre and multi-storey car park when there are sites controlled by parties already involved in the fields of sport, recreation and leisure, namely Lancashire County Cricket Club (on whose land the previous draft Civic Quarter Masterplan proposed the leisure centre) or Trafford Council and UA92 (on whose land the Refreshed Stretford Masterplan, the Economic Impact Assessment and the Leisure Investment Strategy identified the leisure centre be sited).
- 1.12. The Council and their consultants have failed to deliver the leisure centre to the timetable first identified, meaning residents of Stretford and Old Trafford are still using their out-dated old leisure centre. In the meantime, one attempt at a masterplan by way of the Civic Quarter Masterplan SPD has failed, partly because the Council and their consultants did not realise they had produced a land-use plan that required development plan status.
- 1.13. Whilst the plans should be changed to relocate the leisure centre to one of these better sites, the former B&Q should be allocated for residential development, to help deliver much-needed homes to meet the persistent under-supply within Trafford. The majority of the land identified for the 4,000 new homes are in alternative uses, so bringing the B&Q forward for 333 homes in the short-term will help kickstart the much needed regeneration, whilst also improving the character and streetscene of Great Stone Road.

2. Introduction and background

- 2.1. WSP | Indigo has prepared these representations on behalf of Accrue Capital, the owners of the former B&Q on Great Stone Road.
- 2.2. The Council as both a corporate body and as local planning authority is aware of Accrue Capital's vision and objective to redevelop the site for residential-led uses, with discussions having taken place since 2017.
- 2.3. Accrue Capital has regularly met with the LPA to discuss the site, both prior and subsequent to the refused planning application in 2019. The LPA in exercising its development management function has never disputed the principle of residential development on this site.
- 2.4. Accrue Capital has also made representations on the local plan issues and options, the Refreshed Stretford Masterplan and the Civic Quarter Masterplan.
- 2.5. To now read a draft Area Action Plan that proposes around 4,000 new homes across the Civic Quarter, but proposes a leisure centre and a multi-storey car park on the site of the former B&Q is incredibly disappointing.
- 2.6. This is the third strategic plan that has been produced with no discussion with Accrue Capital. From the discussion that took place with other landowners on 12 March at the Stakeholder Meeting, it was telling that other landowners also had had limited dialogue from the Council or its consultants. To have been presented with a 'Land Parcel Information' pro forma just one week before the consultation closes was incomprehensible – the evidence about land parcels and landowner objectives should have been collated in advance of the plan being prepared.
- 2.7. Accrue Capital has never disputed that Stretford and Old Trafford needs regeneration. These representations do support much of the Area Action Plan. However the representations also explain why we object to certain elements and highlight particular shortfalls that will render the plan unsound.
- 2.8. The representations are structured in line with the consultation survey questions, but with additional comments in Chapter 4.

3. Consultation Survey

1. What is your email address?

3.1. matthew.hard@indigoplanning.com

2. Do you think we have identified the right opportunities and challenges that exist within the AAP area? Please state your opinion and provide comments below.

Challenges

- 3.2. Whilst some of the challenges set out on page 47 are agreed with, the AAP should try and understand why these are challenges. For example, the former B&Q site has laid vacant for a few years, but the landowner has previously applied for planning permission to redevelop the land, and various alternative schemes tabled with the LPA with the aim of developing the site.
- 3.3. Part of the challenge is that the masterplanning previously undertaken (in the shape of the Refreshed Stretford Masterplan and the Civic Quarter Masterplan) have not been consistent with their aims for the site, and also these various masterplans have not been consistent with the adopted development plan. The identified land use for the B&Q site has changed from a use compatible with UA92, to a mixed-use scheme including multi-storey car park, to a leisure centre and multi-storey car park. Meanwhile, development management officers (and Members of the Planning Committee) have always accepted the principle of the site being redeveloped for residential development.
- 3.4. The B&Q site is one of the few options to create a neighbourhood “centred around an improved cricket ground”, as directed by the Core Strategy, and should be allocated as such.
- 3.5. Residential development of this site is the best prospect of improving the streetscene to Great Stone Road – at present there is no streetscene to speak of. Residential development will also bring permanent vitality and viability to this part of the Civic Quarter, and will soften the currently stark view across the site of the back of the cricket stand. Well-designed residential development is also likely to be a more visually interesting, active and softer frontage than a pavilion-box style leisure centre and a multi-storey car park.
- 3.6. The AAP should also identify the following challenges:
- Failure to demonstrate a five-year housing supply across the borough;
 - Failure against the Housing Delivery Test across the borough;
 - Over-reliance on the private car.

Opportunities

- 3.7. The first two opportunities on page 49 are **supported**.
- 3.8. The AAP overlooks the opportunity to provide “a new leisure centre where synergies with the Cricket Club could have significant benefit” on “land which could be utilised” controlled by the Cricket Club. The previous draft Civic Quarter Masterplan proposed a leisure centre on the Cricket Club land, and there are no reasons given why this has now changed. We **strongly object** to the “opportunity” to provide car parking and a leisure centre on the former B&Q site.
- 3.9. The AAP should not be planning for car users.

- 3.10. It is perverse to highlight the “complementary” relationship between “leisure activities...and...centre of excellence for health and wellbeing” with “an optimal location for consolidated car parking.” Providing a car park will only encourage travel by car, not by more active and sustainable methods. The best site to achieve a complementary relationship between a leisure centre and other uses would either be directly on LCCC land, where it can link with their sporting objectives, or on the UA92 site where it can link with the proposed primary school and the university academy that includes sport and leisure on its curriculum.
- 3.11. **A leisure centre is not viable and not deliverable on the former B&Q site.** The Council already owns land in the area that would be better suited to this development, for example adjacent to UA92. More explanation is given in Chapter 4 to these representations below.

3. Do you agree with the proposed vision for the AAP area? Please state your opinion and provide comments below.

- 3.12. The vision is for 2037 and beyond, and the vision is **supported**.
- 3.13. However the Council should identify quick-wins to help early delivery of some of the contributing factors to this vision. The former B&Q has been available for residential-led mixed-use development since 2017 and remains deliverable.

