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**Former B&Q Site, Great Stone Road, Stretford, M32 0YP
Appeal by Accrue (Forum) – 1LLP
LPA Ref: 100400/OUT/20**

Appeal Ref: APP/Q4245/W/20/3258552

AC/1/A Summary Proof

Report Date: 08/12/2021

Lee Collier



Introduction

- 1.1. My name is Lee Collier, and I provide expert evidence to this public inquiry on behalf of the Appellant, in relation to concerns raised in relation to the impact of proposed development on the natural turf training facility at the Emirates Old Trafford stadium.
- 1.2. I am the Principal Technical Consultant at STRI, which is a consultancy providing services to the Sport and leisure sectors in relation to turf design and management.
- 1.3. STRI are a global sports surface facility planning, design, construction and consultancy specialist in the development of elite standard sports surfaces. We are recognised globally for setting the benchmark for success in the delivery of large scale, risk-free projects, utilising research backed, innovative design processes.
- 1.4. STRI services over 2,000 clients annually and has project managed and consulted at major events for a multitude of sports including Olympic games, major golf tournaments and international football competitions throughout the world.
- 1.5. I have over 15 years' experience as a design consultant in the global sport surface industry playing a key role in the technical delivery of STRI's major projects and I lead the STRI Group Design & Engineering team. I have a keen understanding of turfgrass requirements which involves a holistic overview of the architectural and climatic restrictions of each project. I hold FACTS Qualification, have a BA (Hons), and have worked as a specialist designer and consultant for 23 years including the design, development, and operation of turf research trials to determine the turfgrass strategy and design solution for FIFA World Cup 2022 in Qatar.
- 1.6. Other key projects include FCB Barcelona Nou Camp Stadium redevelopment, London 2012 Olympic stadium transformation to a football stadium, Wimbledon Centre Court, Samy Ofer stadium in Israel, New Zealand Cricket indoor training venue (including bespoke hemiview light analysis), Western Sydney Bankwest Stadium, among work for governing bodies delivering tournament specific sites. I have a particular expertise in assessing light impact in stadia and other structure in relation to turf management and have completed analysis for more than fifty sites across multiple sports including World Cup stadia in Russia and Qatar.
- 1.7. The appeal is made against the non-determination by the local planning authority of application ref. 100400/OUT/20 which proposes: "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."
- 1.8. The description of development has subsequently changed to reflect the fact that there are 332 apartments shown on the drawings. This does not affect the massing of the proposal.
- 1.9. My evidence relates to the following Main Consideration as identified by the Inspector at the Case Management Conference held in November 2021:

The effect of the proposed development on the fine turf and non-turf training facility at Lancashire County Cricket Club.
- 1.10. This Consideration relates to the following Putative Reason for Refusal, which I am instructed has been identified by the local planning authority:

- 1.11. The proposed development would prejudice the use of the turf and non-turf training facility at Lancashire Cricket Club. The proposed development therefore conflicts with Strategic Objective OTO11, Policies SL3 and R6 of the adopted Core Strategy.
- 1.12. The LPA has since confirmed to WSP (ref: email from Debra Harrison to Matthew Hard., 17 November) that the issue relates to the potential impact on the turf facility (in other words, that there is no impact on the non-turf elements).
- 1.13. My evidence presents a holistic review which assesses how the architectural design of the proposed development will affect the light reaching the fine-turf training facility, since this is fundamental in determining whether the fine-turf facility would be adversely affected by the proposed development.
- 1.14. My conclusion, set out below, is that I do not consider that the proposed development will have such adverse impact. In reaching this conclusion, I have had regard to the following representations:
 - LPA Statement of Case (CD- F68)
 - Sport England representations (August 2020) (CD- F92)
 - Sport England consultation comments (31 July 2020 and 17 July) (Appendices 2 and 3 of Sport England representations) (CD-F97)
 - England and Wales Cricket Board (ECB) Covering Letter (Appendix 4a of the Sport England representations) (CD-F97)
 - ECB Technical Report prepared by Dr Iain James (Appendix 4b of the Sport England representations) (CD- F97)
 - Lancaster County Cricket Club (LCCC) representations (CD-F94)
 - LCCC Statement of Case (CD-F98)

2.0 Summary Proof

I have considered the Sport England Representations document, Appendix 4A prepared by Dr Iain James and in the summary below I provide summary response.

- 2.1 Based on our robust analysis using industry recognised methods to determine both existing and predicted scenarios in relation to light levels alongside a thorough examination of climatic considerations the following results are evident:
- 2.2 The existing conditions relating to daily light integral (DLI) and temperature during critical winter months from November through to January are below the threshold for active growth in *Lolium perenne* (Perennial Ryegrass).
- 2.3 The proposed development will provide only a very minor reduction in DLI and temperature during critical winter months from November through to January which will not significantly change potential for active growth in *Lolium perenne* (Perennial Ryegrass) or change requirements for maintenance through this phase.
- 2.4 In my professional view, the overall extent of change is insignificant. Therefore in my professional judgement the development will not cause any prejudice to the ongoing use of the natural turf practice area.