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Appeal by Accrue (Forum) 1 LLP  
Former B&Q Site, Great Stone Road, Stretford, M32 0YP  
PINS ref: APP/Q4245/W/20/3258552  
LPA ref: 100400/OUT/20  
Proof of Evidence by Gareth Davis  
HIGHWAYS

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## 1 Introduction & Background

1.1 This Proof of Evidence has been prepared by Gareth Davis BSc, MSc, MCIHT, CMILT, Director of Vectos (North) Transport Planning Specialists. I have 30 years experience in Transport Planning and Highway Engineering and have given evidence at numerous Appeal Inquiries. Vectos were appointed by Accrue (Forum) 1 LLP to provide highways and transport advice in support of a residential development at the site of the former B&Q store off Great Stone Road, Stretford.

1.2 The Appeal seeks outline 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.”*

1.3 The development was supported by a Transport Assessment and Travel Plan. In addition, Vectos have provided clarification to respond to comments made by Trafford Council highways officers and Transport for Greater Manchester (TfGM) and these responses were presented in a Transport Addendum dated 10.08.20 (CD-B11) and then in a further Transport Addendum Note 2 dated 21.09.20 (CD-C6).

### Putative Reasons for Refusal

1.4 The Council resolved on 15 October 2020 that it would have refused the application for the Appeal Proposal had it not been appealed on the following seven grounds:-

*“Reason for Refusal 1 (RFR1):*

*The proposed development would prejudice the use of the fine 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.*

*Reason for Refusal 2 (RFR2):*

*The proposed development would have a dominating and adverse impact on Lancashire Cricket Club (LCC) as well as its setting and cultural character and identity. LCC is an internationally significant visitor attraction, cultural and tourism venue. The impact on the visitor experience is considered to be sufficient to weigh strongly against the proposal. The development is therefore contrary to Policies SL3 and R6 of the adopted Core Strategy and the National Planning Policy Framework.*

*Reason for Refusal 3 (RFR3):*

*The proposed development would represent poor design as its form, layout, height, scale, massing, density and monolithic appearance are inappropriate in its context and would result in a building which would be significantly out of character with its surroundings. This would have a highly detrimental impact on the street scene and the character and quality of the area. This would be*

*contrary to Policies SL3 and L7 of the adopted Trafford Core Strategy and the National Planning Policy Framework.*

*Reason for Refusal 4 (RFR4):*

*The proposed development would not provide a development plan policy compliant level of planning obligations in relation to affordable housing and education improvements to suitably and appropriately mitigate the impacts of the development. The applicant has failed to demonstrate that there is a robust viability case to demonstrate that the scheme could not offer a policy compliant level of obligations. The proposed development is therefore contrary to Policies SL3, L2 and L8 of the adopted Core Strategy and the Council's adopted Revised Supplementary Planning Document 1 (SPD1) - Planning Obligations and the National Planning Policy Framework.*

*Reason for Refusal 5 (RFR5):*

*The proposed development by virtue of its height, massing, scale and layout would result in a poor level of amenity and unacceptable living standards for future occupiers of the development, by virtue of inadequate daylight and outlook in both apartments and amenity areas. The proposed development is therefore contrary to Policies SL3 and L7 of the adopted Core Strategy and the National Planning Policy Framework.*

*Reason for Refusal 6 (RFR6):*

*The proposed development by virtue of its height, massing, scale and layout would result in harm to the amenity of existing residential properties on Great Stone Road and Trent Bridge Walk by virtue of noticeable reductions in the amount of daylight and sunlight that they receive and would also have an overbearing impact on these properties and other residential properties in the wider 'Gorses' area. The proposed development is therefore contrary to Policies SL3, L3 and L7 and the National Planning Policy Framework.*

*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."*

- 1.5 It is clear from the above that Highways or Transport matters were not included in the Reasons for Refusal. Further, I note that Paragraph 6.1.28 of the SoCG concluded between the Appellant and the Council states expressly that "The acceptability of the car parking proposed has been agreed and the LPA does not resist the appeal on the basis of any highways-related reason". Further, Paragraph 6.1.42 states "The Scheme is considered to be acceptable in terms of access...."