4. Do you agree with the Strategic Objectives and Opportunities of the AAP?

- 3.14. The majority of the objectives and opportunities are **supported**.
- 3.15. However consolidated car parking in the form of multi-storey car parks should be a last resort, and should be located in areas with good connectivity to all parts of the Area Action Plan, and also in areas where they will integrate well with surrounding land uses. They should not be located on the periphery, nor close to residential areas.

5. Do you agree with the Urban Strategies that have been identified? Please state your opinion and provide comments below.

- 3.16. We **support** the use of ‘courtyards’, though have reservations because the LPA have previously advised that they dislike courtyard developments.
- 3.17. We **object** to the land use strategy, because this will fail to deliver the residential development centred around the cricket ground, as set out in the Core Strategy policy for the LCCC Quarter.
- 3.18. The former B&Q has been promoted as site for residential development for three years, and a new planning application has recently been submitted for around 330 homes on the site.
- 3.19. We **object** to the building height parameters. The TVIA in the evidence base only tests the Council’s assumptions, it does not consider the acceptability of a range of different building heights.
- 3.20. We question why three of the four corners of the AAP have “gateway opportunities”, but the south-western corner is identified for a multi-storey car park.
- 3.21. A well-designed residential scheme, of critical mass and population, will act as a cornerstone to this part of the area, screen the rear view of the cricket stands and provide a better streetscene and character than a big box leisure centre and a multi-storey car park.

6. Do you have any comments on Draft Policy CQ1: Civic Quarter

Regeneration? Please state your opinion and provide comments below.

- 3.22. We **object** to CQ1, on the basis that some of the proposals themselves are not deliverable or viable, namely the leisure centre on the former B&Q. Should the AAP be revised to include deliverable and viable allocations, we'd support this policy.

7. Do you have any comments on Draft Policy CQ2: Housing? Please state your opinion and provide comments below.

- 3.23. We **support** the ambition to deliver 4,000 new homes in this location.
- 3.24. The AAP should set out a trajectory of allocated sites to demonstrate how these homes will be delivered. The former B&Q can deliver between 300 and 350 homes in the first few years of the plan period.

8. Do you have any comments on Draft Policy CQ4: Sustainability and Climate Change? Please state your opinion and provide comments below.

- 3.25. We are concerned about the vagueness in bullet point 3, and the need to “demonstrate an actionable zero carbon plan, incorporating offsetting for both operational and embodied carbon over the first 60 years of the project.”
- 3.26. This is not clear and is ambiguous, and will lead to uncertainty on the preparation and determination of planning applications.
- 3.27. This policy should be tested for its impacts on viability; the delivery of 4,000 new homes (and affordable homes could otherwise be prejudiced).

9. Do you have any comments on Draft Policy CQ5: Conservation and Heritage? Please state your opinion and provide comments below.

- 3.28. No.

10. Do you have any comments on Draft Policy CQ6: High Quality Urban Design? Please state your opinion and provide comments below.

- 3.29. We **object** to the approach to taller buildings and massing set out in the AAP. The B&Q site is capable of accommodating buildings taller than six storeys, without impacting on residential amenity, heritage assets or local character. This is evidenced in the recently submitted planning application.
- 3.30. The policy should also encourage independent design review of major applications.

11. Do you have any comments on the Design Principles set out in the AAP? Please state your opinion and provide comments below.

- 3.31. It will be difficult to ensure all ground floor units have entrances directly from streets or public spaces, especially in the courtyard-style developments encouraged elsewhere in the design principles.
- 3.32. This principle should be reworded to “ground floor units are encouraged to have direct entrances where possible, subject to other design principles.”
- 3.33. Bullet point 4 in the context of amenity is not clear. Other design principles encourage balconies, front garden and active frontages. It may not be possible to “respond to any noise issues” whilst still providing these amenity spaces.
- 3.34. All the principles identified in the ‘residential quality’ section will be difficult to incorporate

whilst achieving the densities of development envisaged. Evidence should be provided with the next draft of the AAP demonstrating how developments can be designed to meet all these principles.

12. Do you have any comments on Draft Policy CQ7: Public Realm Principles? Please state your opinion and provide comments below.

3.35. No

13. Do you have any comments on Draft Policy CQ8: Wellbeing Route - Talbot Road? Please state your opinion and provide comments below.

3.36. No.

14. Do you have any comments on Draft Policy CQ9: Processional Route? Please state your opinion and provide comments below.

3.37. No.

15. Do you have any comments on Draft Policy CQ10: Movement and Car Parking Strategy? Please state your opinion and provide comments below.

3.38. The AAP should encourage underground car parking and a general reduction in the amount of car parking available across the Civic Quarter.

3.39. The aim to position car parks on the periphery of the Action Plan area is misguided. A 600-900 space car park on Great Stone Road (as denoted in the Transport Assessment) won't achieve the aim of removing traffic from Talbot Road, rather it will increase traffic, as cars will need to use Talbot Road to reach Great Stone Road when travelling from either Old Trafford (to the north-east) or Stretford (from the south-west). The junction analysis in the Transport Assessment shows there will be increased queuing at the junction of the two roads as a result.

16. Do you have any comments on the need for an Infrastructure and Obligations policy within the AAP? Please state your opinion and provide comments below.

3.40. No

17. Do you have any comments on the Central Neighbourhood proposals? Please state your opinion and provide comments below.

3.41. The AAP assumes that the proposed development in the grounds of UA92 will be approved, whilst continuing the trend of the previous Civic Quarter Masterplan in failing to have any regard to the acceptability of the principle of residential development on the former B&Q site, nor having any regard to its proposed redevelopment, which the LPA is aware of.

3.42. The new leisure centre should be sited in the Central Neighbourhood, where it relates well with UA92 and the proposed primary school. More information is provided in Chapter 4 below.

18. Do you have any comments on the Southern Neighbourhood proposals? Please state your opinion and provide comments below.

