

ITEM

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| Application Reference | DC/060928 |
| Location: | Seashell Trust, 160 Stanley Road, Heald Green, Stockport, SK8 6RF |
| PROPOSAL: | <p>Hybrid application proposing the following:</p> <p>Detailed Application for the erection of a new school (Use Class D1) with associated kitchen and dining facilities, swimming and hydrotherapy facilities (Use Class D2), infrastructure, drop-off parking, access, landscaping and ancillary works.</p> <p>Outline Application (all matters reserved except access) for the demolition of the Chadderton building, Orchard / Wainwright / Hydrotherapy / Care block, Dockray building, part of existing college, 1 Scout Hut and 1 garage block, and erection of new campus facilities (Use Class D1/D2 - Reception, Family Assessment Units, Family Support Services, Administration / Training / Storage Facility, Sports Hall and Pavilion) with associated infrastructure, parking, landscaping and ancillary works.</p> <p>Outline Application (all matters reserved) for the erection of up to 325 dwellings (Use Class C3) in northern fields with associated infrastructure, parking, access, landscaping and ancillary works.</p> |
| Type Of Application: | Hybrid Application (i.e. part full, part outline) |
| Registration Date: | 18.03.2016 |
| Expiry Date: | Extension of time agreed to 09/02/18 if approved – 12/01/18 if not |
| Case Officer: | Daniel Hewitt |
| Applicant: | Seashell Trust |
| Agent: | NJL Consulting |

DELEGATION / COMMITTEE STATUS

Due to the size of the proposed development and the fact that it is Environmental Impact Assessment (EIA) development, the application must be determined by the Planning and Highways Regulation Committee. The application was referred to the Cheadle Area Committee on 12 December 2017 and the Bramhall and Cheadle Hulme South Area Committee on 14 December 2017 for comment. A summary of the debate at those committees are provided at the end of this report. If members are minded to grant planning permission the application must first be referred to the Secretary of State for Communities and Local Government to give him the opportunity to determine the application himself should he wish to do so (major development in the Green Belt).

UPDATE FOLLOWING AREA COMMITTEES

A summary of the debates at both area committees are provided at the end of this report.

Following a request made by members of the relevant area committees, commercially sensitive financial information that remains confidential has been made available to members of the Planning and Highways Regulation Committee.

Further public representations have been received since the report was added to the area committee agendas so the public representations summary below has been updated accordingly.

Three new matters have been raised by further objections.

A single objection has been received on the grounds that the proposed development would set a precedent for other development in the Green Belt. In response, each planning application is assessed on its own merits and is not bound by previous decisions.

Two objections have also been received on the grounds that police resources are inadequate. In response, the police are funded by general taxation including council tax and it would not be reasonable to require new housing developments to make additional contributions to local police services.

Finally, a single objection has been received on the grounds that specialist SEND services should not be centralised in one part of the country. In response, it is important to note that a key benefit of the development is the proposed expansion of the Trust's outreach and capacity building services.

Further written expressions of support have also been received raising no new issues.

BACKGROUND AND RATIONALE

The Seashell Trust (SST) is a registered charity with Royal patronage, educating and providing specialist care for children and young people aged 2-25 with some of the most complex neuro-disabilities and needs in society. Their cohort include children and young people with a combination of deafness, blindness, autism and attendant profound physical and multiple learning disabilities and/or difficulties. All of the children in SSTs' care have significant brain damage and have little or no ability to communicate independently. The children and young people attending the school and college have been referred by local authorities who do not have the necessary experience, expertise or specialist facilities to educate and care for them due to the severity and/or complexity of their needs.

The Seashell Trust currently have an on-site capacity of 120 students aged between 2-25 years comprising:

- Royal School Manchester, a non-maintained special school catering for pupils and students 2-19 years (referred to as 'the school'); and
- Royal College Manchester, an independent specialist further education college, catering for pupils and students 19-25 years (referred to as 'the college').

Both the school and college provide both day and residential places. Residential students comprise approximately 50% of the intake and reside in new, purpose built housing on the campus (outside of but adjacent to the application site) following the grant of planning permission in 2012. SST in their submission have confirmed that approximately 12% of students are resident year round, 7% are resident during term time only, 13% are weekly boarders and 18% have other short term breaks at SST.

Despite being registered for an intake of 60 students, the number of pupils/students at the school has been capped at 50 by SST due to the limitations of the current accommodation. The proposed new school would enable SST to reinstate their intake to 60 pupils. The applicant has stated that in June 2017 the school had 48 pupils/students on roll (including 6 Stockport residents and 18 from Greater Manchester).

The current capacity of the college is 80 students with 60 in college and 20 offsite on internships. The current number of students being educated on site (including day students and residential students) is 60. No material change in student numbers would result from the proposed development. The applicant has stated that in June 2017 of the 80 students at the college, 20 were Stockport residents and 37 were from Greater Manchester.

The school was rated by OFSTED as 'outstanding' in their last inspection in October 2016. The college now has a 'good' rating (previously 'outstanding') following a recent inspection in October 2017.

In their submission, SST have highlighted research into greater survival rates and the later health status of premature infants that shows that the number of children and young people being born with profound neuro-disabilities nationally is rising significantly leading to a growing demand for SST's specialist services.

SST have confirmed that they currently employ more than 440 members of staff at the site and that 40% of staff live in Stockport and 90% live within a 30 minute drive of the application site.

The need for the development is generated by the inadequacy of SST's current accommodation that is limiting both their intake and the quality of care and education they can provide. These inadequacies are partly due to SST's history. The Trust's current site opened in 1956 and operated as a school for deaf children in accommodation built to meet the needs of intellectually able, ambulant and self-supporting children and young people. It was not until 1972 when local authorities began to include deaf children in mainstream schools that a special unit opened on the site to cater for students with more complex needs. In 1979, the school specialised and catered only for those pupils with additional and complex needs. The situation which occurs to present day.

Despite many extensions and adaptations having been made and new buildings added to SST's campus, SST state that the 1950's buildings on the site are at their "structural and functional limits", no longer meet SST's operational needs and do not provide the teaching and learning environments expected for students with such complex and profound disabilities. Fundamentally, the Trust argue that the original often multi-storey, traditional classroom based school buildings are no longer suitable and severely restrict and limit SST's ability to provide all students with the individually designed curriculums and integration of therapies they require.

Despite the recent completion of the new residential buildings on the campus, paid for by a fundraising appeal, SST's ongoing concerns about the ageing, inadequate and unsuitable nature of remaining accommodation prompted them to develop a Strategic Plan to safeguard and enhance the SST's ongoing work on the site. The plan's objectives include:

- to maintain the schools and college's 'outstanding' OFSTED ratings;
- to play a central role in capacity building in other organisations, schools, colleges and communities across the country;
- to extend SST's reach to more families across the country through external advisory, outreach and training services;
- to be a centre of excellence in the use of assistive technology and digital technologies to support learning, communication and independence;
- to be centre of excellence in community engagement, participation and the delivery of inclusive sports and leisure programmes; and
- to provide high quality, specialist, multi-professional assessment of the needs of young people with neuro-disabilities and early intervention services to families.

SST believe that in order to deliver their strategic objectives the following physical interventions are required:

- the replacement of the existing housing stock (recently completed);
- the replacement of existing school building (currently located in the two storey Dockray building);
- the remodelling of the college accommodation;
- the replacement of training facilities, central support services and development of a community engagement centre;
- replacement sports, leisure and recreational facilities to promote fully inclusive sporting opportunities for all and to resolve lifecycle issues in respect of existing facilities including:
 - new swimming and hydrotherapy pools in a central location;
 - fitness suite, sports hall and pavilion to the north of the campus*Note that the provision of a 3G all weather pitch already has a stand-alone planning permission (see below) and that the GB Seated Volley Ball and Wheelchair racing team already train from the site.*
- Establishment of a national family assessment and early intervention service in a domestic setting to avoid the need for multiple, often uncoordinated assessments in clinical environments

- The establishment of an Outreach & Advisory Support & Inclusion Services (OASIS) to enable those who are unable to secure a place at SST to access its skills and expertise supporting individuals, families, local authorities, maintained schools and colleges across the country.

Clearly, the delivery of SST's strategic objectives can only be delivered if planning permission is granted for their new facilities as proposed which they call their 'Transformation Project' (TP).

SST estimate the overall costs of the TP as being £45M (inclusive of a £4M general cost contingency, £2M construction cost inflation allowance and approximately £3M specific project contingency).

Approximately £20M is attributed to the proposed new school, shared new swimming pool and hydrotherapy complex and improved student pick up and drop off areas that has been developed in detail. The remaining elements are based on outline designs and concepts and therefore estimates are considered less reliable and refined but SST nonetheless believe that they are based on reasonable and fair assumptions. The submitted summary breakdown of costs is as follows:

| | Estimated cost |
|--|-----------------------|
| Education – new school building, new college building, improved site security, new shared dining room, swimming and hydrotherapy facilities | £27M |
| Community – new community centre and SST office accommodation | £5M |
| Sports facilities – new sports hall, all weather sports pitch, new gym area | £5M |
| Training – new facilities for SST staff and others as part of outreach services | £2M |
| Family Assessment and Early Intervention Services – new building(s) | £1M |
| Other – improved site infrastructure and IT services | £1M |
| Contingency | £4M |
| Total Capital Cost | £45M |

SST have then gone on to highlight how the TP could be funded concluding that £3M could be met from SST's cash reserves, £3M from commercial loan funding and £9M from an extended capital appeal. Based on those assumptions, this leaves an anticipated funding shortfall of £30M. Having discounted government funding as an alternative source of funding for reasons set out in more detail below, SST believe that the TP can only be delivered by disposing of part of its landholding to the north of the campus for housing development resulting in the submission of this planning application based on a cross-funding, 'enabling' development case.

DESCRIPTION OF PROPOSED DEVELOPMENT

The application is a hybrid application containing detailed and outline elements. Each component part is described in greater detail below:

Proposed new school building and ancillary facilities – detailed application

The scope of this application has been revised during the application process to take account of the early demolition of the former Quad and Gayton buildings under planning permission ref: DC/061722 (see below) creating a cleared site for the erection of a new school building in the south western corner of the application site near the site access from Stanley Road.

Amount

The proposed new school building would be the largest building on the campus providing 5500m² of purpose built accommodation across a single storey, to accommodate 60 children with a range of special educational needs (an increase of 10 pupil places over the existing, restricted intake). The new building would replace approximately 2500m² of floorspace that was provided in the Quad and Gayton buildings now demolished.

Layout

The building has been designed to include a central courtyard space (both open and enclosed) with the northernmost wing of the building (Shared Block) providing kitchen, dining and therapy rooms and swimming and hydro pools that would be shared between the school to the south and the proposed college to the north.

Scale

Although the proposed school building is single storey, the building incorporates a number of double height spaces including the proposed assembly hall element and shared block. These taller elements are front facing to create a more civic scale at the entrance to the building providing definition and emphasis to the primary frontage. Despite these taller elements, the building would have a flat roof ensuring it would be significantly lower at 7.8 metres above ground level than the part two/part three storey Quad Building it replaces (approximately 10 metres high and two storey with a hipped roof). The building's deep plan necessitates a series of roof lights and rooftop air handling equipment; these elements are set back from the overhanging eaves to minimise their visual impact.

Appearance

The proposed building has high quality, modern appearance and includes a mixed palette of natural looking materials including:

- Textured facing brickwork with recessed joints and feature bond joints
- Contrasting masonry
- Rain screen cladding (copper)
- Timber cladding
- Powder-coated aluminium windows and curtain walling
- Painted steel 'wrap around' canopy with a timber soffit
- Roof lights with diffuse clerestory glazing
- Steel louvre system

The appearance of the school is best understood by referring to the proposed plans. Detailed specifications for the proposed materials and detailing remain outstanding but could be adequately controlled by condition.

Access and landscaping

Access to the Seashell Trust campus would remain from the existing Stanley Road access leading to a new car park or drop off zone comprising 47 disabled parking bays and 10 minibay bays. Hard surfaced areas would be tarmac, coloured to delineate pedestrian areas and with edge details, to create a smooth surface accessible to its users. Parking areas would be interspersed with planting.

A soft landscaped buffer would be incorporated to the south to create a green buffer (30+ metres) between the building and Stanley Road to soften its visual impact in the street scene. Formal and informal outdoor play/teaching space and soft landscape features would wrap around the building's southern and western edges whilst a service access would be provided to the northwest.

Existing mature trees along the southern and western boundaries would be retained where possible, but a significant number of low and moderate quality trees would be lost to development. Compensation would be provided in the form of new planting. The submitted Tree Survey identifies a single English Oak on the site's western boundary as the only high quality tree in this area that would be duly protected and incorporated into the development. None of the trees on the site are covered by a tree preservation order.

Again, details are best understood by referring to the proposed plans.

Proposed new campus facilities – outline with all matters reserved except access

This element of the proposal seeks outline planning permission for what would be a later phase of the campus TP and involves the demolition of the following buildings:

- Chadderton building (max height 6.99m, external footprint 103.9m²)
- College building (max height 6.2m, external footprint 1317m²)
- Orchard/Wainwright/Therapy and Care building (max height 9.2m, external footprint 1462.8m²)
- Garage (max height 3.1m, external footprint 19m²)
- Greenhouses x 2 (max height 2.3m, external footprint 13m²)
- Scout hut (max height 2.4m, external footprint 218.5m²)
- Rear wing of Dockray building (max height 9.2m, external footprint 1567m²)
- Garages to the north of the Dockray (max height 2.4m, external footprint 91.3m²)

In total, approximately 8153m² of existing floorspace would be cleared.

In their place a series of new buildings are proposed, summarised as follows:

- New single-storey reception building next to the Stanley Road entrance gates (maximum 6 metres high, external footprint not to exceed 220m²)
- New single-storey gatekeeper's lodge at the entrance gates

- New single-storey college building adjoining the new school (maximum 5.6 metres high, footprint not to exceed 1350m²)
- New single-storey forest school building to the north west of the new school building (maximum 4 metres high, external footprint not to exceed 30m²)
- 2 new assessment unit buildings to the east of the Millennium Gardens (two storey buildings maximum 8 metres high, external footprint not to exceed 200m² each)
- New single-storey training centre (maximum 8 metres high, (maximum 5.6 metres high, footprint not to exceed 1350m²))
- Family Support and Administration Facilities Building - possible new build or partial refurbishment of the existing two storey Dockray Building (maximum three storey building not exceeding 10 metres high, footprint not to exceed 1400m² noting that the existing Dockray building is 9.2 metres high).
- 2 new storage buildings to the rear of the Family Support and Administration Facilities Building (maximum 6 metres high, footprints not to exceed 220m²)
- New single-storey Sports Hall and Pavilion to the north of Family Support and Administration Facilities Building (maximum 10 metres high, footprint not to exceed 1800m²)

The proposed development also includes:

- The refurbishment of the existing West Lodge building
- New access gates, widened entrance and parking facilities to the north of the new reception building
- The creation of an additional three car parks as follows:
 - Northern car park to the west of the approved 3G all weather pitch (see planning permission ref: DC/059242) to accommodate approximately 98 cars (footprint not to exceed 2200m²)
 - Central car park to the east of southernmost storage building to accommodate approximately 22 cars (footprint not to exceed 420m²)
 - Southern car park to the south of the Assessment Units to accommodate approximately 152 cars (footprint not to exceed 3160m²)
 - New internal access roads/paths, landscaping and associated development

In total, a maximum of 5900m² of floorspace could be created by this outline element of the campus transformation project.

Across both the detailed school and outline campus elements, the cumulative maximum net gain of floorspace across the campus as a whole would be as follows:

| Element | Floorspace (+/-) m ² |
|--|---------------------------------|
| Proposed demolitions (excluding Dockray) | -8152.9 |
| Proposed new school (detailed application) | +5500 |
| Proposed new campus buildings | +5900 (maximum) |
| TOTAL MAXIMUM NET GAIN | +3247.1 |

Proposed housing development – outline with all matters reserved

In order to part fund the delivery of the proposed school and campus transformation developments, the applicant is proposing to sell part of its agricultural landholdings (approximately 15 hectares) to the north of the campus for residential development of up to 325 new dwellings creating a density of approximately 30 dwellings per hectare (net).

It is important to note that the scope of this application has changed to reserve all detailed matters for consideration at a later date. A plan showing indicative access points to the site from Wilmslow Road at its junction with Queensway has been submitted in support of the application in accordance with statutory requirements.

A Design and Access Statement and Indicative Layout has also been submitted demonstrating that the proposed quantum of development could be accommodated whilst responding positively to site constraints and landscape features including the retention of the majority of trees and hedgerows, the inclusion of adequate easements around the watercourse; the incorporation of public open space, sustainable drainage solutions and the public right of way.

Submission summary

The proposed development is Environmental Impact Assessment (EIA) development and is accompanied by an Environmental Statement (ES) that includes chapters on the following environmental effects that arise:

- Traffic and Transport
- Ecology
- Flooding and Drainage
- Landscape and Visual
- Socio-economics
- Summary of Impacts and Mitigation

The ES has been supplemented during the course of the application process with further information including a revised Landscape and Visual Impact Chapter (November 2016).

The following documents have also been submitted in support of the application:

February 2016

- Application forms
- Plans and elevations
- Executive Summary
- Planning Statement
- Statement of Community Involvement
- Sustainability Statement
- Residential Design and Access Statement
- Campus Design and Access Statement
- School Design and Access Statement
- Transport Assessment

- Residential Framework Travel Plan
- Campus Framework Travel Plan
- Acoustic Planning Report
- Affordable Housing Statement
- Arboricultural Method Statement
- Ecological Assessment
- Tree Quality Survey
- Crime Impact Statement
- Badger Survey - CONFIDENTIAL
- Flood Risk Assessment and Drainage Strategy
- School Drainage Strategy
- Historic Environment Assessment
- Campus Ground Conditions Desk Study
- Residential Ground Conditions Desk Study
- S106 Heads of Terms
- Utility Statement
- Crime Impact Statement

November 2016

- Additional Submissions Report and Executive Summary
- SMBC Letter Requesting Additional Information
- Consultee responses
- Supplemental Case for Support – Very Special Circumstances
- OFSTED Case Studies
- Alternative Sources of Funding Paper
- Campus Financial Report
- Updated Internal Road Layout
- Revised Indicative Site Masterplan
- Updated Landscape and Visual Impact Assessment
- Cross Sections
- LLFA Response Document
- Phase 2 Contaminated Land Assessment
- Revised Landscape and Visual Impact section of Environmental Impact Assessment

December 2016

- Film and 'fly through' computer generated imagery

March 2017

- Executive Summary
- Seashell Trust response to issues raised
- Architect letter of support for proposed design solution
- Report on the suitability of existing buildings
- Traffic and Transport Technical Note
- Revised indicative layout

- Revised sections following demolition
- Contextual Statement on Green Belt Impact and the Demolition of the Quad Building
- Agricultural Land Classification Report

June 2017

- Additional Planning Evidence: Very Special Circumstances – Children and Disability

July 2017

- Letter - scope of residential component reduced to reserve access details for consideration at a later date
- Revised plan showing indicative access points

August 2017

- Revised Great Crested Newt Mitigation Strategy

November 2017

- Air Quality Statement
- Traffic Modelling Technical Note

The following financial and viability submissions were made some of which has remained confidential during the application for reasons of commercial confidentiality and it is considered that it is not in the public interest to release the sensitive information contained in the submission:

- Financial Information (05 February 2016) REDACTED
- Project Cost Plan: The Royal School – Seashell Trust (03 June 2016) CONFIDENTIAL
- Results of Marketing, Interim Report (07 November 2016) NOT RELEASED
- Viability of Affordable Housing Provision (07 November 2016) REDACTED
- Results of Marketing, Interim Report (9 March 2017) REDACTED

DESCRIPTION OF SITE AND SURROUNDINGS

The application site extends to 22.52 hectares and is located entirely within Heald Green ward (Cheadle Area Committee).

The site is bound by Stanley Road (B5094) to the south that provides access to the Seashell Trust campus; undeveloped agricultural land to the east with the West Coast Main Railway Line and A34 beyond; Wilmslow Road (B5358) and buildings along it to the west; and Sydall Avenue to the north that together form the Heald Green settlement boundary.

The entire site is located within the Greater Manchester Green Belt as defined by UDP Policy GBA1.1. The existing Seashell Trust campus is also identified as a Major Existing Developed Site in the Green Belt site (MEDS) under UDP Policy GBA1.7. Guidelines for the MEDS allocation is provided in Appendix 10 of the UDP as follows:

Royal Schools for the Deaf, Stanley Road, Cheadle Hulme

This is a long established institution catering for special needs. The site at Cheadle Hulme was established in 1956 and comprises a number of buildings standing in a campus of about 11 hectares, which forms part of a larger landholding of about 32 hectares. The recognition of the special needs catered for at the site has led to additional facilities being permitted, including residential accommodation, as "very special circumstances" under normal Green Belt policy. Outline consent for additional facilities was granted in October 1999 in accordance with a masterplan for the future use of the site.

The site is of a scale and type which merits designation as a major developed site. The MEDS boundary is based on the campus area but excludes peripheral open areas in the north east and at the site frontage. Within this area limited infilling in accordance with the criteria in PPG2 and Policy GBA1.7 would be appropriate development. Partial redevelopment may be appropriate provided there is no greater impact on the openness of the Green Belt. Any proposals should be related to the continuing use of the Royal Schools for the Deaf as an institution catering for special needs. The remainder of the holding is undeveloped agricultural land and is not considered suitable for designation.

Changing needs may mean that redevelopment or enhancement of existing buildings may become necessary beyond the scope of the present masterplan. Any such developments should conform to the criteria in PPG2 and Policy GBA1.7 and should be in the context of an agreed revision to the masterplan for the site.

In the event of the redundancy of the site for its present purpose any re-use or redevelopment should be in accordance with a brief agreed by the Council, taking into account the criteria in PPG2 and Part B of Policy GBA1.7.

The application is also located within the Heald Green Fringe Landscape Character Area under UDP Policies LCR1.1 and LCR1.1a; described in Appendix 12 as:

B. Heald Green Fringe

This LCA is similar to Woodford in terms of its generally flat landform, field patterns and vegetation cover, but is more affected by "urban fringe" uses. The area is split into three compartments by urban development. The western part, together with adjoining land in Manchester, forms a narrow green finger between the two districts. The larger central area contains a number of institutional uses and is bisected by the new A34 road. The

smaller eastern area, south of Grove Lane, includes sports grounds, a mobile home park and a number of residential properties, many with large gardens.

In this LCA the pressure for urban and semi-urban development is likely to be considerable and care will be needed to protect the remaining open and agricultural character of the area. Tree planting should be encouraged, particularly in and around the institutional grounds and along the major road lines.

A public right of way (Cheadle and Gatley 96) crosses the site in an east/west direction linking Wilmslow Road (B5358) to the west with the A34 and the wider footpath network to the east.

The part of the application site to the north of the campus is also dissected by Bruntwood Hall Brook (main river) that runs in a north east/south west direction. As described above, the northern part of the application site where housing is proposed is comprised of agricultural land bounded by native hedgerows. Field ponds of various sizes are also found across the site outside the main campus area. Mature boundary trees partially enclose the campus area and an area of mixed leaf woodland provide further enclosure on land adjacent to the site's south western corner.

Following the demolition of the Quad and Gayton buildings under planning permission ref: DC/061722, the remaining buildings on the site comprise a mixture of single and two storey buildings together with associated access roads, paths, parking areas and landscaping.

Finally, the application site includes land that affects the setting of a grade II listed farmhouse fronting Wilmslow Road known as Griffin Farmhouse with the following list description:

“Farmhouse. Late C18. Brick with rendered front and c20 tile roof. 3-bay central-staircase plan with 2 storeys (plus attics) and small lean-to to left and rear. Central bay is slightly advanced and has a recessed porch with round arch, keystone and impost blocks. 2 ground floor and 3 first floor windows with stone sills and keystones. All have 20-pane sashes except for one which is 12-pane. Large gable stacks and gable attic lights.”

ENVIRONMENTAL STATEMENT (ES)

The application is accompanied by an ES and supplemented by further environmental information that is considered to satisfy the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. It is considered that sufficient information has been provided to assess the environmental impact of the proposed development.

The ES includes chapters on the following environmental effects that arise and assesses their significance both before and after proposed mitigation measures:

- Traffic and Transport
- Ecology
- Flooding and Drainage
- Landscape and Visual
- Socio-economics

The ES has been supplemented during the course of the application process with further information including a revised Landscape and Visual Impact Chapter (November 2016).

Chapter 1 provides a general introduction to the project and structure of the ES as well as stating how to access or purchase copies of the ES.

Chapter 2 sets out the approach to EIA, the methodologies used and general structure of the ES identifying environmental effects that have been assessed as significant and those that have not.

Chapter 3 describes the proposed development and includes an assessment of alternatives including consideration of alternative sites and why these options have been discounted. This chapter also includes the proposed development parameters assessed in the ES.

Chapter 4 assess the **Traffic and Transport** effects of the proposed development based on the findings of a Traffic Assessment (TA). It assesses baseline conditions and accessibility levels including proximity of public transport infrastructure, likely significant environmental effects, necessary mitigation measures and identifies likely residual effects and cumulative effects taking into account the A6 to Manchester Airport Relief Road (A6MARR) currently under construction and nearing completion.

Trips generated by the development were projected using the industry standard TRICS database with numbers uplifted by the industry standard TEMPRO database to reflect projected changes in levels in car ownership. Worst case estimates (AM & PM peak time) were used to model residual flows that do not take into account the effects of any Travel Plans or other mitigation measures proposed. Historic Accident Data is analysed in detail and baseline traffic flows are assessed (with and without the A6MARR) finding that although flows will increase significantly on the A34/Eden Park Road and Stanley Road roundabouts as a result of A6MARR, flows will decrease significantly at the Wilmslow Road/Stanley Road and Finney Lane/Wilmslow Road signalised junction.

The modelling in the ES indicates that 3 junctions will experience a greater than 30 vehicle change in traffic flows as follows:

- Residential site access onto Wilmslow Road
 - This will result in a maximum 13.7% increase in traffic flow
 - The overall effect is assessed as minor as the junction would operate within capacity thresholds
- Wilmslow Road/Stanley Road signalised junction
 - This will result in a less than 5% increase in traffic flow

- The overall effect is assessed as negligible as the junction would operate within capacity thresholds
- Finney Lane/Wilmslow Road signalised junction
 - This will result in a less than 5% increase in traffic flow
 - The overall effect is assessed as negligible as the junction would operate within capacity thresholds

Based on these conclusions, the following effects arising from the increase in traffic flows are assessed as follows:

- Visual effects – ‘negligible’
- Severance – ‘negligible’
- Driver delay – ‘negligible’
- Pedestrian delay and amenity – ‘negligible’
- Accidents and safety – ‘negligible’
- Construction traffic – ‘negligible’ (as movements will be lower during the construction phase than the operational phase)
- Dust and dirt – ‘negligible’ (due to surfaced roads and proposed mitigation)
- Overall construction impact – ‘negligible’

It is important to note that modelled traffic flows do not take into account mitigation measures such as travel plans that can help to reduce traffic by between 10-29%. The modelling undertaken is also tenure blind and a significant proportion of affordable housing is likely to further reduce traffic flows due to statistically lower levels of car ownership.

Overall, the assessment concludes that the development will have a ‘negligible’ impact on traffic and transport conditions in the area in both the construction and operational phases.

Chapter 5 Ecology assesses the impact of the proposed development on biodiversity and the quality of habitats on and around the application site. Based on a series of detailed desktop and field surveys, the assessment first establishes baseline conditions and then goes on to assess the ecological issues and opportunities that arise. Detailed enhancement and mitigation measures are then proposed and residual impacts assessed.

No significant effects on any statutory or non-statutory designated nature conservation sites are expected to arise due to the distance and lack of habitat connectivity between them and the application site. The nearest is Bruntwood Park Site of Biological Interest approximately 950 metres to the north.

Valuable habitats within the site are identified as:

- a small area of mixed broadleaved woodland located immediately to the west of the campus - a priority habitat of principal local importance;
- a network of 17 hedgerows, although mostly species poor, all are a priority habitat of principal local importance and provide habitat connectivity within the site;

- a brook is located in the north of the site flowing northwards with wooded banks providing a valuable riparian habitat for invertebrates, birds and bats; and
- scattered mature trees are of local value and provide valuable riparian habitat for invertebrates, birds and bats.

Surveys identified small patches of invasive species (Himalayan Balsam and Japanese Knotweed) on the site.

Surveys have also revealed the presence of protected and notable species on the site as follows:

- All species of bat are European Protected Species (EPS) and surveys revealed:
 - the presence of common pipistrelle day roosts in five buildings within the SST campus (Quad and Gayton buildings – now demolished; the Chadderton building; the Wainwright building and the rear wing of the Dockray building);
 - 13 mature trees that offer the potential to support roosts;
 - Evidence of foraging and commuting activity focused upon the brook and hedgerows/scattered trees (common and soprano pipistrelle, myotis and noctule species).

Although strictly protected, the findings are assessed as being of local ecological importance given the common and widespread nature of the species recorded.

- Following surveys of 15 ponds, small populations of Great Crested Newt (EPS) were found in 7 ponds, including three ponds on site. A medium population was also recorded in Pond 9. Together it is considered that this forms a medium sized meta-population given their ability to move between these ponds. Although strictly protected, the findings are assessed as being of local ecological importance only given great crested newts are locally common and widespread.
- Badger – two outlier setts were recorded on the site and the site contains improved grassland that provides suitable foraging habitat for them. Their presence is assessed as being of negligible ecological importance given as they are common and widespread although their protected status is noted.
- The woodland, scrub, vegetation and ponds provide nesting and foraging habitat for common woodland species and water birds such as Canada goose, mallard, coot and moorhen. The brook offers suitable habitat for kingfisher but no suitable nesting habitat was recorded. Barn owl were heard during night time bat surveys although no evidence of nesting or roosting barn owls was found although ten trees have potential to support them. Their presence is assessed as being of local ecological importance only as although their protected status is noted barn owl numbers are increasing in Cheshire.

The ES notes that no evidence of otter, reptiles, water voles or rare invertebrates was found given the lack of suitable habitat.

The ES goes on to propose a series of inherent, standard and actionable mitigation measures to reduce the impact of the development including:

- Retention of landscape features such as the brook and its corridor, hedgerows, ponds (apart from Pond 6 lost to development), retention and inclusion of multi-functional green infrastructure and the provision of blue infrastructure through via sustainable drainage measures;
- the preparation of a Construction Environmental Management Plan (CEMP) to protect valuable landscape features and habitats during construction;
- measures to avoid the spread of invasive species etc.;
- the retention and creation of habitats delivered via an Ecological Management Plan (EMP) to ensure biodiversity opportunities are maximised with long term safeguards;
- further badger surveys before development commences and the implementation of protection and mitigation measures as necessary;
- the proposed known loss of common pipistrelle day roosts supporting 7 individual bats will be managed and mitigated via detailed inspections prior to demolition; precautionary demolition methods; bats captured, released or transferred to bat boxes where necessary; bat boxes will be provided to offset the loss of trees with roosting potential; all works would be carried out under licence from Natural England;
- Barn owls will be protected by inspections prior to tree felling/construction works in proximity trees suitable for nesting; if found exclusion zones and other mitigation may be required;
- Impacts on great crested newts would be mitigated by a comprehensive mitigation strategy under licence from Natural England with measures including retaining ponds wherever possible; compensating for the loss of Pond 6 by creating two new ponds; protecting ponds in a habitat mitigation area to the east of the application site; providing connections to other ponds in the area; capture and translocation to new and existing ponds and offsetting the loss of foraging areas through re-provision elsewhere.

