



Hearing Statement

Matters 6-10

- 6 Urban Design
- 10 Movement and Car Parking Strategy

On behalf of:

Derwent Development Management Ltd

In respect of:

Trafford Civic Quarter:

Area Action Plan

Examination in Public

Date:

March 2022

Reference:

MA/DDML/029-3/R003m

1.0 Introduction

- 1.1 This Hearing Statement is submitted in respect of document INS-01 as it pertains to Matters 6-10 inclusive. A key thrust of our response in this respect is the policy framework as it will pertain to the uses impacting White City Retail Park and other property assets in DDML's ownership.
- 1.2 We have previously submitted representations to earlier stages of consultation to the AAP on behalf of Derwent Group. These representations are submitted on behalf of DDML as Derwent has restructured its business and its trading company is now DDML.
- 1.3 This Statement provides responses to the following questions from Matters 6-10 of INS-01, whilst clarifying for completeness that we provide no comment upon Matters 7-9 inclusive:
- 6.1 (Policy CQ5)
 - 6.4 (Policy CQ6)
 - 6.5 (Policy CQ6)
 - 6.7 (Policy CQ6)
 - 6.8 (Policy CQ6)
 - 10.1 (Policy CQ10)
 - 10.6 (Policy CQ10)
 - 10.10 (Policy CQ10)
- 1.4 In the context of Policy CQ5, the Inspector may be aware that we issued representations to the consultation version of this Plan which was primarily focused upon concerns in terms of the conclusions of evidence base material to the AAP vis a vis the significance of existing buildings and a suggested Conservation Area that was mooted in an early iteration of guidance to masterplan the AAP area.
- 1.5 In regard to Policy CQ6, we made no specific representations at Reg 19 stage. However, the Council now proposes to amend key components of the prior approach which includes the removal of the "key gateway locations" designation which we see as a fundamental change. If that had been introduced at Reg 19 stage then we would have objected strongly. This is therefore our first opportunity to comment on the revised position and we would welcome the opportunity to engage given our status as a key affected landowner.
- 1.6 We are therefore compelled to prepare and submit this Statement to assist the Inspector to draw out this information from the Council at the Examination.

- 1.7 We note the MIQs that relate to Policy CQ10 and look forward to the Council's responses to these (notably 10.6). We set out that work has commenced re the preparation of a Statement of Common Ground with Trafford Council and there is potential that any areas of difference between the parties could be reduced prior to the Hearing sessions being commenced. We reserve the right to respond to the Council's comments regarding INS-01.

2.0 Responses to Key Questions

Matter 6 Urban Design

6.1 *Policy CQ5 – Conservation and Heritage - aims to strengthen and celebrate the historic urban grain. How would this urban grain be best described and are the three criteria for development proposals an appropriate and sustainable response to ensure the Plan is sound? How far should the policy reflect the area’s sporting and cultural heritage, e.g., the Manchester Botanical Gardens and White City? Does the Plan provide sufficient focus on the area’s unique heritage?*

- 2.1 We submitted representations in the context of Policy CQ5 to the earlier consultation windows including Reg 19 consultation in March 2021. These were primarily focused upon the evidence base which informed the AAP and to seek firm clarification as to the Council’s intentions regarding some earlier recommendations from prior masterplanning work.
- 2.2 As an initial point, we highlighted a suggestion within the original evidence base material (the Heritage Assessment) to recommend a new Conservation Area to be designated. Whilst this recommendation was not taken forward into the Reg 19 AAP or referred to under Policy CQ5, we wanted to secure express confirmation that it would not be intended because it would not pass the relevant tests.
- 2.3 The Council’s “Summary of Reps and Council Responses” document makes brief reference to our representations in connection with the Conservation Area query and confirms that the AAP is not seeking to take this forward. We welcome and support this clarification.
- 2.4 In response to the MIQ above, we surmise that the Inspector is challenging the extent to which these three criteria respond to the Council’s objective as set out in the final paragraph of the text in the yellow box relating to section 4.5 of the AAP, as extracted below:

"As demonstrated in Section 2, the area has a rich and fascinating history in culture, sports, events, health and wellbeing which unfortunately has been eroded over time. The Council’s objective is therefore to not only ensure that the remaining heritage assets are retained and enhanced but also ensure that the historic urban grain is strengthened and that the untold history of the area is celebrated."
- 2.5 Our high-level analysis is that the application of the three criteria in isolation would not necessarily provide strong positive contribution to celebrating historic uses within the AAP area or to strengthen urban grain.
- 2.6 In reality, two of the three key criteria (2 and 3) would be applicable to proposals where developers can control the use and form of identified heritage assets. Only the first criterion

would be applicable to other proposals in the AAP area that might need to consider solely the setting of heritage assets and how their proposal might impact upon its significance.

