



Paul Butler Associates
Planning, Development & Heritage Consultants

Generation

Duncan Street, Salford

Planning Statement

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Appendix 1 Market Appraisal (Alesco Property)

1. Introduction

Purpose of this Statement

- 1.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of Generation. The statement is submitted in support of an application for full planning permission for the development of a parcel of land that is located to the north of Duncan Street, Salford, M5 3SQ.
- 1.2 The application seeks full planning permission for the redevelopment of the land with a residential scheme comprising of 85 no. apartments arranged in a single development block.
- 1.3 The Planning Statement is intended to provide an overview of the development proposals, summarise the results of the various technical studies and assess the proposals against national and local policy.

Documents submitted with the Planning Application

- 1.4 The planning application is accompanied by drawings prepared by Todd Architects and the following documents in line with Salford City Council's validation checklist:
- Application form and completed ownership certificates
 - Design and Access Statement (prepared by Todd Architects)
 - Phase 1 Geo-Environmental Assessment (prepared by Geocon)
 - Energy and Sustainability Assessment (prepared by WECE Consulting)

- Daytime Bat Survey and Ecological Walkover Study (prepared by Rachel Hacking Ecology)
- Biodiversity Net Gain Report (prepared by Rachel Hacking Ecology)
- Transport Statement (prepared by Axis)
- Interim Travel Plan (prepared by Axis)
- Drainage Strategy (prepared by BWB Consulting)
- Flood Risk Assessment (prepared by BWB Consulting)
- Noise Impact Assessment (prepared by Hann Tucker)
- Crime Impact Statement (prepared by Greater Manchester Police)
- Townscape and Visual Impact Assessment (prepared by Urban Green)
- Air Quality Assessment (prepared by Redmore Environmental)
- Fire Statement (prepared by Surety)
- Viability Appraisal (prepared by Savills).

2. The Site and Surroundings

The Application Site

- 2.1 The development site is a rectangular parcel of land located on the northern side of Duncan Street in Salford. The site largely comprises hardstanding except for a small single storey flat roof building in the south-eastern corner of the site. A two-metre-high metal mesh fence secures the site from the public highway of Duncan Street to the south. The eastern boundary comprises a concrete post and mesh fence.
- 2.2 To the west of the site is a row of two storey units (in mixed use). The plot to the east of the site occupies the corner of Duncan Street and Oldfield Road and is occupied by a petrol filling station and car wash facility. To the rear (north) of the site is the Excalon Works site which extends to the rear of the adjacent units and abuts the railway line to the north.
- 2.3 To the south of the site is the City View construction site. The site has permission for 525 units under planning application reference 16/68723/FUL. Construction is ongoing on site with the two blocks adjacent to Duncan Street nearing completion. The buildings on site will range from 8 storeys to 26 storeys. The built form directly opposite the site will reach 10 storeys in height.



Figure 2.1: View of site from Duncan St, looking north east.



Figure 2.2: View of site from Duncan St, looking at the western party wall boundary.



Figure 2.3: View of site from Duncan Street looking west towards the adjacent industrial units.



Figure 2.4: View from centre of Duncan Street looking east towards Oldfield Road, the City View construction site is in the right of the frame.



Figure 2.5: View looking west from Oldfield Road, the City View construction site is in the left of the frame, the Jet petrol station visible in the right of the frame in front of the site.



Figure 2.6: View from Oldfield Road, looking north west, the site is visible in the centre of the frame.

The Surrounding Area

- 2.4 The development site's immediate surroundings comprise industrial and retail uses, however the 'City View' development site to the south represents a significant 'step change' in the transformation of the area towards becoming a new residential neighbourhood.

Development of this site will continue the evolution of this new sustainable residential neighbourhood.

- 2.5 Approximately 65 metres east of the site is the entrance to the Regent Retail Park, this contains a wide range of retail units including a Sainsburys, Boots and a Home Bargains. East of the Regent Retail Park is the Wilburn Basin residential neighbourhood adjacent to the River Irwell.
- 2.6 The site and neighbourhood lies within the Regional Centre and benefits from excellent walking and public transport links to the rest of the Regional Centre and its economic core, as well as other major employment and visitor locations such as Media City and Salford Quays.
- 2.7 Regent Road (A57) is 100 metres south of the site and forms an important arterial route into Manchester City Centre from the west. Oldfield Road dissects this route providing north / south routes to the A6 and A56. The development site is therefore well located in relation to the strategic road network, however equally important are the sustainable transport options that the site has the ability to capitalise upon. The local road network benefits from good footpath provision meaning that prospective residents will be able to walk to Salford City Centre, Manchester City Centre and other employment locations in the locality.
- 2.8 The Oldfield Road Corridor and Bee Network plans being brought forward by Salford City Council will also improve the pedestrian and cycle network in the locality linking this emerging neighbourhood with wider employment locations such as the Regional Centre and Media City. In addition to the above, bus stops exist on Oldfield Road and Regent Road which provide links throughout the Regional Centre and to Deansgate train station.

Planning History

- 2.9 Paul Butler Associates have reviewed the Council's online planning database. The planning history associated with the site is limited to the approval of an MOT service garage and

erection of a 2.4m high palisade fence to the front boundary (application ref 14/65562/FUL).

This was approved in December 2014.

3. The Proposed Development

Development Overview

- 3.1 The application scheme proposes the demolition of the existing building on site and the construction of a residential apartment building comprising 85 units in 12 storeys of accommodation.
- 3.2 At ground floor, space will be allocated to car parking (8 spaces) and cycle parking (86 spaces), bin storage and a plant room. At the upper ground floor level, communal residential amenity space adjoining a large south facing terrace will be provided. The rear portion of this floor will be occupied by residential apartments with a private terrace. Part of the south facing terrace will also accommodate private terrace space next to the apartments. The upper ground floor terrace also has the effect of setting the main mass of the building back to maximise separation distances to the City View scheme opposite. Extending the ground floor out below this terrace area allows the development to present an active frontage to Duncan Street which is enlivened through landscaping and green infrastructure being introduced into the terrace level.
- 3.3 Above the upper ground floor level the development will be dedicated to residential apartments. A mix of 40 no. 1 bed, 44 no. 2 bed and 1 no. 3 bed units are proposed, all units will meet the nationally described space standards.
- 3.4 The development will be 12 storeys in total (ground plus 11 storeys). The roof level of the development will accommodate a communal terrace for the use of residents in the scheme. A plant area is also proposed at roof level alongside the lift and stair core. An area of the roof next to the plant area will be covered by photovoltaic panels.
- 3.5 The proposed form of the development proposes a clear top, middle and bottom. The ground floor entrance to the development contains double height glazing to create a clear welcoming entrance that enhances the street level environment. Above this the roof

terrace with a pergola and planting further enlivens the streetscene and provides surveillance to the entrance. The middle of the development is formed by a regular façade of recessed green brick panels surrounding the windows alongside grey brickwork in a combination of stretcher and soldier courses. This combination of brick work detail, differing colours of brick, and areas of recessed brickwork creates shadows and texture to the façade, thereby elevating the design quality of the scheme to create a truly beautiful form of development. The crowning 'top' element of the scheme switches the materiality to a green profiled metal cladding to differentiate from the middle section. The roof level presents a saw tooth edge to the elevation to add interest when viewed from street level.

- 3.6 The proposed scale at 12 storeys is similar to the nearest block of the City View development to the south, however ultimately the development remains secondary and subservient to that scheme which is up to 26 storeys in height. This is especially apparent in longer range views of the site.
- 3.7 The design proposals are illustrated in the Design and Access Statement prepared by Todd Architects which accompanies this planning application.