3.43. Any development to directly complement the Cricket Club should first and foremost be aimed to be delivered on land controlled by the Cricket Club, not on third party land.

3.44. The Area Action Plan leaves a wide area of surface parking within the grounds of the Cricket

Club (contrary to efforts to consolidate parking and remove surface parking), and allocates third party land for a leisure centre and multi-storey car park. This is wholly unjustified and strongly **objected** to.

- 3.45. We **support** efforts to connect Old Trafford Metrolink with Great Stone Road, which has been incorporated into all proposals tabled for the redevelopment of the former B&Q.
- 3.46. We **object** to the unjustified limit of six storeys to development on the former B&Q. The recently submitted planning application demonstrates how taller development can be successfully integrated into the surrounding environment.

19. Do you have any comments on the Western Neighbourhood proposals? Please state your opinion and provide comments below.

- 3.47. We **support** a strong gateway to the neighbourhood. We question why the Southern Neighbourhood does not have a similarly strong gateway, instead positioning a Multi-Storey Car Park at its entrance.

20. Do you have any comments on the Northern Neighbourhood proposals? Please state your opinion and provide comments below.

- 3.48. No.

21. Do you have any comments on the Eastern Neighbourhood proposals? Please state your opinion and provide comments below.

- 3.49. No.

22. Do you have any comments on the Integrated Assessment or Integrated Assessment draft Scoping Report? Please state your opinion and provide comments below.

23. Do you have any comments on the evidence base documents?

Townscape and Visual Impact Assessment

- 3.50. We note that the TVIA states that “the AAP masterplan is a visionary ideal to guide future development. The masterplan is illustrative only and presents one interpretation of the guiding urban framework principles. This TVA assesses the likely effects of the urban framework principles that guide the masterplan and AAP proposals as set out in chapters 4 and 5.”
- 3.51. We agree that the TVIA only assesses the approach set out in the AAP.
- 3.52. The TVIA does not assess any other options, including alternative development heights or massing. This is important, because it means the AAP should not be used to prescribe maximum building heights.
- 3.53. We disagree with much of paragraph 4.23 of the TVIA, including the following:
- *“It has a high value for its sense of place and rarity being a unique, international sporting venue.”* Old Trafford is one of 11 international cricket grounds in England and Wales and is not unique.
 - *“It has high legibility for event days.”* Event days at the cricket ground are less common than non-event days, assuming events are cricket matches and concerts.
 - *“It has medium high functionality as public spaces are generally taken over by facilities on event days.”* The public spaces are the highways. The remainder of the area is either

LCCC land (to which there is no public access, unless a paying customer) or the site of the former B&Q.

Transport Assessment

- 3.54. We note the TA assumes the multi-storey car park on Great Stone Road will accommodate between 600 and 900 spaces.
- 3.55. The TA notes the existing access point to the former B&Q is the only feasible access point to the car park.
- 3.56. The TA's junction assessment shows that the Mean Maximum Queue for the Great Stone Road / Talbot Road junction would increase from 27.6 to 155.9. This is a staggering increase in congestion as a result of the development proposals within the AAP and is reason to find the allocation of the site for a car park flawed and unsound.

Heritage Statement

- 3.57. We agree with the list of heritage assets, and welcome the clarification that the non-designated asset within the cricket club's demise is the pavilion, rather than the whole ground.
- 3.58. Whilst the pavilion can be glimpsed from Great Stone Road, the nature of cricket pavilions is that they tend to be inward-looking, ie towards the centre of the playing area, and rarely intended to face out to their surrounding areas. Hence the redevelopment of the cricket ground included modern outward-looking buildings opposite the Town Hall at the rear of the old pavilion, as well as modern development framing the pavilion facing the pitch.

Other comments

- 3.59. The consultants who have prepared the Area Action Plan have mixed up some images. The photos on pages 21 and 163 are not of the consultation associated with the Civic Quarter SPD / masterplan / Area Action Plan. The photos were taken at the pre-application consultation event for the development in the grounds of UA92.
- 3.60. Finally, we **object** to the fact that there is not even a question relating to CQ3 in which respondents can give their views on the provision of a new leisure centre in the southern neighbourhood. This is the only policy without a specific question.

4. Leisure Centre

- 4.1. In September 2017 an Economic Impact Assessment (EclA) of UA92 and related developments in Trafford was published. This partly related to the UA92 campus, defined as:

UA92 Campus: anchored by the creation of 'UA92' a new specialist sports, business and media university, which will offer degrees accredited by Lancaster University, and is expected to support around 6,000 students by 2025. The UA92 Campus will also include a Technology Hub for global technology and digital firm Microsoft, a new community leisure centre, and supporting retail and residential developments.

- 4.2. The EclA specifically considered a leisure centre being provided at the UA92 campus:

The new leisure centre, replacing the existing Stretford Leisure Village, can be expected to lead to higher levels of usage and participation, from which a range of positive effects may be realised including physical and mental health outcomes, quality of life, and positive crime and anti-social behaviour outcomes. Alongside the employment opportunities delivered by the plans, these positive effects for individuals may lead to a reduction in demand for Council services.

- 4.3. The EclA noted that by 2025, at full capacity, UA92 anticipates 6,000 students, and that the education campus on site will include “**a new state of the art leisure centre**” and around 150 apartments and a multi-storey car park.” (WSP | Indigo emphasis)

- 4.4. The EclA is based on this proposal.

- 4.5. Page 24 of the EclA states that:

Although the proposed leisure centre will primarily be aimed at students on campus, there is the possibility of allowing communal access of its facilities during off peak times in order to realise such benefits.

- 4.6. A report to the Council Executive in October 2017 recommended that the Executive:

Approve in principle the relocation of Stretford Leisure Centre to a new facility on the Kellogg's site, subject to consultation through the refreshed Stretford Masterplan and to finalisation and approval of a business plan. The EclA was a background paper to this report.

- 4.7. The report to Executive noted the following:

It is proposed that a new Leisure Centre is built alongside the refurbishment of the current Kellogg's building, with a target opening date of March 2020. The existing facility will remain open throughout this period to ensure continuing leisure provision in Stretford. It is proposed that the existing site will then be developed, with the receipt generated forming an element of the funding package for the new facility.