- 2.7 If it is genuinely intended that the AAP should seek to celebrate local history it might be appropriate to develop a cohesive local heritage strategy underpinned by archive research, to develop interpretive materials and include elements of historic built form where feasible.

6.4 *Should the Plan clarify the strategic views which are worthy of protection and are there other key criteria which should be included in the Plan?*

- 2.8 The AAP has a key aim to deliver a cohesive new neighbourhood with significant intensification in terms of places to live and work. As to where these should be hosted within the AAP area, there would be some logic in identifying sensitive areas where the intensity of built form might be limited.
- 2.9 In the context of the eastern part of the AAP area close to Trafford Bar metro station, this was originally identified as a gateway location but that designation is now proposed to be omitted and yield suppressed as a consequence. We have objected to this suggested Modification.
- 2.10 The use of an analysis that would identify strategic views would essentially introduce zones of lower intensity development and by corollary the remaining space could be used more efficiently. We would envisage that any such analysis would show that there is no credible basis to seek to reduce the yield and extent of opportunity close to Trafford Bar metro stop, which is in reality the most sustainably located part of the whole AAP area.
- 2.11 By extension, the relative accessibility of sites within the AAP area should also be a criterion which is material to identifying where opportunities for increased yield can be secured. This type of approach is analogous to the advice of the London Plan and could easily be assessed by reference to proximity to Metro stations.

6.5 *What is the policy framework for gateway locations and how does this relate to the framework for tall buildings? Is there scope for increased gateway opportunities in the Civic Quarter?*

- 2.12 As we noted under our response to Matter 3 and Matter 4, we understand that through Main Modifications the Council is intending to omit the "gateway locations" that are identified on illustrative diagrams in the Reg 19 plan and reflected in notional analyses of plot by plot yields.
- 2.13 Whilst there may be parts of the AAP area that are more sensitive (i.e in proximity to heritage assets) there is a corollary that there are less sensitive parcels and also locations that provide the opportunity for gateway entry points to the AAP area that provide a sense of arrival.

- 2.14 We do feel that these could reasonably include the south-eastern part of the AAP close to Trafford Bar as well as those that were identified within the Reg 19 iteration of the AAP.
- 2.15 We have set out that there is potential that the Main Modifications will have a net negative impact upon residential yield for the AAP area. The opportunity to deliver greater yield in gateway locations that provide sense of arrival should be afforded positive weight, especially if the trajectory analysis sought (once that evidence is made available) showed that overall yield for the AAP area is likely to fall below the figures currently mooted (i.e. 2500 homes in the Plan period and 4000 in the longer term). In that scenario, strong weight should be afforded to the consideration of options to increase yield and deliverability in the AAP area.

6.7 *Should the Plan include any additional protection for the area's heritage assets? Is there a case for the designation of any additional Conservation Areas?*

- 2.16 Through previous representations we raised the concern that the weight being afforded to preserve and enhance the setting of non-designated heritage assets was excessive relative to the significance of those assets.
- 2.17 Key examples in this context are the former bowling green and the cluster of older buildings close to the Bingo 3000 plot. In both instances, these sites have been subject of considerable change over the years and the potential for them to have genuine significance is limited. We note that some of the recommendations within the Council's evidence base have been essentially rejected and we query why the points cited above are deemed more robust and justify being given weight in the development of the AAP.
- 2.18 We are aware that the original evidence base material (the Heritage Assessment) did recommend that a new Conservation Area should be designated. This recommendation was not taken forward into the Reg 19 AAP and the Council's "Summary of Reps and Council Responses" document confirms that the AAP is not seeking to take this forward. We welcome and support this clarification because we feel that the area is not of sufficient special interest to justify designation and would not therefore pass the relevant tests.

6.8 *Are the settings of key heritage assets, such as Trafford Town Hall and the White City Gates, together with the historic area setting in the Eastern Neighbourhood, adequately defined in the Plan? Does the Plan adequately protect the key views within the Civic Quarter, such as of the Clock Tower and the White City gates?*

- 2.19 The key views of the White City gates are currently experienced from within the retail park plot or alternatively via the A56. In terms of the latter, that visibility is partial and is relevant

solely in the area between White City Circle (to the east) and the signalised junction with Warwick Road (to the west). There are absolutely no intervening views from Talbot Road given the horseshoe arrangement of the commercial units within the retail park.