Pre-Application with the Council

- 3.8 The applicant has engaged with the Council's Planning and Regeneration departments on three occasions to date. Initial development options were presented to Faye Tomlinson in September 2018. In August 2021 updated development proposals were presented to Daniel Welsh (Regeneration) at Salford City Council. Following this a formal pre-application enquiry was submitted to the planning department and the pre-application response was completed in October 2021.

Consultation with Surrounding Properties

- 3.9 There are currently no residents in the immediate vicinity of the proposed development site to consult. However, over the past couple of years the applicant has met and

shared/discussed the emerging proposals regularly with the various neighbours/businesses that surround the site. This has included consultation with the immediate neighbours on all four sides – Excalon; Jet; Manchester Auto Electrical; and Sourced. The feedback received has been positive with neighbours keen to see the area continue to change and regenerate.

- 3.10 A copy of the pre-application design document was issued to the 3 local Ward Councillors (Cllrs Burch, Mashiter & Walsh) in March 2022, inviting their comments and offering to meet with them to discuss. We asked for their views on any other individuals, groups or other stakeholders who it might also be useful for us to consult with on our proposals. On the suggestion of Cllr Burch we liaised with Marie Shields the Council's Neighbourhood Manager for the area.

4. Planning Policy Context

Introduction

- 4.1 This section of the statement sets out the local and national planning policy context of relevance to the determination of this planning application. An appraisal of how the proposal relates to the key planning considerations relevant to the application site is set out in section 5 of this statement.

The Development Plan

- 4.2 Section 38(6) of the Town and Country Planning Act 2004 states that applications for development should be determined in accordance with the Development Plan unless material considerations indicate otherwise. In the case of Salford City Council, the adopted Development Plan consists of the saved policies of the Unitary Development Plan (2009). Due consideration in the determination of the application will also need to be afforded to national policies in the National Planning Policy Framework (NPPF) which represents a significant material consideration.
- 4.3 The emerging Local Plan for Salford City Council is under preparation with the Publication Salford Local Plan: Development Management Policies and Designations submitted for examination in June 2021. Examination hearings took place in December 2021, modifications identified as part of this process are the subject of a consultation up to 11 July 2022. Given the advanced stage of preparation, the Emerging Local Plan is a material consideration in the determination of this application.
- 4.4 Due to delays with the Greater Manchester Spatial Framework (now known as Places for Everyone Plan), the Council took the decision to narrow the scope of the new Local Plan document to focus on development management policies and designations with the exclusion of site allocations and proposals for the overall scale and distribution for

development. These elements will instead be progressed through a separate Local Plan document that will be produced in tandem with the Places for Everyone Plan.

- 4.5 The Revised Draft Greater Manchester Spatial Framework ('GMSF') was subject to public consultation at the start of 2019. The GMSF is no longer going ahead, instead the 'Places for Everyone Plan' (PFEP) is being progressed by the remaining 9 Greater Manchester local planning authorities. The PFEP has been submitted for examination in public, however hearing sessions and representations have not taken place. At this moment in time, as the PFEP has not been tested at examination, it is considered that only limited weight can be given to the policies in the PFEP.

Salford City Council Unitary Development Plan Saved Policies 2009

- 4.6 The saved policies of the Unitary Development Plan (UDP) which are considered relevant to the scheme are outlined below.
- 4.7 Policy ST1 Sustainable Urban Neighbourhoods - requires development to contribute towards the creation and maintenance of sustainable urban neighbourhoods.
- 4.8 Policy ST12 Development Density – the policy sets out that development within the Regional Centre, town centres, and close to key public transport routes and interchanges will be required to achieve a high density appropriate to the location and context.
- 4.9 Policy ST13 Natural Environmental Assets – states that development that would result in an unacceptable impact on any of the city's natural environmental assets will not be permitted.
- 4.10 Policy ST14 Global Environment – encourages development to minimise its impact on the environment. Major applications will need to be accompanied by an assessment demonstrating how they will minimise greenhouse gas emissions.

- 4.11 Policy DES1 Respecting Context – requires development to: respond to its physical context; respect the positive character of the local area in which it is located, and contribute towards local identity and distinctiveness.
- 4.12 Policy DES2 Circulation and Movement – requires development to be fully accessible to all people; maximise the movement of pedestrians and cyclists; and enable access to public transport and local amenities.
- 4.13 Policy DES4 Relationship of Development to Public Space – the policy sets out design criteria to be considered when designing development adjoining public space to ensure that the development has a strong and positive relationship with that space.
- 4.14 Policy DES7 Amenity of Users and Neighbours – the policy requires all new development to provide potential users with a satisfactory level of amenity in terms of space, sunlight, daylight, privacy, aspect and layout. Development which would result in an unacceptable impact on the amenity of occupiers or users of other development will not be permitted.
- 4.15 Policy DES9 Landscaping – requires a high-quality landscaping scheme to be provided as part of the development that reflects and enhances the character of the area and design of the development.
- 4.16 Policy DES10 Design and Crime – the policy seeks to ensure that developments are designed to discourage crime, anti-social behaviour and the fear of crime and also support personal and property security.
- 4.17 Policy H1 Provision of New Housing Development – states that all new housing development must: contribute towards a balanced mix of dwelling sizes, types and tenures and affordability in the local area; be built at an appropriate density; provide a high quality residential environment; make adequate provision for open space and where necessary make a contribution towards local infrastructure and facilities required to support the development.

4.18 Policy EP5 Development within Established Employment Areas – for the purpose of this policy an established employment area is defined as site(s) / building(s) that are currently used, or where vacant were last used, for non-retail employment uses, and fall within one of the following categories:

- Any area with five or more adjacent business unit;
- Any continuous site area of 0.5ha or greater; or
- Any building(s) with a floor area of 5,000 square metres or greater.

Within established employment areas, planning permission will only be granted for the reuse or redevelopment of sites or buildings within an established employment area for non-employment uses where:

1. the development would not compromise the operating conditions of other remaining employment uses; and

2. one or more of the following apply:

a. the developer can clearly demonstrate that there is no current or likely future demand for the site or building for employment purposes;

b. there is a strong environmental case for rationalising land uses or creating open space;

c. the development would contribute to the implementation of an approved regeneration strategy or plan for the area; or

d. the site is allocated for another use in the UDP.

- 4.19 Policy A2 Cyclists, Pedestrians and the Disabled – requires development to make adequate provision for safe and convenient access by the disabled, other people with limited or impaired mobility, pedestrians and cyclists.
- 4.20 Policy A8 Impact of Development on the Highway Network – states that development will not be permitted where it would have an unacceptable impact on highway safety or cause an unacceptable restriction to the movement of heavy goods vehicles along Abnormal Load Routes.
- 4.21 Policy A10 Provision of Car, Cycle and / Motorcycle Parking in New Developments – the policy requires that there should be adequate provision for disabled drivers, cyclists and motorcyclists and that maximum car parking standards should not be exceeded.
- 4.22 Policy EN17 Pollution Control – the policy states that development proposals that would be likely to cause or contribute towards a significant increase in pollution will not be permitted unless they include mitigation measures commensurate with the scale and impact of the development.
- 4.23 Policy EN19 Flood Risk and Surface Water – development which will be subject to an unacceptable risk of flooding or that would materially increase the risk of flooding elsewhere will not be permitted.
- 4.24 Policy DEV5 Planning Conditions and Obligations – states that development that would have an adverse impact will only be granted planning permission subject to planning conditions and obligations.

