



**TOWN AND COUNTRY PLANNING ACTS  
APPEAL BY:- Accrue (Forum) 1 LLP**

PLANNING PERMISSION FOR THE DEMOLITION OF EXISTING RETAIL UNIT AND ASSOCIATED STRUCTURES; ERECTION OF BUILDINGS FOR A MIX OF USE INCLUDING: 333 APARTMENTS (USE CLASS C3) AND COMMUNAL SPACES ANCILLARY TO THE RESIDENTIAL USE; FLEXIBLE SPACE FOR USE CLASSES A1, A3, D1 AND/OR D2; UNDERCROFT CAR PARKING; NEW PUBLIC REALM; AND ASSOCIATED ENGINEERING WORKS AND INFRASTRUCTURE.

**ADDRESS: Former B&Q Site, Great Stone Road, Stretford, M32 0YP**

**PLANNING INSPECTORATE APPEAL REFERENCE  
APP/Q4245/W/20/3258552**

LOCAL PLANNING AUTHORITY REFERENCE: 100400/OUT/20

**PROOF OF EVIDENCE OF ELISABETH LEWIS BA (HONS) DIP TP (CONSERVATION) MRTPI  
ON BEHALF OF TRAFFORD COUNCIL**

December 2021

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## **1.0 Qualifications and Experience**

I am currently employed at Trafford Borough Council as the Heritage Development Officer within the Planning Service. I have over 19 years' experience working in the heritage sector; 15 years of those in the role of a Local Authority Conservation Officer within Greater Manchester. I have occupied my current post at Trafford Council since October 2018.

1.1 I previously held the position of Inspector of Historic Buildings & Areas at Historic England, formerly English Heritage, for four years. I provided expert technical advice and policy guidance on heritage related planning applications & development proposals to local planning authorities covering the Yorkshire & North East regions.

1.2 I am also an active member of the Greater Manchester Conservation Officers Group, which includes representatives from Historic England and the Greater Manchester Archaeological Advisory Service (GMAAS).

1.3 I have a BA (Hons) in Town and Country Planning and a Postgraduate Diploma in Building Conservation. I have been a member of the Royal Town Planning Institute since 2004.

## **2.0 Council's Case and Proposed Development**

2.1 My evidence relates to an appeal by Accrue (Forum) 1 LLP against the non-determination of planning application LPA ref. 100400/OUT/20 at the former B&Q Site, Great Stone Road, Stretford. I sent written responses on the application which led to reason for refusal 7 which related to impacts on the Longford Park Conservation Area. Since then further visualisations have been prepared and I am now satisfied that there will be no adverse impact on the setting of the Conservation Area with the result that reason for refusal 7 is not pursued.

2.2 In my evidence I shall set out the Council's case in relation to built heritage and refer to the following:-

- Appeal site and surroundings
- Planning legislation, policy and guidance
- Significance of the affected designated heritage asset
- Proposed development & impact on significance
- The Council's position on heritage matters.

2.3 In my capacity as Heritage Development Officer, I provided a written response to the proposals on 26<sup>th</sup> July 2020 & 9<sup>th</sup> September 2020<sup>1</sup>. The Appellant appealed and Trafford's Planning and Development Management Committee endorsed the putative reasons for refusal of the application on 15<sup>th</sup> October 2020. This included the following reason relating to built heritage:-

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<sup>1</sup> HDO responses Appendix A

Putative Reason for Refusal 7 (RFR7):

*The proposed development by virtue of its layout, scale and massing would have a harmful impact on the setting of Longford Park Conservation Area equating to 'less than substantial' harm in National Planning Policy Framework terms. The benefits of the scheme are not considered to outweigh the identified harm to a designated heritage asset. The proposed development is therefore contrary to Policies SL3 and R1 of the adopted Core Strategy and the National Planning Policy Framework.*

2.4 My evidence is presented on behalf of Trafford Council and will examine the planning issues pertinent to the appeal relating to built heritage.

### **3.0 Site Description and Surrounding Area**

3.1 The application site comprises of a vacant, single storey retail warehouse formerly occupied by B&Q. A surface car park is located to the south and west of the warehouse. The Site is bounded by Great Stone Road to the south west, the Metrolink to the south east and Lancashire Cricket Club (LCC) to the north east. The Site is approximately 1 ha in size and is sited at a lower land level than Great Stone Road.