- 4.8. It should be noted that the Refreshed Stretford Masterplan **did** endorse the siting of the new leisure facility on the UA92 campus.

- 4.9. It should also be noted that the Council has failed in its stated proposal to build the leisure

centre alongside the refurbishment of the Kellogg's building. As such, by March 2020 the Council has still not provided a replacement leisure centre and the residents of Stretford are forced to continue using their out-dated leisure centre. Due to this failure, the Council is now proposing to compulsorily purchase the B&Q (at further cost to the local taxpayer), rather than provide the leisure centre on the site on which it was originally earmarked and for which the land was presumably acquired.

4.10. In the draft Refreshed Stretford Masterplan, the Council stated that "the proposals include a new state-of-the-art leisure centre as part of the UA92 Campus Quarter. This will replace the existing Stretford Leisure Village, providing a significantly improved facility that is available for everyone to use."

4.11. The final version of the Refreshed Stretford Masterplan (January 2018) stated:

The (Kellogg's) site will also incorporate a new state of the art leisure centre to replace the existing Stretford Leisure Village (Chester Centre) and provide a significantly enhanced facility. This facility will be owned by Trafford Council, and managed by Trafford Leisure, alongside the other Council leisure centres, and local residents will continue to have exactly the same access to the new leisure centre as they do now. It is recognised that any new leisure centre needs to have sufficient capacity to meet the future needs of all users and more detailed proposals for the proposed new leisure centre and the facilities it will contain will be prepared in 2018.

4.12. However by late 2018 the site for the leisure centre had moved to LCCC land, as per the Civic Quarter Masterplan:

Leisure Quarter: To build on the existing success of LCC as a leisure destination, through improved connectivity around the stadium and the creation of a new civic square. Building on the identity as the Leisure Quarter, the area also offers the unique opportunity to provide a new modern public leisure centre with direct links to LCC's outdoor pitches, which will create a unique combination of indoor and outdoor sport provision.

4.13. At a similar time, the Leisure Investment Strategy in October 2018 stated:

The health inequality gap is at its most stark in Old Trafford and Stretford. The opportunity to create a Masterplan to improve the Civic Quarter around the Town Hall and Lancashire County Cricket Ground along with the emergence of UA92, were both unknown factors when the original report was submitted. The option therefore of relocating the leisure centre has emerged as a more cost effective option that will have a bigger impact on addressing the health inequalities in the locality. A new build leisure centre serving the local communities of Stretford and Old Trafford is now proposed and in part the sale of the existing capital asset of the current site provides a financial benefit to this scheme.

4.14. The 'standard model' for the leisure centre included for 300 car parking spaces (albeit the AAP's TA assumes 600 to 900 spaces).

4.15. Furthermore:

Proposals for the final siting of the leisure centre will be dependent upon the results of the Civic Quarter Master Plan consultation however approval is sought for the overall capital expenditure. The exact location will be confirmed when the masterplan proposals are submitted for approval by the Executive, expected to be February 2019. It is assumed

that there will be no additional land costs as these have already been covered as part of the civic masterplan land assembly arrangements. It is designed and firmly positioned as community leisure centre predominantly serving residents in the Stretford and Old Trafford areas but also of sufficient capacity to meet the needs of an expanding student population at UA92.

4.16. If the leisure centre is to be located on third party land, there will be further land assembly costs.

4.17. The total construction cost including overheads, inflation and car parking for 300 cars was stated to be £24.460m. However this was explained thus:

This approach has been proposed in consideration of the circumstances specific to Stretford. The new facility is proposed to be constructed on a relatively flat brown field site with no existing buildings and manageable logistic arrangements. We can use this opportunity to drive the design and really test the market. There would be no loss of service to residents as the existing leisure centre would remain open during the build phase.

4.18. The current proposed location on the former B&Q would require demolition costs in addition to the construction cost and the land assembly cost.

4.19. The build cost also contradicts the assumption in the Transport Assessment that there will be between 600 and 900 car parking spaces in the car park.

4.20. The report also noted that there will be a 125-week process to complete and open the leisure centre:

Stretford Leisure Centre will be complete and operating by half year (June) 2021 following an 125 week lead time, subject to a successful Executive approval 29th October 2018.

4.21. With the associated land assembly process and the need for the Civic Quarter Area Action Plan to progress, in order for a leisure centre to be delivered on the former B&Q site, this 2 ½ year process is likely to be extended by at least another 18 months.

4.22. Therefore the Council is unlikely to open its new leisure centre until 2024, unless it reverts to its endorsed intention to develop it on the UA92 campus, or on land controlled by LCCC.

4.23. It should also be noted that the consultation report following the CQ Masterplan stated:

Some concerns were raised in relation to the need to ensure public access is retained for local residents and therefore provide an enhanced facility to cater for increased use by students.

Any new leisure centre should be accessible to all end users, including people with disabilities, maintain existing prices and ensure better connections to the Metrolink stop and public transport.

There were some suggestions that any new leisure centre should be relocated to Stretford Town Centre.

4.24. The Area Action Plan has not assessed the availability of other sites for the leisure centre, including – significantly – one located immediately adjacent to the Metrolink stop, and which was previously identified in draft policies, in formal Council reports and in published impact assessments as a site fundamentally intended to accommodate a leisure centre.

5. Conclusion

- 5.1. We trust that these representations will be taken into account as the next iteration of the Area Action Plan is produced.
- 5.2. These representations demonstrate that if the current plan is taken forward to examination, it will be found unsound for the following reasons:
- The plan will not be justified, as the alternative sites for the leisure centre, namely the UA92 land and the LCCC land, are undeniably more appropriate.
 - The plan will not be consistent with the policies in this Framework, insofar as it fails to consider whether the proposed leisure centre in a sequential manner.
 - The plan will not be deliverable, as the delivery of a leisure centre on the former B&Q relies will rely on compulsory purchase, of which there is no certainty.
- 5.3. In order to be sound, the plan should allocate the leisure centre to a site that is available and deliverable, and more appropriate in terms of ownership, compatibility with neighbouring uses, viability and which have already been identified and assessed.
- 5.4. The former B&Q should consequently be identified for residential purposes, to help deliver the first tranche of the 4,000 homes across the forthcoming 15 years.