Supplementary Planning Documents

- 4.25 The following SPDs have been considered during the design phase of the development and are addressed as necessary in the subsequent analysis and the supporting technical environmental reports which accompany the application:

- Housing Planning Guidance
- Planning Obligations Supplementary Planning Document
- Sustainable Design and Construction Supplementary Planning Document
- Design Supplementary Planning Document
- Design and Crime Supplementary Planning Document
- Nature Conservation and Biodiversity Supplementary Planning Document
- Flood Risk and Development Planning Guidance
- Trees and Development Supplementary Planning Document
- Contaminated Land Planning Guidance

Emerging Policies: Draft Local Plan – Development Management Policies and Designations

- 4.26 The Salford Local Plan: Development Management Policies and Designations, is currently under Examination in Public with the hearing sessions closed and modifications under consultation it is considered that the emerging Plan is a material consideration in the determination of this application. The relevant policies are set out below:
- 4.27 Draft Policy CC1 'Climate Change' of the emerging Local Plan sets out an approach to design development and decision-making which places sustainability and the need to positively respond to the climate change crisis at its core. Policy CC1 is specifically intended to support the aim of Salford becoming carbon neutral by 2038. The policy sets out the

numerous measures that development should support in order to achieve this aim of carbon neutrality.

4.28 Draft Policy EF1 'Efficient Use of Land' states that developments shall use land efficiently. All parts of a site shall have a clear and positive purpose. Support will be given to the use of suitable previously developed land and appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Under this policy the density of a development shall:

- Respond to the local context, character and distinctiveness; and
- Reflect the accessibility of the site:
 - By public transport, cycling and walking; and
 - To public services, community facilities, amenity and recreation provision.

The highest density development shall be in the most accessible locations. Proposed improvements to the accessibility of a site will be taken into account in implementing this policy, but only where there is a high probability of their delivery and long-term retention. Residential densities shall also meet the requirements in Policy H3.

4.29 Draft Policy EF2 'Co-ordinated development' states that development will not be permitted if it would unacceptably hamper or reduce the development options for adjacent sites or the wider area. Development must make provision for, and be phased with, supporting infrastructure, facilities, and appropriate environmental mitigation.

4.30 Draft Policy EC1 'Existing Employment Areas' sets out the considerations surrounding the use of land within existing employment areas.

4.31 Draft Policy H1 'Type of Housing' the policy sets out that outside of the City Centre, Ordsall Waterfront and Salford Quays and the other town centres that at least 80% of the net increase in dwellings should be houses, a lower proportion of houses (i.e. apartment developments) will be acceptable where it can be demonstrated that:

The proportion of 3 bed houses and other dwelling types with at least 3 bedrooms is being maximised as far as possible; and

At least one of the following applies:

1. It can be clearly demonstrated the site has distinct characteristics that make a higher proportion of houses inappropriate or impracticable to provide such accommodation.
2. The development provides specialist accommodation, such as older people or there is a demonstrable need for different types of dwellings; or
3. The minimum density requirement in Policy H3 can only be met through a higher proportion of apartments.

4.32 Draft Policy H3 'Housing Density' sets out minimum density requirements for new development based on proximity to the centre hierarchy and existing services and facilities.

4.33 Draft Policy H4 'Affordable Housing' the policy sets out a proposed requirement for all high density development to provide 20% affordable housing.

4.34 Draft Policy D1 'Design Principles' sets out that All development shall achieve a high design quality, consistent with the ten characteristics set out in the National Design Guide as follows:

- Context: enhances the surroundings

- Identity: attractive and distinctive
- Built form: a coherent pattern of development
- Movement: accessible and easy to move around
- Nature: enhanced and optimised
- Public spaces: safe, social and inclusive
- Uses: mixed and integrated
- Homes and Buildings: functional, health and sustainable
- Resources: efficient and resilient
- Lifespan: made to last

National Planning Policy Framework

- 4.35 The National Planning Policy Framework (NPPF) was published in July 2021 and sets out the government's objectives for achieving sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development which ensures that sustainable development is pursued in a positive way.
- 4.36 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

4.37 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

Delivering Sustainable Development

4.38 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework. The NPPF is split into 17 chapters, the chapters of relevance to this development are discussed below.

4.39 Delivering a sufficient supply of homes (Chapter 5) - paragraph 60 explains that in order to support the government's commitment to significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward for development where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

4.40 Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where strategic policies are more than five years old. The five year supply should include an

appropriate buffer. Where the local authority chooses to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan the buffer should be 10% to account for any fluctuations in the market during that year. In the event that there has been significant under delivery when measured against the Housing Delivery Test (November 2018 onwards) then a 20% buffer should be applied.

- 4.41 The NPPF is clear at paragraph 11 that housing applications should be considered in the context of the presumption in favour of sustainable development and that relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites or the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years.
- 4.42 Building a strong and competitive economy (Chapter 6) - emphasises that the government is committed to ensuring that the planning system should help create conditions in which businesses can invest, expand and adapt. Significant weight is to be given to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This section also recognises that a poor environment and a lack of housing can act as a potential barrier to investment.
- 4.43 Promoting healthy communities (Chapter 8) - the planning system can play an important role in facilitating social interaction and creating healthy, inclusive and safe communities. Planning decisions should aim to achieve places which promote, amongst other things, safe and accessible developments, where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.
- 4.44 Promoting sustainable transport (Chapter 9) - to protect and exploit opportunities for the use of sustainable transport modes, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities; address the needs of people with disabilities by all modes of transport; create safe and secure places minimising conflicts between traffic and pedestrians; allow for the efficient delivery of goods and access by service and emergency vehicles; and be

designed to enable the charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

4.45 Making effective use of land (Chapter 11) - the NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses.

4.46 Paragraph 120 (d) explains that planning should also promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

4.47 The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 124 sets out that the planning system should support development that makes efficient use of land, taking into account the following:

a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) Local market conditions and viability;

c) The availability and capacity of infrastructure and services - both existing and proposed - as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) The desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change; and

e) The importance of securing well-designed, attractive and healthy places.

4.48 Achieving well designed places (Chapter 12) – this chapter sets out at paragraph 130 that planning policies and decisions should aim to ensure that developments:

A) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

B) Are visually attractive as a result of good architecture and appropriate landscaping;

C) Are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation;

D) Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

E) Optimise the potential of the Site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks; and

F) Create places that are safe, inclusive and accessible and which promote health and well-being.

4.49 Paragraphs 132-133 stress the importance of pre-application discussions with the community and local planning authority in the design process, stating that applicants should work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in the design of the new development should be looked upon more favourably.

4.50 Meeting the challenge of climate change, flooding and coastal change (Chapter 14) - paragraph 152 sets out that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.

4.51 Conserving and enhancing the natural environment (Chapter 15) – the planning system should contribute to and enhance the natural and local environment by protecting and

enhancing valued landscapes, recognising the wider benefits of ecosystem services, minimising impacts on biodiversity and promoting net gains in biodiversity where possible.

Planning Practice Guidance

- 4.52 The Planning Practice Guidance (PPG) was published in March 2014 and subsequently updated. The guidance collates and consolidates guidance previously published in a number of separate documents. The guidance in the PPG has been taken into consideration in formulating development proposals for the application site.

5. Planning Appraisal

Introduction

- 5.1 It is a requirement of section 38(6) of the Town and Country Planning Act 2004 that where a development plan contains policies relevant to an application, the decision must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 The statutory development plan therefore relating to the Application Site consists of the Saved Policies of Salford City Council's Unitary Development Plan 2009. Material considerations relating to this application include the National Planning Policy Framework, Planning Practice Guidance, Supplementary Planning Documents and guidance prepared by Salford City Council and to some extent the emerging policies in the Salford Local Plan.