3.2 The Officer's Committee Report<sup>2</sup> provides a detailed description of the application site.

3.3 Longford Park Conservation Area, Trafford Town Hall, Grade II listed and The Old Trafford Cricket Ground & pavilion [LCCC], a non-designated heritage asset, have previously been identified within the setting of the application site<sup>3</sup>. I am largely in agreement with the heritage assets identified in the Appellants Heritage Statement.

3.4 The existing single storey building was originally erected as the Top Rank Bowling Alley and then the Hardrock Concert Theatre in the early 1970s before being converted to a retail unit. The low height of the existing building and openness of the surrounding car park affords views across the application site allowing some appreciation of the clock tower at Trafford Town Hall & LCCC. In the absence of visualisations, the openness of the site was previously judged to contribute, to a degree, to views from Longford Park Conservation Area to the north and west.

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<sup>2</sup> CD-D5

<sup>3</sup> Appendix B; Map of Longford Park Conservation Area.

#### **4.0 Relevant Legislation, Local and National Planning Policies & guidance**

There is no issue between the parties on the relevant legislation, policy and guidance and I do not therefore repeat it here.

#### **5.0 Main Issues**

I will show why;

- i) The proposed development is no longer considered to cause harm to the setting of Longford Park Conservation Area.
- ii) The impact of the development on the affected heritage asset has now been adequately assessed in the submitted documentation.

#### **6.0 Analysis of Main Issues**

##### **i) The proposed development will not cause harm to Longford Park Conservation Area**

6.1 A brief overview of history of Longford Park Conservation Area is provided in the Longford Park Conservation Area Appraisal SPD 5. 19 & Management Plan SPD5.19a<sup>4</sup>.

6.2 The significance of the Conservation Area derives from the site of the former Longford Hall and its association with John Rylands. During the 20th century, the Estate was designated as a public park and a key aesthetic value of the site comes from its green spaces, mature trees, planting and openness. The layout of the spaces reflects both the park's historic estate use and changes made during its use as a park. The central and southern parts of the Conservation Area are defined by the estate buildings, formal gardens and tree lined paths, whereas the northern

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<sup>4</sup> CD-H9

end of the park is much more open in character, with wide expanses of fields bounded by fencing, hedges and mature trees. In the 1930s a number of buildings and structures were added to the park including the former Firwood Library and entrance from the Quadrant to the north. The park, which is also highly valued as a recreational facility, provides vistas across to the open space to the north of the Conservation Area and beyond towards the former Firwood Library and the application site. The distinctive parkland character is enhanced by the uninterrupted skyline and tall mature trees encircling the Conservation Area; the latter largely obscures the two storey suburban interwar housing fronting Kings Road and Great Stone Road. With the exception of the Deansgate Square development in central Manchester, this character is preserved by the lack of tall buildings visible in views out of the Conservation Area.

6.3 Whilst it is acknowledged that the former B&Q building cannot be viewed from the Conservation Area, its low height and openness of the application site allows the distinctive tree line surrounding the Conservation Area to remain prominent and uninterrupted preserving the parkland character of the Conservation Area.

6.4 Despite the potential impact on the Longford Park Conservation Area identified in the submitted Heritage Statement, no viewpoints were included in the TVIA. An updated TVIA including an additional viewpoint from Longford Park was subsequently requested and provided. As set out in my advice provided on 9<sup>th</sup> September 2020, the submitted viewpoint demonstrated in my view that the proposed development would result in a minor harm to the setting and appreciation of Longford Park Conservation Area in views looking northwards across the open space. This was considered to be at the lower end of the scale and 'less than



substantial harm' [para 202 NPPF]. It was also considered that the proposed development may impact on the experience of the Park at night time which is a relatively dark space.

**6.5 ii) The impact of the development on the affected heritage assets has been adequately assessed in the submitted documentation**

6.6 In accordance with Historic England advice<sup>5</sup> [Step 3] an analysis should be undertaken to identify the effects a development may have on setting(s) and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s). In general, however, the assessment should address the attributes of the proposed development in terms of its: location and siting; form and appearance; wider effects; permanence.