Appendix D

REPRESENTATIONS TO CQAAP (2021)





Accrue (Forum) 1 LLP

CIVIC QUARTER AREA ACTION PLAN

Representations



Accrue (Forum) 1 LLP

CIVIC QUARTER AREA ACTION PLAN

Representations

TYPE OF DOCUMENT (VERSION) CONFIDENTIAL

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1 EXECUTIVE SUMMARY

- 1.1.1. WSP has prepared these representations on behalf of Accrue Capital, the owners of the former B&Q on Great Stone Road.
- 1.1.2. Accrue Capital support the change in allocation from leisure to residential, following several years of promoting the site and demonstrating to the Council that this site is not suitable for a leisure centre or multi-storey car park. It is however disappointing that this change has only taken place after the Council went to the expense of securing authority to progress a Compulsory Purchase Order (CPO) to acquire the site for a leisure centre.
- 1.1.3. We also welcome the aim for 4,000 homes to be delivered, on brownfield land, in this highly accessible area of change, however greater clarity and consistency is needed as to where these homes will be viably and realistically delivered.
- 1.1.4. The majority of the land identified for the 4,000 new homes is in existing alternative uses, so bringing the B&Q forward for 333 homes in the short-term will help kickstart the much-needed regeneration of the Civic Quarter, whilst also improving the character and streetscene of Great Stone Road.
- 1.1.5. The phasing of development has not been presented and so it has not been demonstrated that the AAP can deliver the quantum of homes urgently needed to address the housing shortfall within the borough.
- 1.1.6. Moreover, the building height limitations are not grounded in evidence as alternative building heights and massing has not been assessed in the preparation of the AAP and the plan is unsound due to no assessment of alternatives to ensure justification based on evidence underpins the plan's policies.
- 1.1.7. Furthermore, the infrastructure sum proposed is not compliant with the Regulation 122 tests and will have a huge impact on the viability and deliverability of the AAP, as well as the housing supply and delivery across the borough, with consequential economic and social impacts.

2 INTRODUCTION

- 2.1.1. WSP has prepared these representations on behalf of Accrue Capital, the owners of the former B&Q on Great Stone Road.
- 2.1.2. The Council as both a corporate body and as local planning authority is aware of Accrue Capital's vision and objective to redevelop the site for residential-led uses, with discussions having taken place since 2017.
- 2.1.3. Accrue Capital has regularly met with the LPA to discuss the site, with a planning application for 333 dwellings having been submitted last year, which has been appealed due to non-determination.
- 2.1.4. Accrue Capital has also made representations on the local plan issues and options, the Refreshed Stretford Masterplan, the Civic Quarter Masterplan and the Regulation 18 Civic Quarter Area Action Plan consultation.
- 2.1.5. Accrue Capital has never disputed that Stretford and Old Trafford needs regeneration. These representations do support much of the Area Action Plan. However, the representations also explain why we object to certain elements and highlight particular shortfalls that will render the plan unsound.
- 2.1.6. The representations are structured in line with the consultation survey questions.
- 2.1.7. Accrue Capital welcome any dialogue with the Council regarding the redevelopment of the B&Q, particularly because to date any change to the Council's preferred use of the site has only been ascertained through a review of published material, and not through any meaningful discussions with the landowner or their agent.

3 CONSULTATION SURVEY

3.1.1. This section is structured in line with the consultation survey, setting out the questions which are most relevant. The first five questions relate to contact details and so this section begins with question 6.

3.1.2. Contact details are:

Matt Hard, Matthew.hard@wsp.com.

3.2 TESTS OF SOUNDNESS

3.2.1. Whilst we support the overall ambition of the CQ AAP, there are areas where further work is required in order to meet the tests of soundness.

3.2.2. Our comments are set out under the following headers.

6. Is the CQ AAP positively prepared?

3.2.3. We **support** the ambition to deliver 4,000 new homes in this location, though the AAP should confirm this to be a minimum. However, Policy CQ2 (Housing) should specify the period in which these homes will come forward. The draft policy wording is currently mute on this point.

3.2.4. There are some significant inconsistencies between the CQ AAP and the emerging Local Plan which is also being consulted on, with regards to how the AAP will meet the area's objectively assessed needs.

3.2.5. Draft Policy HO1.6 of the draft Local Plan states that the CQ will provide around 2,700 dwellings, rather than the 4,000 referred to in the draft AAP. Page 163 of the draft Local Plan sets out the phasing of development in the Civic Quarter for a total of 1,689 dwellings to 2037 and beyond:

- 0 to 2024/5,
- 540 from 2025 to 2030,
- 680 from 2030 to 2035,
- 400 from 2035 to 2037
- 69 from 2037 onwards.

3.2.6. In order to be positively prepared, the AAP should be clear in how the area's objectively assessed needs will be met. To do this, the AAP should set out a trajectory of allocated sites to demonstrate how at least 4,000 homes will be delivered. It is also crucial that the AAP and the Trafford Local Plan are consistent with each other; at present it reads as if the two plans have been prepared by different authorities given the discrepancy of more than 2,300 homes across the Civic Quarter. As such we **object** to the absence of any phasing or any allocation of homes across the neighbourhoods or sites.

3.2.7. In terms of the phasing of these homes, the B&Q site can provide 333 new homes by 2024, based on the grant of planning permission in 2021.

3.2.8. The CQ AAP and evidence base documents do not provide an indication of the number of units apportioned for each site and without this information it is unclear how development will be phased and delivered. Nor has a residential appraisal of the redevelopment of the B&Q been undertaken.