In conclusion, residual environmental impacts (other than negligible impacts) on habitats following mitigation are assessed as follows:

- Broadleaved woodland – ‘*minor beneficial*’ (due to EMP)
- Hedgerows – ‘*minor beneficial*’ (due to EMP)
- Loss of improved grassland – ‘*permanent minor adverse*’
- Running water – ‘*minor beneficial*’ (due to EMP)
- Poor semi-improved grassland – ‘*minor beneficial*’
- Invasive non-native species – ‘*minor beneficial*’ (due to CEMP)

Residual environmental impacts on protected species following mitigation are assessed as follows:

- Badger – ‘*negligible*’
- Bats – ‘*negligible to minor beneficial*’ impacts with mitigation under licence

- Birds – ‘*minor beneficial with minor adverse*’ impacts generated by increased predation from domestic cats although this is unlikely to affect the conservation status of local populations
- Great crested newts – ‘*minor beneficial*’ with mitigation under licence

Planning conditions and controls are identified as appropriate mechanisms to secure such an outcome.

Chapter 6 Flooding and Drainage assesses the hydrological impact of the proposed development and proposed mitigation measures. Baseline conditions have been established by completing a topographical survey of the entire site; a desktop review of relevant information; and liaison statutory consultees and private bodies – the Environment Agency (EA), the Council as Lead Local Flood Authority (LLFA) and United Utilities (UU). The assessment methodology is explained.

Baseline conditions note that the both parts of the site generally fall to the north with the western and eastern sides of the residential part of the site falling towards Bruntwood Hall Brook (main river with 8 metre easement), that in turn outfalls into Mecker Brook approximately 3km to the north. Existing surface water drainage on SST campus outfalls into Bruntwood Hall Brook. A review of the EA flood maps confirms that the site is at low risk of surface water flooding (Flood Zone 1) with the only medium/high risk areas being associated with a narrow corridor along the brook. Although parts of the site are identified as being at risk of groundwater flooding, risks are considered low if appropriate mitigation measures are employed (e.g. damp proof membrane installation). Flooding from other sources (tidal, sewer and artificial sources such as reservoirs) are not considered to be a risk.

The ES goes on to propose a series of inherent, standard and actionable mitigation measures to reduce the impact of the development including:

- Measures to prevent silt laden run off and pollution entering the brook or escaping into the ground during construction (via the CEMP) and operational phases; and
- Surface water run off managed in accordance with the SUDS management train and hierarchy (prevention, infiltration, attenuation etc.) with no increase in surface water discharge.

In conclusion and with mitigation, effects are assessed as ‘*negligible*’.

Chapter 7 Landscape and Visual assessed the landscape and visual impacts of the whole development. Chapter 7 has been revised during the course of the application process with further information including a revised Landscape and Visual Impact Chapter (November 2016).

The ES clarifies that ‘landscape impacts’ are defined as “*physical changes in the fabric, character and quality of the landscape (as an environmental resource) as a result of the development and how this is experienced*”. ‘Visual impacts’ are defined as “*changes that arise in the composition of available views of the landscape resulting from the development, and the effects of those changes on visual receptors*”.

(people) from the defined visual impact area around the site, as well as overall effects with respect to visual amenity”.

Based on a desktop review, positive and negative potential landscape and visual effects are identified followed by a description of assessment methodologies that include assessments of the condition, value, susceptibility, sensitivity of views and landscapes followed by consideration of the magnitude and significance of effects.

The baseline landscape position noting existing national and local designations is then established. It is noted that the site lies between the following National Character Areas (NCA): Shropshire, Cheshire and Staffordshire Plain (NCA 61) and the Manchester Conurbation (NCA 55) although the application site itself is located within the Manchester Conurbation NCA. The local landscape Heald Green fringe designation is also noted (as set out above).

A site specific landscape character analysis of land use typology was undertaken incorporating:

- SST campus land
- Settlement – residential periphery of the site
- Open farmland – agricultural fields bounded by native hedgerows with scattered field ponds
- Woodland – area of mixed leaf woodland immediately west of the SST land
- Retail/Industrial Park – including Stanley Green Retail and Industrial Parks
- Informal open space – non-agricultural open space located alongside transport infrastructure

Overall, the site is characterised by open farmland bounded on all sides by settlement and built development and the strength of the relationship between them depends on the presence of vegetation and roads.

In terms of visual impact, visual receptors have been identified and a zone of theoretical visibility established. 16 key viewpoints are then defined (agreed with the Council’s Landscape Officer) to use as a basis for assessment.

A series of mitigation measures are proposed including:

- Existing landscape features to be retained and enhanced
 - The brook corridor
 - The existing hedge along the PROW
 - The tree line forming the northern boundary of the SST campus
 - Existing trees marked for retention on the submitted tree retention plans
 - The Millennium Campus Gardens in the SST campus
 - Partial retention of the orchard, to the south of the campus buildings
 - The tree belt along the A34
 - Trees and hedgerows along Stanley Road
 - Sections of existing hedgerows on Wilmslow Road
- Proposed new elements to mitigate impact within the campus:

- Inclusion of new tree planting
 - Inclusion of soft SUDS features such as wetlands and ponds
 - A new green 'heart space' within the campus extending south from the Millennium Garden
 - New buildings will be predominantly single storey
 - The new school building is set back from Stanley Road
 - New buildings developed within parameters closely related to existing buildings
 - Building materials sensitive to campus parkland nature
 - Structural planting to mitigate impact of parking/hardstanding areas
 - Materials and planting to soften impact of new access point from Stanley Road
 - Additional planting, particularly along Stanley Road and northern campus boundaries where appropriate
- Proposed new elements to mitigate impact within the residential development:
 - Relatively low densities proposed to reflect the suburban character and appearance of the surrounding area
 - Locating the new housing to the west of the site to retain a degree of openness and separation between Heald Green and Cheadle Hulme
 - New structure planting to the east
 - Creation of a development edge which relates to the existing streets and settlement character
 - Appropriate scale and massing relating to local vernacular
 - Reinforcement/further creation of a green corridor along the watercourse edge and PROW
 - Offset distances, retention of hedgerows and tree planting along Wilmslow Road
 - Back to back gardens along Syddall Avenue development edge and small offset and planting to the corner of Wilmslow Road and Syddall Avenue
- Standard mitigation measures:
 - Protection of retained landscape features during construction
 - Enabling works will seek to use existing or proposed permanent access points
- Actionable mitigation measures:
 - Existing and new planting subject to management and maintenance strategies
 - New structure planting to the east of the proposed residential site

The ES then identifies residual impacts after mitigation. In terms of landscape impact, the following conclusions are made:

- *'Moderate'* effects on the openness of greenspace would arise noting that on a landscape scale it is a relatively small remnant of countryside surrounded by urban areas and developments that weaken its character and leave it with relatively low scenic value.

- ‘*Moderate beneficial*’ would arise from improvements to the design and specification of hard materials within the SST campus.
- ‘*Moderate – minor*’ landscape effects would arise from the resultant closing of the gap between the settlements of Heald Green, Handforth and Cheadle Hulme. This has been assessed as moderate – minor as only limited changes to the character of the settlements would arise.
- Only ‘*moderate – minor*’ effects on tree belts, trees and hedgerows across the site would arise given most would be retained and protected during construction.
- Only ‘*moderate – minor*’ effects on field patterns would arise given the severed nature of wider landscape and the proposed retention of tree belts, most trees and hedgerows across the site. These retained elements of green infrastructure would limit adverse effects.
- ‘*Moderate – minor*’ effects on the water course are identified given its proposed retention.
- Only ‘*moderate – minor*’ effects would arise to field ponds as although one pond would be lost to development it would be replaced by two ponds within the site. The potential also exists to create more ponds as part of sustainable drainage systems.
- Resulting improvements to the parkland character of the SST campus are assessed as having ‘*moderate – minor beneficial*’ after 10 years once new planting is becomes established.

The conclusions of the visual impact assessment are as follows:

- It is acknowledged that significant adverse effects on views from Syddall Avenue would arise, however, these have not been assessed given the private nature of the receptors as houses on Syddall Avenue back onto the application site.
- ‘*Major*’ adverse effects are identified on residents of 13 properties on Wilmslow Road that face the application site whose views over open fields would be lost to the housing development however these reduce to “*moderate – minor*” once mitigation planting becomes established.
- ‘*Major*’ adverse effects are identified on views from the public right of way that crosses the site and from Griffin Lodge (under SST ownership).
- ‘*Major – moderate*’ adverse impacts are identified from the corner of Syddall Avenue looking south east and others views from the PROW due to the reduction in openness and long views to the proposed SST buildings;
- ‘*Moderate*’ visual impacts on views from Stanley Road and Dawson Road playing field to the north are identified due to the partial change in view on completion however these reduce to “*moderate – minor*” once mitigation planting becomes established.
- ‘*Moderate*’ visual impacts on views to the west from the PROW adjacent to the A34 corridor are identified once mitigation planting becomes established.

Chapter 8 Socio-economics assesses the social and economic effects of the development during both the construction and operational phases.

Potential effects are identified as:

- Temporary construction impacts arising from construction activity
- Social and educational effects arising from the safeguarding and redevelopment of the SST campus
- Employment and economic effects arising from the safeguarding and redevelopment of the SST campus
- Effects arising from the proposed increase in the resident local population and its effect on:
 - the demographic profile of the area
 - the local economy
 - social and community infrastructure including schools and health services

The methodology used is explained and is based on desk-top research using key data sources such as census data. Only changes assessed as moderate or substantial are considered significant for EIA purposes.

A review of baseline conditions established that:

- Heald Green has a relatively high proportion of older people and a relatively low proportion of young people;
- Heald Green's population declined slightly (-1.6%) between 2001 and 2011 with the 0-15 age group declining by -5.2% and the working age population 16-64 declining by -3.2%. The increase in the number of over 65s was lower (+7.2%) than the Stockport average (+8.5%)
- Demographic trends indicate a significant growth of residents over 65 in Stockport and a growing number of children.
- Labour market data shows that Heald Green fared well during the recent recession showing growth in employment when it fell across the Borough as a whole.
- Census data showed that there were 5100 dwellings in Heald Green in 2011, representing around 4% of Stockport's total. The number of dwellings has increased slightly since then.

In terms of childcare provision in the area, 34 providers were identified within a two mile radius of the application site and their capacities relative to roll size established. Although some spare capacity was identified, it is expected that the private sector would react and provide additional capacity.

In terms of primary school places, 22 state funded primary schools were identified within a two mile radius of the application site and their capacities relative to roll size established - 370 spare places are identified. However, it is acknowledged that it cannot be assumed that this will provide sufficient places to meet increased demand arising from the housing development as it does not provide a breakdown of capacity by age group.

The nearest primary schools, Outwood and Bolshaw Primary Schools (both in Stockport), were identified as being operating at or very near to capacity. Wilmslow Grange Community Primary and Nursery School in Cheshire East (0.7 miles from the application site), the Dean Oaks Primary School in Wilmslow (1.6 miles from the

application site) and Oak Tree Primary School in Cheadle Hulme (1.7 miles from the application site) are highlighted as having significant spare capacity.

In terms of secondary school place, 6 state funded secondary schools were identified within a three mile radius of the application site and their capacities relative to roll size established - 690 spare places are identified including 257 spare places at the Kingsway School (2 miles from the application site).

In terms of health provision, 6 GP surgeries are identified within a two mile radius. 2011 data suggests ratio average of 1800 patients per GP nationally and approximately 2000 patients per GP across the Stockport Primary Care Trust. Using the Stockport average ratio, the assessment concludes there is sufficient spare capacity in the local area to meet the additional demands generated by the proposed housing development. 11 dental practices were identified within a two mile radius of the application site – no capacity data was included in the statement.

No socio-economic mitigation proposed are proposed.

Socio-economic impacts are assessed as follows:

Construction employment effects are assessed as '*minor beneficial*' based on the following conclusions:

- The housing development would generate approximately 600 person years of construction employment equating to approximately 100 construction jobs each year over a six year period (including on-site, off-site and supply chain related jobs).
- In terms of the school and campus redevelopment, it is estimated that it would generate approximately 430 person years of construction employment equating to approximately 80 construction jobs each year over a five year period (including on-site, off-site and supply chain related jobs).
- Construction jobs equate to approximately 4.5% of total employment in Stockport, a rate that has been in decline in recent years. The jobs generated by the proposed development offers the opportunity to effectively reverse those recent declines.

Safeguarding SST enabling them to continue to educate and care for children and young people with profound learning difficulties and/or disabilities is assessed a '*major beneficial*' based on the following conclusions:

- SST plays a nationally significant role in educating and caring for children and young people with complex and profound disabilities. Children and young people are placed at SST from across the country often because their needs cannot be met at other, more typical special educational facilities.
- SST provide services that are unmatched locally and across the region and the ability to continue to do so would be compromised without the proposed development

Safeguarding a major employer in Stockport is assessed as '*major beneficial*' based on the following conclusions:

- SST currently employs approximately 400 members of staff. This would increase to approximately 430 jobs were SST be able to operate at its full capacity.
- Approximately 40% of SS staff live within the Borough and approximately 90% live within a 30 minute drive of the site.
- Although the proposals are based on improving the quality of accommodation rather than increasing pupil capacity, SST estimate that the number of jobs based on the site would increase to approximately 470 staff.
- It is estimated that SST also supports 2 full time equivalent (FTE) jobs through their supply chains in Stockport and 7 FTE in areas within a 30 minute drive of the site.

Effects on the working age population are assessed as '*negligible*' given it is estimated that the proposed housing development would only increase Stockport's overall population and working age population by 0.3%.

The construction of new dwellings is assessed to generate '*moderate beneficial*' effects at the local level as it would increase the number of dwellings in Heald Green by approximately 6%; at a Borough wide level this reduces to '*negligible*' generating an increase in the number of new dwellings of only 0.2%.

In terms of local expenditure effects, the proposed housing development is estimated to generate an additional £4.32 million per annum additional household expenditure that would be spent in Stockport generating approximately 45 FTE jobs in the Borough. These effects are assessed as '*minor beneficial*'.

In terms of social and community infrastructure, the effects on (non-SST) education facilities is assessed as '*minor adverse*' based on child yield estimate calculations and in recognition the additional pressures an increased demand in for school places will create. The following conclusions are made:

- Nursery and childcare facilities would be able to absorb increased demand
- Noting there is no spare capacity in the nearest primary schools (Outwood and Bolshaw schools), primary school pupil yield could be absorbed by existing primary schools within a 2 mile radius of the application site.
- Secondary school pupil yield could be absorbed by existing secondary schools within a 3 mile radius of the application site with Kingsway School identified as being the closest school with spare capacity.

Similarly, effects on health services are assessed as '*minor adverse*' based on the following conclusions:

- GP and dental surgeries should be able to absorb the increase in the local population but is acknowledged that this will place additional demands on local providers.

Finally, although not included in their assessment of significance, the ES estimates that the proposed housing development would generate:

- £440,000 in New Homes Bonus each year for six years;
- £482,100 in annual Council Tax revenue per annum.

It should however be noted that it is not considered that there are any local finance considerations that are material to the application.

Chapter 9 contains a summary of impacts, mitigation measures and significant residual impacts.

A non-technical summary has also been submitted.

POLICY BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications/appeals to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

The Statutory Development Plan includes:

- Policies set out in the Stockport Unitary Development Plan Review (SUDP) adopted 31st May 2006 which have been saved by direction under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004; &
- Policies set out in the Stockport Local Development Framework Core Strategy Development Plan Document (CS) adopted 17th March 2011.

N.B. Due weight should be given to relevant SUDP and CS policies according to their degree of consistency with the National Planning Policy Framework ('NPPF') issued on 27th March 2012 (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given); and how the policies are expected to be applied is outlined within the Planning Practice Guidance ('PPG') launched on 6th March 2014.

Saved policies of the SUDP Review

LCR1.1 Landscape Character Areas (Heald Green Fringe)

LCR1.1a The Urban Fringe including the River Valleys

EP1.7 Development and Flood Risk

GBA1.1 Extent of Green Belt

GBA1.2 Control of Development in Green Belt

GBA1.5 Residential Development in Green Belt

GBA1.7 Major Existing Developed Sites in the Green Belt

GBA2.1 Protection of Agricultural Land

L1.1 Land for Active Recreation

L1.2 Children's Play

L1.7 Recreation Routes: Maintenance and Expansion of Network

L1.9 Recreation Routes and New Development

MW1.5 Control of Waste from Development

CTF1.1 Development of Community Services and Facilities

LDF Core Strategy/Development Management policies

CS1: OVERARCHING PRINCIPLES: SUSTAINABLE DEVELOPMENT – ADDRESSING INEQUALITIES AND CLIMATE CHANGE

SD-1: Creating Sustainable Communities

SD-3: Delivering the Energy Opportunities Plans - New Development

SD-5: Community Owned Energy

SD-6: Adapting to the Impacts of Climate Change

CS2: HOUSING PROVISION

CS3: MIX OF HOUSING

CS4: DISTRIBUTION OF HOUSING

H-1: Design of Residential Development

H-2: Housing Phasing

H-3: Affordable Housing

CS5: ACCESS TO SERVICES

AS-2: Improving Indoor Sports, Community and Education Facilities and their Accessibility

CS7: ACCOMMODATING ECONOMIC DEVELOPMENT

CS8: SAFEGUARDING AND IMPROVING THE ENVIRONMENT

SIE-1: Quality Places

SIE-2: Provision of Recreation and Amenity Open Space in New Developments

SIE-3: Protecting, Safeguarding and Enhancing the Environment

CS9: TRANSPORT AND DEVELOPMENT

CS10: AN EFFECTIVE AND SUSTAINABLE TRANSPORT NETWORK

T-1: Transport and Development

T-2: Parking in Developments

T-3: Safety and Capacity on the Highway Network

National Planning Policy Framework Conformity

The Planning Advisory Services' National Planning Policy Framework Compatibility Self-Assessment Checklist has been undertaken on Stockport's adopted Core Strategy. This document assesses the conformity of Stockport's adopted Core Strategy with the more recently published NPPF and takes account of saved policies from the Unitary Development Plan where applicable. No significant differences were identified. Where significant conflicts do arise these are highlighted and explained in the analysis section of the report.

Supplementary Planning Guidance

Supplementary Planning Guidance (Saved SPG's & SPD's) does not form part of the Statutory Development Plan; nevertheless it does provide non-statutory Council approved guidance that is a material consideration when determining planning applications. The following are considered relevant to this application:

- Provision of Affordable Housing SPG
- Design of Residential Development SPD
- Recreational Open Space provision and Commuted Payments SPG
- Sustainable Design and Construction SPD

- Sustainable Transport SPD
- Transport and Highways in Residential Areas SPD

National Planning Policy Framework

Paragraph 6 states: *“The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system”.*

Paragraph 7 states: *“There are three dimensions to sustainable development: economic, social and environmental”.*

Paragraph 11 states: *“Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.*

Paragraph 12 states: *“This National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.”*

Paragraph 13 states: *“The National Planning Policy Framework constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications”*

Paragraph 14 states: *“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.*

For decision-taking this means (unless material considerations indicate otherwise):

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - i) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - ii) *specific policies in this Framework indicate development should be restricted”.*

Paragraph 17 states: *“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:*

- *be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for*

the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;

- not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;*
- support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);*
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;*
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);*
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*

- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and*
- *take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs”.*

Paragraph 19 states *“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”*

Paragraph 32 states *“All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:*

- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- *safe and suitable access to the site can be achieved for all people; and*
- *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”*

Paragraph 35 states that *“plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to*

- *accommodate the efficient delivery of goods and supplies*
- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones*
- *incorporate facilities for charging plug-in and other ultra-low emission vehicles*
- *consider the needs of people with disabilities by all modes of transport”*

Paragraph 36 goes on to state that *“a key tool to facilitate this will be a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.”*

Paragraph 38 states that *“for larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.”*

Paragraph 47 states *“To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and*
- *set out their own approach to housing density to reflect local circumstances.”*

Paragraph 49 states *“Housing applications should be considered in the context of the presumption in favour of sustainable development. 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.”*

Paragraph 50 states *“To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:*

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*
- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and*
- *where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.”*

Paragraph 56 states *“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”*

Paragraph 70 states *“to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments*
- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs*
- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community*
- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services”*

Paragraph 72 states *“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

- give great weight to the need to create, expand or alter schools; and*
- work with schools promoters to identify and resolve key planning issues before applications are submitted.”*

Paragraph 74 states *“existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements*
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location*
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”*

Paragraph 75 states *“planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”*

Paragraph 79 states *“the government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land*

permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Paragraph 80 states that “*Green Belt serves five purposes:*

- to check the unrestricted sprawl of large built-up areas;*
- to prevent neighbouring towns merging into one another;*
- to assist in safeguarding the countryside from encroachment;*
- to preserve the setting and special character of historic towns; and*
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

Paragraph 81 states “*Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*

Paragraph 87 states “*As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”*

Paragraph 88 states “*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”*

Paragraph 89 states “*A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:*

- buildings for agriculture and forestry;*
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”*

Paragraph 90 states “*certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:*

- *mineral extraction*
- *engineering operations*
- *local transport infrastructure which can demonstrate a requirement for a Green Belt location*
- *the re-use of buildings provided that the buildings are of permanent and substantial construction*
- *development brought forward under a Community Right to Build Order*

Paragraph 103 states that “when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- *within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and*
- *development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.”*

Paragraph 109 states “the planning system should contribute to and enhance the natural and local environment by:

- *protecting and enhancing valued landscapes, geological conservation interests and soils*
- *recognising the wider benefits of ecosystem services*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*
- *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability*
- *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”*

Paragraph 112 states “Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”

Paragraph 118 states that “when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately*

mitigated, or, as a last resort, compensated for, then planning permission should be refused

- *proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest*
- *development proposals where the primary objective is to conserve or enhance biodiversity should be permitted*
- *opportunities to incorporate biodiversity in and around developments should be encouraged;*
- *planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and*
- *the following wildlife sites should be given the same protection as European sites:*
 - *potential Special Protection Areas and possible Special Areas of Conservation*
 - *listed or proposed Ramsar sites*
 - *sites identified, or required, as compensatory measures for adverse effects on European sites, potential special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites"*

Paragraph 124 states that "planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."

Paragraph 128 states that "in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

Paragraph 131 states "In determining planning applications, local planning authorities should take account of:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.”*

Paragraph 132 states *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

Paragraph 134 states *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”*

Paragraph 162 states that *“Local planning authorities should work with other authorities and providers to:*

- *assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands*
- *take account of the need for strategic infrastructure including nationally significant infrastructure within their area”*

Paragraph 173 states *“pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”*

Paragraph 187 states *“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities*

should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area”.

Paragraph 196 states *“The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. This Framework is a material consideration in planning decisions”.*

Paragraph 197 states *“In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development”.*

Paragraph 205 states *“Where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.”*

Paragraph 215 states *“...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)”.*

Paragraph 216 states *“From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:*

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”*

Planning Practice Guidance (PPG)

This is national planning policy guidance that can be a material consideration in the determination of planning applications. The following paragraphs are considered to be of particular relevance to this application:

In what circumstances might it be justifiable to refuse planning permission on the grounds of prematurity?

Annex 1 of the National Planning Policy Framework explains how weight may be given to policies in emerging plans. However in the context of the Framework and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the

Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

*(a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; **and [my emphasis]***

(b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

Refusal of planning permission on grounds of prematurity will seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.

Paragraph: 014 Reference ID: 21b-014-20140306

Revision date: 06 03 2014

Should children's best interests be taken into account when determining planning applications?

Local authorities need to consider whether children's best interests are relevant to any planning issue under consideration. In doing so, they will want to ensure their approach is proportionate. They need to consider the case before them, and need to be mindful that the best interests of a particular child will not always outweigh other considerations including those that impact negatively on the environment or the wider community. This will include considering the scope to mitigate any potential harm through non-planning measures, for example through intervention or extra support for the family through social, health and education services.

Revision date: 01 09 2015

Paragraph: 028 Reference ID: 21b-028-20150901

What is the starting point for the 5-year housing supply?

The National Planning Policy Framework sets out that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirements. Therefore local planning authorities should have an identified 5-year housing supply at all points during the plan period. Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the 5 year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that

evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.

Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints. Where there is no robust recent assessment of full housing needs, the household projections published by the Department for Communities and Local Government should be used as the starting point, but the weight given to these should take account of the fact that they have not been tested (which could evidence a different housing requirement to the projection, for example because past events that affect the projection are unlikely to occur again or because of market signals) or moderated against relevant constraints (for example environmental or infrastructure).

Paragraph: 030 Reference ID: 3-030-20140306

Revision date: 06 03 2014

Emerging development plan document: Draft Greater Manchester Spatial Strategy – October 2016 (GMSF)

The Greater Manchester Combined Authority consulted upon a first draft joint development plan document or Spatial Framework for Greater Manchester as whole from October 2016 to January 2017. Over 27,000 responses to GMSF were received to the first draft and a revised plan is now being prepared, taking account of the comments made. A second draft is now expected to be published in June 2018. If eventually adopted by the Council, the GMSF would form part of the statutory development plan for Stockport.

NOTE: GMSF remains in the early stages of development and has not yet been through examination or formally adopted by the Council. It is therefore important to note that currently it does not form part of the statutory development plan and given its early stage of development can only be afforded very limited weight in decision making.

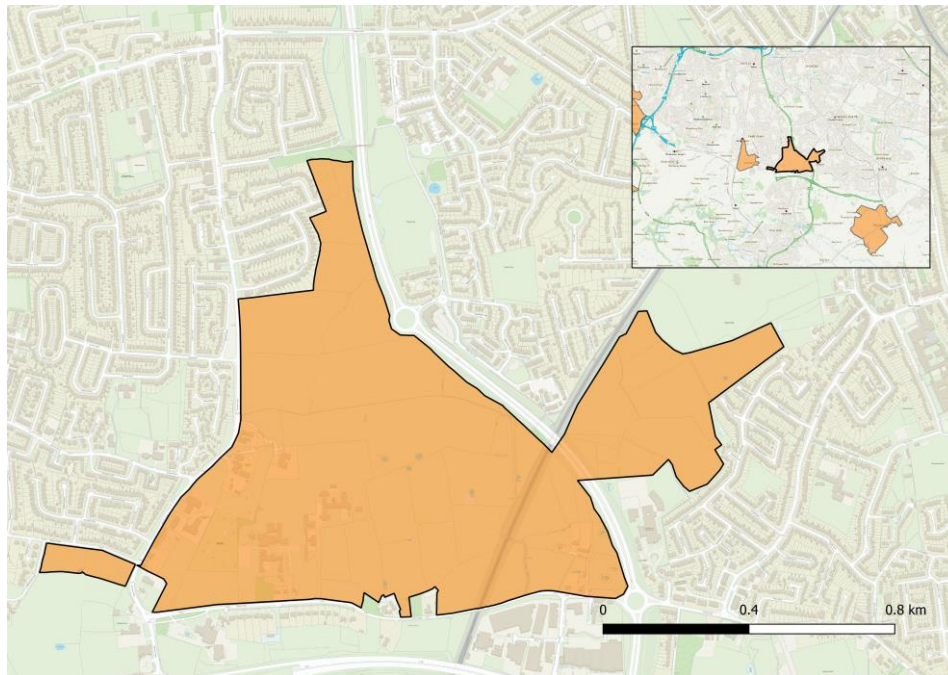
Policy GM5 (Housing) identifies Greater Manchester's (GM) housing requirement over the 20 year lifetime of the plan as 227,200. It proposes that Stockport accommodates 9% of that total GM requirement equating to 965 new homes per year (approximately double the number specified in the Core Strategy).

Policy GM13 (Green Belt) redefines the extent of the GM Green Belt in light of new allocations in the GMSF (both releases and additions) – see Policy GM25 below.

Policy GM21 (Education, skills and knowledge) identifies a series of policy priorities including supporting *“the provision of new and improved education and training facilities with good public transport access”*.

Policy GM25 (Allocations) sets out a series of policy requirements relating to all allocations in the GMSF including stating that *“development must be in accordance with a masterplan or Supplementary Planning Document (SPD) that has been adopted by the relevant local planning authority (or authorities), with no development taking place prior to the adoption of the first masterplan for the site”*.

Paragraph 28.8.22 allocates Land off A34 (Stockport) (Allocation Ref: OA22) for Green Belt release.



The allocation comprises approximately 96.75 hectares of land the majority of which is located on the western side of the A34 (see diagram above). The allocation proposes *“upwards of 3,700 dwellings will be delivered and the scheme shall be characterised by a high level of green and blue infrastructure”*.

The policy goes on to state that:

“The development of the site will need to:

- 1. Provide a range of housing including a range of sizes and tenures to meet defined local need.*
- 2. Deliver a suitable proportion of affordable housing across the site, phased to ensure that both market and affordable housing can be delivered at similar times within the development of the site.*
- 3. To provide a new small local centre, providing a range of facilities including provision for doctors, dentists and other health related facilities.*
- 4. Maintain sufficient land to enable the development of an exceptionally high quality world renowned educational facility for the Seashell Trust. [my emphasis]**
- 5. Make provision for measures to address existing car parking issues in the area.*
- 6. Provide financial contributions towards the provision of educational facilities on the site.*

7. Incorporate measures to ensure that the rate of runoff of surface water from the land is not increased and, ideally, is decreased.
8. Provide financial contributions to fund the delivery of a new access onto the A34 at land to the west of Eden Point.
9. Provide significant financial contributions towards further public transport and highways infrastructure/service provision so as to enable the use of more sustainable modes of transport whilst mitigating the impact of additional traffic on, in particular, the A34, Stanley Green and Wilmslow Road corridors.
10. Provide significant financial contributions towards the provision of improved cycle and walking routes between the site and Heald Green, Cheadle Hulme and Handforth.
11. Incorporate high standards of design across the full dwelling range.
12. Incorporate high standards of landscaping treatment with substantial provision of green and blue infrastructure.
13. Safeguard protected species and their habitat, especially the retention of existing ponds.
14. Sensitively integrate new development with areas of priority habitat including the retention of existing deciduous woodland.
15. Ensure the provision of corridors of natural habitat along and adjacent to railway and A34 which both dissect the site, linking the existing wildlife corridors to the north and north-east with the open land to the south.
16. Deliver high quality landscaping throughout the development."

The Reasoned Justification for the allocation is as follows:

"The site benefits from good connectivity to the local road network with the ability to create a new access directly onto the A34 at Eden Point. It offers the opportunity to deliver a high quality form of development which represents an opportunity to provide an extension to Heald Green and Cheadle Hulme.