6.7 Local planning authorities are to consider at an early stage whether development affecting the setting of a heritage asset can be broadly categorised as having the potential to enhance or harm the significance of the asset through the principle of development alone; through the scale, prominence, proximity or placement of development; or through its detailed design. Determining whether the assessment will focus on spatial, landscape and views analysis, on the application of urban design considerations, or on a combination of these approaches will clarify for the applicant the breadth and balance of professional expertise required for its successful delivery<sup>6</sup>. Furthermore, a development of this size and scale should be supported by

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<sup>5</sup> Appendix C; Historic England *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3* (Second Edition) 2017 para 32.

<sup>6</sup> Ibid para 35.

visualisations, wireframes and modelling based on an agreed Zone of Theoretical Visibility [ZTV]. This approach is supported by Historic England's advice on setting<sup>7</sup>.

6.8 The applicant submitted an amended Landscape/Townscape Visual Impact Appraisal (TVIA), following the request of additional viewpoints from Longford Park Conservation Area. The submitted TVIA included fifteen wireframe viewpoints, the location of which can be seen at Appendix 1 of the document, which were produced to inform the TVIA. These viewpoints provided a visual representation of what the proposed development would look like from each viewpoint. Additional viewpoints (VP) were requested including a portrait representation of VP1 and VP5, a VP from Longford Park and from within the cricket ground were requested during the course of this application. A viewpoint from Longford Park Conservation Area was submitted and a CGI was submitted indicating a view within the cricket ground. The request for portrait versions of VP1 or VP5 to show the full visual impact of the building was not addressed by the applicant.

6.9 The additional viewpoints from Longford Park and within the cricket ground were requested to enable additional assessments to be made with regard to concerns over the potential impact of development on heritage assets. Further assessment on this point can be found at paragraphs 139 to 154 of the Committee Report. It should be noted that the development is five to nine storeys in height, not eight as stated in the applicant's TVIA. However, the models within the TVIA did not appear to accurately reflect the height of the proposed development. It was considered that the conclusion of the TVIA that there would be 'no notable townscape effects' arising from the proposed development was an inaccurate summary of the likely impact of the development and the proposals were likely to result in

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<sup>7</sup> Ibid para 21.

some significant impacts on the local townscape character and key views, particularly when travelling along Great Stone Road and when viewed from Longford Park Conservation Area. These primarily related to the scale and massing of the proposed scheme which was considered out of scale with the character of not just its immediate context, but the wider surrounding area.

6.10 The visual representations 1 to 3, 5, 8, 9, 14 and 15 included in Appendix 1.0 of the amended TVIA appeared to demonstrate that the proposed development would be highly visible from a number of viewpoints. Its prominence was exacerbated by the scale, height and massing of the proposed development and it was clear within the viewpoints that there were no developments of a comparable scale and massing which sit within the same viewpoint. This appeared to indicate that the scale of the proposed development is out of keeping with the general character of the development area.

6.11 In the light of that material and as set out in the Committee Report, the development was considered to cause harm to the conservation area as described. Great weight was also attached to that harm.

6.12 On 19<sup>th</sup> November 2021, the appellant provided an unrendered photomontage<sup>8</sup> of viewpoint 15 taken from the parkland looking north towards the application site. This viewpoint was previously agreed with Ms Debra Harrison and provides a verified view of the proposed development. Whilst the development will clearly be visible from the northern aspect of the Conservation Area, it is not as prominent as depicted in the previous TVIA view and will be partially obscured by the treeline even in winter months. I therefore consider

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<sup>8</sup> CD - F108

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sufficient information has been provided to substantiate the development will have a neutral impact on the setting of Longford Park Conservation Area.

## **7.0 Summary and Conclusions**

7.1 The key issue for consideration as relating to Reason for Refusal 7 is the impact of the proposed development on the significance of Longford Park Conservation Area. Following the submission of the verified view (viewpoint 15) on 19<sup>th</sup> November 2021, it is agreed with the appellant that the proposed development will not result in harm to the setting of Longford Park Conservation Area, a designated heritage asset. Reason for Refusal 7 is thus not pursued.

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## **8.0 Appendices**

**Appendix A** – Heritage Development Officer consultation responses.

**Appendix B** – Map of Longford Park Conservation Area.

**Appendix C** – Historic England *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3* (Second Edition) 2017.