The Principle of Development: Employment Land Supply

Site Context

- 5.3 The site is 712 square metres in size and comprises a small kiosk building that is 94 sq.m in size. The remainder of the site is an open yard secured from Duncan Street by mesh fencing and an access gate. The site has been sporadically occupied over the last 10-15 years and was last used as a coach hire base.
- 5.4 The site is considered to comprise low grade employment land and due to the site offer of hardstanding and a small building, the site would only attract a limited number of occupiers. To enable a wider variety of employment uses to be attracted to the site, significant investment would be required to create additional floorspace on the site.

- 5.5 The surrounding area is one that is in a period of transition from what was once an employment area with industrial tenants and high occupancy to an area that is transitioning to non-employment uses with the core industrial activity in decline.
- 5.6 Most notably to the south of the site, is the 'City View' site which extends from Regent Road up to Duncan Street. Granted in February 2017, this scheme will accommodate 525 residential units within 4 blocks of development. Construction work is currently ongoing on site, to the immediate south of the application site boundary is a 10 storey block which is approximately 18 metres away (across Duncan Street).
- 5.7 To the east of the site is a Petrol Forecourt and car wash which is a retail use (this doesn't align with Policy EP5 and the definition of an employment area).
- 5.8 To the west of the site is a row of industrial warehouses, some of which are vacant, others are in use by automotive repair / servicing trades. Immediately to the west of the site the unit at number 32 -34 Duncan Street appears to be in part use as a Place of Worship (google maps). As noted further below, this row of units has also been removed from the Council's supply of employment land.
- 5.9 To the north of the site is the Excalon site. The applicant has been in constant communication with the owners of this site throughout the pre-application phase and therefore have a detailed understanding of the operations on that site. The site has in the past been used for the processing of aggregates however this use has been significantly scaled back in recent years with more localised depots being preferred. The site is significantly underused and space on the site has been sublet in recent years, notably during the pandemic one of the buildings was sublet to the NHS for storage of PPE. SISK Construction now occupy one of the units for the storage of building materials. Evidently the site is no longer the industrial, noise generating site that it may once have been. This is further confirmed via the results of the Noise Impact Assessment which does not attribute any noise generating activity to this site.

Context: Local Policy Evidence Base

Employment Need

[Places for Everyone evidence base document: Employment Land Needs for Greater Manchester (updated March 2021)]

- 5.10 The report considers the future scale of employment land needs in Greater Manchester for the Places for Everyone Plan and covers the plan period from 2021 to 2037.
- 5.11 The research and analysis in the update is based upon past completions data which is a widely accepted and robust methodology. The report concludes that the net change in industrial / warehousing floorspace across the whole of GM (9 boroughs) is forecast to be 3,330,000 sq.m for the 16-year period (2021 – 2037) (see table 1.2 of that document). Table A2 goes on to give an illustrative estimate of need of 251,000 sq.m of I/W floorspace within Salford over the same period.
- 5.12 The net change in office floorspace across the 9 GM boroughs is forecast to be 1,910,000 sq.m for the period 2021 – 2037. The illustrative estimate of need for Salford is 336,000 sq.m over the same period.

Employment Supply

- 5.13 The Salford City Council Housing and Economic Land Availability Assessment (HELAA) was published in October 2021 and covers the period of 01 April 2021 to 31 March 2037. This monitoring report is useful as it provides a snapshot of the anticipated supply within the borough. In terms of Industrial / Warehousing, the HELAA identifies a net change of 87,158 sq.m of floor space based on 181,838 sq.m of gross additions and 94,680 gross losses. This is based on the baseline supply of existing sites.

- 5.14 The HELAA then relates this to the proposed allocations within the Places for Everyone Plan. These allocations have the potential to support 320,000 sq.m of Industrial / Warehousing floorspace (under the Port Salford expansion).
- 5.15 The total supply figure based on existing sites and allocations within the plan period 2021 to 2037 is therefore 407,158 sq.m. When this is set against the illustrative estimate of need for 251,000 sq.m within the Employment Land Need for GM document it is evident that the amount of supply is far greater than the need identified.
- 5.16 Table 6.1 of the Draft Places for Everyone plan identifies a supply of 337,576 sq.m of office space over the 2021-2037 period indicating that office supply will just fulfil the need identified.

Ordsall / Duncan St Employment Supply

- 5.17 Within the Ordsall ward, 168 sq.m of industrial / warehousing is identified as being lost over the period. Annex 1 identifies these units as 30a and 32-34 Duncan St which adjoin the application site. The reasons for the sites being identified as discounted is due to the presence of planning permission for these units (see fig 5.1 below). As noted in the preceding section, this further illustrates the transition of the area and surrounding units to non-employment use

2021 to 2037 – housing and economic land availability assessment annexes (October 2021)
Annex 2 – Sites not considered developable for housing, offices, industry/warehousing up to 2037

Ward	Site ref	Address	Reason(s) site has been discounted as being developable	Site area (ha)
Ordsall	H/ORD/025	32-34 Duncan Street Salford M5 3SQ	Planning permission for Change of Use of ground floor unit from B8 (storage and distribution) to A5 (Hot food takeaway) installation of new shop front and vertical extract duct to rear elevation	0.01
Ordsall	H/ORD/028	30A Unit A 30-34 Duncan Street Salford M5 3SQ	Site owner has planning permission for the change of use of part of existing warehouse unit to a hot food takeaway.	0.01
Pendlebury & Clifton	H/PBC/002	Riverside House, Agecroft Road, Pendlebury, Swinton,	Previous interest in the site from a residential permission (see 15/66600/OUT was approved subject to legal agreement (not signed and app withdrawn)). However	2.2

Fig 5.1: Sites on Duncan St discounted for employment use in the HELAA (October 2021)

Regeneration Context

5.18 Section 3 of the emerging Salford Local Plan: 'Development Management Policies and Designations', sets out the purpose and objectives of the Plan. The Plan calls for development to be genuinely sustainable supporting economic, social and environmental objectives in a way that addresses the challenges facing Salford. Key aims which development should make an appropriate contribution to includes:

- Future-proofing the city.
- Regenerating urban areas.
- Maximising the reuse of previously-developed land and ensuring that land is used efficiently as part of new developments.
- Reducing the need to travel and maximising the ability to do so by sustainable modes.
- Providing distinctive and thriving neighbourhoods that support wellbeing, with high levels of green infrastructure.
- Achieving high quality design.
- Supporting healthy lifestyles.
- Improving air quality and reducing pollution.
- Tackling the scandal of fuel poverty.
- Addressing problems of housing affordability and availability to avert a housing crisis.

- Delivering more accessible and adaptable homes so that all needs can be met, including those of disabled people and older people.
- Ensuring a good range of easily accessible shops and facilities, with strong town centres and local centres.
- Providing more local employment opportunities and training opportunities.
- Protecting and enhancing environmental and heritage assets, including strategically important green infrastructure.

5.19 The Plan's Strategic Objectives recognise that to support regeneration and the efficient use of land that at least 85% of new dwellings will need to be built on previously developed land (objective 5).

5.20 Strategic Objective (9) - To significantly enhance accessibility and reduce congestion, sets out a key target to:

a) Increase in the proportion of journeys that are by walking, cycling and public transport

b) Improvement in journey times on the key route network

Planning Justification

5.21 Saved UDP Policy EP5 states that within established employment areas, planning permission will only be granted for the reuse or redevelopment of sites or buildings within an established employment area for non-employment uses where:

1. the development would not compromise the operating conditions of other remaining employment uses; and

2. one or more of the following apply:

- a. the developer can clearly demonstrate that there is no current or likely future demand for the site or building for employment purposes;
- b. there is a strong environmental case for rationalising land uses or creating open space;
- c. the development would contribute to the implementation of an approved regeneration strategy or plan for the area; or
- d. the site is allocated for another use in the UDP.