It is recognised that this is a large scale of development in an area which already suffers from severe congestion which, although being eased by the opening of the A6-MARR in late 2017, still remains a significant issue. As such the provision of significantly improved public transport and highway infrastructure are prerequisites for its delivery and will be required in order to enable the use of more sustainable modes of transport whilst mitigating the impact of additional vehicular traffic. The refresh of the South East Manchester Multi-Modal Strategy will outline options for significant transport infrastructure improvements in this area, also having regard to significant development proposals in the neighbouring authority area to the south."

RELEVANT PLANNING HISTORY

Planning Application No: DC/064034

Address: Seashell Trust, 160 Stanley Road, Heald Green, Stockport, SK8 6RQ

App Type: Full Planning Permission

Proposal: Planning application for the creation of three nature conservation ponds, hibernacula and associated landscaping on land to the north east of the Seashell Trust Campus, Stockport.

Final Decision: Grant

Decision Date: 27/01/2017

Planning Application No: DC/063067

Address: Seashell Trust, 160 Stanley Road, Heald Green, Stockport, SK8 6RQ

App Type: Full Planning Permission

Proposal: Construction of temporary construction access road and two temporary car parks to facilitate the construction of the new school building at the Seashell Trust campus. Temporary for a period of 3 years.

Final Decision: Under consideration

Decision Date: Under consideration

Planning Application No: DC/061722

Address: Seashell Trust, 160 Stanley Road, Heald Green, Stockport, SK8 6RQ

App Type: Demolition of Buildings

Proposal: Prior notification approval for the demolition of the Quad and Gayton buildings.

Final Decision: Prior approval not required

Decision Date: 17/05/2016

Planning Application No: DC/060116

Address: Seashell Trust, 160 Stanley Road, Heald Green, Stockport, SK8 6RQ

App Type: EIA Screening Opinion

Proposal: EIA Screening Opinion

Final Decision: EIA Development – ES Required

Decision Date: 12/11/2015

Planning Application No: DC/059404

Address: Seashell Trust, 160 Stanley Road, Heald Green, Stockport, SK8 6RQ

App Type: Full Planning Permission

Proposal: Extension to existing college building, provision of new cycle path with activity areas and new pedestrian road

Final Decision: Grant

Decision Date: 28/09/2015

Planning Application No: DC/059242

Address: SEASHELL TRUST, 160 STANLEY ROAD, HEALD GREEN, CHEADLE, SK8 6RF

App Type: Full Planning Permission

Proposal: Construction of a synthetic sports pitch with associated floodlighting, fencing, viewing area and footpath

Final Decision: Grant

Decision Date: 28/09/2015

Planning Application No: DC/053494

Address: SEASHELL TRUST, 160 STANLEY ROAD, HEALD GREEN, CHEADLE, SK8 6RF

App Type: Full Planning Permission

Proposal: Erection of two single storey buildings to be used to house small pets and birds and dog grooming facilities for the use of children at the school

Final Decision: Grant

Decision Date: 01/11/2013

Planning Application No: DC/049833

Address: SEASHELL TRUST, 160 STANLEY ROAD, HEALD GREEN, CHEADLE, SK8 6RF

App Type: Full Planning Permission

Proposal: Demolition of existing training centre building and erection of 17 no. residential units (Class C2), garden pavilion, electrical distribution panel and associated works, hard and soft landscaping, area of play and parking facilities

Final Decision: Grant

Decision Date: 18/10/2012

Planning Application No: DC/025700

Address: RSDCD, Stanley Road, Cheadle Hulme, Cheadle, Stockport, SK8 6RQ

App Type: Full Planning Permission

Proposal: Erection of single storey teaching block with covered link to existing building

Final Decision: Grant

Decision Date: 10/04/2007

Planning Application No: DC/024050

Address: Royal School for the Deaf & Communications Disorders, Stanley Road, Cheadle Hulme, Cheadle, Cheshire, SK8 6RQ

App Type: Full Planning Permission

Proposal: Over roofing of existing flat roofed college building

Final Decision: Grant

Decision Date: 20/10/2006

Planning Application No: DC/022133

Address: Royal Schools for the Deaf & Comm Disorders, Stanley Road, Cheadle Hulme, Cheadle, Cheshire, SK8 6RQ

App Type: Variation of Conditions

Proposal: Variation of condition 3 of consent DC020664 to allow extensions to remain after 10 years time limit.

Final Decision: Grant

Decision Date: 07/04/2006

Planning Application No: J/72398

Address: ROYAL SCHOOLS FOR DEAF STANLEY ROAD CHEADLE HULME

App Type: 74 - 99 Application

Proposal: ERECTION OF TWO STOREY RESIDENTIAL AND ASSESSMENT CENTRE AND EXTENSION TO MAIN BUILDING TO FORM INDOOR SPORTS HALL AND EXTENDED SWIMMING POOL SURROUND WITH CYCLE TRACK AND ADDITIONAL CAR PARKING

Final Decision: Grant

Decision Date: 20/10/1999

Planning Application No: J/70310

Address: ROYAL SCHOOLS FOR THE DEAF STANLEY ROAD

App Type: 74 - 99 Application

Proposal: Single storey extension to Wainwright House to form hydrotherapy pool

Final Decision: Grant
Decision Date: 27/01/1999

Planning Application No: J/63779

Address: WAINWRIGHT HOUSE ROYAL SCHOOLS FOR THE DEAF STANLEY ROAD

App Type: 74 - 99 Application

Proposal: Installation of lift shaft

Final Decision: Grant

Decision Date: 08/01/1996

Planning Application No: J/47680

Address: Royal School for the Deaf, Stanley Road, Cheadle Hulme.

App Type: 74 - 99 Application

Proposal: First floor extension to admin block.

Final Decision: Grant

Decision Date: 02/05/1990

Planning Application No: J/38097

Address: Royal School for the Deaf, Stanley Road, Cheadle Hulme.

App Type: 74 - 99 Application

Proposal: Class 14 residential accommodation with staff and ancillary accommodation (Outline).

Final Decision: Grant

Decision Date: 10/02/1987

Planning Application No: J/31333

Address: Royal School for the Deaf, Stanley Road, Cheadle Hulme.

App Type: 74 - 99 Application

Proposal: Proposed single storey extension to medical centre.

Final Decision: Grant

Decision Date: 19/07/1984

Planning Application No: J/27334

Address: Stanley Road, Cheadle Hulme, Stockport.

App Type: 74 - 99 Application

Proposal: Retention of temporary residential student accommodation.

Final Decision: Grant

Decision Date: 08/08/1983

Planning Application No: J/22832

Address: Land fronting Wilmslow Road, Cheadle Hulme.

App Type: 74 - 99 Application

Proposal: Residential.

Final Decision: Refuse

Decision Date: 06/05/1981

Planning Application No: J/12401

Address: Part of Gill Bent Farm, Stanley Road, Cheadle Hulme.

App Type: 74 - 99 Application
Proposal: Residential development.
Final Decision: Refuse
Decision Date: 20/07/1978

Planning Application No: J/6996
Address: The Royal Residential School for the Deaf, Stanley Road, Cheadle Hulme.
App Type: 74 - 99 Application
Proposal: Single-storey extension to secretaries office.
Final Decision: Grant
Decision Date: 15/09/1976

Planning Application No: J/6573
Address: Royal Residential Schools for the Deaf, Stanley Road, Cheadle Hulme.
App Type: 74 - 99 Application
Proposal: Single storey extensions.
Final Decision: Grant
Decision Date: 21/07/1976

Planning Application No: J/4204
Address: Stanley Road, Cheadle Hulme.
App Type: 74 - 99 Application
Proposal: Extension.
Final Decision: Grant
Decision Date: 22/10/1975

Planning Application No: J/4215
Address: Stanley Road, Cheadle Hulme.
App Type: 74 - 99 Application
Proposal: Extension.
Final Decision: Grant
Decision Date: 22/10/1975

Planning Application No: J/4214
Address: Stanley Road, Cheadle Hulme.
App Type: 74 - 99 Application
Proposal: Extension.
Final Decision: Grant
Decision Date: 22/10/1975

PUBLIC REPRESENTATIONS

The owners/occupiers of neighbouring properties have been notified by letter - in excess of 900 letters were sent as part of the most recent notification process.

The application has also been publicised by way of site notices posted around the application site and by way of notices published in the Stockport Express most recently on 02 August 2017. The proposal has been advertised as EIA development with further information submitted; as a departure from the development plan; as

development affecting a public right of way and as development that affects the setting of a listed building.

To date a total of 761 representations have been received comprising 444 objections to the development and 317 expressions of support. Multiple representations from single addresses have been counted as one.

The objections received have been reviewed, analysed and are summarised as follows:

| Objection | Number | % |
|--|--------|-----|
| Green Belt Harm | 385 | 87% |
| Traffic generation/congestion/highway safety/cumulative traffic impacts with other developments (Cheadle Mosque, North Cheshire Growth Village etc.) | 407 | 92% |
| Financial need case not made | 280 | 63% |
| Assertions that SST would have to close are exaggerated | 7 | 2% |
| Alternative funding sources should be pursued | 39 | 9% |
| Flood risk/high water table | 32 | 7% |
| Inadequate community infrastructure - school places | 369 | 83% |
| Inadequate community infrastructure - GPs and social care | 375 | 84% |
| Brownfield sites should be developed first | 18 | 4% |
| Air /Light pollution | 45 | 10% |
| Loss of wildlife habitat | 66 | 15% |
| Alternative sites should be pursued | 6 | 1% |
| Green Belt 'very special circumstances' case not made | 32 | 7% |
| SST's engagement with community inadequate | 10 | 2% |
| No shortage of housing in Stockport | 18 | 4% |
| Not enough affordable housing would be provided | 208 | 47% |
| Adverse effect on views | 25 | 6% |
| Cumulative impacts arising from development proposals in Cheshire and at Manchester Airport etc. inadequately assessed | 12 | 3% |
| Public transport / cycling infrastructure in the area is inadequate | 13 | 3% |
| Construction related disruption | 8 | 2% |
| Local amenities plan shows a primary school on Haddon Rd that does not exist | 2 | 0% |
| Access should be from the east (A34 corridor) | 4 | 1% |
| Loss of local greenspace and recreational value – public right of way etc. | 28 | 6% |
| Loss of peaceful enjoyment of home (Human Rights implications) | 1 | 0% |
| Would adversely affect the character of Heald Green | 36 | 8% |
| Premature - should wait for new development plan | 4 | 1% |
| Negative impact on house prices | 10 | 2% |
| Will attract crime | 3 | 1% |
| Loss of agricultural land | 7 | 2% |
| More cost effective solutions such as refurbishment should be pursued | 14 | 3% |
| Site masterplan inaccurate - pond to rear of Syddall Avenue not shown | 1 | 0% |

| | | |
|---|---|----|
| Local authorities from outside the region should fund it as that's where most of SST's students come from | 2 | 0% |
| Car parking provision excessive | 1 | 0% |
| Contamination/unexploded bomb risks | 1 | 0% |
| Conflict of interest as SMBC a SST customer | 1 | 0% |
| Financial and Marketing information withheld | 1 | 0% |
| Driven by desire to realise pre-GMSF land values | 1 | 0% |
| Would set a precedent for other development in the Green Belt | 1 | 0% |
| Police resources inadequate | 2 | 0% |
| SEND services should not be centralised in one part of the country | 1 | 0% |

The expressions of support received have been reviewed, analysed and are summarised as follows:

| Support | Number | % |
|--|--------|-----|
| Need of modernisation | 248 | 78% |
| The nature of SST's work is very special | 232 | 73% |
| No alternative solutions available | 142 | 45% |
| Housing need | 36 | 11% |
| SST is an asset to Stockport and Greater Manchester | 90 | 28% |
| The development will transform the lives of students | 45 | 14% |
| Community access to sports facilities | 86 | 27% |
| SST unique with national and international recognition | 66 | 21% |
| SST a significant and excellent local employer | 10 | 3% |
| No wildlife harm would arise | 28 | 9% |
| Urban sprawl concerns unjustified (gap retained) | 22 | 8% |
| SST pre-dates the Greater Manchester Green Belt | 1 | 0% |

A single anonymous comment has also been received raising no material planning considerations.

Heald Green and Handforth Action Group (HGHAAG)

In response to the application and the proposed changes to the Green Belt in the area, a group of local residents have formed an action group to challenge the proposals. Since the submission of the application a series of detailed responses have been submitted in opposition to the application as follows:

- HGHAAG initial objection letter
- HGHAAG supplementary objection letter
- HGHAAG Analysis of SST Communications
- HGHAAG Further Objections letter
- HGHAAG Comparative Build Costs Spreadsheet
- HGHAAG SST Escalating Budgets Spreadsheet
- HGHAAG Building Bulletin 102 SEND School Case Studies
- HGHAAG Alternatives to proposed £45m campus
- HGHAAG Analysis of DfE Data on Actual Build Costs (Priority Schools Building Programme)
- HGHAAG DfE School Build Costs Spreadsheet data and analysis by HGHAAG

- HGHAG Response on latest submission “Very Special Circumstances– Children & Disability”
- HGHAG Response to Financial Aspects of Additional SST March 2017 Submissions
- HGHAG Response to Carillion Viability Assessment / RP&P Cost Plan Review
- HGHAG Submission on Building Condition Survey

A summary position statement was submitted on request on 19 November 2017 as follows:

Overview

Heald Green & Handforth Action Group (HgHAG) fully recognises the value of the excellent work carried out by Seashell Trust (SST), and supports the redevelopment of the site to enable the Trust’s work to be continued with greatly improved facilities. Our objection relates only to the scale and unprecedented cost of the current proposal, the unproven need and the linkage to the sale of Green Belt land in this hybrid planning application.

The burden of proof to justify all statements and costs put forward in this application lies with Seashell Trust and their agents NJL Consulting. HgHAG objections to this application concern claims made by the Trust as regards complete termination of their business and services. SST claims that there is “no Plan B”, should their planning application be rejected.

The application and supposed survival of the SST business is purportedly reliant on a £45million cash injection, with £15m being raised by the Trust and an alleged ‘funding gap’ of £30 million financed by the sale of Green Belt land.

Concerns about building a housing estate consisting of 325 houses in the Green Belt and the impact on local infrastructure have led local residents, via HgHAG, supported by the Ratepayers Association, MP Mary Robinson, and Peter Yates (former Chief Planning Officer, Macclesfield Council) to challenge SST business practices, finances, accounts and proposed build costs.

We assert that the Trust’s alleged ‘requirements’ have increased directly in terms of potential revenue from their proposed sale of Green Belt land (alongside potential grant of planning permission to a property developer). It is highly unfortunate that the SST agents (NJL) are now attempting to leverage the Trust’s charitable status so as to manufacture a VSC case in order to realise this as-of-yet untapped revenue. And sadly, when viewed against the highly commendable goals of the SST’s original Transforming Lives appeal, this VSC-based application completely undermines the ‘needs-based’ case of the Trust.

The standard of proof required to demonstrate VSC is exceptionally high. The VSC case being made in this application is a financial one, intrinsically linked to the claimed need for funding. This linkage explains why HgHAG has ensured that all information presented is relevant, factual and evidence based, using Government furnished data.

HgHAG's analysis focuses on the "new build" SST school, which the application states will have a capacity of 60 student places, and an estimated capital cost of £24.3 million including contingency.

HgHAG sought information on the Priority School Building Programme (PSBP) via an FOI request to the Department for Education. We have also used information from the latest DfE-approved National School Cost Benchmarking Study – this information is based on 727 recent school builds, many of which are Special Educational Needs (SEND) schools, with £5.4 billion total contracted value.

Subsequent HgHAG analysis of this large body of DfE data clearly demonstrates that the SST school as proposed is around 5 times the DfE Benchmark cost for a 60-student SEND school, and that the need for a £45m investment by SST is not proven. Furthermore, SMBC planning officers themselves have formally and quite rightly questioned [ref: Note 1] whether this application (and the VSC case) is based on a desire, not on genuine need. HgHAG concurs. Our uncontested build costs evidence proves beyond doubt that SST can build a new school and re-model the campus within the £15 million they have stated they can raise, and without selling any Green Belt land.

SMBC responses to VSC claims made in two comprehensive SST submissions

SMBC's Chief Planning Officer rejected the financial VSC case in a formal letter to SST's agent (NJL Consulting) written in July 2016 following the first public consultation. The SMBC rejection letter raises a number of key issues (as referred to in this summary). These issues remain unanswered by SST...

- Reference Note 1: Extract from SMBC Chief Planning Officer Letter (July 2016)

As part of the Viability Assessment, SMBC commissioned an independent review of build costs by Rex, Procter & Partners (RP&P) who reported in September 2016. The existence of the RP&P report was made public almost one year later, and HgHAG was denied key information on grounds of 'public interest' and 'commercial sensitivity'. HgHAG submitted a formal appeal in September 2017 to SMBC for the release of further information from this report under relevant EIR regulations. After a second set of SST submissions and a further public consultation, SMBC again rejected the VSC case, with notification to NJL Consulting in a February 2017 email.

- Reference Note 2: Extracts from SMBC Chief Planning Officer Email (February 2017)

This email demonstrates that 5 months after the September 2016 build cost review exercise was completed by RP&P, SMBC still deemed that RP&P's report was insufficient proof for the VSC case made by NJL, which was judged as "particularly deficient". SMBC required further VSC justification for inappropriate development in the Green Belt.

Planning Officers informed us that within their email, the request for “Further Financial information requiring consideration, assessment and rebuttal submitted by other interested parties” specifically refers to all of HgHAG’s build costs work and required rebuttal on the part of NJL Consulting. To this date, no such rebuttal has been forthcoming.

The following topics provide a brief summary of all the key issues raised by SMBC which remain unaddressed.

Green Belt – Very Special Circumstances?

- *The VSC case is predicated on the claim that SST is different to the other (220) SEND schools; however no evidence has been supplied to support this claim which is clearly questioned by SMBC in their July 2016 letter [ref: Extract in Note 1]*
- *HgHAG has provided information on Special Needs categories catered for by other SEND schools as supplied by DfE which clearly demonstrates that SST is similar to (if not, the same as) many other SEND schools – [ref: Note 3 - DfE Priority School Building Programme (PSBP) analysis, pages 20 – 22]*
- *Facilities and equipment listed by SST are standard for SEND schools as per Building Bulletin 102 Section 11*
- *SMBC challenged NJL’s claim that SST is “unique”; the claim was subsequently changed to state that SST is a “special, special school”. This invented categorisation is not recognised by DfE, Ofsted, the CQC or any other professional body*
- *Ofsted classifies SST as a “small special school”*
- *Claims of national and international significance are unsubstantiated - the majority of SST students are from the local area; HgHAG provides counter-examples in third VSC response (Ref: Note 7)*
- *VSC are intrinsically linked to SST school build costs which are excessive (5 times Government benchmarks) – [ref: Note 3 DfE PSBP analysis, pages 8 – 10]*
- *Government SEND School size recommendations are not adhered to despite the Planning Statement in the application stating that Building Bulletins will be followed, as other SEND schools have done [ref: Note 4 and Note 5 Government Building Bulletins 102 and 104 detailing SEND school design]*
- *Proposed SST school is at least 3 times the Government-recommended SEND school size for 60 students – [ref: Note 3 DfE PSBP analysis, pages 24 –26]*
- *SMBC (belated) acceptance of this VSC case will set a damaging national precedent for the exploitation of Green Belt as a vehicle for funding private development on this scale, when substantially less costly alternatives clearly exist*

Third attempt to demonstrate Very Special Circumstances (June 2017)

Since the second rejection of the VSC case by SMBC in February 2017, NJL Consulting submitted a third attempt to prove VSC – a letter titled ‘VSC - Children and Disability’. This letter is highly duplicitous and unsubstantiated; it makes inaccurate and fallacious claims; it distorts both cited case law and legislation as well as internationally binding legal agreements and national planning policy.

HgHAG responded in detail to this letter in August 2017 (Ref. Note 7 below). No response has been forthcoming. NJL has yet to acknowledge HgHAG's clear reasoning as regards the invalidity of these latest VSC arguments.

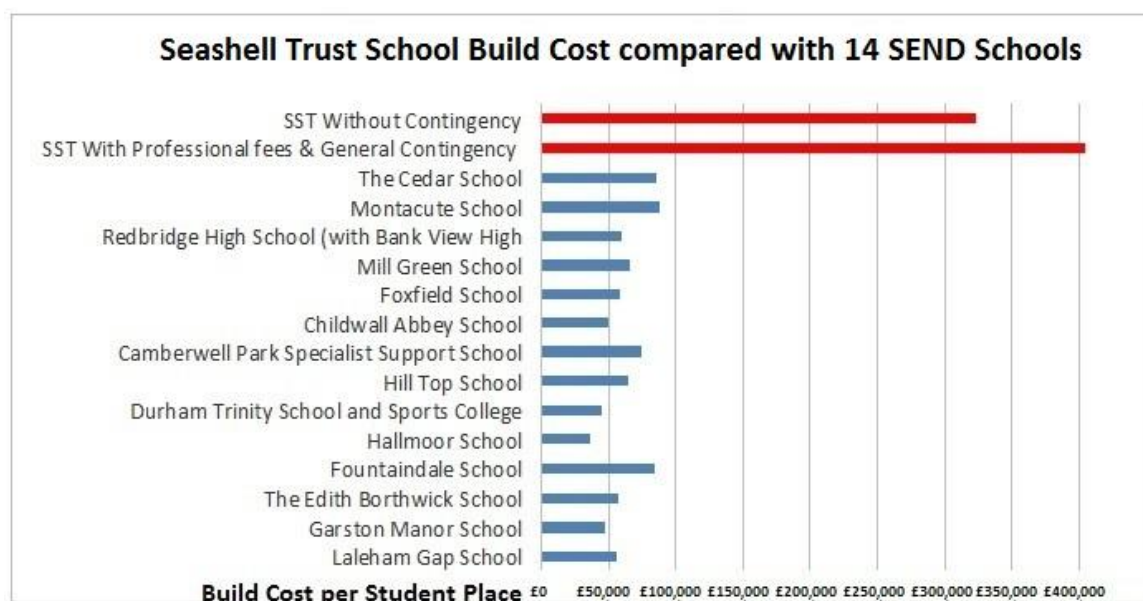
Considering the documented rejections by SMBC of the VSC case following two comprehensive public consultations, it is imperative that a full and proper rebuttal is provided to each of the substantive arguments presented by HgHAG. Without such a rebuttal, as well as responses to the outstanding VSC issues listed above, the VSC case fails.

Build Costs (linked with 'Very Special Circumstances' claims)

HgHAG wrote to the SST Trustees in March 2017 raising numerous questions, including the comparison of SST school build costs with other SEND schools. SST responded that we (HgHAG) had used a "small sample size ... based on historic data". To address these SST concerns, HgHAG submitted an FOI request (June 2017) to the Dept for Education (DfE). Information supplied by the DfE increased the sample size dramatically and we (HgHAG) updated our study results accordingly. Current and correct results relating to our costing exercise are based on all SEND schools built since 2014.

HgHAG's full analysis of the Priority School Building Programme from supplied DfE data is presented in a detailed document and spreadsheet, as referenced in note 3 below, and we respectfully ask members to familiarise themselves with the content and conclusions of these documents.

The chart below is one of several key charts from the above documents. This presents Build Cost per Student Place (the metric used by the DfE) and uses all of the 14 SEND schools built since 2014 as supplied by the DfE in response to HgHAG's FOI request:



Source: DfE Priority School Building Programme
FOI Request 2017-0030234 June 2017

- All recent schools built within 30% of DfE benchmark cost – [ref: Note 3 DfE PSBP analysis, page 12]
- SST school is approximately 5 times (500%) DfE SEND school benchmark cost
- DfE-approved National Cost Benchmarking Study [ref: Note 6, page 5] is supported by 107 councils, including SMBC
- DfE Benchmarking study is based on 783 schools, £5.4 billion total value – [ref: Note 3 DfE PSBP analysis, pages 18 & 19]
- DfE data indicates that the proposed £24.3m for a 60-student SEND school is excessive, and that the SST school can be built for around £4m – [ref: Note 3 DfE PSBP analysis, pages 16 – 17]
- No justification has been presented for such an enormous difference with all other recent SEND school build costs (these schools are superb SEND facilities, built to the highest standards)
- HgHAG costs analysis remains uncontested; NJL has failed to rebut HgHAG build costs submissions
- Chief Planning Officer's formal request to NJL for rebuttal indicates SMBC acceptance of the validity of comparing SST school costs with other SEND school costs
- NJL has not rebutted but simply dismissed HgHAG build costs studies, and SST has claimed that comparison of their school with other SEND schools is "not relevant"

Viability Assessment - Cost Review

The Cost Review was commissioned by SMBC & Carillion and undertaken by Rex Procter & Partners (RP&P) as part of the Viability Assessment. This review clearly highlights a systematic over-costing of the SST proposals. HgHAG's full response to the Cost Review process is presented in the document referenced in Note 8 below.

In this document, HgHAG contend that the Cost Review process was flawed due to the following reasons:

- had very narrow Terms of Reference
- failed to account for Government (DfE) Benchmark data on SEND school build costs
- considered only proposed SST plans (aspirational)
- failed to question 'reasonableness' of plans
- failed to compare other SEND school costs (per DfE data) with SST proposed costs
- failed to consider Govt Building Bulletin compliance in terms of actual SEND school size
- failed to consider viable alternatives to the SST proposals - the Inspector's Report in a recent case (Oaklands College, St Albans) confirms this is a valid consideration for a Viability Assessment

HgHAG has submitted an appeal to SMBC to release information and we have requested a full internal investigation of the Cost Review process. The appeal and review are ongoing, and to date (November 2017) we have not received the results of the SMBC internal investigation into the Cost Review process.

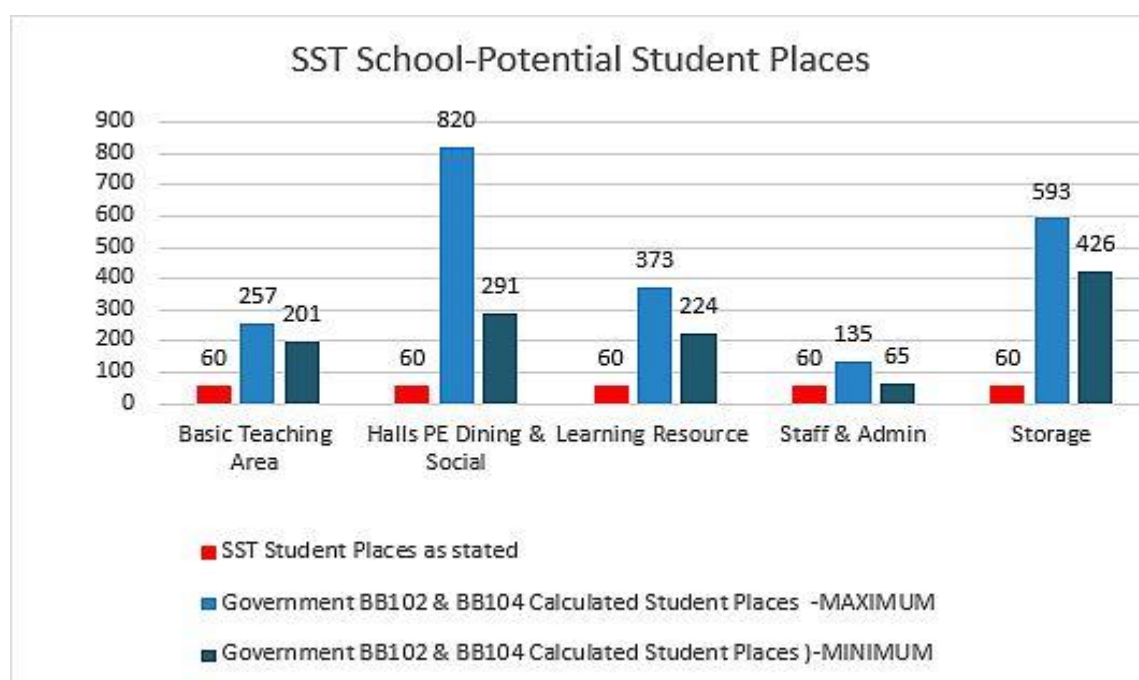
One piece of information released to us was the Level 0 School Floor Plan. We have prepared a further detailed submission on this and have shared with SMBC our Building Bulletin Model, which calculates School sizes & potential Student Numbers. A brief summary of this work follows.

Size of proposed School and Potential Student Capacity

In a recent case (Oaklands College, St Albans), the Inspector confirmed that alternatives to funding development via land sale should be fully explored; and that evidence of smaller scale development which would meet the needs of the students, should be properly considered. It is therefore of paramount importance that HgHAG evidence, demonstrating the excessive SST school size and potential student capacity, is addressed.

The proposed new SST school is stated in the application to have a capacity of 60 student places. However, the SST School Floor Plan (GA Level 0 Plan Rev B6) fully supports our previous findings on the excessive size of the new school for 60 students and the unprecedented increase in potential student numbers.

- Government Building Bulletin 102 & 104 calculations (Ref Notes 4 and 5) have been applied to all the SST Level 0 floor plan areas
- Only the 5 Net Areas (Chart below) are used to calculate both the Minimum & Maximum Potential Student Places as specified by Building Bulletins
- Building Bulletins calculate that the SST proposed school is at least 3 times the size required
- The chart below shows that Potential Student numbers will increase by much more than 3 times the school size and therefore school size alone cannot be used as representative of potential student numbers
- The chart presents both Min & Max student numbers as specified in building bulletins along with SST stated student numbers



Finances

A full response to the latest financial submissions has been provided by HgHAG as referenced in Note 9 below.

- *SST Accounts reveal a healthy business with the ability to raise £15m, and no mention of financial troubles*
- *Charity Commission submissions do not mirror the statements on SST business closure should planning application be refused*
- *SST overall project budget escalated from £20m in 2012 to approx £60m in 2016 following developer engagement*
- *No formal business plan provided, yet there are many references to the business impact of a refusal*
- *No costed alternatives or rationale for the preferred option have been shared, as required by SMBC*
- *There has been a continual reluctance to engage with government assistance/support - Mary Robinson MP*
- *SST 'vision' (5 years only) fails to quantify potential impact of the project on the business*
- *VAT rationale is poor and demonstrates a business expansion*
- *Project management and contingency costs are excessive*
- *There has been no rebuttal of HgHAG challenges regarding clear financial discrepancies*

Need or Desire?

The July 2016 SMBC letter to the SST agent formally documents a number of key issues regarding the extent of the SST project as defined; the following SMBC requirements relate to 'need' and remain unaddressed:

- *demonstrate "that the proposed school and campus development is completely necessary, as opposed to being desirable"*
- *demonstrate a "need for their facility (that could not be provided by other providers) in or nearby this location"*
- *prove that the submitted proposal is the "only way of meeting the alleged shortfalls and deficiencies of SST"*

HgHAG evidence shows that the proposed SST school is hugely oversized for the number of students [ref: Note 3 DfE PSBP analysis, pages 24 – 26]:

- *Govt Building Bulletins clearly show that a 60-student SEND school should be around 2000 square metres*
- *The proposed 5,500 square metre school could accommodate around 230 students (Building Bulletins)*
- *The equivalent size calculation for the proposed college remodel/rebuild shows it could accommodate around 250 students*
- *Total student capacity (school and college) is stated by SST to be 140 by 2020; However size calculations show that total capacity could actually be around 480 students*

Building Condition Survey provided is not fit for purpose – performed by SST's architect, not RICS surveyor – [HGhAG's response document is referenced in Note 10 below]:

- A number of existing buildings are under 15 years old, perfectly serviceable and need not be demolished*
- The Care Suite is proposed to be fully demolished; this is not due to unserviceable condition but purely it's current location, to make space for a car park*
- Need for new Swimming pool building is unproven as existing facility extended/refurbished 15 years ago at cost of £800,000*

There is no substantiated case for the proposed public sports hall and pavilion.