### Lancashire County Cricket Club Statement of Case

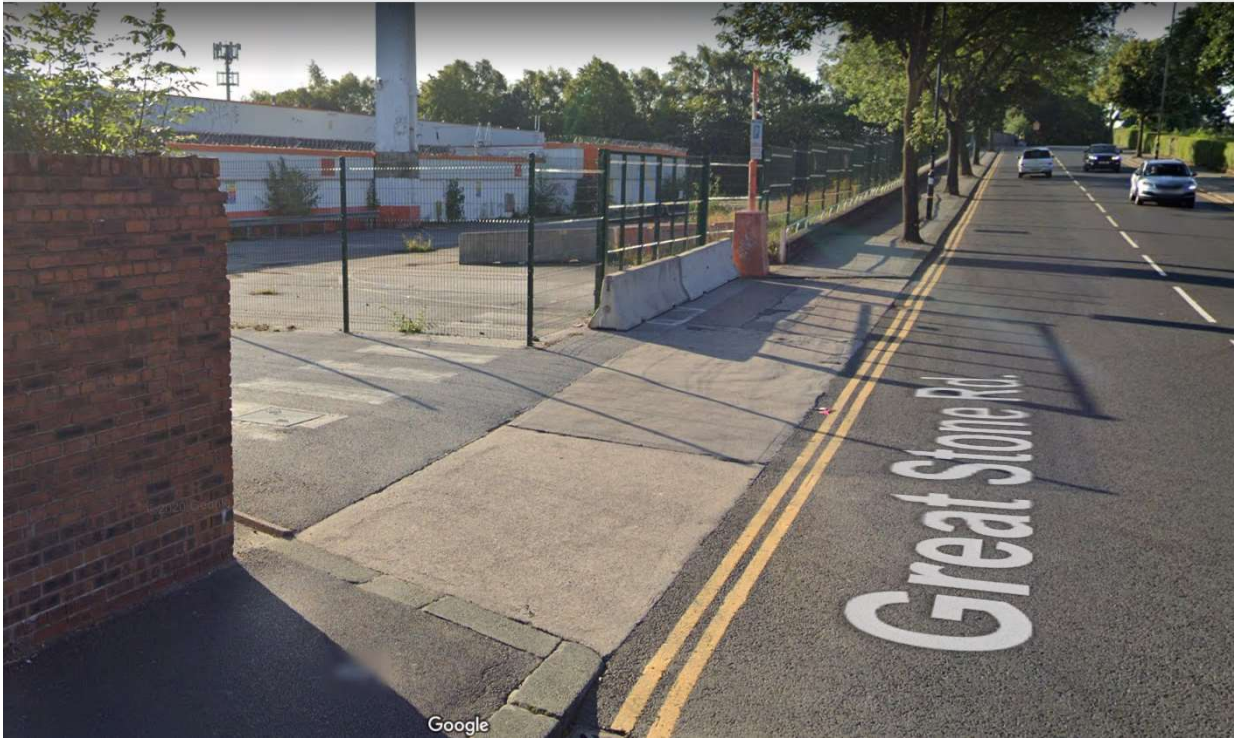
- 1.6 Lancashire County Cricket Club (LCCC) have provided a Statement of Case (CD-F98) and within that document they set out their objections to the scheme. In paragraph 1.7 they state that they object to the Appeal Proposal for five principal reasons. The third reason relates to their access onto Great Stone Road adjacent to the site as below:

*The Appeal Proposal will have an unacceptable impact on LCCC's ability to use its existing access and will cause adverse road safety issues in terms of vehicular and pedestrian conflict;*

- 1.7 The LCCC representations then presents in Appendix 7 (CD-F97), a report by Axis explaining in more detail the reason behind the objection. In summary the objection arises because of an assumption that the development will create a new access arrangement that will then hinder access to the Emirates Old Trafford (EOT) site.
- 1.8 In the next section, I describe why the access to EOT is not affected by the proposals.