Existing Employment Area?

5.22 Given the characteristics of the site and surrounding area, there is considerable doubt as to whether the site can be considered to form part of an 'established employment area' for the purposes of Policy E5. Paragraph 8.4 of policy E5 states that an established employment area is defined as site(s) / building(s) that are currently used, or where vacant were last used, for non-retail employment uses, and fall within one of the following categories:

- Any area with five or more adjacent business units;
- Any continuous site area of 0.5ha or greater; or
- Any building(s) with a floor area of 5,000 square metres or greater.

5.23 Given the changes that have transpired (as described above in 'site context'), it is very much an area in decline as an employment area and no longer purely industrial in nature. The evidence in the HELAA demonstrates that the Council no longer consider the adjacent units to the west on Duncan Street to form part of the supply of employment sites, in addition

one of these sites is seemingly used as a Place of Worship and the site to the east (petrol filling station / car wash) is a retail based employment use (not covered by Policy E5). Furthermore, the site to the south has been re-developed for residential use and introduces 525 residential units in place of previous employment land. We therefore do not consider the application site to readily fall within one of categories specified in the policy.

- 5.24 The potential to re-use the application site for industrial or other employment uses is also now constricted due to the presence of City View to the south. It is no longer viable to have a noise generating industrial use opposite residential properties and this has restricted the ability for other sites to continue to operate in the same way or market themselves to their full potential as they are no longer likely to be compatible with a residential use, thereby reducing the scope of employment uses that could be acceptable on the site. We therefore firstly conclude that the application no longer forms part of an established employment area.

Policy E5 Compliance

- 5.25 Part 1 of the policy requires that the operating conditions of other remaining employment uses would not be compromised. The main consideration in this respect concerns the potential for new residential development to be materially affected by existing noise conditions in the area. A Noise Impact Assessment (NIA) has been undertaken by Hann Tucker Associates which utilised 4 days of 24 hour survey data and further manned surveys on separate days to establish the noise conditions at the site. This is a far more detailed and robust sample of baseline data than that utilised in the Noise Report for the City View development which was judged to be an appropriate use in similar proximity to surrounding uses. The Noise Impact Assessment is able to conclude that with the incorporation of appropriate glazing and alternative ventilation to certain units then the development is capable of proceeding without compromising the operating conditions of surrounding employment premises. The NIA found that the main noise constraints affecting the site were attributed to the petrol filling station which is not a protected use under Policy E5 in any event.

- 5.26 In terms of compliance with Part 2 of the policy it is considered that the development is compliant with Parts 2a, 2b and 2c of the policy.

2a: There is no current or likely demand for the site or building for employment purposes

- 5.27 In terms of current and future demand for the application site to be used for employment purposes. It is clearly demonstrated via paragraph 5.10 – 5.16 above that the future employment land supply within Salford far exceeds the identified need and therefore, this site can be considered surplus to requirements.

- 5.28 We also consider that due to the characteristics of the site, comprising a limited amount of floorspace, that significant investment would be required to transform the site into a more attractive proposition. Furthermore, more locationally appropriate employment premises are likely to exist. As noted above, the presence of an adjacent residential use also restricts the range of employment uses that could successfully operate from the site.

- 5.29 This leads to a conclusion that housing development would be the most appropriate use for the site and this is supported by the NPPF Chapter 11 'Making Effective Use of Land'. Paragraph 120 of the NPPF states that planning policies and decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).

- 5.30 The NPPF therefore specifically calls for substantial weight to be given to the value of regenerating under used brownfield sites for housing development. Furthermore, Paragraph 123 states that:

Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework;

- 5.31 As evidenced in this section, the alternative use of this site for residential use would not undermine employment land supply and would support the transition of this part of the city to a mixed use area.

2b: Strong Environmental Case for rationalising land uses

- 5.32 The transition to a residential / mixed use area is evident with the City View development opposite the site. The nearest development block has facing windows 18 metres from the application site. Due to the presence of large scale residential development in the vicinity of the site, the character of the area has irreversibly changed. Introducing an employment or industrial use onto the application site has the potential to create environmental issues in terms of potential noise pollution and complaints. Therefore, the employment uses that could be operated from the application site are significantly limited: the granting of planning permission for City View has in effect put a significant constraint on the scope of uses which could operate from the site in the future. We therefore believe that it would be an unreasonable position for the Council to take by approving residential development at City View, but then expect a neighbouring occupier to find an industrial or employment

occupier to take up a site 18 metres from a habitable window as this will inevitably restrict their operation. Should the Council adopt a position of requiring employment use only on the application site then they would have adopted a position contrary to Policy EF2 'Co-Ordinated Development' which states that development should not unacceptably hamper or reduce the development options for adjacent sites.

- 5.33 We therefore consider there to be a strong case for rationalising land uses within this area and positively responding to Chapter 11 of the NPPF and Policy EF1 'Efficient Use of Land' of the emerging Salford Local Plan.

2c: Approved Regeneration Strategy

- 5.34 The applicant opened pre-application discussions with the Council in 2018. At this time, they were informed that a Regeneration Masterplan was being planned for the area. This has since been shelved due to resourcing issues and the likely need to focus on the adoption of the new Local Plan and Places for Everyone Plan as a priority. Evidently the Council had considered this area as an area of change and this is reflected in its excellent public transport links and access to surrounding services such as the retail park and access to the City centre. These are precisely the types of sites which paragraph 120 of the NPPF is there to encourage.
- 5.35 Whilst there is no site specific regeneration masterplan, the strategic objectives in the Emerging Local Plan advocates the need to fully utilise previously developed land and significantly enhance accessibility and reduce congestion, by increasing the proportion of journeys that are by walking, cycling and public transport – which can be achieved by building houses in the most sustainable locations. The development of this site for residential use would therefore align with these regeneration objectives.
- 5.36 It is also noted that the Officer Committee Report for the City View scheme recognised that City View was to be the start of further regeneration in this area, where it is stated:

A development such as this also has the potential to kick start further re-development/regeneration schemes in the area.

- 5.37 In light of the above it can reasonably be considered that the proposed development aligns with the regeneration priorities of the Council.

Summary

- 5.38 This section has demonstrated that the redevelopment of the application site for a residential-led mixed use scheme meets the relevant tests set out at UDP Policy E5 and will contribute to the regeneration objectives set out in the emerging Local Plan. Furthermore the development is compliant with Chapter 11 of the NPPF which seeks to make the most effective use of sustainably located land.

The Principle of Development: Residential Use

- 5.39 The proposed development is considered to be in full compliance with the adopted policies of the Saved UDP. The application will provide new housing in a location close to existing services and public transport facilities, in accordance with the strategic objective of Policy ST1 'Sustainable Urban Neighbourhoods'.
- 5.40 Aligned with the above, the core focus of the NPPF is to ensure that development is sustainable. The NPPF outlines that sustainable development consists of three interdependent objectives (economic, social and environmental) that should be engaged in mutually supportive ways (para 8). Development should be situated in the right place to 'support growth, innovation and improved productivity'; residential schemes should provide sufficient homes in terms of number and range where they are needed to 'support communities health, social and cultural well-being'.

Sustainable Development

- 5.41 As demonstrated through this submission, the development site is undeniably located in a highly sustainable location. The site is well served by bus links and the Regent Road corridor and is a popular choice for people wanting to live within a commutable walk or cycle distance from the city centres of Salford and Manchester.
- 5.42 The guiding ethos of the scheme is also one of sustainable living and the development specifically responds to the challenge set out in the Emerging Salford Local Plan Policy CC1, which seeks to ensure that all development considers sustainability and the need to positively respond to the climate change crisis.