HgHAG research highlights that the proposal is a desire for significant business expansion by stealth.

There is no substantiated need for more SEND places; misleading data is presented on future 'growth' based on a report which includes the disabled and ageing population as a whole, not just SEND children.

Conclusion

We fully recognise Seashell Trust's highly commendable mission of educating and caring for SEND children. We are in complete agreement that Seashell Trust must be enabled to continue this excellent work and where necessary, improve the facilities in which they operate. However, as regards the Trust's most recent planning application, we are quite rightly concerned about the unprecedented cost of this proposal for a SEND facility. The proposed build costs are now £45 million (up from £36 million as publicly stated in December 2015) predominantly funded by the sale of Green Belt land to a house builder. In addition to the loss of our highly valued and irreplaceable Green Belt, 325 houses will have an obvious impact on access to local amenities, extra traffic and the resultant decrease in air quality.

The key planning question is whether or not the SST agents have clearly proved the "Very Special Circumstances" required to build a housing estate on 25 acres of our Green Belt. The consideration of 'need versus desire', as clearly articulated by SMBC in the text below [note 1], is of crucial importance in addressing this question. Is there really a 'compelling need' for a £45m project requiring a £30m capital injection from land sale? Is the current proposal 'the only way of providing or meeting the alleged current shortfalls and deficiencies of SST'? Are alternatives available which will in fact meet SST's need?

In response to these questions, HgHAG has provided factual, verifiable information demonstrating that the actual need for this unprecedented sum is unproven. This factual evidence is from the SST accounts and three different independent statutory sources: from other recent SEND school builds, Government (DfE) cost benchmark guidelines and Building Bulletins for SEND schools. The evidence from all three is very clear - Seashell Trust can build a superb new school, as well as improving and upgrading their valuable facilities, well within the £15m funds they have stated they are able to raise. There is simply no need to sell Green Belt land. The burden of

proof of Very Special Circumstances lies with the applicant and their agent. Planning Officers have been asking for this for nearly two years but the required proof is still absent.

We ask members to carefully consider the evidence. It is clear that Seashell Trust will not close should this application be refused. A number of affordable alternatives are possible, all of which would meet the Trust's needs and provide a superb new state-of-the-art SEND facility. We look forward to receiving details of their future plans, which can be achieved within their current financial resources.

References

- 1. Extract from SMBC Chief Planning Officer letter to NJL Consulting, July 2016:*
- 2. Extracts from SMBC Chief Planning Officer email to NJL Consulting, February 2017:*
- 3. Dept for Education (DfE) Priority School Building Programme (PSBP) Analysis July 2017*
- 4. Dept for Children, Schools & Families / Education Funding Agency - Building Bulletin 102 'Designing schools for disabled children and children with Special Educational Needs'*
- 5. Dept for Education - Building Bulletin 104 'SEND and alternative provision: Area Guidelines'*
- 6. National School Delivery Cost Benchmarking – Primary, Secondary & SEN Schools February 2017*
- 7. HgHAG August 2017 Response to SST third VSC submission - NJL letter 'Children and Disability'*
- 8. HgHAG August 2017 Response to Viability Assessment / RP&P Cost Review*
- 9. HgHAG August 2017 Response to additional Financial submission*
- 10. HgHAG August 2017 Response to Building Condition Survey*

Mary Robinson MP

In a letter dated 22 August 2017 she confirms her opposition to the proposed development as follows:

"First of all, I wish to state that I support the broad principle of the redevelopment of the Seashell Trust's educational buildings and support their ambition to ultimately enhance the quality of the educational environment for the many special needs children who attend the school. I understand that in the Trust's view this ambition can only be achieved through large scale development on their land.

However, having been elected in 2015 and re-elected in 2017 as the Member of Parliament for Cheadle on a strong local promise to protect the Green Belt, I equally cannot support the proposal to build this large scale development on Green Belt land. Green spaces and Green Belt designation are fundamental to promoting better air quality, better public health and preventing urban sprawl and blending of local communities, particularly in this case Heald Green, Cheadle Hulme and Handforth.

In my view, the very special circumstances being presented by the Trust do not outweigh the substantial harm to the Green Belt caused by such a large scale

development, which is contrary to the core principle of the National Planning Policy Framework (2012), the support for which was also reiterated in the Government's White Paper earlier this year: that Green Belt land has a strong presumption AGAINST development. The financial "very special circumstances" put forward in my view do not meet the threshold of allowing this application in Green Belt when considered with many other factors, including increased traffic congestion and the lack of suitable infrastructure.

Considering Stockport Council's concern about the proposed development of Green Belt land in the Greater Manchester Spatial Framework (GMSF), granting this large development in prime Green Belt land would send a message to all our residents that the Council's opposition to such inappropriate development in Green Belt land is not sufficiently robust.

I trust that you will consider this representation when determining the application."

Heald Green and Long Lane Ratepayers' Association (HGLLRA)

The Chairmen of the HGLLRA have submitted three letters of objection to the application (summarised below) in each case making clear that they are the views of the committee of the HGLLRA and are independent of any views held by Heald Green ward councillors.

18 April 2016

Firstly, they state that they value the work carried out by SST and acknowledge the need for SST to update their aging facilities. They also acknowledge SST as a major local employer and the shortage of affordable housing in Stockport and surrounding areas. They therefore make clear that they fully support SST's ambition to modernise their facilities but cannot support the proposed housing development.

They acknowledge that the SST campus is located within a designated Major Existing Developed Site (MEDS) in the Green Belt and do not believe that any detrimental effect on views into the Green Belt would arise from the proposed campus redevelopment.

They go on to highlight that the proposed housing development is 'inappropriate development' in the Green Belt and state that insufficient information has been submitted by SST to demonstrate that very special circumstances exist to justify the proposals in the form of financial information, consideration of alternatives and detailed analysis of need. They go on to state that this is vital in order for an informed, evidence based, decision to be made.

They then state they have great concerns about the traffic impact of the proposed housing development together with cumulative effects associated with the A6MARR, the large housing development at Woodford and emerging proposals in neighbouring Cheshire East. They state that the present situation is intolerable and that the impact of the proposed new housing would lead to gridlock. The following problems in the local area are highlighted:

- congestion at the Wilmslow Road/Finney Lane junction;
- congestion at the Cheadle Royal roundabout from all sides; and
- congestion on the A34 for northbound traffic at the Gatley Road junction.

They acknowledge that the opening of the A6MARR may alleviate some congestion but highlight specific concerns about the proposed access to the housing development from Wilmslow Road linked to rat-running along Queensway to access Finney Lane and highway safety concerns associated with speeding.

They also highlight a number of other infrastructure related concerns relating to:

- drainage challenges arising from the prevalence of clay soils and field ponds in the area;
- primary schools in Heald Green are full and mostly oversubscribed; and
- the local health centre and GP are unable to cope with local demand.

In conclusion, they emphasise their support for SST and the great work they do with some of the most profoundly disabled children. They confirm that they are fully supportive of the Trust's ambition to modernise and improve its facilities but highlight their serious concerns about the impact of the proposed 325 dwellings.

28 September 2016

Additional comments were submitted in respect of SST's financial position summarised as follows:

They state that the applicant's case for very special circumstances is based on two premises:

1. SST will cease to exist without the proposed redevelopment

This premise is set out in the documents submitted as part of the application and was communicated at public meetings held by SST leading up to the submission of the application.

Following a review of SST's accounts, they argue that SST remain in a strong financial position and there is no evidence to suggest that the Trust are in financial difficulty or that their future is at risk if the proposed development does not proceed. They state that there is no evidence to suggest that local authorities are cancelling contracts with SST; that they are reliant on any one income source or local authority and that they continue to benefit from a strong donor base.

They go on to state that *"it is our challenge that, contrary to the application being based on 'need' it is based on 'want' and the Trust may have drawn up a "gold plated" wish list, encouraged by their developer partner. There is no suggestion that the Trust would not employ any monies raised from the sale of Greenbelt land into the provision of services in line with their charter but the case made for planning permission is inaccurate and misleading in its attempt to gain approval."*

2. There are no alternative funding sources available to SST

HGLLRA argue that alternative funding sources have been unduly discounted in favour of the proposed sale and development of SST's Green Belt land given SST's strong financial position as contained in their accounts and statements to the Charity Commission, particularly in respect of SST's ability to secure debt finance.

23 December 2016

They welcome the increase from 10% to 30% of affordable housing on the northern fields now suggested but are still unhappy that this falls well short of the figure of 50% which SMBC policy requires.

The guarantee of both formal and informal open space within the housing development is welcome but does not compensate for the total loss of the present open space.

The Seashell Trust's agreement to allow public access to the new sports facilities is welcome but this accessibility already exists, as the local community can already access the swimming pool, climbing wall, football pitches and gym at the Seashell Trust for an admission fee. We therefore do not feel that this is an additional feature.

The package of local transport improvements is negligible when considering the extra traffic which will be generated from the residential development. They maintain their position that traffic congestion is already intolerable and that the proposed housing development will only exacerbate problems. The proposed mitigation measures will not be effective.

The supplementary information to the original application does not offer any additional evidence that the Seashell Trust would be unable to function without the funding released from the sale of the northern fields. We would consider that, if a different timeframe for improvements were used, it should be possible to rebuild over a longer period of time using their current, not insubstantial, finances and borrowing power. There are other similar school settings in the country which have been built at far less cost. As the Seashell Trust has been judged to be "outstanding" by OFSTED on the last three successive inspections, we find it difficult to believe that the school has such inadequate facilities that they have stopped admissions and hence will eventually close the school without remedial actions. The stopping of admissions was not mentioned at the Public Meeting in November 2015. The statement about the most vulnerable children of Stockport "indisputably" being failed is very subjective, unsubstantiated and unproven as a case to close the school.

The amendments offer no further evidence that brings us to conclude that the Seashell Trust has very special circumstances to warrant using Green Belt land for building.

16 August 2017

They state that although 30% affordable housing is now being proposed this remains significantly less than the 50% planning policy requirement and is therefore considered unacceptable.

The total cost of the campus redevelopment at £45M as it equates to many times the cost of other special schools. Indeed, the proposed school is three times the size of Government design guidance for special schools. SST could 'transform' their campus at a significantly lower cost over a longer period of time. They highlight that SST's submission records some buildings earmarked for replacement as being in good condition that could be remodelled rather than replaced. Some costs appear particularly high such as the recycling centre, storage and parking facilities that have no direct relevance to the education of the students.

They note that SST claims to be a 'very special special school' and meets the needs of students whose needs cannot be met by the students' own local special schools. They state that Stockport has by far the largest number of students attending SST in Greater Manchester that suggests that other Council's or schools are able to meet the needs of their disabled students via alternative service providers. They continue to applaud the work of SST but question whether the proposed 'transformation project' is necessary given they continue to secure outstanding OFSTED ratings in their existing accommodation.

Very special circumstances have still not been demonstrated.

The proposed housing development without investment in necessary transport, education and health service infrastructure would be detrimental to the residents of Heald Green.

Traffic problems will be exacerbated by the North Cheshire Growth Village in neighbouring Cheshire East (circa 1500 new dwellings, up to 12 hectares of employment land and associated development).

To conclude, they state that very special circumstances have not been demonstrated and exceptions to the 50% affordable housing requirements should not be permitted.

Parents in Partnerships Stockport (PIPS)

"PIPS is Stockport's official independent local parent / carer forum run by parents, carers, grandparents and family members who have a child/young person between the ages of 0-25 years with special educational needs, disabilities and any other additional need. PIPS offers an opportunity for families to come together, to share information, give their views, listen to their issues & concerns to share with Stockport Council, Health and local SEND organisations to help the design, delivery and review of services for children and young people with SEND in Stockport. PIPS provide training, workshops, coffee mornings, live social media and provide peer support.

PIPS are writing to Stockport Council to support Seashell Trusts planning application on behalf of many families of children and young people with special educational needs and disabilities (SEND), as well as those with severe and complex needs. We have sort the views of our members through our social media, face to face meetings, workshops, training days and coffee mornings. Many of our members either have children and young people who go to Seashell Trusts: Royal School Manchester or

Royal College Manchester, attend CADS sports (in the summer holidays), family days, school activities, swimming, parent carer workshops, information days and training.

Here are just some of the views we have received:

- School is old, out dated and not appropriate for children & young people with severe and complex needs. This provision was previously for Deaf Children.*
- Mainstream schools are continually being updated to meet the needs of their children so why can't our children's school be updated to meet their needs*
- Seashell Trust provide the best support they can whilst having to use buildings that are not appropriate or good enough for our children and young people*
- Hydrotherapy is in a building separate to the school and needs to be in the same building so that they do not get cold and become ill.*
- School is too small for example: corridors are too narrow, windows too thin (not strong enough for our children and young people with challenging behaviours)*
- Classrooms are not student friendly*
- Dining hall is too small to cater for children and young people with physical disabilities*
- Layout of the school does not promote independence – it is not safe – not allowing the children to be independent*
- School is too cramped and our children and young people need space and appropriate environment.*
- School is old, cold and not appropriate any longer for our children and young people it is nearly 70's old and has not been updated to meet the needs of severe and complex needs.*
- The school urgently needs redeveloping to meet the needs of children and young people with special educational needs (not as it was for Deaf Children as they have much more complex needs now)*
- We are worried that if this planning does not go through how long they will be able to carry on meeting the needs of our child as it is not an appropriate building anymore.*
- School rooms are wrong size & shape to accommodate our children and young people*
- School needs fully updating it is so old and not appropriate*
- Hoping that this will mean there are more places available as it has been full the last year and really hard to get a place as there is an increase of children and young people with severe and complex needs who hit the criteria for this provision and is constantly increasing. We do not want our children going out of borough*
- Royal School Manchester is not fit for purpose as it stands!*
- A school needs to be built to meet the needs of our children & young people there is nowhere else for them to go!*
- Needs less isolation for children and young people*
- Need bigger sensory areas so children and young people can come together. Currently no group sessions due to being too small which means only 1-2 are able to be together at once*

- *Not enough space to store equipment for example: wheelchairs, walkers and standing frames.*
- *School needs to be updated to meet the needs of sensory impaired children and young people that attend.*

Seashell Trust is a lifeline for our most vulnerable families in Stockport who have children and young people with severe and complex needs. These children and young people need the very best specialist care, support and provision to meet their needs. It is vital that the school building meets the needs of these children. We also need to ensure that we keep this quality of provision in Stockport to keep our children and young people in the borough, the last thing we want is for them to be sent out of borough and away from their families.

Seashell Trust's school urgently needs to be rebuilt and designed to meet the needs of the cohort of children and young people that they educate, the school and other buildings on site were built back in the 1950s. It was not designed for children and young people with severe and complex needs they are now educating it was for deaf children and young people which were much more able. However even now the school would not meet the needs of those children either. These children and young people require amongst other things hydrotherapy within the school (rather than in another building), physiotherapy rooms, sensory rooms, storage for equipment and appropriate size classrooms and appropriate toilet facilities. Seashell Trust has evidenced and from our experience of views of families that they have tried everything they could to raise the funding, however we do understand that they have no choice other than to sell the land to ensure they can build a school that meets the needs for this specific cohort of children and young people.

PIPS ask that you strongly consider our letter of support as representatives of families in Stockport who have children and young people with special educational needs and disabilities and we believe that this planning on greenbelt land in this case does come under special circumstances."

Stockport Action Youth Speakers (SAYS)

SAYS are an independent local participation group for children and young people with special educational needs and disabilities. Their aim is to co-produce services in Stockport.

SAYS support the SST application as they know how much children, young people and families will benefit from the scheme once it is finished. SST have supported SAYS for 2 years and help young people with little or no communication needs to be able to access SAYS. They stress the important role SST plays in supporting children and young people with severe and complex needs.

They strongly support SST's commitment to providing community access to the proposed sports facilities.

SAYS have received a lot of feedback from families that the support and services SST offer is excellent and believe we are lucky to have SST in Stockport as most children/young people have to be sent outside their boroughs/districts to receive

such specialist care and education. SEND children and young people should be close to home wherever possible.

The proposal will provide some much needed affordable housing in Stockport.

The SST campus needs to be redeveloped as it was built in the 1950s and wasn't designed for children and young people with very complex and severe disabilities that SST now cater for. Most other special schools are unable to provide the specialist care that are needed to meet their needs. SST have no other way of raising the money to deliver the proposed scheme.

The state that "this is an opportunity to make such a huge difference for children and young people with severe and complex needs in Stockport as well as those families that access it for swimming and sports activities for the children and young people with special educational needs and disabilities. Due to so many cutbacks over the years there is very little in the community for children and young people with special educational needs and disabilities and this is something Seashell Trust specialise in and is very much needed without this families will hit crisis."

CONSULTEE RESPONSES

Cheshire East Council - No response to date.

SMBC Education

Introduction and Context

The mainstream school population has increased over the past seven years. One of the key principles in the development of Special Educational Needs & Disabilities (SEND) is that the vast majority of pupils should be educated within Stockport and within their local, mainstream school and community. For some children and young people, however, it is recognised that their needs can only be met within a special school.

Nationally and locally there are growing numbers of children with complex special educational needs and disabilities who require a specialist school place and this has increased at a higher rate than the overall population. Medical advances and other factors mean that there are more children needing specialist school placements.

Stockport LA has historically placed children and young people in non-maintained, independent or out of borough specialist provision, because-

- a. The child/ young person's presenting needs are sufficiently complex that they can't be adequately met within Stockport's maintained special schools in the borough,
- b. The placement at the existing special provision has broken down for the child/ young person due to the complexity and changing needs of the child/ young person, and a change of placement is required,

- c. There is a parental request for a specific setting for a child/ young person which has been upheld by a tribunal or would be likely to be upheld by a tribunal,
- d. This is an appropriate post-18 provision for the most complex young people.

These pupils usually have-

- a. severe and complex or profound and multiple special educational needs and/or
- b. very high physical needs and/or
- c. very significant health or medical needs and/or
- d. complex Autism with behaviour that challenges and/or a learning disability and/or
- e. multi-sensory needs, visual or hearing impairment.

Over recent years increasing demand for specialist places have been accommodated by expanding Stockport's special schools, which has involved investment in school adaptations and increased capacity: one of the primary schools for pupils with complex needs has been expanded from 49 places in 2009 to 90 places in 2017 (+46%), and the secondary school for pupils with complex needs has been expanded from 73 places in 2008 to 104 places in 2017 (+29%).

Despite this expansion year-on-year all special schools and resourced provisions are full or over number and the LA are placing an increasing number of pupils in out of borough special schools and non-maintained/ independent special schools provision. Many of these are not within the Stockport 'footprint' and, therefore, also incur additional transport costs and in some cases residential costs. In addition, the Special Educational Needs and Disabilities Code of Practice has enshrined the requirement that where educational placement is still relevant and named in an Education Health Care (EHC) plan this should be sustained until the age of 25 years.

It should also be noted that some of the external independent place providers are now declining requests for further places as they are also full. Due to these factors there is significant concern that if the lack of overall specialist places is not addressed rapidly then this will mean that the LA will find itself in the position of not being able to identify a school place for some of our most vulnerable pupils.

Specification

- The children and young people that are placed at Seashell are the most complex and acute of the pupils that are placed in out of borough special or non-maintained, independent special schools. The needs of this group are becoming increasingly acute
- These children and young people need highly specialist teaching, extensive therapy and medical intervention and a high quality specialist environment, facilities and resources.
- This will include-

- a. Classrooms of sufficient size to accommodate specialist equipment and high adult to pupil ratios,
- b. Additional rooms for the teaching of specialist skills, e.g. cookery, art therapy, music, drama,
- c. Wide corridors and extensive storage to allow access and to store specialist equipment,
- d. Withdrawal spaces and calm areas to provide appropriate areas when a young person is highly agitated/ exhibiting behaviour that challenges,
- e. Medical rooms of sufficient size, e.g. to accommodate pupils who need to be vented for extended periods,
- f. Specialist and large bathroom facilities with specialist equipment where personal needs can be addressed,
- g. Access to hydrotherapy,
- h. An environment that meets the needs of pupils with visual and hearing impairments,
- i. Communal space/ hall and dining facilities of sufficient size to incorporate the whole population with support staff,
- j. Sufficient staff and teaching and learning preparation areas.

Given the above the Education Asset Plan manager reviewed the Design and Access Statement and Proposed Floorplans for the school in relation to Buildings Bulletin 102 (BB102) and BB104 and would provide the following comments:-

The trust specialises in education and care for children with very complex neuro – disabilities/needs in society including deafness, blindness and autism, attendant with profound physical and multiple learning disabilities and/or difficulties (PMLD and MSI) - This range of complex and profound need and the age range of pupils requires very specialist accommodation of which none of the current guidance documents covers, therefore comparison would not be viable (please note that BB102 and 103 are non-statutory guidance).

The existing buildings are 2525m² and were built originally to accommodate pupils with hearing impairments and therefore would not be fit for purpose for pupils with such a broad range of complex needs that the school now caters for. As with this type of SEN education facility the needs of pupils change regularly and set areas of space are not always appropriate and can be limiting if provided as such. The proposed new build is 5500m² and incorporates fit for purpose accommodation in terms of teaching, specialist learning, medical, dining, therapy, circulation and social spaces. The plan/layout provides flexibility/adaptability to the size and use of spaces as the needs and cohorts of pupils change. The design team have consulted with various stakeholders and the proposal has taken into account the current and future needs of the pupils and staff. As an Education Asset Manager, I would confirm that the proposal delivers a fit for purpose learning and social environment for the pupils and staff.

Given these considerations we consider that the renewal and improvement of the facilities and buildings of the Seashell Trust will help better support some of the most

vulnerable children and young people of Stockport, who require and deserve the best support that can be offered.

Impact on schools capacity

The statistical model widely used nationally for the number of children to be expected from a housing development is as follows:

Each 100 houses will present, on average, 4 children for every year group.

The style of the development may decrease this expectation, such as where the development is flats or apartments, or the numbers presenting may be higher if the housing development is all family homes.

For a development of 325 houses we would expect around 91 primary places to be needed; around 65 secondary places to be needed; sixth form we would expect 26 additional places needed.

The number of primary places is close to the 105 half form of entry and given the pressures already in the system over school places it will likely mean that a school nearby will need enlargement of 0.5FE in order to secure the places. DFE expectations are that such an expansion should cost around £900,000. The new Cheadle Hulme Primary free school will offer an additional 2FE from September 2018 but we anticipate all those places being needed by 2019 by populations already in train.

With respect to secondary provision there is pressure on the lower years 7 and 8. However this year we have around 60 spare places at Bramhall High School and that is projected to continue for a few years. Further capacity may be freed up by the new Laurus Cheadle Hulme High School (free school) that opens in September 2018 but we cannot predict this unknown factor at this stage.

Sixth form provision is available at a number of sites and no difficulties are envisaged over places at that level.

SMBC Public Health

In response to objections and the concerns of local residents about the ability of local GP surgeries and practices to accommodate the increased demand for their services arising from the proposed housing development, colleagues in Public Health wrote to the local surgeries/practices identified in the ES to ask them whether they would be able to anticipated number of additional patients. Two written responses were received. The first from Cheadle Hulme and Bridge House Medical Centres confirmed that their list is open for new patient registrations, the proposed development is within their catchment area (the distance to the centre from the application site is approximately one mile) and that they *“could accommodate or make arrangements to accommodate all 840 patients”*. A second response was received from the Eastern Cheshire Clinical Commissioning Group on behalf of the Handforth Health Centre who confirmed that their catchment area does not extend to

the application site and given the growth proposals in the Cheshire East Local Plan they do not plan to accept patient registrations from the application site.

Earlier comments about the scheme as a whole were as follows:

The provision of improved facilities for this nationally important resource for education and care for children with complex neuro-disabilities / needs is welcomed in terms of the specialist public health benefits both within and outside the Borough.

The use of Building for Life 12 design standard is also welcomed in terms of this standard providing some overall guidance on masterplanning for the site, ensuring multiple benefits for site occupants and users. It is recommended that Building for Life 12 inform the detailed design stage to ensure achievement of the goals outlined in the standard, which will benefit all site occupants and users, including in terms of their general health.

Stockport's Sustainability Checklist score for the development is 30 'yes' responses with 14 'gold' scores, resulting in an overall SILVER score for the development. As an outline application there are some aspects of sustainability design not yet known especially in terms of materials. This scoring may well improve at detailed application stages as more decisions are made and these decisions should include considerations of the health benefits of sustainable design and construction as laid out in Stockport's Sustainable Design & Construction SPD. As that document states, the earlier sustainable design ideals are incorporated into a development the more cost effective those options can be including cost savings for the development. In terms of public health many aspects of sustainable design are important to ensuring health benefits. In this case, use of the Building for Life Standard 12 as well as considerations of sustainable transport options and sensitive landscaping are critical for reasons laid out below.

Transport

The application clearly outlines the benefits of walking and cycling, with plans to promote alternative modes of transport for both staff and visitors. There is clear identification of cycling networks, the added value of the A6MARR development and the submitted Transport Plan states 'Delivery of improved cycle parking facilities throughout the site'. However it has been made clear to the Council's Highways Officer that more detailed information around cycle parking is critical to support such claims. Any comments from the Council's Highways Officer around that issue should be carefully considered, from a public health perspective, to ensure full take up of cycling opportunities.

In addition further comments made to the Highways Officer (which will be reflected in that officer's comments and recommended conditions) include that the area's walking and cycling access will also be increased by the provision of the A555 parallel walking and cycling route. The promotion of these routes and their linkages to work and retail venues should be promoted as part of the site's residential travel plan. Furthermore to integrate with the improvements made to the PROWs 97cg, 96cg, 97(a)cg and 104cg as part of other housing development sites, there would be a desire to make PROW 96cg into bridleway along its full length, to increase cycle access and further strengthen east west cycle linkages / permeability in the Borough,

with potential linkages to National and Regional Cycle Network Routes. The proposed pedestrian and cycle routes on the site are welcomed and with signing as well as wider mapping being made available to new residents, these could be potentially positive in increasing physical exercise and sustainable travel in residents along with the positive mental and physical health effects this has. In addition, the Highways Officer has been informed that it might not be beneficial to segregate off road routes on an estate road system, where an appropriate road layout could afford the opportunity for safe cycling on the carriageway as they would be low speed and quiet.

In terms of informing wider health benefits, promoting active travel contributes to management of good public health in the Borough, especially healthy weight. Achieving healthy weight reduces risks of other lifestyle diseases such as hypertension, coronary heart disease and stroke. Reducing risks of such diseases also reduces pressures on current and future public sector health budgets. It is extremely welcome from a Public Health perspective when new development reflects the fact that the built environment can have major impacts on residents' ability to be active. Active environments produce benefits including ensuring a healthier local work force whilst benefitting the Borough's economy and environment. In addition an appropriately designed built environment can contribute to reducing social exclusion, including through offering cycle and pedestrian routes for both commuters and recreational users.

Recreation

The proposed availability of the swimming and hydrotherapy facilities by the wider community at specified times are welcomed by Public Health in terms of increasing the availability for recreational uses to the general public, especially reflecting the relatively low levels of sport and active recreation for adults in the Borough. Whilst data for Stockport's obesity levels shows them to be below the national average, it is still of concern that there is a rising trend in adult obesity while child obesity levels remain higher than the previous decade.

From a physical activity & excess weight perspective, these proposals can be viewed very positively. The development and improvement of indoor and outdoor facilities (including walking and cycling) on the site will play a significant role in increasing activity levels for SEND pupils but also provide improved opportunities for the wider community. Data shows that people with a disability or special need are more likely to be inactive and overweight.

Biodiversity

The proposed actions in the Sustainability Statement that will benefit biodiversity on the site will also go some way to benefiting both the physical and mental health of site residents, staff and visitors. In particular the view of green space enhances the human spirit offering real term benefits to people's health and wellbeing since stress is known to exacerbate a wide range of health conditions (Valuing GI's health benefits).

SMBC Highways Engineer

This is a hybrid application seeking full and outline planning permission for different aspects of the development. Full permission is sought for a new school with associated facilities, infrastructure, drop-off parking, access, landscaping and ancillary works. Outline permission (with access included) is sought for the construction of new campus facilities within the school complex with associated infrastructure, parking, landscaping and ancillary works. Outline permission (with all matters reserved) is sought for the construction of up to 325 residential units with associated infrastructure, parking, access, landscaping and ancillary works on land to the North of the school.

The submission is predicated on an enabling case for investment into the School site and alongside pertinent planning issues there are highway matters that need due consideration.

School and Campus proposal

With respect to the new school proposal I note it is not intended that there will be any material change in pupil numbers at the school, with the existing capacity at circa 120 students aged from 2 - 25 years. The site access on Stanley Road will be modified with it being moved a few metres to the East. This requires the loss of a couple of trees and I am satisfied that the new access point will have adequate visibility to and for traffic emerging from the access and I therefore express no concern. I also note that a bus stop on the frontage is inhibited by the existing access and the modification of the access will need to ensure that bus user needs are respected in the detailed design.

Within the site ample provision will be made to meet the likely and realistic parking demands of the site with associated manoeuvring space and potential for safe servicing to take place. In conclusion I am accepting that there is no material change to the scale of the school and its intended services and operation and I raise no concerns. In the event that permission is granted conditions will be required to cover access formation/bus stop alterations; access closure; pedestrian walkway provision; hardstanding and parking area space designation, layout, formation and drainage; cycle parking, travel plan and construction management plan.

The campus proposal is in outline format and I am satisfied that the access arrangements which will share the new entrance on Stanley Road will be fit for purpose and have sufficient design capacity to accommodate traffic generated by the proposal, which I note would be limited. The indicative drawings submitted suggest there is sufficient scope to set out the campus and all associated infrastructure so I see no reason to express concern about the principle of this proposal. I am aware a connection for pedestrians and cyclists only may be provided to the adjoining residential land and this is welcomed, with matters of detail capable of assessment at reserved matters stage.

Residential proposal

The application also seeks outline permission with all matters reserved for the development of up to 325 residential units on land to the North of the school site. The residential element of the application is clearly a development of significant

importance and scale and is the enabling argument behind the overall application. It is also nevertheless from a highway perspective effectively a relatively straight forward residential build on a vacant plot of land. Following extensive discussion it was agreed with the Case Officer that means of access could be reserved matter and the submission was amended such that all matters are now reserved for subsequent approval. I do however note that vehicular access is intended to be taken from Wilmslow Road.

Reviewing the submission from a highway perspective it seeks to establish whether the site is of sufficient scale to accommodate up to 325 residential units, whether the impact of development on the highway network can be deemed to be acceptable and whether the site is suitably accessible for such development. In agreeing that access can be a reserved matter it was noted that the application for outline planning permission must state the area or areas where access points to the development proposed will be situated. As such through discussion some principles for access have evolved and these I will discuss and comment on later.