- 3.2.9. The AAP should also identify the following challenges:
- Failure to demonstrate a five-year housing supply across the borough;
 - Failure against the Housing Delivery Test across the borough; and
 - Measures outlined in the Housing Delivery Test Action Plan to ensure delivery of new homes in the strategic locations across the borough, including the Lancashire Cricket Club Quarter, which falls within the proposed CQ AAP boundary.
- 3.2.10. With regard to the HDT Action Plan, its proposed actions include working with landowners on the CQ AAP. To date, the working with landowners has been minimal, as evidenced by the habitual failure for the team preparing the AAP to engage meaningfully with Accrue Capital.
- 3.2.11. Without having regard to the aforementioned challenges, the AAP runs the risk of failing to help solve the problems that the Council need addressed, namely a land supply of less than three years and a persistent failure to deliver the number of new homes required.
- 3.2.12. The plan is therefore **unsound** and not positively prepared.

7. Is the CQ AAP justified?

Building Heights

- 3.2.13. We **object** to the building height parameters. The building height limits proposed are not justified and could impact on the deliverability of the AAP.
- 3.2.14. The TVA (5.15) states that a six-storey limit to the B&Q site redevelopment is due to sensitivities in height to neighbouring suburban homes. We **disagree** with this. The TVA only tests the Council's assumptions, it does not consider the acceptability of a range of different building heights and therefore evidence is not presented to justify the building height parameters proposed.
- 3.2.15. The B&Q site is capable of accommodating buildings taller than six storeys, without impacting on residential amenity, heritage assets or local character, but this has not been tested within the evidence base to the AAP.
- 3.2.16. The acceptability of taller building heights at the B&Q site has been tested and demonstrated within technical reports prepared for the recent planning application for 333 homes. Documents associated with the application are provided in **Appendices A-C**, so that the AAP Inspector has the benefit of that evidence.
- 3.2.17. The recent planning application for 333 homes (four to nine storeys) has also undergone design review with Places Matter. The Places Matter Design Panel did not share the Council's position that the site could only accept a building of at most six storeys. Within their written response (**Appendix D**), Places Matter stated:
- "The Panel expressed its clear view that a site of this significance feels right for development at this scale, height and massing. The Panel did not agree that there was any need to define a rigid datum at six storeys and that justification could be made to adjust this as outlined in more detail below".*
- 3.2.18. The CQ AAP should also encourage independent design review of major applications.

Townscape and Visual Assessment (TVA)

- 3.2.19. We note that the TVA (January 2020) prepared for Trafford Council states that *"the AAP masterplan is a visionary ideal to guide future development. The masterplan is illustrative only and presents one interpretation of the guiding urban framework principles. This TVA assesses the likely effects of the*

urban framework principles that guide the masterplan and AAP proposals as set out in chapters 4 and 5.”

- 3.2.20. As the TVA only assesses the approach set out in the AAP, and one that is illustrative, it is clear that different reasonable alternatives have been considered and assessed in this respect.
- 3.2.21. The TVA does not assess any other options, including alternative development heights or massing. This is important, because it means the AAP should not be used to prescribe maximum building heights.
- 3.2.22. We **disagree** with much of paragraph 4.23 of the TVA, including the following:
- *“It has a high value for its sense of place and rarity being a unique, international sporting venue.”* Old Trafford is one of 11 international cricket grounds in England and Wales and is not unique.
 - *“It has high legibility for event days.”* Event days at the cricket ground are less common than non-event days, assuming events are cricket matches and concerts.
 - *“It has medium high functionality as public spaces are generally taken over by facilities on event days.”* The public spaces are the highways. The remainder of the area is either LCCC land (to which there is no public access, unless a paying customer), the site of the former B&Q, or other private land.
- 3.2.23. To conclude, there is no evidence to confirm that the building heights are justified, and the plan is therefore **unsound**.

Heritage Statement

- 3.2.24. We agree with the list of heritage assets and welcome the clarification that the non-designated asset within the cricket club’s demise is the pavilion, rather than the whole ground.
- 3.2.25. We **agree** that views of the pavilion are generally limited to within the ground and that from Talbot Road the historic building is no longer recognisable and has the appearance of a modern sporting venue and facilities (page 28 of the Heritage Assessment).

Gateway opportunities

- 3.2.26. We question why three of the four corners of the AAP have “gateway opportunities”, but there are no gateway opportunities identified in the south-western corner. A well-designed residential scheme, of critical mass and population, will act as a cornerstone to this part of the area and screen the rear view of the cricket stands.
- 3.2.27. We **support** efforts to connect Old Trafford Metrolink with Great Stone Road, which has been incorporated into all proposals tabled for the redevelopment of the former B&Q.

AAP Design Code

- 3.2.28. It will be difficult to ensure all ground floor units have entrances directly from streets or public spaces, as set out in Page 1 of the Design Code (‘Frontages’, bullet point 6), especially in the courtyard-style developments encouraged elsewhere in the design principles.
- 3.2.29. This principle should be reworded to “ground floor units are encouraged to have direct entrances where possible, subject to other design principles.”
- 3.2.30. We **support** the concept of courtyard-style developments.

- 3.2.31. Bullet point 4 of the ‘amenity’ section needs to be revised. Other design principles encourage balconies, front garden and active frontages. It may not be possible to “respond to any noise issues” whilst still providing these valuable amenity spaces.
- 3.2.32. All the principles identified in the ‘residential quality’ section will be difficult to incorporate whilst achieving the densities of development envisaged. Evidence should be provided which demonstrates how developments can be designed to meet all these principles.
- 3.2.33. Bullet point 4 of “form and massing” states that a minimum of 18m should be provided between facing windows for buildings of up to and including 6 storeys in height, with more space for taller buildings. This is supported. However it should be noted that the front façade of the proposed development at the B&Q site (for 333 homes) would be located between approximately 34 metres and 43 metres from the front elevation of the existing residential dwellings on Great Stone Road, and between 41 and 44 metres to the facade of the houses on Trent Bridge Walk. This suggests that with regards to separation distances, a building taller than six storeys in this location would be appropriate, subject to an assessment of daylight/sunlight. It demonstrates further that the AAP is not grounded in evidence and an assessment of reasonable alternatives.