Housing Mix

Type of Dwellings

- 5.43 The proposed development is considered to respond positively to the requirements of Saved UDP Policy H1 (1-6) as follows:

Contribute towards the provision of a balanced mix of dwellings within the local area in terms of size, type, tenure and affordability.

- 5.44 The wider area is comprised of low rise family housing to the south of Regent Road with higher density housing blocks closer to Salford City Centre and Manchester City Centre. The provision of housing in the form of apartments therefore provides a balance to the mix of dwellings in the immediate locality in terms of tenure and type and will provide an appropriate density of housing given the site's sustainable location.

Be built at an appropriate density, which will be no less than 30 dwellings per hectare.

- 5.45 In light of the accessibility of the site to the major economic centres of Salford City Centre and Manchester City Centre, there is a clear case for a higher density of development. Furthermore, the physical characteristics of the site and the requirements of the NPPF also promote a higher density of development in such locations.
- 5.46 In addition to the above factors, a market appraisal has been carried out by Alesco Property, which examines the demand for the type of units in this location. The appraisal is included at appendix 1 of this statement.
- 5.47 The appraisal explains that the development is likely to appeal to new residents due to its access to employment hubs right across the city. The appraisal notes that with Middlewood Locks and Wilburn Basin successfully completed and embedded into the area and the Regents Plaza blocks soon to be completed, these three projects along with the smaller projects bodes well for this area becoming the latest destination choice for young professionals choosing this as their neighbourhood.
- 5.48 The development and mix of units is considered to align with market forecasting and recent demand experienced in the local area, the analysis stating that the size and type of apartments proposed are the types that they are seeing increased demand for from customers.
- 5.49 Given the analysis included with this statement it is considered that the proposals will diversify the housing offer within the local area and the sustainable location of the site means it is the ideal location to support a vibrant mixed community, in accordance with policies MX1 and H1 of the UDP.

Provide a high-quality residential environment and adequate level of amenity in accordance with design policies.

- 5.50 As demonstrated via the submitted Design and Access Statement, the proposed design is of an exceptional design quality that respects the residential amenity of surrounding properties.

Make adequate provision for Open Space.

- 5.51 Due to the limited size of the site, opportunities for Open Space are restricted, furthermore Secure by Design constraints are likely to restrict public access into the site. However, the applicant proposes that the roof area presents the opportunity for a shared outdoor terrace for residents providing a place of rest and social engagement.

Make an adequate contribution to local infrastructure and facilities required to support the development and be consistent with other policies of the UDP.

- 5.52 These requirements are dealt with elsewhere in this statement and the supporting documentation.
- 5.53 In terms of accessibility, Policy H1 is supported by Policy HOU1, this states that:

Within the rest of Central Salford (i.e. excluding the Regional Centre, Broughton Park, Claremont, and the northern part of Weaste and Seedley), new developments should provide a broad mix of dwelling types. Apartments should only be the predominant form of provision on sites in the most accessible locations within Central Salford.

- 5.54 As noted above and in the supporting Transport Statement, the site is in a highly accessible location and should be regarded as falling within the most accessible locations in Salford. The provision of apartments can therefore be supported under Policy HOU1.

Dwelling Mix

5.55 SPG Policy in the Housing Planning Guidance supports policy H1. SPG Policy HOU 2 states:

Where apartments are proposed, they should provide a broad mix of dwelling sizes, both in terms of the number of bedrooms and the net residential floorspace of the apartments. Small dwellings (i.e. studios and one bedroom apartments) should not predominate, and a significant proportion of three bedroom apartments should be provided wherever practicable.

Alternative approaches can again be justified having regard to A-H of Policy H1 (as above).

5.56 The development proposes the following mix of dwellings: 40 no. 1 bed dwellings, 44 no. 2 bed dwellings and 1 no. 3 bed dwellings. As over 50% of the units will be a minimum of two bedrooms, the development ensures that small dwellings will not predominate. As demonstrated through this statement the development also responds positively to the requirements of A-H of policy H1 in that:

- The size of the development is considered to be appropriate for the accessible location and makes efficient use of an underused site in a highly sustainable urban location. The development thereby supports the aspirations of NPPF policy that promotes an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (para 119).
- The physical characteristics of the site in terms of its size and the presence of a 10 storey block to the south means that an apartment development is the only realistic design proposition that will positively respond to the emerging character of the area. A development of the type proposed promotes and supports the development of

under utilised buildings meeting an identified need for more housing in accordance with para 120 of the NPPF.

- As noted earlier the wider area is characterised by low rise family housing to the south of Regent Road and higher density housing closer to the city centres of Salford and Manchester. The provision of residential development in the form of apartments therefore provides a balance to the mix of dwellings in the immediate locality in terms of tenure and type.
- The site is in a highly accessible location, whereby residents will be able to walk and cycle to the city centre thereby facilitating a transition to a low carbon environment.
- The market appraisal prepared by Alesco Properties demonstrates that there is demand for the type of units proposed.

Compliance with Emerging Draft Policy H1 'Type of Housing'

- 5.57 In response to draft Policy H1, the proposed mix of accommodation has been informed by advice from local agents (Alesco Properties) to ensure that the proposed development offer responds to the existing and forecasted demand for residential accommodation in the most accessible parts of Salford. Analysis provided by Alesco Properties and submitted in support of this application shows that the mixture of one and two bedroom apartments responds to an identified need for this type of accommodation. It is therefore clear that the inclusion of 1 no. three bed apartment responds to B1 of the policy in that this type of accommodation has been maximised as far as possible in order to make the development marketable.
- 5.58 Part B2 of the policy is also complied with in that the site has distinct characteristics in terms of its site size and design context next to a 10 storey apartment building that would mean it is inappropriate and not an efficient use of land to put low density housing on the site, this demonstrates compliance with B2a.

- 5.59 Part B2b is complied with in that the evidence provided by Alesco (noted above) shows that there is a demonstrable need for this mix and type of apartment accommodation.
- 5.60 Part B2c requires the minimum density requirement in Policy H3 to be met. On the Proposals Map for the Emerging Plan, the Regent Road Local Centre is located less than 50 metres from the site. Under the policy a minimum density of 50 dwellings per hectare is required. The City Centre Salford boundary is also approximately 160 metres north west of the site, under the policy a minimum of 120 dwellings per hectare is required. The density of development proposed therefore responds positively to the minimum density requirements set out in the Local Plan.

Unit Sizes

- 5.61 The unit sizes meet the space standards set out in the Nationally Described Space Standards and Draft Policy H3 of the emerging Salford Plan.

Summary

- 5.62 On balance the type and mix of accommodation is considered to be appropriate and justified against local policy requirements. The development strives to perform positively against emerging sustainability policy and is justified against the adopted policies of the Saved UDP. The application will also provide new housing units in a location close to existing services and public transport facilities, in accordance with the strategic objective of Policy ST1 'Sustainable Urban Neighbourhoods'.

Planning Obligations

- 5.63 The national planning policy framework (NPPF) identifies that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of planning conditions or planning obligations. It highlights that planning obligations should only be used where it is not possible to address unacceptable

impacts through a planning condition (paragraph 55). The NPPF also restates the three statutory tests for planning obligations which are defined in the CIL Regulations (paragraph 57).

5.64 The NPPF sets out that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment as part of the application. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case (paragraph 58).

5.65 A Viability Assessment has been prepared by Savills which having regard to the NPPF and PPG identifies the circumstances which mean viability needs to be considered further in the determination of the scheme.

5.66 The Viability Assessment tests the viability of the application, finding that the provision of affordable housing and financial contributions for other planning obligations would prejudice the planned development coming forward due to the identified viability constraints affecting the site.