During discussion I have been stressing some general principles and concerns that arise when considering development of significant scale and those matters that are critical and need consideration as part of this proposal.

The Council has a longstanding problem with local roads being congested and this in part can be attributed to cul-de-sac type developments which focus all vehicle movement onto limited sections of the highway network and can give rise to general traffic congestion due to the limited number of access opportunities. I feel there should be a strong drive on focusing development toward the key route network and this will help to minimise traffic impact on local road network. In this case I have been strongly of the view that the development should have connectivity beyond simply movement to and from Wilmslow Road and am looking to ensure that the development is future proofed to provide connectivity to the strategic road network; that is to the A34 at the Bradshaw Hall roundabout junction. Whilst the proposal has to be assessed on its individual merit I feel it would be remiss of me not to seek to ensure that this proposal does not prejudice further development and connectivity beyond the site.

In appraising the likely site access arrangements the applicant has acknowledged and agreed in principle that the development infrastructure should allow for future proofing and potential direct connection to the A34 to give an alternative means of access. The detailed layout will be expected to embrace these principles rather than prejudice them. It should also be noted that such a connection will also assist the general movement of traffic around the strategic highway network and the Heald Green local road network in particular as there would be alternative routes to connection with the A34 and further afield. It is therefore expected that the document of access principles and design codes that will evolve and be expected to form part of any reserved matters applications will identify these expectations to the housing developers likely to progress the build. The identification of the future potential connectivity will also then be clear to prospective purchasers and this would reduce or even eliminate the risk of their uncertainty on the longer term objectives and expectations surrounding the site and area in general.

It has also be discussed and agreed in principle that the site will have one principle means of access and this is required and expected to be in the form of a traffic signal controlled junction. This junction would incorporate the main site spine road, Wilmslow Road and Queensway on the west side of Wilmslow Road and its delivery will need to be the subject of conditional control to ensure all future reserved matters or full applications deliver a fit for purpose junction with adequate design capacity and integrated user facilities.

Other principles discussed and agreed include the spine road design parameters to ensure it is future proofed and able to serve further development and capable of connection to the A34 and that the road can accommodate heavy goods vehicles and public service vehicles. There is also future potential for upgrading the Griffin Lodge access road to facilitate an appropriate quantum of residential development; for limited direct plot access on Wilmslow Road and for the layout to deliver appropriate internal residential roads and infrastructure to enable connectivity across and through the site for vehicles, pedestrians and cyclists.

For the avoidance of doubt the applicant has provided with the submission, for discussion purposes only, an indicative site layout drawing. The intention of this is to show it is practical and possible to develop the site with up to 325 units whilst integrating and respecting the future proofing requirements that have been discussed, the necessary road and other infrastructure needs and the planning requirements within any potential site layout. It is fair to comment at this stage I am relatively satisfied from a highway perspective that the site is of sufficient scale to accommodate the quantum of development proposed whilst respecting highway requirements. There may need to be some revisions to the property designs and perhaps a mix of dwellings and apartment type builds to better enable development however at this stage I find no reason to express concern.

In terms of the suitability of the site for residential development noting that the site access and layout details are matters reserved for subsequent approval, the determinant issues at this stage from a highway perspective are traffic generation and consequent highway impact, both operationally and from a safety view point and site accessibility.

In order for me to agree in principle to site redevelopment I need comfort that the surrounding highway network has sufficient capacity to accommodate development traffic and that appropriate means of access can and will be delivered. It would be remiss of me to simply agree to 325 units on a site if it is clear that there is insufficient spare capacity on the network to accommodate development traffic, or there is a clear need for off-site improvement and/or being aware that safe access cannot be achieved. The site also has to be demonstrably accessible for development purposes and the submitted Transport Assessment (TA) considers and responds to these matters in detail.

Existing local area highway conditions

The TA includes a review of the existing traffic and transport conditions within an agreed study area. Personal injury accident data has been sourced from TfGM and

this confirms that there has been a total of 37 PIAs within the study area between October 2010 and September 2015.

At the Finney Lane / Wilmslow Road signalised junction a total of eight collisions have been recorded in the last five years. All are slight in severity and the collision type and numbers are not untypical for a junction configuration of this nature. Only one of the collisions has been recorded as involving a vulnerable road user, the remaining collisions at this location relate to collisions between vehicular traffic. It is not unreasonable therefore to comment that in terms of highway safety the junction operates within existing accepted thresholds.

The Wilmslow Road corridor from Finney Lane to Stanley Road has 16 recorded collisions on this link. Six involved collisions between vehicular traffic and pedal cyclists and two involve motorcyclists. In summary over 50% of these collisions have involved vulnerable road users although it is noted that the majority of collisions occurred pre-2013. This period pre-dates the delivery of cycle improvements along Wilmslow Road and around the Cheadle and Gatley area in general and since introduction of the measures the cyclist collision rate has significantly reduced. Therefore any further measures that are brought forward to assist vulnerable road users are likely to have a positive effect on reducing collisions on this route.

The Wilmslow Road / Stanley Road Junction has only one recorded collision, that being a slight vehicle collision. There is no evidence of a significant accident problem at this junction.

Stanley Road between Wilmslow Road and the A34 has two recorded collisions in the last five years. This represents a low collision rate and does not suggest this corridor suffers from a particular accident problem.

The Stanley Road / A34 junction has six recorded collisions, the majority involving vehicles and one with a cyclist. This level of collision does not present a significant problem at a junction of this nature and carrying significant volumes of traffic.

The A34 / Eden Park junction has four recorded collisions, two of which involved slight rear end shunts on approach to the junction. Two other collisions are recorded as serious, one involved a motorcyclist and a vehicle and the other a three vehicle shunt. The serious nature of collisions at this junction is a concern and I would expect that the recent introduction of signal control at the junction will assist reducing the risk of incident and collision.

In summary a review of the accident data, whilst identifying a significant number of incidents, does not evidence that the local road network is suffering from extremes or types of incident that are unacceptable for this type of network. I therefore need to ensure that the development does not worsen this position or materially increase the risk to safety of all highway users.

Base Traffic Situation / A6MARR effect

During scoping for the Transport Assessment exercise two sets of base traffic flows were agreed appropriate for assessment purposes in order to draw comparisons between the existing performance of the highway network and that after the opening

of the A6MARR scheme. The year of opening is based on 2016 with a future year assessment at 2021 and whilst I appreciate this is no longer a true representation of current circumstances at the time of submission of the proposal it was considered an appropriate and acceptable approach. The assessment based on 2021 after the opening of the A6MARR is of most relevance in assessing the impact of the proposed development on the surrounding highway network.

The study area includes the site access, the Wilmslow Road junction with Finney Lane and Etchells Road, the Wilmslow Road junction with Stanley Road, the Stanley Road junction with the A34 and the A34 roundabout junction at Bradshaw Hall. The 2017 base flows were derived from 2015 surveyed flows and due growth factor application.

It was clear that when the A6MARR scheme went through due process and was granted planning permission, Wilmslow Road and the nearby local road network would experience considerable traffic relief as a consequence of the opening of the new road. It was predicted that the annual average daily traffic flow in 2017 would reduce by approximately 1000 movements from 11400, an approximate 10% reduction. Finney Lane itself and its junction with Wilmslow Road would also experience considerable relief however Stanley Road daily flows will not materially change and flows on the A34 would increase by about 5%.

The fact that the A6MARR opening will release some headroom capacity at the Finney Lane junction is clearly of benefit to the development site but it does undermine the general principles and objectives of the A6MARR project. However it is difficult to be critical of a landowner seeking an opportunity as a consequence of the benefits of the A6MARR and this cannot be deemed to be a determinant factor when considering the application as proposals need considering on merit. The traffic impact has to be assessed relative to predicted background traffic levels and mitigation provided to ensure there are no operational and safety concerns arising. It is however wholly reasonable that the Council endeavours and can expect to lock in the benefits of the A6MARR on the local road network and ensure that development does not prejudice any future improvements that may be progressed.

Trip generation and distribution

I am accepting that the redevelopment of the education facility off Stanley Road will not materially change traffic generation etc. associated with this element of the site. I note that pupil and staff numbers will remain similar to the existing operation and that the improvements to the sports and training facilities on the campus will not materially change the site operation and associated vehicle movements to and from the site. I do not therefore see any reason to express concern about the school and campus proposals impact on the safety and operation of Stanley Road.

Conversely the residential development off Wilmslow Road comprising up to 325 units will generate a significant volume of additional traffic and associated movements on the surrounding highway network. This necessitates a full and proper assessment of the traffic generation and consequent impact on highway operation and safety.

To calculate the site traffic generation the TRICS database was interrogated for appropriate trip rates for residential development. I have thereafter, to ensure a robust approach, required an assessment utilising the rates which were utilised for the Woodford BAE development which I consider is a relatively comparable site.

The use of the two different trip rates shows that there is no material difference in the morning period two way traffic generation figures and there is a small difference during the evening period, with the inbound traffic generation being slightly higher.

Seashell trip rates:

| | In | Out | Two-way |
|----|-----|-----|---------|
| AM | 51 | 134 | 185 |
| PM | 119 | 75 | 194 |

Woodford trip rates:

| | In | Out | Two-way |
|----|-----|-----|---------|
| AM | 47 | 138 | 186 |
| PM | 157 | 81 | 238 |

The submission from the applicant comments that whilst the Woodford rates give a comparable output it is not considered that the two sites are directly comparable. This site is in more of an urban location with public transport evident and in closer proximity to services and other amenities. It is further considered that car travel will be less reliant at this site and there is greater opportunity for sustainable travel choices to be made. It would be difficult and perhaps unreasonable for me to reach a different conclusion as I have no evidence to argue to the contrary and I therefore have to conclude that the traffic generation outputs based upon the applicant's determined trip rates will ensure an appropriate base for assessment.

Trip Distribution & Assignment

The residential development trip distribution is based on existing traffic movements on Wilmslow Road and turning proportions on the approach arms to Finney Lane / Wilmslow Road and Wilmslow Road / Stanley Road signalised junctions.

In the morning traffic peak it is predicted that 60% of traffic (80 trips) would leave the site and turn right travelling North along Wilmslow Road and 40% (54 trips) would turn left travelling south. Further afield at the Finney Lane junction existing distribution figures show that 59% (47 trips) would continue North, 15% (12 trips) would left turn and 26% (21 trips) would right turn. At the Stanley Road junction 66% (36 trips) would continue South and 34% (18 trips) would turn toward the A34. In terms of arrivals at the site 60% (31 trips) would come from the South and 40% (20 trips) from the North.

In the evening traffic peak it is predicted that 46% of traffic (55 trips) would return to the site from the North and 54% (64 trips) from the South. On the Northerly side 60% of returning traffic (33 trips) would travel straight through the Finney Lane junction with the remaining proportion (22 trips) turning at this junction or joining Wilmslow

Road from other side roads. From the South 71% (45 trips) would have travelled from the Handforth side of the Stanley Road signals and 29% (19 trips) right turned. Departures from the site during the evening peak are shown to be 46% (35 trips) turning Northward and 54% (46 trips) turning South.

These traffic generation figures are thereafter used to assess the impact of development on the nearby highway network and junctions that may be affected by development.

A6MARR effects

The A6 relief road (A6MARR) was granted planning permission a couple of years ago and work is ongoing to complete the project with a scheduled opening in the spring of 2018. The road should deliver significant benefits to the local road network with appreciable reductions in traffic flows along a number of routes. The Heald Green area is predicted to experience significant relief as there will be a more direct route between the A34 and M56/Manchester Airport area, with Wilmslow Road expecting a 10% reduction in traffic, Finney Lane up to 40% and other local roads also experiencing significant flow reductions.

Whilst I note that the road scheme will release significant levels of headroom capacity on numerous links and junctions around the Heald Green area I am particularly keen to see that development does not frustrate the positive effects of the A6MARR mitigation and complimentary works and the benefits of the scheme can be locked in. I do however have to acknowledge that additional traffic generation and consequent impact has to be assessed on its own merit and if it is demonstrated that the impact will not give rise to material congestion and delay or perhaps gives rise to conditions that are no worse than current operating conditions, then a reason for opposition based upon frustrating or undermining the traffic objectives of the A6MARR is not something I consider can be sustained. Whilst it will be unreasonable to criticise a development predicated on off-setting the benefits of the A6MARR scheme I do need to ensure that development does not prejudice the Council's ability to deliver the A6MARR mitigation and complimentary measures and that any works brought forward by the development are compatible.

Highway Impact

Development Management Policy T-3 'Safety and Capacity on the Highway Network' states that development which will have an adverse impact on the safety and/or capacity of the highway network will only be permitted if mitigation measures are provided to sufficiently address such issues. Furthermore developments shall be of a safe and practical design, with safe and well-designed access arrangements, internal layouts, parking and servicing facilities.

The accompanying TA assesses the impact of the development on various links and junctions, predicated on the access strategy being via a new junction on Wilmslow Road. An extensive modelling exercise has been undertaken based upon operating conditions post development completion (noting this was initially anticipated to be 2017 but significant delay in determination of the application has been experienced)

and a future year of 2021. The future year assessment is the pertinent and critical period for assessment.

Junction modelling work has been undertaken for the site entrance on Wilmslow Road, the Wilmslow Road / Stanley Road junction and the Finney Lane / Wilmslow Road junction. Beyond these junctions it is predicted that the links and other junctions will experience less than a 30 vehicle change (increase) in overall vehicle flow and as such it would not be reasonable to expect or justify to the applicant that additional modelling work must be undertaken. For example the predicted increase at the A34 / Stanley Road junction would be less than 1%, a proportional increase that is well within daily fluctuations in flow and deemed to be negligible and not severe.

The initial proposal for the site access was an all movement priority junction with a double lane exit from the site spine road and widening on Wilmslow Road to facilitate a right turn lane to the site. I can advise that a priority junction option has been modelled using acceptable software and this demonstrates that a new junction on Wilmslow Road will not have an unacceptable impact upon the operation of the highway network in terms of capacity, queuing or delay. However, whilst the junction is forecast to operate within accepted capacity thresholds in the 2021 scenario in both the AM and PM peak periods there is limited potential for growth and future connectivity toward the A34.

Following extensive discussion the applicant has recently acknowledged my view and agreed that the site will be best served and future proofed with a traffic signal controlled junction (as discussed earlier). A schematic drawing has been provided and whilst this will need to be the subject of further review and thereafter detailed design it is pertinent to test the suitability of a signal controlled junction and assess the effect it would have on general highway operation. I have received an initial modelling note which shows that a signal controlled junction with acceptable lane provision, capacity, pedestrian and cycle facilities can be installed on this corridor without giving rise to unacceptable congestion and delay. There is sufficient capacity within the potential design for development purposes and spare capacity for additional usage and I am therefore of the opinion that from a safety and operational perspective the site can and should be accessed by a traffic signal arrangement. It will also afford the opportunity for high quality pedestrian and cycle crossing facilities as these can be integrated into the signal junction and reduce the risk of conflict with traffic, a scenario that is preferred to the stand alone crossing points that would be needed to accompany a priority junction arrangement.

The Wilmslow Road / Stanley Road signal controlled junction has been modelled using acceptable software and this shows that the junction currently experiences greater operational concerns during the PM period. It has to be acknowledged that the A6MARR scheme creates significant relief at this junction and whilst the submitted modelling exercise demonstrates there are existing capacity concerns with this junction, the consequent effects of the A6MARR will significantly reduce flows through the junction with demonstrable improvement to its general operation. The A6MARR scheme creates a significant and material improvement at this junction with a significant reduction in traffic movement and some of this created capacity will be taken up by development traffic. The modelling exercise shows that when

compared to existing conditions the junction, even with development traffic imposed, will operate more efficiently than current observed conditions.

The modelling of the Wilmslow Road / Finney Lane junction shows that it currently experiences capacity issues with drivers experiencing delay and congestion. The submission shows that the junction will experience considerable relief as a consequence of the AMARR opening. In the post development scenario of 2021 it is shown that during the AM peak the junction will operate within accepted capacity thresholds when compared to existing conditions and that the traffic generated by the proposed development will not materially change the performance of the junction in this future year assessment. With respect to the PM peak period, overall the junction generally performs with more spare capacity than the current scenario although it is predicted to operate with a marginal reduction in capacity on the Wilmslow Road southbound arm with it showing some operational difficulties. The predicted operational difficulties of this arm are however no worse than current operating conditions and in fact there is shown to be less delay than current traffic conditions.

In summary the submitted modelling results show that the impact of the proposed development will be minimal when compared to the future baseline traffic situation. It has to be acknowledged that the impact of the development is assisted by the capacity benefits that the A6MARR scheme is predicted to deliver. With the A6MARR scheme demonstrated to deliver capacity benefits along Wilmslow Road the applicant's view is that it is logical to orientate the development toward Wilmslow Road albeit respecting the potential to future proof the site and provide potential for connectivity to the A34. The test for a development is whether the impact can be deemed to be severe and the submission has shown that the impact of development would not give rise to operating conditions that are materially any worse than as exist at present and therefore it cannot be deemed to be severe. It is not reasonable to require development to address existing operational and capacity issues but as a minimum the position should not be worsened and mitigation provided where necessary.

I am relatively satisfied that my requirements to lock in the benefits of the A6MARR have not been unacceptably affected and note that the development will deliver material improvements with improved pedestrian and cycle facilities that will hope to encourage sustainable transport choices to be made measures by not just new residents but also existing Heald Green area residents. I see no reason to consider that the development would significantly change the operation of the local highway network compared to existing conditions and it should not exacerbate any local road safety issues and I therefore conclude there would be no justification to oppose the application on the grounds of traffic generation and consequent highway impact along the Wilmslow Road and adjoining local road network.

Beyond the junctions that have been subjected to modelling work, as I have commented earlier it is predicted that the links and other junctions will experience less than a 30 vehicle change (increase) in overall vehicle flow. This applies to the Stanley Road junction with the A34 and the Cheadle Royal junction with the A34. Whilst I have to acknowledge that these junctions do experience traffic congestion and delay for drivers, the predicted increase in flows as a consequence of

development will be negligible relative to background flows and as such it would not be reasonable to expect or justify to the applicant that additional modelling work must be undertaken. It would also be unreasonable and unsustainable to expect this development to deliver improvement or mitigation at junctions remote from the site.

As has been advised earlier I am of the opinion that the development should be future proofed and provide for opportunity to connect the site and adjoining land to the A34 / Eden Park roundabout junction. This scenario was also raised during public engagement prior to submission of the application and as such the TA includes a sensitivity test for the creation of a junction onto this roundabout.

The modelling work shows that the junction does suffer from extreme levels of congestion during the traffic peak periods and this is likely to be worsened as a consequence of the opening of the A6MARR. The future year model of 2021 demonstrates that the junction is predicted to operate in excess of accepted capacity thresholds and it would experience further degradation in performance with the introduction of the traffic associated with the development. Notwithstanding this I remain of the view that the development should not prejudice any opportunity of connectivity and I will look to ensure that the main spine road layout is suitable in design terms and affords access to the relative adjoining land. I do however acknowledge that the applicant does not control land adjoining the roundabout and whilst this cannot be a determinant factor for this application there would be a clear benefit to the local road network if development enables multiple access opportunities and this matter should not be overlooked.

In conclusion I am satisfied that the traffic assessment is robust and shows that the development will not give rise to changes in predicted operating conditions that are deemed to be severe. As such I see no reason justification on traffic and highway impact grounds to oppose the principle of up to 325 residential units being constructed on this site.

Site accessibility

DM Policy T-1 is clear that new development will be required to be sustainably accessible by public transport, walking and cycling. Where additional transport infrastructure is required to make a site accessible this should be incorporated into the proposal. New development is also required to maintain and enhance the connectivity and accessibility of the walking and cycling networks where appropriate to create new routes to fill gaps in the existing network. The primary purposes behind this policy are to ensure a site can reasonably and safely be accessed by all modes of travel, to reduce the need to travel by car and to give particular consideration to the needs of the most vulnerable road users.

The starting point for accessibility assessment is the Council's Accession model. This shows a variance in scoring across the site with the Wilmslow Road frontage scoring in the region 45 and the Easterly side of the site scoring 34-35, clearly due to the isolation and significant displacement of this part of the site from the more active side toward Heald Green. Whilst the modelling may show the site as an overall could be considered to be accessible it is my opinion that this does not necessarily suggest the development would be sustainable in terms of the movement of people.

In terms of potential bus usage the site is located within acceptable walking distances of scheduled bus services, with the nearest bus stops being located within 100m of the vehicular site access on Stanley Road and Griffin Lane respectively. Three services operate within close proximity to the site providing 4 buses per hour that are realistically usable. Whilst this is not at the frequency of Town or District Centre locations and it does limit the potential origin and destination choices for users, the presence of services does demonstrate that the site is accessible by bus.

With regard to access to and from the site by rail the nearest mainline rail station is in Handforth, a distance of 1.9km (a 24 minute walk or 6 minute cycle time) from the site. All bus services routing near to the development site provide links to the railway station. The station provides opportunity for connection with Manchester city centre and Crewe with two direct rail services per hour using the station.

Pedestrian and cycle infrastructure around the area is relatively good as footways exist, footpaths are close by and some dedicated cycle facilities exist. There are however a number of deficiencies in particular the limited availability of safe crossing facilities on Wilmslow Road, incomplete cycle route infrastructure and poor quality surface footpath routes. I strongly feel that these deficiencies will prove a barrier toward sustainable travel choices being made with for example commuter traffic not utilising informal footpath routes and School children not walking to school due to the busy nature of and need to safely cross Wilmslow Road.

In terms of the services and amenities that residents can reasonably expect to access and enjoy the TA includes a review of proximity to and travel time from the site. There are four primary schools relatively close to the site with a walk time of less than 20 minutes. Secondary schools are more remote but still within a 45 minute walk. There are local shops within a 10 minute walk although major supermarkets are more remote. It is worth noting that it is only likely to be staff that would perhaps walk to a major supermarket as this is not a realistic option for shoppers. Other services, notably a health centre and post office, are within a 20 minute walk. Beyond this major employment opportunities and other leisure facilities are typically a 30-40 minute walk from the site.

In summary, I consider it is fair to comment that the site could be accessed by alternative travel modes should a household not be a car owner or user. However the available alternatives, that is public transport, walking and cycling routes are not ideal, prevalent, attractive, readily available or frequent enough in terms of public transport to encourage persons to choose to 'give up a car trip' and make an alternative mode choice. As such I am strongly of the view that the development to be policy compliant needs to include a comprehensive package of infrastructure improvements off site in order to mitigate for the additional trips in a sustainable manner.

I have acknowledged that due to the scale of development proposed it will be unreasonable and could not be sustained to expect meaningful improvement to bus services and frequencies in the area. I have also highlighted that the development infrastructure should be designed to facilitate potential bus routing through the site and not prejudice future improvements. Whilst service improvements are not

reasonably deliverable there is a need to ensure that the associated infrastructure is fit for purpose and that stops within the vicinity are accessible to all users. There is therefore the need for the two bus stops closest to be upgraded to current standards and this can be incorporated into the highway scheme S278 Agreement that will evolve at reserved matters stage.

In terms of pedestrian and cycle infrastructure there are a number of deficiencies in the area. These have been discussed at great length with the applicant and a package of improvement works have been agreed which can be the subject of conditional control where works are on highway land and a S106 Agreement where a condition is not really permissible.

Improved connectivity between the site and Stanley Road to the South and the United Reform Church to the North is essential and a cycleway adjacent to the Wilmslow Road carriageway to align with some existing facilities will be provided. This will involve footway widening and the creation of segregated off road facilities with the majority of work being within adopted highway verge areas. To the North and beyond the Church where Wilmslow Road narrows and it is not reasonably practical to provide dedicated cycle facilities therefore in addition a signage strategy will be delivered to advise the use of quieter roads to bypass Wilmslow Road. This will probably involve the use of Queensway and East Avenue to travel further afield on a cycle.

There is a short section to the South across the frontage of 377 Wilmslow Road (the CMA site) and delivery of a widened footway on this frontage will be dealt with a financial contribution of £30,000 secured under the terms of a S106 Agreement. Delivery of this facility will afford better and essential connectivity to the A6MARR cycleway and access to major employment opportunities, amenities and services to the East and West of the site.

In addition, there is a need for improved crossing facilities on Wilmslow Road fronting the site. There can be pedestrian and cycle facilities integrated into the principle access signal controlled junction and this will best serve the site. Other crossing facilities probably in the form of refuges will be required at the either end of the site frontage. These measures are essential to ensure safe crossing of Wilmslow Road which is clearly of a wider nature and undesirable for as a walking and cycling route particularly for children travelling to nearby Schools.

Improvement and connectivity to the public right of way network is required to the East of the site and appropriate facilities will be integrated into the internal road infrastructure. Beyond the site frontage there is a need to improve the public right of way connecting to Bradshaw Hall and Stanley Road and a financial contribution of £27,500 that will be secured under a S106 Agreement will meet this need. Thereafter there will be merit in status changes to this route to enable cycle usage and this can be pursued by the Council following due process.

Finally, deficiencies have been identified at the junction of Wilmslow Road with Etchells Road and Finney Lane, the junction not having facilities that are conducive to convenient usage by pedestrians and cyclists. This junction will clearly be subjected to increase usage by vulnerable road users as a consequent of the

development and measures are necessary to mitigate for this. Therefore a financial contribution of £15,000 has been agreed and this will be secured under the terms of a S106 Agreement.

In summary I am satisfied that the delivery of this package of measures which can be conditioned on any approval granted and the subject of a S106 Agreement where a condition is not appropriate, will ensure a meaningful and positive improvement to site accessibility and mitigate for increased trips in a sustainable manner.

Conclusion

I consider the submission has reasonably evidenced that a development of up to 325 can be accommodated on this site without giving rise to a severe impact, which is the NPPF test, on the highway network. The residential aspect of the submission, although in outline, can bring forward a road layout and acceptable access arrangement on Wilmslow Road and protect the potential for connection to the A34 in the longer term. A package of accessibility improvements will mitigate in a sustainable manner the level of trips anticipated for the site and address some of the concerns and deficiencies in the area. I am therefore satisfied that subject to detailed planning conditions and the completion of a S106 Agreement, there is no reasonable reason to withhold consent from a traffic and transportation perspective.

SMBC Environmental Health (Noise and odours)

The applicant has submitted an Acoustic Planning Report that has assessed the environmental and plant noise levels upon the proposed internal noise levels of the new school and residential premises.

Internal noise levels for the proposed school campus have been assessed in line with 'BB93:2014 acoustic design of schools - performance standards' the development can meet guidelines with the following proposed mitigation measures:

- Double glazing with a minimum performance of Rw+Ctr 28 dB
- Mechanical ventilation, or where attenuated passive ventilation is being used vents will need to be acoustically rated. The performance of individual vents will depend on the number proposed to each room.

Internal noise levels for the residential aspect assessed in line with 'BS 8233:2014 Guidance on sound insulation and noise reduction for buildings' the development can meet guidelines with the following proposed mitigation measures:

- Facade construction to meet the overall sound insulation performances given in Section 8.4.2.
- Acoustically rated double glazing.
- Mechanical ventilation to dwellings on the east/west boundaries of the site.
- No reliance on opening windows to provide background ventilation.
- Acoustically rated facade vents in locations where natural ventilation is proposed.

Plant noise has been assessed in line with 'BS4142:2014 Method for rating industrial and commercial sound'. Plant noise should be limited for the campus and the school to 48dB day and 29dB during the night.

Subject to implementation of the proposed mitigation measures and control in respect of plant noise I do not object to the application.

SMBC Environmental Health (Air Quality)

Having reviewed the submitted Air Quality Assessment, no objections or comments have been raised.

SMBC Energy and Sustainability Officer

Energy Statement

The proposed delivery of carbon reduction targets for both the school and the residential element are welcomed. The following condition should be applied to the relevant applications in terms of evidence to support such statements of target achievement where a Target Emissions Rate has not yet been calculated or evidenced in the documentation:

'Before the development is commenced details of the percentage carbon savings (as required by Core Strategy Policy SD3) to be achieved on the development, including details of the methodology that will achieve the target should be submitted to and approved in writing by the Local Planning Authority.

Reason - In the interests of evidencing policy compliance in terms of achieving carbon emission targets on site as required by Core Strategy Policy SD3.'

The wider site could potentially support a district heating system that serves the school and the domestic element and if this has been discounted on technical or cost terms then that needs to be evidenced. Was the School development assessed for a biomass boiler and infrastructure that could allow the school to future proof for a connection to a wider district heating / combined heat and power scheme for the wider site at a later date? If this was done and rejected on technical / financial grounds then further detail of this option should be added to the energy statement as evidence. If not, then to satisfy policy requirements around full evidence of consideration of all options, an estimated cost of this potential wider approach needs to be included in Appendix B to support discounting the option on cost grounds. Estimated figures for this type of development can be obtained from the UK District Energy Association: <http://www.ukdea.org.uk/>

The energy statement (ES) states that it refers only to the planning application for the proposed school project but then Appendix B Renewable Energy Assessment (which should form part of the energy statement if the ES is to be policy compliant) discounts biomass boilers for the domestic element. If the intent is to produce a detailed energy statement for the residential element (to satisfy policy compliance) at a later application stage then this needs to be clearly stated in paragraph 3.18 of the Sustainability Statement. Therefore in terms of the residential element, no technology should be discounted at this stage if a detailed assessment is not being

done until later application stages, and any reference to the residential element in Appendix B should be removed to avoid confusion and complication at later stages.

Consideration of solar technologies should include acknowledgement that the site is a MEDS site in the Green Belt and any proposed use of such technologies needs to take account of establishing very special circumstances for their use. Stockport Council's Sustainable Design & Construction SPD has an appendix on domestic wind applications in the Green Belt which outlines the principle aspects of any technology that speak to very special circumstances: tackling carbon emissions; evidence of carbon reduction; income generation from technologies; financial benefits to the school from such income and the associated benefits to students with particular needs.

The NOABL wind resource can provide up to date average wind speeds for the school post code which I have found to be 4.9m/s at 10m height as evidence that wind would not be technically feasible. This figure should be added to the Appendix B section on wind to evidence technical infeasibility.

Sustainability Statement

Drainage & Water: commitment to the delivery of Stockport's sustainable drainage target is welcomed given the surface water flooding that occurs in this area, which could be exacerbated rather than ameliorated by a more traditionally designed development. The proposed low water consumption levels are also welcomed.

The SS outlines several ambitious commitments to ensuring a sustainable development. In order to ensure that this flows through to on-site delivery (including costing them at the earliest stage of the project to fully understand ecological assets and their economic benefit) the following needs to be taken account of:

Biodiversity: I support the recommendation made by the Council's Nature Development Officer regarding the need for a detailed Landscape Plan and Construction Environmental Management Plan to ensure that the stated commitments regarding Biodiversity are delivered. The opportunities for sustainable drainage design which can also benefit biodiversity need to be carefully considered so that opportunities to cost effectively enhance both are not missed. The Sustainability Checklist states that Urban Heat Island issues are being addressed – further detail could be provided in this section of the SS to evidence proposed enhanced biodiversity (including landscaping) that tackles urban heat island impacts.