Affordable Housing Contribution

- 3.2.34. The evidence supporting affordable housing policies is insufficient.
- 3.2.35. The draft AAP proposes a minimum of 25% Affordable Housing. It is not clear how this policy can be treated as a minimum, because in most scenarios, an applicant won’t commit to a higher proportion, and there is no mechanism proposed to control this.
- 3.2.36. The viability assessment reports that the CQ area can viably support provision of 25% on-site affordable housing, however the viability assessment only tests two scenarios; 20% and 25% affordable housing. This is further reason for the 25% affordable housing to be a maximum not a minimum.
- 3.2.37. The emerging Local Plan is also in preparation and is being consulted on currently. The draft Local Plan proposes 40% affordable housing across the borough, significantly higher than the 25% proposed within the draft AAP. This higher proportion of affordable housing has not been tested within the CQ AAP viability assessment and so it is not clear whether this would be deliverable.
- 3.2.38. Both the Local Plan and the AAP will have development plan status, so clarity is required as to which policy takes priority. It also brings into question how robust the local plan is, if it assumes 40% affordable housing across the borough when only 25% is allegedly viable in the Civic Quarter.
- 3.2.39. Furthermore, no developments in the AAP area have been found viable at 25% affordable housing:

Table 3.1 Affordable housing provision within the AAP

Site name	Application reference	Total Homes	Affordable housing
UA92	99795/OUT/20	Up to 750	15%
86 Talbot Road	88792/FUL/16	90	0%

MKM House	101651/FUL/20 (awaiting decision)	88	0% (as set out in the applicant's viability report).
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3.2.40. Therefore, the AAP is **unsound** because its affordable housing policy is not justified.

8. Is the CQ AAP effective?

3.2.41. We consider that the following will inhibit the deliverability of the CQ AAP:

- Absence of phasing and delivery of new homes;
- Building height parameters; and
- Infrastructure sum.

Infrastructure sum – the principle

3.2.42. We **object** to the introduction of a fixed rate financial contribution (per sqm) imposed on all development, which would cover “area-wide” infrastructure costs, and which would be secured via S106 planning obligations. We understand the sum would cover drainage, a new substation, public realm and highways improvements, hostile vehicle mitigation, green space, education, health, leisure and sports facilities and utility upgrades.

3.2.43. The Infrastructure Sum should meet the legal tests as set out in regulation 122 of the Community Infrastructure Regulations 2010 and Paragraph 56 of the NPPF, ie be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

3.2.44. By applying a fixed rate contribution across the AAP area, it requires development proposals to fund improvements which are not necessary to make the development acceptable in planning terms and which do not directly relate to the development. As an example, the B&Q site would be required to pay contributions towards drainage when the site can be suitably drained without off-site improvements. Therefore, this levy would not satisfy the three tests.

3.2.45. Furthermore, private market homes, leisure uses and hotels in this area are already subject to CIL charging.

Infrastructure sum – impact on viability

3.2.46. It is useful to apply the proposed infrastructure sum to known schemes within the Civic Quarter, to understand how viable the levy will be. For example, the proposed redevelopment of the B&Q for 333 homes is currently expected to provide circa £1,000,000 of S106 financial contributions alongside affordable housing. Notwithstanding the ongoing dispute with the LPA regarding the viability of the development, the AAP’s levy would almost treble the contributions to circa £2,970,000 from the identical scheme. This would seriously jeopardise its viability and therefore brings into question the effectiveness of this policy.

3.2.47. The approved application to develop a mixed-use scheme in the grounds of UA92 would also be seriously affected by the levy. The Council and Bruntwood’s JV scheme was found to be viable providing:

- More than 51,000 sqm of residential floorspace;
- More than 26,000 sqm of commercial floorspace;

- 15% affordable housing; and
- Approximately £1.1m of financial contributions.

3.2.48. Applying the AAP’s levy to this scheme would have required more than £9,000,000 of financial contributions alongside 25% affordable housing. This is substantially greater than what was agreed to be viable between the applicant and the LPA.

3.2.49. It is clear that the S106 contributions set out in the AAP, allied with CIL, will seriously and significantly undermine the viability and deliverability of the AAP, with consequential and fundamental impacts upon the borough’s housing land supply, the borough’s housing delivery and the economic and social characteristics of its communities. The AAP would be **unsound** as it would not be effective.

Sustainable stormwater management

3.2.50. A comprehensive stormwater management strategy is recommended with the Public Realm Code. We recognise that this is proposed across the AAP Area, however we wish to reiterate that the recent residential planning application at the B&Q site can drain itself adequately without further intervention. This demonstrates that taking a blanket approach to infrastructure funding is not consistent with the tests for planning obligations.

9. Is the CQ AAP consistent with national policy?

3.2.51. As set out in the previous sections, we consider that the plan is not deliverable (notably due to height restrictions, affordable housing, infrastructure levy), which is inconsistent with Paragraph 35 of the NPPF, and it is also not based on sound evidence and assessment of reasonable alternatives. Nor is the levy consistent with the CIL Regulations and NPPF and is therefore **unsound**.

3.2.52. We are **supportive** of the intention to encourage small scale retail uses which meet local needs (Policy CQ3 Mixed Use Communities) and consider this approach for mixed communities is consistent with NPPF policies.

10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?

3.2.53. No.

11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.

3.2.54. Our key comments relating to the tests of soundness are summarised within the table below:

Table 3.2. Tests of soundness and modifications proposed

Policy / page no.	Reason for not meeting test of soundness	Modifications proposed
Policy CQ2	The policy should specify the period in which 4,000 homes will come forward.	The policy should specify when homes will come forward, i.e. “4,000 homes will come forward up to 2037”
	Phasing of development is not provided, which undermines the	A residential appraisal of the B&Q site should be undertaken.