Design

5.67 The submitted Design and Access Statement provides a detailed overview of the design proposals.

5.68 The scale of the proposed development at 12 storeys is commensurate with the City View development immediately to the south of the site, with the nearest block of the City View scheme being 10 storeys in height. The proposed development here is considered to be complimentary in terms of scale and this will be apparent when viewed from the street level environment and shorter-range views whereby the two blocks will be viewed on a similar footing side by side. In longer range views, the minor difference in height between the two

blocks becomes less relevant as the proposed development will be clearly viewed as secondary to the wider City View Scheme which is 26 storeys in height.

- 5.69 The slight step up in height between the nearest block of the City View scheme will also enable a transition to a higher scale of development on the Excalon site to be achieved in the future, acknowledging that the sites' proximity to City Centre Salford means that a development of scale could be logical there. Even if that scenario was never realised, it is considered that the scale of development remains acceptable given the subtle variation in height in comparison to the nearest City View block.
- 5.70 The building height is therefore considered to positively respond to this neighbouring scale of development and will provide a coherent streetscape which will be reinforced if future development comes forward in the area. The officer report for the City View scheme identified that the scheme had the potential to kick start further redevelopment / regeneration schemes in the area and it is considered that development on this site has the ability to continue that trend.
- 5.71 In terms of the buildings' overall massing, the massing and facade treatment is organised in a tri-partite manner with a base, middle and top to provide order and visual interest. At the lower levels, the upper ground floor terrace allows the mass of the building to be set back from the street edge to ensure that separation is created to the City View scheme whilst also ensuring that the development is not over dominant to the streetscene. The main facade is then organised as a regular grid of pale grey brick with localised areas of recessed green to surround the windows. The tri-partite organisation of the facade is completed with upper storeys that are metal clad. The scheme includes a 'crowning' element created from the roof level benefitting from an external terrace, this provides a further reduction in the overall massing and provides visual interest in the upper level.
- 5.72 Overall, the development is considered to be appropriate in terms of its design, scale and massing and will create a complimentary addition to the local streetscene and wider cityscape. Further analysis in this respect can be found in the submitted Townscape and

Visual Impact Assessment (Urban Green) and the Design and Access Statement (Todd Architects).

5.73 Other Key Planning and Environmental considerations

Residential Amenity

- 5.74 The site layout and location of windows sensitively responds to the location of surrounding residential properties. In the south (front) elevation of the development, the windows are set back from the site frontage due to the presence of a first floor terrace. This set back allows the relationship with the site boundary to mirror the corresponding relationship that the City View scheme has with its northern boundary. We therefore find that that the relationship between the two schemes is acceptable in light of the urban location.
- 5.75 To the eastern elevation of the development, one habitable room window is proposed in the upper floors of the scheme. The site to the east is currently used as a petrol filling station and therefore the existing use will not be adversely affected by this window. Conversations with the owner of the petrol station site have also indicated that it is likely to remain in this use in the long term. Should the site ever be redeveloped in the future, as the Design and Access Statement outlines, the potential model for future development on this site would be likely to attract a lower form of development to avoid an imposing corner structure and to provide a transitional scale to the Regent Road shopping centre to the east.
- 5.76 To the north, it is not considered that the presence of habitable room windows would hamper the ability for development to come forward on that site. The existing site to the north is at a lower level and there is an embankment between the sites. Given the size of the site to the north, we consider that it would be unrealistic for any future housing development on that site to be built in such proximity to this scheme so as to cause an unduly harmful level of amenity for future residents.

- 5.77 The application is also accompanied by a Daylight / Sunlight Assessment (prepared by GIA) which examines the relationship with surrounding buildings and spaces.

Transport and Highways

- 5.78 The application is accompanied by a Transport Statement and Travel Plan prepared by Axis Consulting. This provides a review of the accessibility of the site which confirms that the site is in a highly sustainable location being located within close proximity to a range of local amenities and high quality pedestrian, cycling and public transport facilities and infrastructure. The areas of Spinningfields and Deansgate, which contain an array of amenities, can also be accessed within a circa 2km walk from the site, whilst the wider City Centre and surroundings are accessible on bicycle. This is an attractive proposition for new residents.
- 5.79 In terms of the access into the site, the vehicular access will be located at ground floor level. A separate access point is proposed for pedestrians.
- 5.80 The TS goes on to explain that servicing will take place from Duncan St with private waste collections from the street. In terms of parking provision, in support of the sustainable ethos and the approach to reduce reliance on the private car, limited parking is proposed on site with 8 spaces and 4 motorcycle spaces. This level of parking provision is within SCC's maximum car parking standards and is consistent with the parking provision approved at other similar residential schemes nearby recently, some of which have been approved with zero parking. Given the site's highly sustainable and accessible location within Salford and on the fringe of Manchester City Centre with excellent opportunities for residents and visitors to access the site by sustainable modes of transport, including walking, cycling and public transport this level of provision is considered acceptable. The development is also accompanied by 100% cycle parking in order to fully promote the opportunities for sustainable travel.

- 5.81 The TS goes on to examine potential trip rates associated with the scheme and this demonstrates that the level of trip generation is negligible and would not cause detriment to the safety or operation of the local highway network.
- 5.82 Paragraph 111 of the NPPF sets out that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This is a high policy test, the development proposed will be limited in its impact and would not give rise to any severe traffic impacts.

Ecology and Trees

- 5.83 A Daytime Bat Survey and Ecological Walkover Study has been prepared by Rachel Hacking Ecology and is submitted in support of the application. The survey results show the habitats across the site are of low ecological value. No evidence of protected species or suitable habitats was identified on site. It is the opinion of Rachel Hacking Ecology that the development can proceed without the need for further survey work (e.g. bat activity surveys) or bat mitigation due to the negligible potential of the building to support bats.
- 5.84 The above demonstrates that the impact on the natural environment has been surveyed, recorded and the need for mitigation considered accordingly. The development is therefore considered to be in accordance with chapter 15 of the NPPF.
- 5.85 The application is also accompanied by a Biodiversity Net Gain Assessment, which assesses the current habitat offer at the site, the intention of this assessment being to ensure that there is not net loss of habitat provision. Given the low ecological value of the site, the development will not result in any loss of biodiversity value and is capable of proceeding without mitigation.

Noise Impact

- 5.86 A Noise Impact Assessment Report has been prepared by Hann Tucker and is submitted in support of the planning application. The assessment analyses the potential impact from surrounding uses and ensures that desirable internal noise levels can be met within habitable rooms of the proposed development.
- 5.87 The report finds that suitable internal noise levels can be achieved when appropriate glazing and ventilation systems are used. With the mitigation measures in place there is no adverse impact predicted upon the proposed noise receptors and the development is considered to be in complete accordance with Policy EN17 and Chapter 15 of the NPPF and relevant national guidance.

Ground Conditions

- 5.88 A Phase 1 Preliminary Risk Assessment and Phase II Intrusive Site Investigation has been prepared by Geocon. The submitted document examines the historic use of the site and various sources of potential contamination and has been informed by the results of on site intrusive survey work. The report recommends that a Remediation Strategy is developed to outline the proposed methodology for remediation of the site. Such an approach is standard for a development of this nature and can be secured by an appropriately worded planning condition.

Air Quality

- 5.89 An Air Quality Impact Assessment has been prepared by Redmore Environmental. As the site is located to the south of a number of industrial facilities an Air Quality Impact Assessment was undertaken in order to consider baseline conditions at the site, consider location suitability for the proposed end-use and assess potential impacts associated with the scheme.