Public Transport: in terms of rail the SS fails to reflect the findings of the Transport Assessment which includes Heald Green Station as an option for rail travel for pedestrians and cyclists. However neither the SS nor the Transport Assessment establish if there is sufficient cycle parking at the stations to facilitate the scale of residential development. Traffic congestion in this area (especially on the A34 Bypass) is at critical levels and any new development needs to maximise support for sustainable transport options, including multi-mode use such as cycle and rail. This enables the development to ensure it tackles a variety of issues: air quality, traffic congestion, carbon emissions, climate change, physical activity and public health.

Design: Building for Life 12 Pre-assessment

- Facilities and Services – the assessment of GP provision in the EIA could be checked with Stockport's Public Health Team responsible for Stockport's Joint Strategic Needs Assessment to establish if the assessment of GP (and other health facilities) provision is accurate and appropriate or whether any further provision is planned in the area.
- Public Transport: see earlier comments regarding rail access
- Meeting Local Housing Requirements: Were the proposed affordable housing provision levels taken account of in the B4L 12 assessment?
- External storage and amenity space: at the more detailed stage this will need to include considerations of cycle parking at the school for staff and visitors and other cycling infrastructure such as showering / clothes drying and storage to enable cycle commuting as a real option. This is mentioned in the Transport Assessment but not in the B4L 12 summary.

November 2017 Update

Following a series of clarifications around the existing Energy Centre on the campus and confirmation that conditions would be applied to any permission requiring the submission of further details at later stage(s) no objections are raised.

SMBC Contaminated Land Officer

Having reviewed the submitted Phase I Ground Investigations and Phase II Ground Investigations for the residential land, risks to human health and the environment are considered to be generally low across the site and therefore the following conditions are recommended:

Residential element

Conditions requiring the submission of a further detailed ground gas investigation and the implementation of any necessary remediation measures e.g. ground gas membranes.

School and campus element

Conditions requiring:

- the submission of a further intrusive ground investigation as recommended by the Phase I investigation;
- the submission, written approval and implementation of a remediation strategy (if necessary); and
- the submission and written approval of validation report (if necessary).

The scope of the conditions should address risks from both ground contamination and from ground gases.

SMBC Arboriculture

The proposed development is not within or affected by a conservation area.

There are no legally protected trees within this site or affected by this development.

The proposed hybrid application with several aspects of demolition and construction including related infrastructure and car parks footprint areas are shown at this time within the informal grounds/former hard standing areas of the existing site and it is assumed the proposed new developments will potentially impact on the trees as the site currently has a fair level of vegetation.

A full tree survey has been submitted as part of the planning application to show the condition and amenity levels of the few remaining trees in or around the red edge and where applicable which trees could be retained to increase the amenity levels of the site with retained mature trees and it is confirmed this is a true representative of the tree-scape.

A detailed landscaping scheme will also need to be conditioned as part of the full planning application submitted which clearly shows further enhancements along the road frontages and throughout the site to enhance SUDs capacity and to improve the amenity throughout the site with native species planting. Consideration should also need to be given to the level of planting within the proposed car park areas and new road construction making sure adequate levels are detailed but using appropriate species and planting pits to guarantee success rates, improve SUDs potential through options such as tree pits and perpetuity tree cover for the surrounding environment to improve the local biodiversity and amenity of the area.

In principle the main works and design will require the removal of trees to implement the design, however these trees are in majority low amenity trees, fruit trees or in decline and as such could easily be replaced and further enhance the site as part of any landscaping scheme which can be conditioned.

In its current format the scheme proposals tree loss which as stated above is low amenity trees so is acceptable as long as some consideration is given to the improvement of the landscaping design to include a detailed landscaping scheme that includes a greater number of new trees along the proposed access and road frontage and improved specification for trees in the car park areas and approach to the site to improve the amenity and aesthetics of the site for users and local community making sure a percentage of these are native large species, as well as increased native hedgerows and fruit trees at every opportunity.

The following conditions would be relevant to any planning application relating to the site:

No existing trees other than those proposed for removal within the site shall be cut down, topped, lopped, uprooted, wilfully damaged or wilfully destroyed without the prior written approval of the local planning authority, with the exception of those indicated otherwise on the approved plan. Any hedgerows, woody plants or shrubbery removed without such consent or dying or being severely damaged or being seriously diseased, within 5 years of the development commencing, shall be replaced within the next planting season with trees of such size and species as may be approved in writing by the local planning authority.

No development shall take place until all existing trees on the site except those shown to be removed on the approved plans, have been fenced off in accordance with BS 5837:2012 "Trees in relation to construction - Recommendations". The fencing shall be retained during the period of construction and no work, excavation, tipping or stacking of materials shall take place within any such fence during the construction period.

No development shall take place until details of all proposed tree planting, including the intended dates of planting, have been submitted to and approved in writing by the local planning authority. All tree planting shall be carried out in accordance with the approved details prior to the development being brought into use.

SMBC Nature Development Officer

Nature Conservation Designations

The site has no nature conservation designations, legal or otherwise. It does however contain a number of habitats which are of local ecological importance for biodiversity such as broad leaved woodland (Habitat of Principle Importance, Local Biodiversity Action Plan (LBAP)), hedgerows (Habitat of Principle Importance, LBAP, Hedgerow Regulations, 1997) brook, mature trees as well as habitats which are valuable at a site level (orchard, improved grassland, scrub and species poor semi-improved grassland). The protection, mitigation and compensation for the loss of any of these habitats will need to be detailed within the landscaping for the site and the Construction Environmental Management Plan (CEMP).

Legally Protected Species

A suite of ecology surveys have been carried out (in 2015 and 2016, together with updated site assessment in 2017) and submitted with the application. All survey work has been carried out by suitably experienced ecologists and in accordance with best practice guidance.

Bats

All species of bats, and their roosts, are protected under Section 9 of the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010. The latter implements the Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora. Bats are included in Schedule 2 of the Regulations as 'European Protected Species of animals' (EPS).

Under the Regulations it is an offence to:

- (1) Deliberately capture or kill a wild EPS
- (2) Deliberately disturb a wild EPS in such a way that significantly affects:
 - a) the ability of a significant group to survive, breed, rear or nurture young.
 - b) the local distribution of that species.
- (3) Damage or destroy a breeding place or resting site of such an animal.

Bat surveys including internal and external building inspections were undertaken to assess the potential of the buildings to support roosting bats and search for evidence of bat presence. Inspections were undertaken using binoculars, a high powered

torch and an endoscope. Buildings were also subject to two bat activity surveys (Dusk emergence surveys for the buildings within the full application, and dawn re-entry surveys for the buildings within the outline application). The surveys were undertaken in August and early September 2015, by suitably experienced ecologists. The buildings ranged in suitability to support roosting bats from negligible to moderate potential, and no evidence of roosting bats was found during the inspection surveys. The activity survey however identified 5 of the buildings as supporting small day roosts for bats (Quad, Gayton, Chadderton, Wainwright and Dockray).

The trees on the site were inspected for bat roost potential in January 2016. Where this could not be established from the ground or trees had potentially suitable features, climb and inspect surveys were undertaken. No evidence of roosting bats was identified; however 13 trees were confirmed as offering suitable bat roost potential.

Bat activity transect surveys were undertaken to establish how bats are using the landscape. Common and soprano pipistrelle bats were recorded using the site along with a *Myotis* species. Noctule bat activity was also recorded flying over the site. Bats were recorded foraging and commuting within the site, with high levels recorded around the brook and along certain hedgerows (H5, 7, 9) and individual trees (T2,3) within the site.

As the development would result in the loss of bat roosts, a Natural England Development licence will be required once planning permission has been granted. A bat mitigation strategy has been submitted which would avoid damaging the favourable conservation status of the local populations.

Great Crested Newts

Great crested newts and their habitats (terrestrial and aquatic) receive the same level of protection as bats (see above). A number of ponds are present within and adjacent to the site, with known records of great crested newts from previous survey work on the site. 15 ponds within and adjacent to the site were surveyed between May and June 2015, using a mixture of egg searching, torching and bottle trapping depending on the pond conditions. Sufficient survey effort has been undertaken.

Great crested newts were detected within 9 of the ponds which were subject to 6 surveys, following Natural England guidance. A medium sized population of great crested newts was detected within pond 9, with the other ponds supporting small populations (and eggs only within pond 3). Given the close proximity of the ponds to each other, and the lack of barriers to dispersal, the site is classed as a medium meta-population. There appears to be an inconsistency in Figure 251/P10b where Pond 11 is shown as supporting a medium population (purple) as opposed to a small population (orange) but this is not material to the validity of the findings of the report or the overall site assessment.

One great crested newt breeding pond (pond 6) will be lost as a result of the proposed development, along with the loss of low quality terrestrial habitat >50m from the ponds and within 50-250m, which equates to a High scale impact on the great crested newt population, without mitigation. Therefore a Natural England

Development licence will be required once planning permission has been granted. An updated great crested newt mitigation strategy (2017) has been submitted with the application.

Badgers

Badgers are protected under the Protection of Badgers Act, 1992. This makes it an offence to kill or injure a badger or to damage, destroy or obstruct access to a sett. It is also an offence to disturb a badger while it is in a sett. A badger survey was undertaken in October 2015. A search of the grounds and all accessible land within 50m of the proposed development was undertaken. Two partially used outlier badger setts were located within the development site. A latrine and evidence of foraging (snuffle holes) was also recorded suggesting that badgers are using the entire site – including the more developed school site. The setts will be retained as part of the development and access for badgers across the site will be maintained along green corridors. However there will be a loss of foraging habitat and potential for badgers to be disturbed should they enter the development site.

Badgers are a mobile species and can readily excavate new setts or re-inhabit previously disused sett. A badger mitigation plan including an update badger survey will therefore be required.

I would also like clarification as to whether an assessment of the impact on Badger Sett 1 of the 'Potential Trail: Informal Play' as shown on Drawing / Rev: 50394 PL(90)26/Rev B has been undertaken as it is indicated on the plan to be in close proximity to the existing sett.

Birds

The nests of all breeding birds are protected under the Wildlife and Countryside Act (1981) as amended. Certain species such as barn owl are listed on Schedule 1 which receive additional protection from disturbance of the nests. A barn owl was heard during the night time bat surveys and trees within the adjacent habitat have cavities suitable to be used by nesting/roosting barn owls. 10 mature trees on the site were identified as having potential barn owl features and following climb and inspect surveys in January 2016. No evidence of barn owl was found, although those with potential should be re-inspect immediately prior to felling. The habitats on the site are generally poor quality for foraging barn owls, although may be used in a transient manner.

The trees, hedges, scrub and grassland habitats could support nesting and foraging birds. The improved grassland is heavily grazed and therefore less likely to support farmland species such as skylark, but could support small wintering numbers of species such as snipe.

Riparian Mammals

The habitats on the site have assessed as offering low to no potential to support riparian mammals such as water voles and otter. No evidence of these species was recorded during the surveys. Otters receive the same level of legal protection as bats and GCN (outlined above) whereas water vole are protected under the Wildlife and Countryside Act 1981 (as amended).

Reptiles

The site is considered unlikely to support reptiles given the limited of suitable habitat available. Reptiles are protected under the Wildlife and Countryside Act 1981 (as amended).

Invasive Species

Himalayan balsam and Japanese knotweed are present on the site. Both of these species are listed on Schedule 9 of the Wildlife and Countryside Act, 1981 (as amended) (WCA). In addition Cotoneaster was recorded on site and many species of Cotoneaster are also listed on Schedule 9. This makes it an offence to plant or otherwise cause the spread of these species in the wild.

Recommendations

The proposed development would result in the destruction of a great crested newt pond and terrestrial habitat, and buildings which are known to support bat roosts with the potential to kill or injure bats/great crested newts and damage their habitat without appropriate mitigation and compensation measures. As a result a European Protected Species License (EPSL) for great crested newts and an EPSL or a Low Impact Class License (LICL) for bats, will be required from Natural England. The EC Habitats Directive 1992 requires the UK to maintain a system of strict protection for protected species and their habitats.

The Directive only allows disturbance, or deterioration or destruction of breeding sites or resting places:

- in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment
- and provided that there is
 - no satisfactory alternative and
 - no detriment to the maintenance of the species population at favourable conservation status in their natural range.

The UK implemented the Directive by introducing The Conservation of Habitats and Species Regulations 2010, which contain two layers of protection:

- a requirement on Local Planning Authorities (“LPAs”) to have regard to the Directive’s requirements above; and
- a licensing system administered by Natural England.

The converse of this guidance is that if issues of detriment to the species, satisfactory alternatives and public interest seem likely to be satisfied, no impediment to planning permission arises under the Directive and Regulations.

I would emphasize the need for the LPA to consider all three tests when determining this application and that evidence of this consideration is provided when producing planning reports or reporting to area committee. The need for the LPA to consider the impact of the three tests has been demonstrated by a number of judicial reviews,

including R (on the application of Simon Woolley) v Cheshire East Borough Council, June 2009) and Morge (FC) (Appellant) v Hampshire County Council (2011).

The first two tests of the Habitats Directive (over riding public interest and no satisfactory alternative) are planning tests and outside of my area for comment, although Natural England provide guidance on this.

On the test of no detriment to the favourable conservation status, the principles of the mitigation strategies for bats (Paragraph 5.6-5.9 of the Ecological Assessment) have been outlined which will avoid impacts on the favourable conservation status on bats. Please note that updated bat surveys may be required to inform any licence application.

Should planning permission be granted, the principles of the bat mitigation measures as described in the 'Ecological Assessment (paragraph 5.6-5.9) should be used to produce a bat mitigation method statement (which can be in the form of a Natural England licence application). This method statement should include details of the mitigation including updated survey work (including tree inspections and any building roost update surveys to inform the licence application), timing of the works, compensatory roost spaces (both pre, during and post construction), and lighting, and should be based on update survey work, where appropriate. The mitigation method statement should be submitted to the LPA for approval. Once approved, unless otherwise agreed in writing by the LPA, the method statement should be undertaken in full, and the mitigation measures shall be permanently maintained and retained in accordance with the approved detail.

In respect of great crested newts (GCN) the 2017 GCN Mitigation Strategy details measures to minimise impacts on great crested newts through: implementation of Reasonable Avoidance Measures RAMS; retention and sympathetic management of some of the terrestrial habitat (and some maintenance of landscape connectivity) on the site; strategy for the trapping and translocation of GCN and; creation and sympathetic management of terrestrial GCN habitat (2.1ha) and creation of new ponds for GCN within a 'receptor area' (approved planning consent DC064034).

It is acknowledged that the available habitat for GCN will be reduced as a result of the proposals however this is offset to a degree by the fact that the 'mitigation habitat' will be of a higher quality. Nonetheless, the 2017 GCN Mitigation Strategy states that following discussions with Natural England *"terrestrial habitat creation over and above the enhancements set out in this strategy will be required to mitigate for the loss of terrestrial habitats to development."*

The GCN Mitigation Strategy then goes on to state: *"Seashell Trust, TEP and Natural England are in discussions over the use of New Licensing Policy 2 (NLP2) to provide offsite habitat creation or the funds to secure such habitat creation at an identified location."*

Whilst this approach is acceptable in principle, as yet, no 'offset site' has been identified. Until a suitable site has been identified and a mechanism to ensure its long-term management (together with appropriate monitoring work) has been agreed, it is not possible to demonstrate that the Favourable Conservation Status

test has been satisfied. I would therefore advise further details and clarification on these issues is provided prior to determination.

In addition to the above, I would recommend that the following conditions are applied to any planning permission which may be granted:

Once the issues outlined above (relating to the requirement offsite GCN mitigation) have been addressed and it can be demonstrated that the favourable conservation status test can be met, the GCN Mitigation Strategy should be further updated. This document will therefore then include updated survey work (as necessary), RAMS, habitat creation/enhancement and management, replacement and management of terrestrial habitat (including retention/enhancement of habitat connectivity within the site), capture and relocation and monitoring, and details of offsite mitigation compensation and monitoring. It would also be expected that features to protect amphibians are incorporated into the scheme design – such as dropped kerbs and amphibian friendly gully pots. Once updated the mitigation strategy should be submitted to the LPA for approval. Once approved, unless otherwise agreed in writing by the LPA, the mitigation strategy should be undertaken in full, and the mitigation measures shall be permanently maintained and retained in accordance with the approved detail.

Clarification as to whether the badger survey and assessment has considered the impact of the potential play trail in close proximity to sett 1 needs to be sought as per my comments above. Once this has been clarified, further comment can be made. It is likely that a condition will be required that is worded to ensure that: 'No development should take place until a badger mitigation strategy has been submitted to the LPA for approval. This should contain details of updated badger survey work and a method statement to reduce the impact of the proposed work on the badgers on the site (for example no trenches/excavations to be left uncovered overnight). All mitigation proposals should be based on the updated survey results as outlined in paragraph 5.5 of the Ecological Assessment.'

Measures should be implemented to avoid pollution of or negative impact on the watercourses (including implementation of buffer zone) and other sensitive ecological features during construction and to ensure protection of all retained and created habitats or features of biodiversity interest such as trees, hedgerows, woodland and ponds. This can be dealt with within a Construction Environmental Management Plan (CEMP):

[BS42020: D.4.1] No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the LPA. The CEMP shall include:

- a) risk assessment of potentially damaging construction activities
- b) identification of 'biodiversity protection zones'
- c) measures and sensitive working practices to avoid or reduce impacts during construction
- d) location and timing of sensitive works to avoid harm to biodiversity
- e) times during construction when specialist ecologists need to be present on site to oversee works

- f) responsible persons and lines of communication
- g) roles and responsibilities on site of an ecological clerk or works (EcOW) where one is required
- h) use of protective fences, exclusion barriers and warning signs

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority

[BS42020: D.3.10] Prior to the commencement of development, an invasive non-native species protocol shall be submitted to and approved by the LPA, detailing the containment, control and removal of Japanese knotweed, Himalayan balsam and Cotoneaster on site. The measures shall be carried out strictly in accordance with the approved scheme.

To avoid impacts on nesting birds including barn owls (as per Appendix E5.6). The following condition should be attached to any planning permission granted:

[BS42020: D.3.2.1] No vegetation clearance/demolition works should take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation/buildings for active birds' nests immediately before vegetation clearance/demolition works commence and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the LPA.

A detailed landscaping plan for the site (comprising a mix of locally native species) should be produced detailing the mitigation and compensatory habitats including woodland, hedgerows, species rich grassland, orchard, scrub, and individual trees. It is crucial that habitat connectivity within and across the site is retained and improved. The scheme must also seek to provide biodiversity enhancements, in line with National and Local Planning Policy and the possibility of using the land to the north of the proposed ecological compensation area (currently in the trusts ownership but not within the development) should be explored to deliver these enhancements. I would also advise that bat and bird roosting/nesting facilities are provided within the new buildings. A Landscape and Ecological Management Plan (LEMP) for habitats and species should also be submitted in conjunction with the landscaping scheme, and needs to consider the roles and responsibilities for delivery of subsequent management measures.

[BS42020 D4.5]: A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by the LPA prior to the commencement of development. The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed
- b) Ecological trends and constraints on site that might influence management
- c) Aims and objectives of management
- d) Appropriate management options for achieving aims and objectives
- e) Prescriptions for management actions

- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five year period)
- g) Details of the body or organisation responsible for implementation of the plan
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

The lighting of the final scheme will also need to be designed to avoid inappropriate lighting of features used by bats and other wildlife. It is advised the following condition is used:

[BS42020: D3.2] Prior to occupation, a "lighting design strategy for biodiversity" for areas to be lit shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- identify those areas/features on site that are particularly sensitive for bats and badgers and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

The following informative should be applied to any planning permission which may be granted:

The developer should be aware that a Natural England EPSL (GCN and bats) or a Low Impact Class Licence Bats only) needs to be obtained prior to the commencement of works to ensure no degradation of nature conservation legislation.

Greater Manchester Ecology Unit (GMEU)

Initial response

A medium population of great crested newts has been found on this site. As you may be aware, great crested newts and their habitats are protected under UK and European legislation and are a material consideration when determining planning applications. There is potential for great crested newts to be harmed by the above development through direct harm during site clearance and construction works and through the loss of breeding and terrestrial habitats.

Under the Conservation of Habitats and Species Regulations 2010 (as amended) which enacts the Directive into the UK, a licence will be required from Natural England to derogate the terms of this legislation before any work can be undertaken that could harm newts. Before a licence can be granted three tests must be satisfied. These are:

- i) That the development is in the interest of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequence of primary importance for the environment;
- ii) That there is no satisfactory alternative;
- iii) That the derogation is not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range.

In considering planning applications that may affect European Protected Species, Local Planning Authorities are bound by Regulation 9(1) and 9(5) of the Conservation of Habitats and Species Regulations 2010 to have regard to the Habitats Directive when exercising their function. Defra Circular 01/2005 gives guidance to local authorities on how these issues should be considered.

All three tests must be satisfied before planning permission is granted on a site. The first two tests are essentially land-use planning tests. As regards the third test I note the submission with the application of comprehensive planned Mitigation Measures for avoidance of harm to newts and for provision of compensatory habitat (GCN Mitigation Strategy 2017, TEP). The measures described include:

- Retention of known on-site breeding ponds
- Retention and management of some terrestrial habitat and landscape connectivity within the site
- Creation and management of 2.1 ha of terrestrial gcN habitat
- Proposals for trapping and translocating newts
- Establishment of a newt receptor area which will be managed for newts, including the creation of new ponds suitable for breeding

The mitigation plan acknowledges that the quantity of habitat available to newts will be reduced but that the quality of part of the remaining habitat will be enhanced. The strategy reports that in spite of these planned qualitative improvements Natural England currently regard the terrestrial habitat provision as insufficient and that terrestrial habitat creation over and above the enhancements set out in the mitigation strategy will be required to mitigate for the loss of terrestrial habitats to development. No further land appears to be available within the site to meet this shortfall. NE have advised that a possible way forward would be to adopt a relatively novel approach through the provision of off-site habitats for newts. Section 4.54 of the report states that *Seashell Trust, TEP and Natural England are in discussions over the use of a*

New [protected species] Licensing Policy to provide offsite habitat creation or the funds to secure such habitat creation at an identified location. The use of NLP2 and the identification of an appropriate site will be agreed and secured in advance of reserved matters applications for the Greenfield Site.

No such site has currently been identified and, even if land were identified, no legally binding mechanism (S106?) seems to be presently available to secure the agreed long term management, maintenance and monitoring of any compensatory habitat and associated newt population. With this level of uncertainty as to whether the long term conservation status of great crested newts can in fact be achieved I am very reluctant to advise the planning authority that permission could be granted to the scheme, since I cannot say with certainty that the third test of the Conservation of Habitats and Species Regulations 2010 (as amended) can be met. The Council may wish to seek legal advice on this issue.

If notwithstanding this advice the Council does grant permission to the development I would recommend that:

- Details of the off-site provision for great crested newts must be provided as a Condition of any approval and/or as part of future Reserved Matters applications for the planned development(s)
- The implementation of the (amended) GCN Mitigation Strategy should be required in full
- Detailed Landscape Plans of the application site should be required to be prepared and submitted. These Plans should include details of -
 - the proposals to enhance habitats in the newt receptor area,
 - proposals to retain a degree of habitat connectivity within and across the site to ensure that there is provision for newts to move between retained breeding ponds and terrestrial habitats
 - new landscape planting (species types and numbers)
 - features that could be incorporated into the built development to protect amphibians (e.g. dropped kerbs, amphibian friendly gully pots)
 - The preparation of a detailed Habitat and Landscape Creation and Management Plan for the site as a whole and particularly for the newt receptor areas.

Further response following further dialogue with Natural England

I have now had the opportunity to review the latest advice from Natural England regarding this development and great crested newts and I am aware of the dialogue that has taken place between the consultant ecologists working on behalf of the applicant and Natural England on this matter. This information has reassured me that –

- The off-site approach for the provision of compensatory habitat for great crested newts is acceptable to Natural England under the terms of new Licensing policies

- There is a high level of confidence that off-site provision for newts will be forthcoming
- It is very likely that NE will grant an appropriate protected species License to facilitate the development based on the approach proposed

I would not therefore sustain an objection to the application on nature conservation grounds. I would recommend that:

- Details of the off-site provision for great crested newts must be provided as a Condition of any approval and/or as part of future Reserved Matters applications for the planned development(s). No works that could harm great crested newts should commence until these details have been provided.
- The implementation of the (amended) GCN Mitigation Strategy should be required in full
- Detailed Landscape Plans of the application site should be required to be prepared and submitted. These Plans should include details of -
 - the proposals to enhance habitats in the newt receptor area,
 - proposals to retain a degree of habitat connectivity within and across the site to ensure that there is provision for newts to move between retained breeding ponds and terrestrial habitats
 - new landscape planting (species types and numbers)
 - features that could be incorporated into the built development to protect amphibians (e.g. dropped kerbs, amphibian friendly gully pots)
- The preparation of a detailed Habitat and Landscape Creation and Management Plan for the site as a whole and particularly for the newt receptor areas.

Natural England

Initial response

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England's comments in relation to this application are provided in the following sections.

Statutory nature conservation sites – no objection

Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.

Protected species

We have not assessed this application and associated documents for impacts on protected species. Natural England has published Standing Advice on protected species. You should apply our Standing Advice to this application as it is a material

consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.

Local sites

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.

Landscape enhancements

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when

to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further response on revised great crested newt mitigation strategy following dialogue (13/10/17)

The current mitigation proposal as it stands is not sufficient for the Favourable Conservation Status Test (FCS) to be met for an European Protected Species licence to be granted; however it does offer some compensation on site and I am convinced that it should be relatively straightforward to secure additional off-site compensation that would complement the current on-site mitigation strategy for the FCS to be met.

In order to minimise delay and allow more time to explore off-site solutions and possibly obtain more information on what will become of the surrounding land in the future, I would be satisfied if this was conditioned at outline consent stage. The condition should clearly spell out that the scheme will not be able to start without sufficient GCN compensation in place in the form of off-site compensation/commuted sum towards an identified GCN habitat creation project in the local area. This will need to be secured by ideally a Section 106 to ensure long-term site safeguard.

Further response on 'favourable conservation status' derogation tests

"Following our conversation last Friday, I would like to add a few points to my previous statement as I understand there are still some reservations regarding the project being able to secure an EPS licence for GCN. The only reason at this stage I am not able to provide an in principle statement that the licence will be granted is due to the land surrounding the development currently allocated in the GMSF therefore limiting the possibility to connect the compensatory habitats to the wider landscape and also the potential threat that a future link road might fragment the proposed compensation area.

Before the introduction of the New licensing Policies, such a scheme would have required loss of valuable commercial land to accommodate the compensation. The New licensing Policy (summarised below) offers now more flexibility in the location of the compensatory habitats. The purpose of the off-site compensation would be to provide additional GCN habitats that would serve two purposes: one to provide additional GCN habitat to ensure the Favourable Conservation Status is maintained without the constraints of having to put it within the red-line boundary and to secure additional habitat that will offset any fragmentation should the link road be brought forward.

From my latest conversation with TEP ecologists, I understand they are exploring several options: a couple in the vicinity of the site to potentially link the proposed compensation area to the railway line (to maintain and enhance the connectivity) and three other off-site options with third parties on land where there are known existing GCN population. This is an opportunity to maximise development land while providing greater benefits to GCN. Similar projects with higher impacts on GCN have recently been licenced and have accommodated much larger off-site compensation

areas. Therefore with some time to explore options, I believe the Seashell Trust project should be able to provide a solution that would be acceptable.

TEP ecologists have previously used New Licensing Policy 2 on another project and therefore know what is expected. I am also working with them under Discretionary Advice Service to ensure they put forward a revised compensation strategy that will meet the Favourable conservation Status Test.

Policy 2– Greater Flexibility in the location of newly created habitats that compensation for habitats to be lost

- Policy can only be used when there are good reasons for maximising development on the site*
- Where placing compensation outside a site clearly exceeds any detriment of the conservation status of GCN.*
- Will require additional investment in compensation and offer net gain, long term security and management*

I am therefore confident that an acceptable compensatory solution is forthcoming and that imposing a planning condition at present will assist in providing reassurance that the scheme will go forward while providing that extra time required to finalise the compensation proposal.

Greater Manchester Fire and Rescue Service (01/12/16)

No objection but highlights that the development will require building regulations approval and that the Fire Authority should be consulted as part of the building regulations approval process.

SMBC Conservation Officer

Context

The application is a hybrid application which seeks full planning permission for a new school with associated facilities, infrastructure, parking, landscaping and ancillary works, at the existing school site, which is located off Stanley Road. Outline permission is sought for the construction of new campus facilities with associated infrastructure, parking, landscaping and ancillary works within the school complex. Outline permission (with all matters reserved) is also sought for the construction of up to 325 residential units with associated infrastructure, parking, access, landscaping and ancillary works, on pastoral land to the North of the school which is bounded by Syddall Avenue to the north, Wilmslow Road to the west and the Handforth Bypass (Kingsway) to the east.

The submission centres on the making of an enabling case for investment into the School site and alongside pertinent planning issues there are matters relating to the historic environment that require due consideration.

The application is supported by a Historic Environment Assessment (dated January 2016). This document sets out the archaeological and historical background of the

area and provides a basic assessment of significance for known and potential heritage assets, both within the site and within a defined 1km search area around the site. The assessment puts the identified assets within their local and national context, provides a framework for assessment of relative levels of significance and harm, and makes some outline recommendations for mitigation.

No part of the application site is covered by Conservation Area designation nor are any designated or undesignated heritage assets (in the form of standing buildings / structures) located within it. In analysis of the application and the supporting Historic Environment Assessment I concur with its findings that the proposed development would not have an adverse effect on the fabric or setting of all but two of the heritage assets, identified as being within 1km of the application site. This conclusion has been reached as a result of the distance between the application site and these assets and / or the intervening topography. It should also be noted that for the purpose of my consultation response I have not considered impact on identified and potential or unidentified sites of archaeological significance (below ground). This matter has been considered separately by the Greater Manchester Archaeological Advisory Service (GMAAS) and a consultation response has been provided.

Consequently the heritage assets considered most significant to this application, and which therefore form the focus of my consultation response, are the Grade II listed building Griffin Farm (and associated curtilage building) and the non-designated heritage asset, Outwood House. As there would be no impact on the fabric of these buildings my concerns relate to the effect of the proposed development on their setting – most specifically with regard to the seeking of Outline permission (with all matters reserved) for the proposed residential development on the land to the north of the school.

Griffin Farmhouse, located on Wilmslow Road, has been designated as a grade II listed building since 1985. The historic asset description for the building reads as follows:

'Farmhouse. Late C18. Brick with rendered front and c20 tile roof. 3-bay central-staircase plan with 2 storeys (plus attics) and small lean-to to left and rear. Central bay is slightly advanced and has a recessed porch with round arch, keystone and impost blocks. 2 ground floor and 3 first floor windows with stone sills and keystones. All have 20-pane sashes except for one which is 12-pane. Large gable stacks and gable attic lights.'

There is a detached former shippon / barn to the immediate north of the farmhouse which is afforded statutory protection by virtue of being included within the curtilage of the listed building.