	<p>deliverability of the AAP (paragraph 16(b) of the NPPF).</p> <p>There are inconsistencies with the development capacity of the CQ AAP within the AAP and the emerging local plan.</p>	<p>An indication of the number of units should be provided by site, in order to understand delivery and phasing of development over the AAP period.</p> <p>The number of new homes proposed within the area should be consistent between the CQ AAP and emerging Local Plan. The Local Plan states that 1,689 dwellings will be phased, but this contradicts the 4,000 homes figure within the AAP. We will respond to the Local Plan consultation accordingly.</p>
Parameters Plans (Page 63)	<p>Building heights are not justified. The TVA does not assess any other options, including alternative development heights or massing.</p> <p>The building height limits proposed could undermine the deliverability of the AAP (paragraph 16(b) of the NPPF).</p>	<p>The building height parameters plan should be omitted or revised to allow for taller building heights within the southern neighbourhoods.</p> <p>An assessment which considers taller building heights should be undertaken to justify the heights proposed.</p>
Policy CQ11 Infrastructure and Obligations: Infrastructure Sum	<p>The fixed rate financial contribution proposed does not meet the legal tests set out in Regulation 122 of the CIL Regulations 2010.</p> <p>This policy will undermine the deliverability of the AAP, in opposition to paragraph 34 of the NPPF.</p>	<p>Infrastructure delivery should only be sought within the AAP, where it meets the tests set out in Regulation 122 of the CIL Regulations 2010.</p>
Policy CQ11 Infrastructure and Obligations: Affordable Housing contribution	<p>The viability assessment only considers 20% and 25% affordable housing scenarios. Whereas the emerging Local Plan is proposing 40% affordable housing borough wide. This scenario should be assessed in accordance with the NPPF tests of the soundness (paragraph 35(d)).</p>	<p>The viability assessment should assess more than two scenarios where the emerging local plan is proposing much higher affordable housing delivery than 25%.</p>
AAP Design Code	<p>It will be difficult to ensure all ground floor units have entrances directly from streets or public spaces.</p>	<p>Evidence should be provided which demonstrates how developments can be designed to meet all the residential quality principles.</p>
4.23 of the TVA	<p>We disagree with the identified townscape value of the Sports and Recreational Character Area.</p>	<p>This should be revised to reflect our comments at 3.2.19.</p>

12. Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.

3.2.55. Please refer to table 3.2.

13. Are you proposing modification(s) to make the CQ AAP sound or to strengthen its soundness?

3.2.56. Please refer to table 3.2.

14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.

3.2.57. Please refer to table 3.2.

15. If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?

3.2.58. Yes, we wish to participate in the Examination in Public.

16. Reason for Attending the Examination – Soundness. Please note that participation in the Examination will be at the discretion of the appointed Inspector. If you wish to participate in the Examination, please outline why you consider this to be necessary.

3.2.59. Accrue has a wealth of evidence and understanding of the local context that brings the deliverability of the AAP into doubt.

3.2.60. Accrue Capital is one of the main landowners within the AAP, owning 1ha of land that has been consistently promoted for residential development for more than four years. Hitherto the LPA has identified the B&Q for alternative uses associated with the UA92 development and subsequently a leisure centre and multi-storey car park. The Council had obtained CPO authority to commence proceedings to acquire the B&Q site for a leisure use which has added additional cost and complexity to promoting the site for residential developments.

3.2.61. Whilst the ongoing disagreement between the Council and Accrue Capital about the future of the B&Q site has slowly softened, there remains dispute about the scale of development the site can withstand.

3.2.62. It is also essential to attend the Examination to interrogate the Council's assumptions (if there are any) on phasing, the number of homes on each allocation and the deliverability thereof, as well as the proposed levy.

23. Further comments

3.2.63. The consultants who have prepared the Area Action Plan have mixed up some images. The photos on pages 21 and 163 are not of the consultation associated with the Civic Quarter SPD / masterplan / Area Action Plan. The photos were taken at the pre-application consultation event for the development in the grounds of UA92.

4 CONCLUSIONS

- 4.1.1. Accrue Capital is a major landowner within the Civic Quarter, who have been promoting the former B&Q for residential development for several years. Accrue **support** the re-allocation of the B&Q for residential development, following previous plan iterations that proposed a leisure centre and car park on the site.
- 4.1.2. Accrue Capital have long **supported** this area being in need of regeneration and change; indeed, part of this area was identified as a Strategic Location in the Trafford Core Strategy. The objective to deliver 4,000 new homes on brownfield land in this strategic area of change is also **supported**.
- 4.1.3. However, the plan is **unsound**.
- 4.1.4. There is no phasing of the 4,000 homes.
- 4.1.5. The 4,000 homes are not distributed across the AAP in specific allocations or target capacities.
- 4.1.6. The figure of 4,000 homes is contradicted by the draft Local Plan, which the Council is concurrently consulting on.
- 4.1.7. Without setting out allocations and phasing trajectory that demonstrates action to swiftly improve the Council's housing land supply and enable the delivery test to be passed, the plan fails to be positively prepared.
- 4.1.8. The imposed building heights across the Civic Quarter are not justified by evidence; there has been no assessment of alternatives. The building heights are contradicted by other design policies within the AAP and should be amended. Notably, there is no evidence to impose a maximum of six storeys on the B&Q site. It should be noted that the local Design Review panel agreed. The AAP is not justified in this regard, and delivery of the AAP and the required homes to improve land supply and delivery may be prejudiced as a result.
- 4.1.9. There is no justification for the affordable housing policy being treated as a minimum; furthermore, no developments in the LCCC Strategic Location (which forms part of the AAP) have been able to viably provide 25% affordable housing. Delivery of the new homes is therefore questioned, if the 25% affordable housing is persisted with, even as a maximum.
- 4.1.10. The imposition of a levy-style infrastructure sum to be secured via S106 does not meet the tests set out in legislation and policy.
- 4.1.11. Furthermore, the infrastructure sum will have a substantial and detrimental effect on the ability for the Civic Quarter to provide new homes. This will be disastrous for the Civic Quarter and for the borough as a whole, with harm to the social and economic interests of the borough's communities.
- 4.1.12. Accrue Capital look forward to discussing these points with the Inspector, and indeed with the LPA should they wish.



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