- 5.90 The risk of potential impacts from fugitive dust emissions (associated with industrial uses) was assessed using a method based on standard industry guidance. This included consideration of a number of factors including the scale and nature of emissions from the surrounding facilities, the location and sensitivity of the development and prevailing meteorological conditions.
- 5.91 Following consideration of the relevant factors, overall effects as a result of emissions associated with the industrial facilities were not predicted to be significant.
- 5.92 The AQA also examined the potential for future residents to be exposed to high pollution levels in the future due to traffic exhaust emissions associated with vehicles travelling to and from the site. These were assessed using standard screening criteria. As the development provides limited car parking spaces, road traffic exhaust emission impacts were not predicted to be significant.

Flood Risk

- 5.93 The site is located in Flood Zone 1 and therefore is at low risk of flooding i.e. less than 1 in 1,000 year's annual probability of flooding. The application has been accompanied by a Flood Risk Assessment (prepared by BWB Consulting). This considers the flood risk in relation to the site and concludes that the proposed usage is entirely appropriate complying with NPPF guidance. An appropriate surface water drainage strategy is also to be implemented, in order to manage the surface water runoff generated by the proposed development. Please refer to the submitted Drainage Strategy for further information.

Sustainability

- 5.94 An Energy and Sustainability Assessment has been prepared by WECE Consulting which addresses UDP Policies SD1, DP1, EG1, and EG2 and considers emerging Policy CC1.

- 5.95 The above policies require that the development is of a high design standard in order to support Salford City Council's commitment to reducing carbon emissions through energy use and assist the city with meeting national energy target reductions. In addition, all new development must comply with Building Regulations Part L and support and promote the use of renewable and Low/Zero Carbon (LZC) technologies through thoroughly assessing their feasibility.
- 5.96 In order to achieve compliance, the development has been modelled using SAP 2012, the governments Standard Assessment Procedure for residential dwellings.
- 5.97 The proposed development adopts the Energy Hierarchy to ensure that the correct approach to design is taken to promote an energy efficient low carbon solution. The following Energy Efficient design measures are therefore specified as part of this development:
- High levels of insulation throughout with minimal thermal bridges
 - Passive solar gains and internal heat sources
 - Excellent level of airtightness
 - Good indoor air quality by openable windows
- 5.98 The statement then goes on to consider all aspects of sustainable design to ensure that the development is considered in a holistic manner. The statement concludes that the proposed sustainable design and energy strategy allows the development to comply with Salford City Council's planning policy requirement.

Fire Safety

- 5.99 In accordance with government guidance a Fire Safety Statement is submitted in support of the application. This outlines the firefighting/safety measures to be incorporated into the development to ensure compliance with relevant guidance and legislation.

Design and Crime

- 5.100 A Crime Impact Statement prepared by Greater Manchester Police has been submitted in support of the application. The report confirms that the proposed design has been appraised using the principles of 'Crime Prevention Through Environmental Design'. The report finds the proposed scheme to be acceptable from a crime prevention perspective and includes recommendations in respect of certain measures which will be taken through the detailed design process. Assuming planning permission is granted, the development will then be required to achieve Secured by Design accreditation - this process will be secured via planning condition.

6. Conclusions

- 6.1 This planning statement has been prepared on behalf of Generation in support of a full planning application for the development of a parcel of land to the north of Duncan Street, M5 3SQ.
- 6.2 The application seeks full planning permission for the redevelopment of the land with a residential scheme comprising of 85 no. apartments within a single development block.
- 6.3 The application scheme is considered to be in full compliance with the adopted policies of the Saved UDP and emerging policies in the Salford Local Plan.
- 6.4 The development site is located in a sustainable location close to local transport links. The site also benefits from excellent local cycling and walking infrastructure. The proposed development maximises the opportunities that the site's sustainable location presents and plans for a development which makes the best use of an underused site in the urban area.
- 6.5 As evidenced in this statement and supporting technical reports, the site has been shown to be a suitable and sustainable location for new development with no known adverse impacts arising from the development that would significantly and demonstrably outweigh its benefit. In fact, it is our view that no material planning considerations exist that would justify a refusal of planning permission. Consequently the proposals are considered to constitute sustainable development as defined by the NPPF and the presumption in favour of sustainable development should apply in the determination of this application.

Appendix 1: Market Appraisal (Alesco Property)

Generation Ltd

Market Appraisal for boutique block at Duncan Street of 85 Apartments

Delighted to have received the information on this project on Duncan Street which is located in an area west of Castlefield, that is extremely accessible for tenants wishing to live within a 17-18 minutes walking distance of the Deansgate/Spinningfields which are major employment hubs, alongside the 'Castlefield' entertainment hub.

It means residents could use the 'Orsdall Chord Footbridge' / 'hidden footbridge which is due to reopen across the river Irwell, meaning even quicker access into Castlefield and Deansgate, another advantage for quicker access.

Living here, means you can have the option to cycle to offices in the Northern Quarter, University Quarter or MediaCityUK with no need to use major roads or use new cycle paths. With the provision of a Bike space zone for 86 bikes adding value to the property.

The area around here has changed a lot in recent years moving from a former industrial area to now becoming a new residential area. With new neighbourhoods now completed at Middlewood-Locks and Wilburn Basins adding much needed footfall of people to the shops here which in turn will lead to further demand for shops/cafes here.

The Duncan Street Project is on a quiet side road off 'Oldfield Road' a main road that links Chapel Street, Regents Road and Ordsall Lane. Hence, ideally located for easy access to these roads which lead to these employment hubs right across the city as mentioned above and to MediaCityUK / Old Trafford and Trafford Business Park (by cycling).

Middlewood-Locks and Wilburn Basin projects having successfully embedded themselves into the adjacent area. The Regents Plaza blocks soon to get completed, these three anchor projects along with the smaller project bodes very well for this area becoming the latest destination choice for young professionals choosing this as their neighbourhood.

The Duncan Street project being a boutique development of 86 units, will give it an advantage over the larger anchor projects, as many tenants like the feel of the smaller boutique projects as they tend not to be so busy with people and you get chance to know your neighbours in the smaller unit projects.

A project of this size is often built efficiently and on time, so can be turned round from breaking ground to completion in the reasonable time compared to some of the larger sites which can over-run.

Regents Retail Park, is across the road, means tenants have major shops / brands, a gym and a Costa literally minutes' walk away. I note the mix of apartments in the block, is well split between the range of 1beds (standard and large) and the two bed options. These are the sizes and types of apartments we are seeing increased demand for from our customers.

On these blocks, it's important to have the choice and options to offer out, so 22 x standard 1-beds at over 37sq m for One person is great. To have a similar amount of the larger ones as well is ideal for a Couples so good design and indeed meets the new NDSS requirements. I see there is an almost equal balance of Two Bed Apartments which can cater for 3 people while at same time allowing the room to be a work space option should that be a requirement.

The communal areas on the floorplan are a very good size for this size development with the amenities like the Terraces on top floor and First floor. These add excellent value from my experience, as people need to get out of their apartment to get fresh air and to have private chats with friends etc.

The demand for developments providing this outdoor space has increased as it improves mental well-being and helps develop a sense of community. The views from the roof terrace towards the city centre of Manchester are also a key feature of this development. The parcel storage area for modern day deliveries from online shopping orders again a necessary key provision for young professionals living at Duncan Street.

The large lobby on ground floor gives lots of light and will give a lovely welcoming feel. The first floor amenities and workspace in the communal areas again ideal for giving residents the option to work at home but not having to sit in their kitchen or bedroom.

Considering all the factors above, these are for me all very sweet spots for living / buying / renting here in a new boutique development is an ideal addition to the local area.

Best Regards

Martin Cooney

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