Planning history: Under applications DC/017602 & DC/017605 planning and listed building consent was sought and granted, in 2004, for residential development for 11 apartments within the existing farmhouse and shippon buildings. For a period of 10 years prior to this the buildings had been vacant and neglected and were in a poor state of repair. The development included works for the appropriate repair, restoration, and conversion of the heritage assets. This repair, restoration and conversion has resulted in changes to the listed building whereby revisions to the

listed building description is required. For example, the rendering to the front elevation has been removed, natural slate has replaced the tiled roof covering and windows and doors have been repaired / replaced. The subdivision of the farmhouse for use as two apartments has also resulted in alterations to the internal arrangement of the building. The works have resulted in structural and aesthetic improvements to the farmhouse and shippon from their pre-application condition.

Outwood House is located immediately to the south of Griffin Farm. The building is recognised as an undesignated heritage asset. The Historic Environment Record (HER) entry for the building reads as follows:

'Two buildings on location on the 1830 Swire & Hutchings map. Named 'Outwood House' on the 1st edition OS map (1872). Site comprised 2-storey farmhouse believed to be of c 1750, formerly known as Peel Croft, and adjoining this on the south the later Outwood House farmhouse, formerly the Griffin Inn. Site documented as Peel Croft and Griffin in 1840. The inn subsequently moved to a site further to the north along Wilmslow Road in Stockport Etchells. Buildings shown on early maps still survive, including farm house, which appears to be of 18th century date, and which has a 3-light window with small panes on 1st floor and large welsh slates on roof. Rendered but handmade brick evident on outbuildings (Site Visit, N. Redhead, 5/8/2005).'

Planning history: This building has also been the subject of residential development (under application DC/015458 in 2004) which saw the conversion of the existing building into 16 apartments and the erection of new build block of 8 apartments, associated car parking, highways and landscaping.

The Griffin Farmhouse and Outwood House sites were in the same ownership at the time of development and the schemes were undertaken with a co-ordinated approach.

Location and Setting (current and historic)

To the immediate north of the site is the open land which forms part of the application site identified for housing development, which comprises fields used for pasture. Historic land use records (in the form of the tithe maps and apportionments for the area) show that this land was a mixture of arable, pasture and meadow predominantly occupied by Issac Hankinsen of Griffin Farm and William Robinson of Outwood House. This land is now in the ownership of the applicant.

The Griffin Farm site is bounded to the north and south-east by Griffin Lane private access road and Griffin Lodge which provides purpose built single-storey accommodation for adults with a range of complex needs. This development was first granted outline permission in 1994 (J60717) followed by reserved matters permission in 1996 (J64523). Griffin Lane access road, Griffin Lodge, and the land on which it stands are in the ownership of the applicant. Historically the land on which Griffin Lodge stands was farmland occupied by Issac Hankinsen of Griffin Farm.

To the south of Griffin Lodge is the existing Seashell Trust school site which forms part of the application. To the east of Griffin Lodge is open countryside with the Handforth Bypass beyond.

To the west of the site, on the opposite side of Wilmslow Road, is the suburban development of the Heald Green settlement which is formed predominantly of detached and semi-detached housing. The Ordnance Survey plans of 1954 and 1962/3 illustrate that suburban development had encroached to the west (and north beyond the existing open fields), on previously open land.

National & Local Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where an adopted development plan contains relevant policies, an application for planning permission or an appeal should be determined in accordance with the plan, unless material considerations indicate otherwise. The applicable development plan in this instance is the adopted Core Strategy DPD and the saved policies of the Stockport Unitary Development Plan Review. In view of the requirements of Section 38(6), the application should be assessed against the Stockport Local Development Framework: Core Strategy Development Plan Document (adopted March 2011) and saved policies of the Stockport Unitary Development Plan Review (adopted May 2006).

Particularly relevant policies in respect of the historic environment in this case are:

Core Strategy Policy CS8: This sets out the Council's recognition of the unique place the historic environment holds in Stockport's cultural heritage and the multiple ways in which it supports and contributes to the economy, society and daily life. It also recognises the historic environment as a non-renewable resource which is of a fragile and finite nature and sets out the conservation and management of this important resource as a key component of the wider principal of sustainable development which forms an overarching principal of the LDF. Policy CS8 goes on to say that development will be expected to make a positive contribution to the protection / and or enhancement of the borough's historic assets.

Development Management policy SIE-3. This requires 'clear and convincing justification' to be provided for any harm to heritage assets (which is the same test as set by paragraph 132 of the NPPF).

Current planning legislation requires the decision maker to have special regard to the setting of a listed building. Paragraph 132 of the NPPF makes it clear that when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation and clear and convincing justification should be required for any loss or harm caused. It goes on to note that significance can be harmed or lost through development within the asset's setting.

Paragraph 133 of the NPPF requires that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the

substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Paragraph 134 of the NPPF requires that where development proposals will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Paragraph 135 of the NPPF requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset.

In the exercise of functions under the Planning Acts, in considering whether to grant planning permission for development which affects a listed building or its setting, local planning authorities are also required to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses, under S66(1) of the Planning (Listed Buildings and Conservation Areas) Act, 1990.

Assessment of Significance and Evidence of Harm

The submitted Historic Environment Assessment asserts that Griffin Farm is the only designated heritage asset that would experience tangible change within its setting which may impact upon its significance. In establishing the significance value and magnitude of the impact of the proposed development the assessment utilises guidance presented in the Highways Agency Design Manual (Vol II S3 part 2 2007).

It attributes the GII listed farmhouse a 'medium' significance value, as an example of a late C18 farmhouse that has undergone change in both its function and form, having been converted (together with its associated outbuildings) to multiple residential dwellings. It also asserts that the buildings are no longer in their original agricultural use and that the surrounding open land is no longer associated with the farmhouse. The report emphasises that whilst the open land to the north provides a partial rural backdrop to the former farmhouse, the listed building is now essentially located within a modern suburban area with views of modern residential development now being part of its setting.

The assessment contends that the proposed development would result in changes to the setting of Griffin Farmhouse such that it would be significantly modified at worst and noticeably changed at best. As such, the magnitude of impact has been assessed as 'Moderate' to 'Minor'. The indicators of medium significance and moderate to minor impact have been cross reference within the applied methodology and the outcome of the assessment is that the impact of the proposed development on the GII listed heritage asset would be to cause less than substantial harm (Appendix 2: Tables 1, 2 & 3).

It is my opinion that the GII listed building as a statutory designated heritage asset should be attributed a high to medium significance value. In my view the open land to the north of Griffin Farm continues to contribute to the significance of the GII listed

Griffin Farmhouse and the undesignated heritage asset at Outwood House. In their current undeveloped state these fields provide an appropriate rural and tranquil setting for the farmhouse and the associated former farm buildings. The 1839 and 1845 Tithe Maps and Apportionments provides evidence of a functional and historical link between Griffin Farm and Outwood House and this land with the fields being in the same ownership and being farmed as part of these agricultural estates. Consequently the proposal would damage the rural setting of the heritage assets and would act to erode the functional and historical relationship that once existed between the farms and associated farmland. The effect would be most visually evident from Wilmslow Road as the views of the former farmhouse and agricultural buildings, sitting within a rural landscape, would be lost. Nevertheless I must concur with the findings of the report in terms of the changing appearance and character of the assets and their surrounding environment (in becoming substantially more suburban in character) and noting that the farmhouse and associated outbuildings no longer form a part of a working farm, so the harm caused to this agricultural setting would lead to the loss of the historic functional link and not a current working functional link. As such, having regard to the high threshold for 'substantial harm', I consider that the proposed development would cause 'less than substantial harm' to the designated heritage asset (Griffin Farmhouse) for the purposes of the NPPF.

Mitigation

It is clear from the Illustrative Masterplan that no real consideration at this point has been given to the layout of the housing scheme or potential methods of reducing the impact of built development on the immediate setting of the listed building. By way of reference to mitigation in respect of the impact on the setting of Griffin Farmhouse, the Historic Environment Assessment states that 'the detailed master-planning of the site, which would be prepared at a later stage could utilise sensitive landscaping and design to reduce the significance of impact which the building may experience due to changes within its setting' (p21). The documents also sets out that that with regard to the proposed residential housing within the pasture fields for which outline consent is requested '...it should be noted that the proposed built development would not extend across the entirety of the area shown' (p2). It has been informally agreed with the Case Officer that mitigation may take the form of the parcels of land closest to the listed building remaining undeveloped and being given over to open space, along with more extensive areas of planting along the edge of the propose housing development, nearest to the Griffin Farm building. I consider that the provision of a sizeable open area on the part of the site next to Griffin Farmhouse, together with associated landscaping, could lessen the impact of the development on the immediate setting of this group of listed buildings. It is nonetheless clear that this would not produce a setting of the same quality and characteristics as currently exist. In light of the Outline nature of this element of the application and in the absence of plans to indicate the site layout, the importance of securing a scheme which is mindful of the significance of the listed building and its setting and the great weight that must be attached to its conservation, cannot be over emphasised. I also note that the application seeks outline permission for 'up to' 325 residential units. Without further information related to the number, design, form and layout of these units I am unable to comment on these matters in detail but must stress that they will be of paramount importance in seeking to achieve a scheme which may be considered acceptable in the context of impact on the listed building and its setting.

Summary / Conclusion

It is my opinion that the proposed development by causing 'less than substantial harm' would fail to preserve the special architectural and historic interest of the Grade II listed building, Griffin Farmhouse and would impact negatively on the significance of the undesignated heritage asset Outwood House. These findings bring the scheme into conflict with elements of local and national planning policy.

Given the statutory duty as regards listed buildings, set out in s66(1) of the 1990 Act, the Council must give considerable importance and weight to the desirability of preserving the setting of Griffin Farmhouse in carrying out the planning balance exercise, even where the harm that would be caused has been assessed as "less than substantial".

The Council's Core Strategy policy SIE-3 and paragraph 132 of the NPPF both require that 'clear and convincing justification' is provided for any harm or loss caused to significance of heritage assets (noting that significance can be harmed or lost through development within the asset's setting).

Paragraph 134 of the NPPF requires that where development proposals will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Paragraph 135 of the NPPF requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.

In closing, I must emphasise the need for the LPA to consider the above and apply all the relevant tests when determining this application, and to provide evidence of this consideration when producing the associated planning reports or reporting to area committee. To assist in this, heritage assets and the correct approach to them has recently been addressed by a number of recent Court of Appeal judgments, including *Barnwell Manor Wind Energy Ltd v East Northants DC* [2014] EWCA Civ 137, and *(Forge Field Society) v Sevenoaks DC* [2014] EWHC 1895 (Admin).

Greater Manchester Archaeological Advisory Service (GMAAS)

The application includes a Historic Environment Assessment prepared by Wardell Armstrong. This included consultation with the Greater Manchester Historic Environment and is in accordance with National Planning Policy Framework paragraph 128.

The study provides an understanding of the location and relative significance of heritage assets (designated and non-designated) within and close to the application site. The assessment relies on an out dated local history publication rather than consulting more recent archaeological studies of the area, such as Arrowsmith's 'Stockport: A History' or the Greater Manchester Past Revealed booklet on Cheadle. However, this would not have changed the main conclusion which is that there is no known significant archaeology within the application boundary. The site falls in to two parts for the development: the reconstruction of the campus, where GMAAS accept

that there is no archaeological interest and no requirement for mitigation, and the outline proposal for the housing scheme in the northern half of the application area, where GMAAS consider that further archaeological investigation is merited. This area contains field boundaries and pasture but has the potential to yield evidence for early periods (Prehistoric, Roman, Medieval). It is noted that in around 1981 a mid-4th century Roman coin was found adjacent to the site on the opposite side of Wilmslow Road – this may relate to a possible Roman road from Cheadle to Alderley Edge.

GMAAS recommend that further archaeological evaluation should be undertaken during the determination period for the outline housing scheme to allow an informed judgement on the need for and scope of further archaeological mitigation. This work should take the form of aerial photographic analysis, a detailed site walk-over to allow identification of potential early settlement areas or features, targeted geophysical survey and trial trenching. If this process identifies archaeological remains that will be destroyed by development ground works then further more detailed excavation, recording and analysis will be required.

The archaeological works for the housing scheme should be secured through a condition attached to planning consent. The condition should be worded as follows:

No development shall take place until the applicant or their agents or successors in title has secured the implementation of a programme of archaeological works. The works are to be undertaken in accordance with a Written Scheme of Investigation (WSI) submitted to and approved in writing by Stockport Planning Authority. The WSI shall cover the following:

- 1. A phased programme and methodology of investigation and recording to include:*
 - archaeological evaluation*
 - where justified by the above, targeted excavation.*
- 2. A programme for post investigation assessment to include:*
 - analysis of the site investigation records and finds*
 - production of a final report on the significance of the below-ground archaeological interest.*
- 3. Provision for dissemination of the analysis and report on the site investigations.*
- 4. Provision for archive deposition of the report, finds and records of the site investigation.*
- 5. Nomination of a competent person or persons/organisation to undertake the works set out within the approved WSI.*

Reason: In accordance with NPPF Section 12, Paragraph 141 - To record and advance understanding of heritage assets impacted on by the development and to make information about the heritage interest publicly accessible. To record and advance the understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence (and any archive generated) publicly accessible in accordance with NPPF policy 12, paragraph 141 and SIE-3 "Protecting, Safeguarding and Enhancing the Environment" of the adopted Stockport Core Strategy DPD.

The work should be undertaken by a suitably experienced and qualified archaeological contractor, funded by the applicant, and in accordance with guidance provided by GMAAS who would also monitor the implementation of the works on behalf of Stockport MBC.

Manchester Airport

The proposed development has been examined from an aerodrome safeguarding aspect and Safeguarding Authority for Manchester Airport has the following comments to make:

Physical/ Obstacle Safeguarding - Height of Development

With a maximum height of 10m AGL, the proposed development would have no impact on Manchester Airport's protected Obstacle Limitation Surfaces (OLS) and does not therefore conflict with the Airport's physical safeguarding criteria.

Lighting Scheme

The development is in close proximity to the aerodrome and any associated external lighting proposals (eg. street lighting, floodlighting) will need to be assessed from an aerodrome safeguarding perspective to ensure that their design is appropriate. The height of lighting columns will need to be evaluated in relation to the OLS to ensure that there is no infringement, and the specification and direction of lighting will need to be designed to ensure that there is no glare in the direction of aircraft and to avoid confusion with aeronautical ground lights. In the absence of such details being submitted with the planning application we request that the following condition is attached to any approval granted.

Recommended Condition:

The installation of external lighting shall not commence until full details of the schemes of lighting required during construction and for the completed development have been submitted to and approved in writing by the Local Planning Authority, in consultation with the Safeguarding Authority for Manchester Airport. The lighting scheme should be designed so as not to breach Manchester Airport's Obstacle Limitation Surfaces and shall specify that lighting is of flat glass, full cut off design with horizontal mountings and no light spill above the horizontal.

Reason: To avoid endangering the safe operation of aircraft by ensuring that Manchester Airport's Obstacle Limitation Surfaces are protected and that the lighting does not confuse or distract pilots and Air Traffic Controllers in the vicinity of the aerodrome.

Crane Operations During Construction

The operation of cranes/ tall equipment during construction may present a hazard to aircraft and will need to be assessed separately to ensure that aircraft safety is protected. The British Standard Institute Code of Practice for the safe use of cranes (BS 7121, Part 1) places a duty on crane operators to consult the aerodrome before intending to erect a crane in close proximity to an aerodrome. We therefore request that the following informative is attached to any approval granted:

Recommended Informative:

Cranes, whilst they are temporary, can be a hazard to air safety. The developer or crane operator must therefore contact Manchester Airport Airfield Safety and Compliance at least 21 days in advance of intending to erect a crane or other tall construction equipment on the site. This is to determine whether a Tall Equipment Permit would need to be obtained and whether any operating restrictions would need to be agreed in advance of issuing the Permit.

Reason: To ensure that Manchester Airport's Obstacle Limitation Surfaces are protected to avoid endangering the safe operation of aircraft.

Bird Hazard Safeguarding

We are satisfied that the landscaping and ecological mitigation proposals will have no measurable impact on the bird hazard at or around Manchester Airport.

1. The small size, simple design and location of the two new ponds that will compensate for the loss of Pond 6 are acceptable from a bird hazard safeguarding perspective.
2. Although a high proportion of berry producing shrubs are included in the planting scheme, which would be problematic if planted immediately adjacent to the airport, in this particular location we are not concerned that feeding by birds on berries at this site would have a negative impact on the bird hazard in the vicinity.

Bird Hazard Management During Construction

Consideration should be given to the potential for construction works and any earthworks and flooding that occurs on the site during construction becoming a bird attractant. This would be a potential bird hazard and may require mitigation being put in place. The following condition should therefore be attached to any approval granted.

Recommended Condition:

Development shall not commence until a Construction Management Plan, which includes detail of the bird mitigation measures that are to be implemented during construction and any periods of earthworks and flooding that occurs on the site, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Safeguarding Authority for Manchester Airport.

The Construction Management Plan is to be implemented as approved.

Reason: To avoid endangering the safe operation of aircraft through the attraction of birds.

Other Matters

We reserve the right to provide further comments in relation to any subsequent application for reserved matters.

SMBC Landscape Officer

Having reviewed the submission, including the Landscape and Visual Impact Assessment, no objections are raised at this stage.

SMBC Lead Local Flood Authority

There are full and detailed design proposals submitted for the school area of the proposals only.

The concepts and the aspiration set out to use the open watercourse and a green/blue corridor is encouraged as a sustainable solution. This seems to imply detention basins. The use and retention of pond areas to enhance the amenity and biodiversity is also encouraged. However, as these are concept and for the outline application it not clear that this would be the proposed and final solution. If so and feasible this would be consented.

The school site that has the conventional drainage proposals shows a flaw in the hierarchical strategy to achieve a similar outcome. A final outfall to the watercourse is accepted to the level of flows to be determined if through a more sustainable approach. No review should be carried out on the technical aspects as the strategy set out for the School site is geared to an unsustainable solution that would need modification.

No detailed review can be carried out on the strategy and viability of the residential site at this outline stage although the draft strategy would appear to be heading in the right direction.

After discussion with the Planning Officer the LLFA feels there are many opportunities to provide sustainability on both areas. This would:

- reduce the costs of conventional drainage;
- reduce the scope of conventional drainage;
- reduce the flows that are being passed on and stored on site in line with the first stages of the hierarchy and management train; and
- reduce pollution and create needed amenity for a school of this nature.

Suggestions are to use landscape areas for ponds; shallow swales; tree pits detention basins; and especially rain gardens. Management of private drains and the use of geo-cellular storage can be problematic and needs maintenance to avoid flood risk to the site. The hard surface areas should either be sloped to drain to channels to landscaped areas or be permeable. The former would be preferred. Gully pot and leads should be avoided.

In conclusion, the LLFA tentatively support the application for the outline for the residential site, but would need to see the strategy established. The LLFA needs more confidence that sustainable solutions are proposed for the school area and it would be possible to manage this through conditions:

No development shall take place until a surface water drainage scheme detail and means of disposal for the site, based on sustainable drainage principles with evidence of an assessment of the site conditions (inclusive of how the scheme shall be managed after completion) has been submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must be restricted to not exceed the agreed runoff rates and unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage

system either directly or indirectly. The development shall be completed, maintained and managed in accordance with the approved details.

Reason

To manage water run-off from the site in accordance with Policy SD-6 'Adapting to the Impacts of Climate Change', of the Stockport Core Strategy DPD.

Environment Agency

We have no objection in principle to the proposed development, but would wish to make the following comments.

Flood Risk

We consider that full planning permission for the demolition of existing “Quad” and “Gayton” buildings and erection of a new school and outline permission for the residential development of up to 325 +dwellings should only be granted if the following mitigation measures are implemented and secured by way of planning condition on any planning permission.

Condition

The residential development permitted by this hybrid planning permission shall only be carried out in accordance with an approved site layout demonstrating that the 8m easement from top of bank of the designated “main river” Bruntwood Hall brook, provides a continuous unobstructed area.

Reason

To reduce the risk of flooding to the proposed development and elsewhere.

Flood Risk Activity Permit

Under the Environmental Permitting Regulations, a flood risk activity permit from the Environment Agency may be required for any proposed works or structures, in, under, over or within 8m of the top of the bank of Bruntwood Hall brook which, is designated a ‘main river’.

The Environment Agency has discretionary powers to carry out maintenance works on the channels of "main river" watercourses to remove blockages and ensure the free flow of water. The responsibility for the repair and condition of Bruntwood Hall brook, its channel, banks and adjacent structures, lies ultimately with the riparian owner.

Contaminated Land

We have previously reviewed:

Desk Study report for the site (Hydrock Ground Conditions Desk Study, Ref: R/14802/004, dated: 02nd October 2015).

Further investigation was considered to be required to fully assess the potential risks to controlled waters. Supplementary information has now been provided, which includes the following report which we have reviewed with regard to the risk posed to controlled waters:

Ground Investigation Report (ref: R/14802/006 Issue 2) by Hydrock, dated May 2016.

The Ground Investigation report appears to cover a different part of the proposed development land than the Desk Study report. The proposed development appears to be split into two distinct parts: the northern area which is proposed for residential development and the southern area which is the campus redevelopment scheme. The Ground Investigation Report has assessed the proposed residential development area in the northern part of the site only. This land is Greenfield in nature and, based on the available information, is considered to pose a negligible risk to controlled waters.

Further detailed information will still however be required before built development is undertaken in the southern part of the proposed development (campus redevelopment project). This should include a Phase 2 intrusive investigation to assess the risks posed by the potential sources of contamination identified in the Desk Study report.

It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information on the campus development area prior to the granting of planning permission for the northern Greenfield residential development scheme. However, we respect that this is a decision for the Local Planning Authority.

The proposed development of the campus will be acceptable only if the conditions we previously recommended are included in any planning permission granted [these were conditions requiring a comprehensive site investigation to be undertaken together with any necessary remediation and in respect of unforeseen contamination remediation – dated 13 June 2016].

Biodiversity

A planning condition should be included (on the outline planning) requiring a scheme to be agreed to protect an 8m wide buffer zone along Bruntwood Hall Brook.

Condition

No development shall take place until a scheme for the provision and management of an 8m wide buffer zone alongside the Bruntwood Hall Brook shall be submitted to and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The buffer zone scheme shall be free from built development including lighting, footpaths, domestic gardens and formal landscaping; and could form a vital part of green infrastructure provision. Any proposed detention ponds should be located outside of the buffer zone. The schemes shall include:

- plans showing the extent and layout of the buffer zone.
- details of any proposed planting scheme. All planting within 8m must consist solely of invasive species
- details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term including

adequate financial provision and named body responsible for management plus production of detailed management plan.

Reason

Development that encroaches on watercourses has a potentially severe impact on their ecological value. E.g. artificial lighting disrupts the natural diurnal rhythms of a range of wildlife using and inhabiting the river and its corridor habitat.

Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected.

This condition is supported by the National Planning Policy Framework (NPPF), paragraph 109 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. The Natural Environment and Rural Communities Act which requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged.

Sport England

The proposal includes a sports hall, pavilion, swimming pool (learner pool) and hydro therapy pool with changing. This is a hybrid application whereby full planning permission is being sought for the swimming pool, changing and hydrotherapy pool. Outline consent (with all matter reserved except for access) is being sought for the sports hall and sports pavilion.

We note that the artificial grass pitch (subject to a separate planning application which Sport England raised no objection to (LPA ref 15/40473)), will be outside the red edge of the application.

The proposal also includes an outline application for up to 325 dwellings.

The sport facilities being proposed are clearly for the use of the students of the school that caters for students with a range of profound and multiple learning difficulties, autistic spectrum disorders and multi-sensory impairment. We note that the sport facilities will be made available for community use.

The occupiers of new residential development, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should

contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site.

It is noted that the sports hall, pavilion and the artificial grass pitch (subject to a separate planning consent) will be available for community use. Sport England considers that the provision of these sport facilities will cater for any increase in demand for sport facilities. The sports hall and sports pavilion, which are sited directly adjacent to the artificial grass pitch, will create a sporting hub on the site. Sport England seeks to ensure the new sports facilities are fit for purpose. As the sports hall and pavilion are in outline, Sport England can advise on the design if we are consulted on the reserved matters application(s).

Sport England does not wish to object to this application as it is considered to meet the objective: PROVIDE, subject to a planning condition securing the community use of the sport facilities to cater for any increase in demand brought about by the residential development.

Community use is the managed use of the site by the local community who would pay a reasonable fee to use the facilities. The ability to access good sport facilities within the local community is vital to any sports organisation, yet many clubs struggle to find places to play and train. A large number of sporting facilities are located on school sites and making these available to sports clubs and the community can offer significant benefits to both the school and the local clubs and community. Therefore the following condition should be attached to the decision notice to secure the community use:

Prior to the development being brought into use, a Community Use Scheme shall be submitted to and approved in writing by the Local Planning Authority, after consultation with Sport England. The Scheme shall include details of pricing policy, hours of use, access by non-school users/non-members, management responsibilities and include a mechanism for review. The approved Scheme shall be implemented upon commencement of use of the development.

*Reason: To secure well managed safe community access to the sports facility, to ensure sufficient benefit to the development of sport and to accord with Policy ***

Informative: A model Community Use Scheme is available on the Sport England website www.sportengland.org

If you wish to amend the wording of the conditions or use another mechanism in lieu of the condition(s), please discuss the details with the undersigned. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

The absence of an objection to this application in the context of the Town and Country Planning Act, does not in any way commit Sport England or any National Governing Body of Sport to support for any related funding application.

United Utilities

United Utilities will have no objection to the proposed development provided that the following conditions are attached to any approval:

Foul and surface water shall be drained on separate systems.

Reason: To secure proper drainage and to manage the risk of flooding and pollution.

Prior to the commencement of any development, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions shall be submitted to and approved in writing by the local planning authority. The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and unless otherwise agreed in writing by the local planning authority, surface water shall discharge as shown on drainage layout drawing 03155523/P1. The development shall be completed in accordance with the approved details.

Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution. This condition is imposed in light of policies within the NPPF and NPPG.

Regardless of the stage in the planning process, we recommend the local planning authority includes a condition in their decision notice regarding a management and maintenance regime for sustainable drainage systems. We suggest the following condition should be appropriate for most instances:

Prior to the commencement of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:

a. The arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and

b. Arrangements concerning appropriate funding mechanisms for its ongoing maintenance of all elements of the sustainable drainage system (including mechanical components) and will include elements such as ongoing inspections relating to performance and asset condition assessments, operation costs, regular maintenance, remedial works and irregular maintenance caused by less sustainable limited life assets or any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime.

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To manage flooding and pollution and to ensure that a managing body is in place for the sustainable drainage system and there is funding and maintenance mechanism for the lifetime of the development.

We recommend the developer also contacts the Local planning authority along with the lead local flood authority to discuss surface water drainage as they will ultimately be the decision maker on this matter.

Water comments

A water supply can be made available to the proposed development.

Our water mains will need extending to serve any development on this site. The applicant, who may be required to pay a capital contribution, will need to sign an Agreement under Sections 41, 42 & 43 of the Water Industry Act 1991.

The applicant must undertake a complete soil survey, as and when land proposals have progressed to a scheme design i.e. development, and results submitted along with an application for water. This will aid in our design of future pipework and materials to eliminate the risk of contamination to the local water supply.

United Utilities have no site specific issues associated with this proposed development. The forecasted demand will need to be modelled to determine whether network reinforcement is required.

The level of cover to the water mains and sewers must not be compromised either during or after construction.

Each individual unit will require a separate metered supply at the applicant's expense and all internal pipework must comply with current water supply (water fittings) regulations 1999.

Should this planning application be approved, the applicant should contact United Utilities on 03456 723 723 regarding connection to the water mains/public sewers. The applicant must undertake a complete soil survey, as and when land proposals have progressed to a scheme design i.e. development, and results submitted along with an application for water. This will aid in our design of future pipework and materials to eliminate the risk of contamination to the local water supply.

A water supply can be made available to the proposed development.

General comments

It is the applicant's responsibility to demonstrate the exact relationship between any United Utilities' assets and the proposed development. United Utilities offers a fully supported mapping service and we recommend the applicant contact our property searches team on 03707 510101 to obtain maps of the site.

Due to the public sewer transfer, not all sewers are currently shown on the statutory sewer records, if a sewer is discovered during construction; please contact a building control body to discuss the matter further.

Supporting information

United Utilities wishes to draw attention to the following as a means to facilitate sustainable development within the region.

Site drainage

In accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), the site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.

The NPPG clearly outlines the hierarchy to be investigated by the developer when considering a surface water drainage strategy. We would ask the developer to consider the following drainage options in the following order of priority:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.

Justification for pre-commencement condition

If a pre-commencement condition has been requested in this correspondence, please consider the following information as justification of this request.

In accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015 Part 6, we have been asked to provide written justification for any pre-commencement condition we may have recommended to you in respect of surface water disposal.

The purpose of the planning system is to help achieve sustainable development. This includes securing the most sustainable approach to surface water disposal in accordance with the surface water hierarchy.

It is important to explain that the volume arising from surface water flows can be many times greater than the foul flows from the same development. As a result they have the potential to use up a significant volume of capacity in our infrastructure. If we can avoid and manage surface water flows entering the public sewer, we are able to significantly manage the impact of development on wastewater infrastructure and, in accordance with Paragraph 103 of the NPPF, minimise the risk of flooding. Managing the impact of surface water on wastewater infrastructure is also more sustainable as it reduces the pumping and treatment of unnecessary surface water and retains important capacity for foul flows.

As our powers under the Water Industry Act are limited, it is important to ensure explicit control over the approach to surface water disposal in any planning permission that you may grant.

Our reasoning for recommending this as a pre-commencement condition is further justifiable as drainage is an early activity in the construction process. It is in the interest of all stakeholders to ensure the approach is agreed before development commences.

Greater Manchester Police – Design for Security

The proposed development should be designed and constructed in accordance with the recommendations contained within section 3.3 of the submitted Crime Impact Statement dated (27/11/2015 – URN: 2012/0012/CIS/02) and a planning condition

should be added to reflect the physical security specification listed within section 4 of the appendices within the submitted Crime Impact Statement.

In summary, our support for this application is dependent on the recommendations made within the Crime Impact Statement being incorporated into this proposal.

SMBC Property Consultants (Carillion)

Background

The advice sought by Stockport MBC related to the submission of information by the Seashell Trust in respect of the cost of providing the new facilities. This information was integral to the planning application as the cost of the scheme is intended to be met in part from the development of Green Belt land which the Trust owns at its Stanley Road site.

Carillion Services as property consultants to Stockport MBC were asked to comment on two elements to the submission as follows:

1. the cost of providing the new facility which the SST were proposing to construct at their Stanley Road site.
2. Secondly the revenue implications from the sale of a significant part of their landholding which is located in the Green Belt.

The following is a summary of the situation to date.

Carillion Plc employed the services of Rex Procter & Partners (RP&P) Quantity Surveying and Cost management Consultants to review the cost plan prepared by the Trust to advise whether the costs as submitted were realistic.

A report, (The Report), dated the 23 September 2016 'Seashell Trust Transformation Project Cost Plan Review' was subsequently prepared by Craig Hoyle of Rex Procter & Partners.