## 2 Response to LCCC Objection

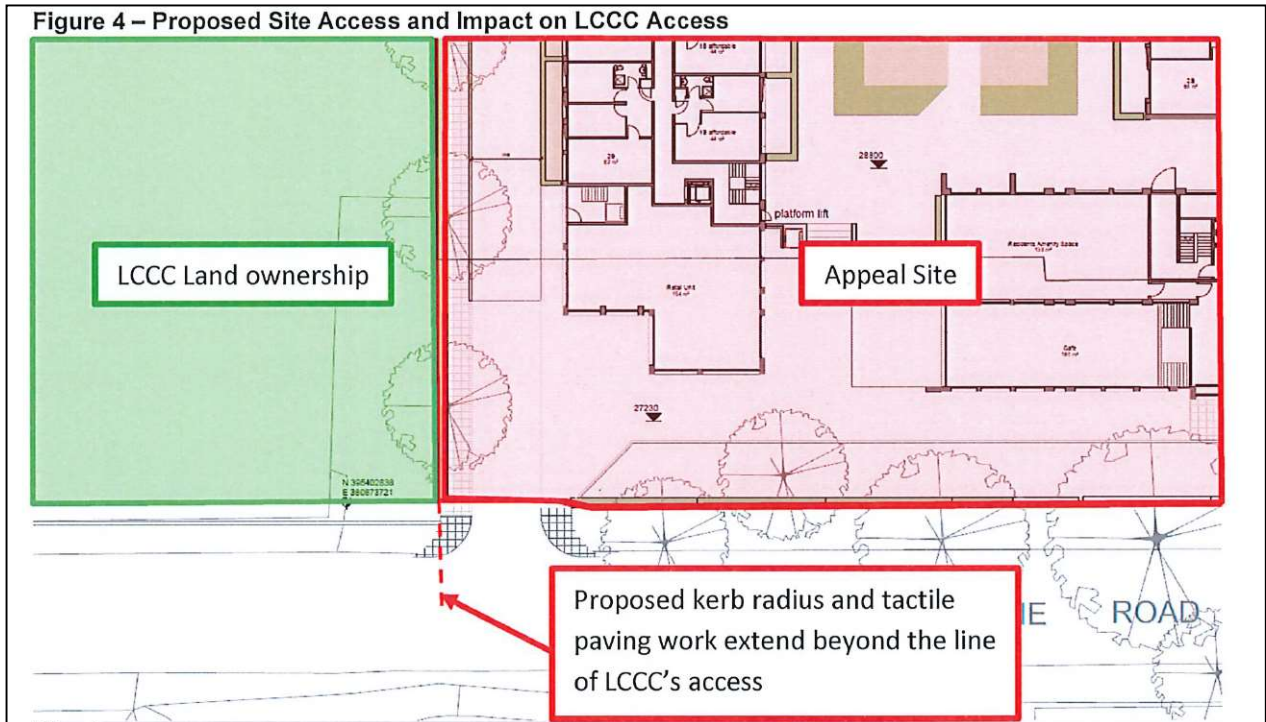
- 2.1 The LCCC objection is based on the assumption that a new kerb would be built on the highway that would hinder the access to EOT.
- 2.2 The existing access arrangement is shown in **Figure GD1** as derived from Google Streetview.



**Figure GD1 Existing Access Layout** (Google Streetview)

- 2.3 The site access across the former B&Q site and the LCCC access is a dropped kerb bringing the footway down to carriageway level and that the access is of a concrete construction which has areas of repair.
- 2.4 This layout allows vehicles to turn in and out without restriction and can do so safely as described in Section 3.3 of the Transport Assessment with no personal injury accidents in the vicinity of the access since 2014.
- 2.5 The objection by LCCC arises from an incorrect assumption regarding the nature of the highways works at this access. On Page 4 of the Axis report, given in Appendix 7 of the LCCC representations, the second paragraph states:

*The proposed arrangements include new kerbed corner radii into the former B&Q site access, which include tactile paving for blind or partially sighted pedestrians. On the north-western side, the kerbed radius extends from the appeal site, across the footway crossover, to tangentially tie into the channel line of Great Stone Road at a point which projects partially across the front of the LCCC access. See **Figure 4** below:-*