- 2.20 In terms of how the area is appreciated today, it would be difficult to argue that the White City gates do represent a key view from within the Civic Quarter, other than the retail park itself.
- 2.21 The White City gates are the only remaining built relic of the Botanical Gardens that we understand opened in 1832 and effectively closed in 1907. Following disposal, the site was redeveloped for speedway and greyhound racing until it was then taken forward as a retail park in the 1980s.
- 2.22 The gates serve as a reminder of the former use but in itself this is ineffective without interpretive materials and archive evidence that would illustrate that social and cultural history. The White City gates are listed structures in their own right, but it is self-evident that their setting is very much altered by consequence of the redevelopment of the site which itself occurred nearly 100 years ago.
- 2.23 Put simply, DDML is content to retain the White City gates and for it to be noted as an area which should be used positively to help frame the new neighbourhood that is envisaged by the AAP. Nevertheless, we do feel that it would be a missed opportunity if excessive weight was afforded to the need to preserve its setting given the reality of its relative significance.

Matter 10 Movement and Car Parking Strategy

10.6 Is the multi-storey car park (MSCP) strategy, based on peripheral locations, justified? Are the four indicative MSCP locations shown on page 81 realistic or aspirational? What MSCP capacities are envisaged?

- 2.24 We submitted representations in the context of Policy CQ10 to the earlier consultation windows including Reg 19 consultation in March 2021. Our key argument was to recognise that it identifies a concentration of AAP parking requirements upon the White City Retail Park site as well as other locations in the AAP area.
- 2.25 The Reg 19 AAP seeks to reduce surface level parking by employing multi-storey car park formats in given locations. We set out in Reg 19 reps that Derwent accepted this approach could be achievable in principle, but the development would need to be subject of detailed design and viability analysis. However, we also set out concerns because in our experience, MSCP proposals can be challenging to deliver and sustain from a viability perspective.

- 2.26 It appears self-evident that if only 4 key locations for parking are to be identified then it would be intended that they would provide parking to serve their own needs and those of surrounding plots. If the quantum of parking is greater than is necessary for the development plot in isolation, then it must be deemed as a general infrastructure requirement.

- 2.27 The construction of an MSCP represents a considerable capital investment and by its very nature those costs will be incurred prior to any opportunity to secure income through day tickets or contract parking. Given that the AAP Main Modifications now advise that yield over the Plan period is unlikely to exceed 2500 homes, then the timetable for this parking facility to be in full occupation is extensive.

- 2.28 At this point in time, it would be extremely unlikely that DDML would seek to construct an MSCP that would provide parking in addition to its own needs, unless the excess costs and any associated risk was noted as a general infrastructure item and funded accordingly.

- 2.29 We have no evidence to suggest that Continuum have built any such modelling into their viability work so the extent of any associated impacts upon the relative viability of a given site or the AAP as a whole is unclear.

- 2.30 It would also be the case that placing excessive parking on one site might therefore suppress its potential to accommodate more valuable development and give a relative advantage to other plots which could be essentially "car free".

- 2.31 If it were to prove that the viability of such an endeavour for DDML was below a reasonable level, then the Council should consider how the redevelopment of White City might need to be reviewed in the light of any planning benefits of a MSCP as compared to other planning objectives identified by the AAP or as part of a broader equalisation approach. We have raised this query with Continuum in July 2021 both verbally and in letter form, but they have provided no specific written response. We would encourage the Inspector to seek the Council's view on this matter to aid his analysis of the topic.

10.10 *Are the proposed green routes justified and realistic?*

- 2.32 We submitted previous representations to the effect that the balance of economic uses being proposed by the Reg 19 AAP would fail to meet the genuine shopping requirements of the residents of this significant new neighbourhood of new homes and those working in the new offices and attending the higher education facilities.

- 2.33 We understand that the Council does intend to show that more retail facilities could be

provided to serve the AAP area, primarily by retaining more of the White City Retail Park site for those uses. We welcome that in principle but note that this will have an inevitable effect upon residential yield and the indicative plans for the consolidation of car parking and pedestrian routing through the wider AAP area.

- 2.34 It will be incredibly important for the Council to undertake the exercise to clarify how the proposed revision of policies relative to retail provision will impact upon other aspects of the AAP including overall yield and housing trajectory, as well as any aspirations in terms of the alignment of connecting routes and the locations of shared open spaces.
- 2.35 It is almost inevitable that the direct consequence of this endeavour is that the illustrative network of connecting routes going through the White City Retail Park plot and the proposed open space will not be able to be delivered in the form shown in the Reg 19 document and will need to be redrawn. This will also need to have regard for the fact that the retained retail uses will need appropriate level facilities for store servicing and customer parking.
- 2.36 Without any such amendment, the connecting routes through the White City site will serve no effective purpose and should be omitted.
- 2.37 That is not the outcome which we seek, and we would instead encourage the Council to provide updated and workable plans that show how the site could support a mix of retail and residential uses within the Plan period.