- 2.6 This assumption is incorrect, based on a misinterpretation of the plan which in hindsight could have been better explained.
- 2.7 For clarity there will not be any raised kerbs to hinder vehicle movement. The footway and accesses will simply be resurfaced and be designed to the current footpath level. This allows vehicles to manoeuvre in and out of both accesses as they do now without restriction. There is therefore no impact on the movement of LCCC vehicles accessing EOT and they will be able to continue operating in a safe manner as they do at the moment.
- 2.8 The cross hatching on the plan described in **Figure 4** above was intended as a surface treatment and not tactile paving, matching the internal paving treatment within the site. Given the misunderstanding, I have sought to clarify the proposed highway works to the footway crossing at the site accesses and this is presented in **Dwg VN70912-D103** at **Appendix AC/2/C - GD1**.
- 2.9 This General Arrangement plan shows that, subject to a Section 278 highway design, the highway access is to be re-surfaced. The highway construction would be sufficient to take the traffic by heavy goods vehicles. Large vehicles accessing the LCCC EOT site will be able to do so as they do currently.
- 2.10 As an enhancement, the repaired concrete would be resurfaced with tactile paving for visually impaired pedestrians at either side of the wider access. In the centre of the junction we show flush kerbs which define the accesses into each entrance, but these can be driven over, and these are a visual cue for pedestrians that there are two accesses.
- 2.11 These works to resurface the footway and add tactile paving would be subject to a Section 278 agreement, be approved by the local highway authority and be subject to a safety audit. Overall the works would present an enhanced and safer highway treatment.



2.12 AXIS, highway consultants to LCCC have written requesting tracking of HGVs at their access and for a Road Safety Audit to be provided. In **Appendix AC/2/C -GD2** I have provided their correspondence and my response. I state that as there is no change to the access other than resurfacing, there is no need to track vehicles for what is quite a wide access into EOT. Furthermore, a Road Safety Audit is not required for what is a resurfacing scheme (albeit now with extra tactile paving). As already stated, this will be subject to approval by the highway authority which includes a Road Safety Audit as standard practice.

### 3 Summary & Conclusions

#### Summary

- 3.1 This highways evidence has been presented in support of the Appeal by Accrue (Forum) 1 LLP, (PINS ref: APP/Q4245/W/20/3258552, LPA ref: 100400/OUT/20) for the *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.*
- 3.2 The planning application was supported by a Transport Assessment, (DC-A15), Travel Plan (CD-A16) and two further Transport Addendums (CD-B11 and CD-C6) to clarify issues raised by Trafford Council.
- 3.3 Trafford Council have given their Putative Reasons for Refusal to the application but none of the Reasons relate to highways or transport matters. Further, in the SoCG the Council has confirmed that it has no objection to the appeal proposals on any highways or access related grounds. Therefore, the highway authority does not have an objection to the scheme.
- 3.4 Lancashire County Cricket Club (LCCC) have an access adjacent to the site access and a common dropped crossing is provided for vehicles across both accesses.
- 3.5 LCCC have raised an objection to the proposals as follows:
- The Appeal Proposal will have an unacceptable impact on LCCC's ability to use its existing access and will cause adverse road safety issues in terms of vehicular and pedestrian conflict;*
- 3.6 LCCC have presented a report by AXIS Consultants Ltd, as an Appendix to their representations which makes assumptions about the highways works at the site access and assumes that the proposals would introduce new raised kerbs and tactile paving for pedestrians and that this would adversely affect the access to Emirates Old Trafford (EOT) and cause a safety issue.
- 3.7 This objection is based on a misunderstanding of the highway proposals. In summary, there is no proposal to construct raised kerbs that would hinder vehicle access to EOT so there is no impact on the LCCC operations and no adverse impact on safety. This Proof of Evidence has clarified the proposals including presenting a highway layout plan to confirm the nature of the works.
- 3.8 It is proposed that the access is resurfaced to enhance what is an existing repaired concrete surface. That resurfacing would be at the same level as the existing footway. There is a benefit for visually impaired pedestrians by providing tactile paving at each end of the wider crossing. Between the accesses a flush surface detail, which can be driven over, is proposed as a visual cue that there are two accesses adjacent to each other.
- 3.9 For clarity these works do not change the ability of LCCC vehicles to turn in and out onto Great Stone Road and does not adversely affect the road safety risk. It is noted that the accident history was previously presented in the Transport Assessment supporting the planning application and shows no recorded injury accidents on highway in the vicinity of the accesses since 2014 when the site was operating as the B&Q DIY Store. This accident risk will not change with development.

- 3.10 These relatively minor highways works would be subject to a Section S278 agreement and approval by Trafford Council and that process would include a Road Safety Audit.
- 3.11 In summary, the proposals do not affect the highway access to EOT other than resurfacing which does not affect the safe movement of LCCC vehicles. There is no reason for the highway's objection by LCCC to be sustained.

### **Conclusion**

- 3.12 As there is no objection from Trafford Council on highway grounds and that there are no highways implications on the LCCC access, I can see no reason why the Appeal could be refused on highways grounds.