Rex Procter & Partners are Chartered Quantity Surveyors with a wide experience in a variety of construction projects which include the public, private and third sectors. RP&P have worked on a number of projects in the education sector advising on cost issues for new build facilities and the conversion /rehabilitation of existing buildings as well as working on a number of projects from conception to completion.

The Transformation Project

The SST is a registered charity which provides residential education and short break facilities for children and young adults with complex communication and learning difficulties. The current campus was predominately developed in the 1950's for a client group with different needs as a consequence the SST is seeking to redevelop the facilities with a combination of new build and refurbished elements. The SST refer to this as the "Transformation Project".

Funding for the development is proposed to be met in part by the sale and development of its landholdings in the vicinity of the school which is currently located in the Green Belt.

SST Submission

The SST cost plan comprises two elements The Royal School and Master Plan Works. Budget figures were supplied for each element and were considered separately.

The Seashell Trust (SST) submitted a comprehensive range of documents and plans for the Royal School which were referenced in the response by RP&P. These are referred to in the RPP report as Appendix A to E on which RPP have made their comments which are then referred to in the body of the report.

The methodology employed by RPP in assessing the costs for the Royal School involved checking building areas, both floor and elevations, from the plans provided, and to analyse the cost of the materials used in the construction together with the external works. This approach should identify any inaccuracies or discrepancies in the cost rates having had regard to the size of the buildings as shown on plan.

Regard was also to be made on the choice of materials and construction methodology to determine whether in the view of RPP this was the most appropriate solution in terms of cost and application. RP&P were not instructed to provide alternative design or construction solutions but comment is made in The Report on elements where it was considered that the SST proposal may result in increased cost where a substitute could have been adopted.

The information provided on the Project Master Plan works was at feasibility stage of development, design and cost information was not as advanced as that for the school and costs were generally based upon a cost per building area and external areas.

Regard was made to cost and price information published by the Building Cost Information Service (BCIS) of the Royal Institution of Chartered Surveyors in addition to experience of similar projects which RP&P have had professional involvement or knowledge.

The Royal School

The Royal School is to be replaced with a new build facility. This is to be a predominately single story building with both learner and hydrotherapy swimming pools with associated changing areas and assembly/performance hall.

The detailed cost plan submitted by SST identified a headline figure to which an allowance for VAT and client contingency gave a final figure. Appendix B in The Report contained a summary of these figures with commentary by RPP breaking down cost by element and by unit rate (per sq.ft).

RP&P arrived at a revised cost figure which was approximately 5% less than the cost plan figure. The main reasons for the difference in the two figures is set out in the Report.

RP&P noted that there were a number of site abnormal costs included within the figures including allowances for ground contamination, a piled foundation solution and a large cost for sewer diversion works. It was also noted that the costs include for a steel frame solution to a single storey building, a large number of folding dividing walls and all loose, fitted and bespoke furniture.

Whilst RP&P have commented on the cost allowances included they have not commented on whether the design solution proposed is appropriate for which an Engineers comment may be required.

Particular reference is made to the use of the rain screen cladding which has been to the entirety of the elevations to the swimming pool and hall. This “Tecu” bronze rain screen cladding is considered to be a high cost item and its extensive use could be replaced by an alternative material with a cost saving a set out.

The Master Plan Works

In addition to the new build Royal School the SST intend to develop other areas of the campus by a combination of the updating existing and providing new buildings including a new sports centre with all-weather pitches and ancillary car parking and site infrastructure plus IT infrastructure works site wide.

Appendix C of The Report provides a summary of these costs and as with analysis of the Royal School RP&P have evaluated and given commentary. The SST cost plan provides a total cost of the works which is carried forward and allowances made as set out in The Report.

At date of the Report the Master Plan was at feasibility stage only consequently the response was made on the information made available and analysis confined to costs based on floor and external areas.

The Report stated that there were a number of significant differences between the SST submission and the view of RP&P however the conclusion reached meant that the overall cost was very close.

It is noticeable that in the view of RP&P that the cost estimate for the Sports Hall was deemed inadequate having had regard to other similar projects of which they had knowledge and this was reflected in their analysis in Appendix C.

Project Cost Summary

Appendix A of The Report provides a summary of the Project Costs and compares the SST estimate to the RP&P evaluation. The difference between the two parties was represented a difference of less than 6% on the total proposed budget cost. The main differences in the two figures are summarised and are largely confined to differences of opinion on construction costs however more than half of the change relates to the treatment of inflation on costs.

Section 4.0 of The Report sets out RP&P view on the possible effect of inflation on tender levels going forward. The Report was prepared post Brexit the repercussions from which it was considered would result in a flat line or possible slight reduction in

inflation until the 2nd quarter 2020. This was not a view shared by SST whose cost consultants have made an allowance they consider appropriate having regard to their view of the current tender environment.

RP&P have analysed published data from the BCIS on tender price forecasts and have taken a mid-point between the May 2016 and Sept 2016 figures to arrive at an inflation allowance which they consider realistic in the current climate.

Other costs are separately referred to and comment is made as to their acceptability. One issue which has yet to be confirmed by the SST is the issue of VAT having had regard to their charity status. The Report sets out that VAT has been added at a rate of 20% with the exception of the new build school, reception building, college building and training centre which are nil rated.

There are other items within the estimated costs for which no details are provided and these totalled equate to approximately 2.5% of the total sum and included the following items:-

- External Play Equipment
- Sewer Diversion Works
- Bespoke Furniture
- IT infrastructure.

No additional comment has been made with reference to these costs and these have been adopted for the purposes of The Report.

Following publication of The Report a conference call was convened and attended by Ian Keyte (Carillion Plc), Crag Hoyle (RP&P), Stuart Brahney (Stuart Brahney Associates Quantity Surveyors), Richard Riley (Mace Construction) and Nicola Giles (SST). Notes of the conference call are included which contains comment made by RP&P with responses from the SST representatives.

The comments made by SST were noted but the view of RP&P was that they did not warrant a change in the conclusion reached in The Report (23 September 2016). A further submission title *Formal Response on Financial Aspects of Planning Application as at 8 November 2016* Extract from SMBC Letter of 21 July 2016 requesting additional information to support the planning application was submitted subsequent to the cost plan information to which this summary document makes reference.

Page 7 of this document refers to a General Programme Contingency. This sum reflects approximately 10% of the transformation budget based on the Trusts cost plan. Justification for the inclusion of this sum is set out in the document but is stated to be held to guard against general cost increases and revenue decreases. The Trust does however confirm that as individual elements of the project become clearer and risks reduce and the requirement for this general programme contingency would be expected to lessen.

In a significant project of this nature it would not be uncommon to have an overall project contingency. It should be noted however that the current cost plan does already make allowance for the following:-

- Within construction cost, allowances have been made for poor ground and a piled foundation.
- Allowances are included for possible site contamination
- Allowances included for services and culvert diversions
- A specified sum is already included for inflation.
- Specifications and choice of material appears generous
- Construction contingency is included on total build cost (including the items above).

It is considered that the current cost plan submitted by the Trust already makes adequate provision for contingency on construction cost elements. A general programme contingency would conventionally seek to address issues including but not confined to:-

- Programme slippage which may be an issue to the Trust given that the projected start date already appears to have slipped
- Inflation charges though this has been addressed in the summary document and is the source of a difference of opinion between the Trust and RP&P
- Possible fluctuations in revenue receipts funding the scheme.
- RPP have commented in their report that following Brexit there is a degree of unpredictability in the construction market. As a consequence the Building Cost Information Service (BCIS) as referenced in the reports has struggled to predict with any degree of certainty how construction prices including materials and labour costs will be affected.

The inclusion therefore of general project contingency is not unreasonable but its size is dependent upon the accuracy of the cost plan to which it relates. The more certain the elements contained in headline appraisal are the smaller the contingency which needs to be provided for. What needs to be avoided is adding further contingencies over those already allowed for. The two basic elements to this scheme namely build cost and revenue from land sale can only be determined following exposing both to consideration by the market by tendering or other means.

It is understood that neither of these two elements can be confirmed by the Trust at the present time.

Response on Revenue Submission

Carillion consulted the documents provided which comprise the two reports, and comments are set out below. The main points of concern surrounded the marketing process; how the developers were selected and whether any of the Trusts requirements in any way affected the value of the bids submitted i.e. were the bidding conditions so constrained that values were depressed. There were also some queries regarding the workings of the appraisal. It is appreciated that the submissions were commercially sensitive, but in the context of this situation where

significant concessions are being sought, it was felt it was reasonable to see evidence of the submissions and how the bids were arrived at.

Two documents were provided by the Trust to accompany their planning submission:-

Report 1 Seashell Trust Transformation Project Report Author John Walley

Report 2 RESOLVE 106 Affordable Housing Consultancy

Having considered both documents it was felt there was a need for clarification on a number of points which were material to the consideration of the wider submission. Some issues related to technical aspects of the submission, others to more general aspects of the need for the release of land to fund the Transformation Project. Some of these queries may have already been raised by Officers within the Council including those from the Finance Department who we are aware have also been requested to analyse certain elements of the submission.

A question mark surrounded the manner in which the land was brought to the market. Carillion requested evidence of how the site was marketed and which developers were invited to make submissions for the land. As the report had referred to a “selection process” from which numbers were refined, evidence as to the criteria used to implement this process was also requested.

Reference is made to the following:

- Phase 1 – stage briefing pack
- Phase 2 questionnaire and briefing pack
- Phase 3 Analysis of proposals

The report suggested that the site was originally offered on the assumption that an onsite affordable housing requirement of 10% was appropriate. Given that the policy compliant stance is 50% it was queried as to why this approach had been taken and whether this influenced the eventual selection process?

Reference was made to the distribution of a marketing pack and eight expressions of interest. Carillion sought to view details of the content of the marketing pack and raised other queries:-

- a) Range of offers submitted based on 10% on site affordable provision. Why was this route adopted when not close to policy compliant requirement (see previous comment)?
- b) Chosen bidder referred to as “dropped out” – why was this?
- c) Remarketing had already recommenced – query as to how this was this being conducted. Details of marketing information requested?
- d) Copy of DAT spreadsheet required as referenced in report. Concern regarding use of NIA (Net Internal Area) and GIA (Gross Internal Area) in cost and revenue calculations.

- e) Point 2.12 makes comment on increase of affordable provision and impact on net internal areas if increased from 10% to 30% - this point is not understood clarification requested.
- f) Statement that headline figure of value expressed as a capital value per square foot would not be achieved if the proportion of onsite affordable housing increased. Evidence requested to support this assumption (assumption presumably being that increased level of affordable housing negatively affects private house prices)
- g) Developers Information not provided as commercially sensitive – was this reasonable given the request being made?
- h) Anticipated level of developer's profit considered high and applies to entire scheme. Provision of the developer's appraisal would clarify this point.

The above comments were made prior to a meeting with the SST on the 5th July 2017.

This meeting was also attended by the SST property and planning consultants. A summary was given as to how the marketing process which commenced in November 2015 was conducted. This included details of the questionnaire which parties were asked to complete and the level of information which was provided by the SST to assist bidders. It was explained that the original thirteen parties approached were a mix of regional national house builders including Plc's. These parties were reduced to eight by way of a scoring mechanism adopted by the SST. Carillion were not provided with details of the criteria adopted. From this reduced list three parties submitted formal bids. The range of offers varied significantly with the lower being some 27% less than the highest bid. Carillion were advised that the highest bidder later withdrew from the process which affected their ability to make such a significant investment in a single location.

The SST remain confident that the remarketing of the site in early 2018 will generate the required capital receipt from what they consider to be 25 net developable acres. This assumption further assumes an on-site affordable provision of 30%. Our understanding was that this was not the basis of the original marketing exercise.

As previously stated the marketing literature together with details of the offers submitted had not then been made available to verify, however the SST invited Carillion representatives to view all the relevant documentation on a suitable date.

The purpose of the meeting was to establish whether some of the concerns as set out above can be answered.

Review of marketing information

This was undertaken on 20th July 2017. Ian Keyte and Christine Telford visited the Seashell Trust and reviewed the documents relating to the marketing process undertaken during 2015 and 2016 and were able to verify the marketing process as

described above. It appeared that the level of offer was significantly affected by the proportion of affordable housing, which is to be expected.

A number of offers were received including one from a private individual.

The Trust are now resigned to re marketing the site, and the indication was that this would take place should Outline Planning Approval be gained. It has been discussed that the site is brought to the market and is marketed nationally, and on a flexible basis, so that both public, private, national and local developers can consider it on an entire site basis or part thereof. Clearly this will present challenges to ensure the site is released and developed on a comprehensive basis and the cash flow is secured to fund the school building scheme.

It appears to be acknowledged that at 30% affordable housing, the scheme will be viable and provide the Trust with sufficient funds for the school building project. The affordable housing is to be split 50/50 between social rent and intermediate shared ownership.

Overage/ clawback provisions were recommended by Carillion to address the affordable housing shortfall between 30 and 50%. Stockport Planning department advise that these will be incorporated into the Section 106 agreement and these contributions will be used for off – site, but local (Heald Green/ Cheadle Hulme/ Bramhall), additional affordable housing provision. The overage agreement is also intended to take account of market changes and/ or surplus funds when actual costs are determined. In addition the Trust will be making open space contributions based on the standard formula approach.

The Trust have offered the Council an “open book” approach to the monitoring of Project costs and incomes and are agreeable that this can be reviewed by the Council as the scheme progresses.

The scheme is now dependent on the approval of the Planning Application for its progression

ANALYSIS

Green Belt considerations

Assessment of harm

The starting point for decision making is, of course, the statutory development plan. The site lies within the Greater Manchester Green Belt as designated by SUDP Policy GBA1.1 and the accompanying Proposals Map. The Greater Manchester Green Belt was originally designated in 1984 by the Greater Manchester Council.

The NPPF makes clear that “*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*” (NPPF Paragraph 79).

NPPF Paragraph 89 and SUDP Policy GBA1.2 state that the construction of new buildings in the Green Belt should be regarded as inappropriate unless the development is one of a number of specified exceptions to this general rule. None of the specified exceptions in these policies apply to the proposed development despite the SST campus is designated as a Major Existing Developed Site in the Green Belt (MEDS) under SUDP Policy GBA1.7. This is because both the NPPF (Paragraph 89 – sixth bullet point) and SUDP Policies GBA1.2 and GBA1.7 only support the redevelopment of previously developed sites in Green Belt where the development would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. In this case, all elements of the development are considered ‘inappropriate’ as despite being submitted as a hybrid application with three component parts, those parts have not been disaggregated and nor can they be, given the application is based on a cross-funding proposition. Even if they were disaggregated, all three elements would be still considered inappropriate as the quantum of development proposed and their overall impact on openness significantly exceeds those of existing and recently demolished buildings on the site. This conclusion is not disputed by the applicant in respect of the outline housing and wider campus elements, but they do argue in the submitted Planning Statement that the proposed school building is not inappropriate development in the Green Belt as it would not have a greater impact on the openness of the Green Belt than the former Quad and Gayton buildings (already demolished) it replaces. The LPA disagrees with that conclusion as despite being considerably lower than the former Quad building, the proposed school building would have a far greater quantum of floorspace (5500m² as opposed to the 2522m² it replaces); have a far greater footprint; and occupy a far more prominent position on the site. The entire development is therefore considered inappropriate development in the Green Belt.

NPPF Paragraph 87 is clear that “*inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.*” This strong presumption against inappropriate development is echoed in SUDP Policies GBA1.2, GBA1.5 and GBA1.7, however, these policies make no allowance for ‘very special circumstances’ exceptions to be made and therefore are considered to conflict with the NPPF (note that SUDP policies pre-date the NPPF and are based on former government policy that left ‘very special circumstances’ exceptions to be considered outside the development plan). In such circumstances, greater weight should be given to the NPPF in accordance with Paragraph 215. The assessment of whether ‘very special circumstances’ exist and clearly outweigh the harm caused by the proposal is therefore the key to whether planning permission should be granted. Nonetheless, the fact that the proposal constitutes inappropriate development in itself means that the development is, by definition, harmful to the Green Belt. NPPF Paragraph 88 makes clear that substantial weight should be given to any harm to the Green Belt. It follows that substantial weight should therefore be given to the harm to the Green Belt caused by the development by reason of inappropriateness.

In addition to the harm caused by inappropriateness, it is then necessary to consider the magnitude of the development’s impact on the openness and permanence of the Green Belt.

It is clear from the submission that both the proposed school and campus elements would result in:

- a significant uplift in the overall quantum of floorspace and when compared to existing buildings;
- the potential for a significant uplift in the overall scale and massing of the proposed campus buildings defined by the outline building parameters; and
- the proposed expansion of associated development including car parks, access roads, hard surfaces.

These effects would all result in a significant cumulative reduction in openness on the SST campus. In addition, the development of up to 325 new homes on open farmland will clearly all but permanently eliminate any sense of openness on the developed part of the site despite the proposed landscape and visual mitigation measures proposed in the ES, that itself acknowledges the loss of openness that would result. It is therefore considered that the resultant permanent reduction in the openness of the Green Belt adds significantly to the Green Belt harm that would arise. This additional harm should also be given substantial weight in the overall planning balance.

Paragraph 80 of the NPPF makes clear that the Green Belt serves five purposes. Each purpose is considered in turn below:

To check the unrestricted sprawl of large built-up areas

Whilst there is no doubt that the Greater Manchester conurbation qualifies as a large urban area and the proposed housing development would extend the settlement boundary of Heald Green, it is not considered that the proposed housing development would result in unrestricted sprawl given the location of the housing has been deliberately contained on the western side of the site, in part, to maintain a green and open gap between the settlement boundaries of Heald Green and Cheadle Hulme. It would however result in an almost continuous stretch of built form along both sides of Wilmslow Road when travelling north-south between Heald Green and Handforth broken only by a marked increase in openness between Bolshaw Road and the A555. Given degrees of separation would be maintained between settlement boundaries, the development would be located at the urban edge and would not spread out in an untidy or irregular way it is considered that the proposals would not result in urban sprawl. Given the outline nature of the housing proposal it will clearly be necessary to reassess the position at the reserved matters stage(s) should this position change.

To prevent neighbouring towns merging into one another

The applicant makes clear in their submission that in developing their proposals they have sought to limit Green Belt harm by preventing Heald Green and Cheadle Hulme from merging into one another by focusing the proposed housing to the west of the site with access from Wilmslow Road to maintain an open, green gap between them to the west of the A34. Similarly and as concluded above, the existing 'gap' between Heald Green and Handforth would not be affected by the proposed development. It is therefore considered that the proposals successfully prevent the merging of existing settlement boundaries,

despite the size of the gap decreasing between Heald Green and Cheadle Hulme, this Green Belt purpose would not be offended. Given the outline nature of the housing proposal it will clearly be necessary to reassess the position at the reserved matters stage(s) should this position change.

To assist in safeguarding the countryside from encroachment

Whilst the proposed redevelopment of the SST campus would not result in countryside encroachment given the development would be contained within its existing curtilage, the proposed housing development would result in the loss of approximately 15 hectares of open countryside. The proposed development would therefore clearly and directly conflict with this Green Belt purpose.

To preserve the setting and special character of historic towns

The suburban parts of Stockport affected by the proposed development are not historic towns and therefore the development does not conflict with this purpose of Green Belt designation.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The Greater Manchester Green Belt has been successful in assisting urban regeneration across the conurbation and continues to be. These regeneration objectives are reflected in Core Strategy Policy H2 which states that where there is a less than five year supply of housing during the first ten years of the plan period then a previously developed land target of 80% will apply. This 'brownfield first' policy is also reflected in NPPF at Paragraph 17 which defines encouraging "*the effective use of land by reusing land that has been previously developed (brownfield land), providing it is not of high environmental value*" as a core planning principle. The proposed housing development would, on the face of it, clearly conflict with this Green Belt purpose. However, given the Council's latest Annual Monitoring Report indicates that the 80% brownfield target is being achieved it is not considered that the proposed development of greenfield land in exceptional circumstances (assuming very special circumstances exist) would have a significant adverse effect on urban regeneration efforts and 'brownfield first' policy objectives. It is also important to acknowledge that a degree of flexibility will be necessary given the severity of the current housing undersupply, as reflected in the Draft GMSF.

Overall, the proposed development is inappropriate development in the Green Belt, which is harmful by definition. There would be additional harm to the Green Belt caused by a marked reduction in openness and encroachment into the countryside arising from the proposed housing development component only. The proposed development is therefore in clear conflict with local Green Belt policy whilst the NPPF makes clear that substantial weight must be given to Green Belt harm in the overall planning balance.

Very special circumstances?

Despite the very strong policy presumption against inappropriate and harmful development in the Green Belt, the NPPF does not prevent such development being approved if 'very special circumstances' exist that clearly outweigh the

potential harm to the Green Belt by reason of inappropriateness, and any other harm.

Neither local nor national policy specify what demonstrating a case for 'very special circumstances' should entail but there is considerable case law which suggests that adhering to the following approach is likely to be suitable:

1. Identify (with evidence) an essential objective that the proposal is intended to meet;
2. Demonstrate that that essential objective could not reasonably be met in a less harmful way (i.e. consideration of other sites outside of the Green Belt or alternative sites within the Green Belt where less harm would be caused or which would amount to a form of development accepted by NPPF paragraph 89); and
3. Demonstrate that the proposed development would meet the essential objective and that doing so clearly outweighs the degree of harm caused by the proposal

In their submission, the applicant asserts that very special circumstances do exist and that planning permission should be granted. Their case is predicated on an argument based on educational and financial need; the lack of suitable, alternative, less harmful ways of meeting that need; and that the public benefits of the proposal clearly outweigh the cumulative harm generated by the proposal.

Educational benefits – an essential objective?

SUDP Policy CTF1.1 states that the development of community services and facilities will be permitted providing a series of criteria are satisfied including that no Green Belt harm would arise. Similarly, SUDP Policy GBA1.7 seeks to support and facilitate the limited infilling and complete or partial redevelopment of MEDS sites including the Seashell Trust campus, providing Green Belt harm does not arise. Given the harm identified above, the proposal would be in conflict with these development plan policies. Core Strategy Policy AS2, however, offers less conditional support for the proposals by stating that sufficient community and education facilities will be provided including Special Education Needs facilities, modernised secondary schools and indoor sports development including those connected to educational establishments with dual-use arrangements.

The NPPF Paragraph 72 places a far stronger policy presumption in favour of education related development by stating:

“The government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- *give great weight to the need to create, expand or alter schools*
- *work with schools promoters to identify and resolve key planning issues before applications are submitted.”*

Paragraphs 70 and 162 also make clear that local planning authorities should plan positively for community infrastructure to meet needs and forecast demands, and take account of the need for strategic infrastructure by working with other authorities and providers.

The applicant in their submission have set out in detail the need to redevelop the school, college and other campus buildings and facilities that are no longer considered fit for purpose due to the changing needs of the pupils and students at SST arising from the changes in the needs and nature of the cohort over time – this is summarised in the Background and Rationale section at the very beginning of this report.

The value and quality of the services SST provide are clear and not in dispute. This has been independently confirmed by the comments from the Council’s Education team who recognise the value and growing demand for the very specialised services SST offer. It is also reflected in the school and college’s consistently ‘good’ or ‘outstanding’ OFSTED ratings.

In simple terms, SST argue that due to nature of the very specialised services they offer, caring for and educating some of the most disabled children in the country, they should be considered a ‘special, special school’ of more than local importance and the proposed development, including the enabling housing development, are necessary to secure a long term, sustainable future for the Trust and the expansion of their services, including their important outreach services, to meet growing demand across the country.

The special nature of the services provided by SST and the need to modernise their facilities have been very well articulated and expressed in a number of written representations received from parents of children and young people educated and cared for by SST:

Parents of student at SST

“Our daughter is a residential pupil in her first year at the Royal College Manchester (RCM); previously she was a pupil at the Royal School Manchester (RSM) having started at the school last year in April 2016. Our daughter is deafblind and has profound learning difficulties...our daughter’s previous school was the Royal School for Deaf Children Margate (RSDCM) but it closed suddenly and unexpectedly in December 2015. It took us 4 months to find a suitable alternative school for our daughter following the closure of RSDCM – there are very few special schools now remaining in the country with the expertise needed to support the education of deafblind pupils. The Seashell Trust is a unique organisation in the UK – as far as we are aware there is no other school or college with the same high standard of skilled experienced staff needed by complex and vulnerable children like our daughter.

We were very pleased when our daughter was offered a place at the Seashell Trust in April 2016. Although the college is a long way from home (we live 175 miles away), we are happy to make the long car journeys needed as she has settled well at the Seashell Trust, and is making good progress. The specially adapted houses recently built for residential pupils are of a very high quality and are a significant factor in making our daughter's life as residential pupil work well.

We are obviously concerned that the poor quality of some of the existing school and college buildings compromise the Seashell Trust's ability to provide an appropriate learning environment for the pupils. We have read the Seashell Trust's Planning Application and campus masterplan and support the reasons why the proposed transformation project cannot be delivered elsewhere. The proposed plan will bring about many significant economic, social and environmental benefits (detailed in the Campus Design and Access Statement) and enable the Seashell Trust to continue to perform a vital service of national significance – not least to the vulnerable children attending the school and college, and the 440 staff supporting them.”

Parent of child at SST

“My son will be starting at the Seashell Trust in November. He is ...years old and is profoundly deafblind. He also has severe learning difficulties and has no functioning vestibular system. We have found it very difficult to have his needs met [where we live]. This includes his care needs as well as his educational needs. There simply are not very many people nationally trained in teaching and caring for children with profound multi-sensory needs. It is an extremely specialised area. We have tried for years with many professionals at home trying to give our son the right provision. This simply was impossible. The end result has been heart breaking for my husband and myself. It has caused our family to be in crisis for some time – almost resulting in family breakdown. It has affected our physical and mental health as well as affecting our son's two siblings.

Our son displays very challenging and self-injurious behaviour which is just too difficult and severe to deal with at home. We have been looking for a specialist provision for him for some time now. Maybe over two years. This means we have visited and researched most of the other specialist provision in the country. There is no other provision who can provide what our son needs. He is profoundly deaf so Seashell's background as deaf specialist is extremely important to us. The Seashell Trust is a school and care provision with very special circumstances. Most of the children and young people here have very low-incidence high needs like our son, who would not find their needs met to such a high standard as they do here anywhere else. Whilst many children travel from all over the country to attend Seashell, there are many children from the local area gaining the advantage from attending the school. In fact, in my son's new class the three other children are from the local area. I have spent quite a lot of time in what will be my son's new class and I can remember thinking how lucky the families of these children are that had such an amazing provision so close.

Seashell Trust is an organisation which I am sure the people of Stockport are very proud of. The work it does benefits many very vulnerable highly disabled children

and their families. They can carry out outreach work and training to many other special schools across the country. I asked them to do this with my son's previous special school last year. Their reports and input really changed our feelings about our son's future. We started to feel hopeful that there was a way out of the challenging and self-injurious behaviour which was becoming the norm for our son. This was because he was so frustrated at not having his high sensory needs met and not being able to communicate. Seashell Trust showed us that there is a way forward that doesn't require restraint and medication which was the route the professionals [where we live] were going down. Our son was medicated with Clonidine which is a medication which dangerously lowered our son's blood pressure and made him ill and even more uncomfortable and unhappy. It was dangerous – it's affects resulted in A and E visits and ambulances being called. We took him off this medication but it is a drug that is widely used to sedate children who are showing challenging behaviour. The point is that Seashell are able to provide a holistic and round the clock approach to meeting these children's needs whilst keeping the children safe and happy therefore reducing the need for medication which can be harmful and also taking away the need for restraint to be used which also affects a person's mental well-being considerably.

We see Seashell as a safe place for our son where he will be given the potential to learn to communicate his needs and feelings and also start to make choices. For the first time ever we are hopeful for his future.

Seashell needs a new school building if they are to provide the therapy services they need. Also so that the building is of the same quality and high standard of their residential buildings. The old school building is completely inappropriate for these children who need a warm and inviting safe building. Their new building will be designed with special features to help children like my son who are deaf blind to learn how to navigate independently around their surroundings and features which will stimulate and help them feel safe – such as special lighting and skylights. They also need new resources for hydrotherapy, physiotherapy and sensory integration. These resources can really alter the quality of life for these children who have so many difficulties. The Seashell Trust want to provide an environment across their whole site which helps these very vulnerable children to feel safe and calm in what must be a very scary and confusing world for them.

I know you are probably very aware of the plans that the Seashell Trust have to make sure that their new facilities benefit the wider community. Please consider how these facilities will also benefit the families and siblings of these children who will have gone through very tough times with their family member. I am hoping that my other two children can access the new sports facilities with and without their brother. They can therefore spend quality time with him in a safe environment. Plus, going forward – there will always be lots for them to do when they visit.

I have always cared a lot for the environment and I would never ever consider being in favour of building on greenbelt land unless it was in very special circumstances. I hope my letter has conveyed how this is a very special circumstance. Please help secure the future of this very special place and their very special young people."

Parent of child who attends SST's inclusive School Holiday Sports Programmes, SK7

Whilst I oppose plans to build on green belt where often other sites could be used instead, it is my belief that the development of greenbelt land is justified in this case due to the very special circumstances of the work of the Seashell Trust. The Trust gives profoundly disabled children and young people from across the UK, including many from Stockport and Greater Manchester, the education they need to live independent, creative and happy lives. Most other special schools, without Seashell Trust's expertise could not meet their needs. The school needs the development to continue to educate these children.

We live very close to the trust and have a child with Smith Magenis Syndrome, a very rare syndrome which presents severe behavioural challenges for us. Our son is used to being cared for at Seashell Trust when he attends school holiday programmes (CADS). It is our dream that he will be able to reside there when we are unable to look after him full time. It is an amazing place where the staff understand him, close to where we live, and a place that he has been familiar with since a young age.

We hear horror stories all the time, in the media, of children being cared for out of borough, too far away from their parents. It is no exaggeration for me to say that as parents we are petrified about what will happen to our son when we die. Stockport can be proud to say they have this gem of a place (for people with disabilities), and we need to help Seashell to achieve their ambitions to provide greater provision for our children in need. In my experience there are not enough service providers please do not let the amazing work of the trust be halted when cuts are affecting our children so much already.

Significantly, even most of the individuals and organisations who have formally objected to the proposed development, including HGHAG, Mary Robinson MP and the HGLLRA acknowledge the value and importance of the work SST do and the need for SST to modernise their facilities, even if though they disagree with the development as proposed.

It is therefore considered that the special nature of the educational benefits provided by SST and the need for them to modernise, as necessary, to safeguard their future in fit for purpose accommodation are a clear public benefit and not in dispute.

The first test of establishing an 'essential objective' required to make a case for very special circumstances (set out above) is therefore considered satisfied.

What is clearly in dispute is the scale and scope of both the Transformation Project and the consequent quantum of enabling housing development proposed with many arguing that alternative solutions are available to SST that would meet their needs without resulting in the significant Green Belt harm and other harm identified in this report.

Consideration of alternatives

As can be seen from the representations received above, many objectors state that the Green Belt harm and other harm that would be caused by the housing development could be avoided if SST pursued alternative ways of modernising their estate. Those in support of the development argue that there are no suitable, alternative solutions available to SST.

Could the Transformation Project be delivered on an alternative site in a less harmful way?

Alternative sites have been considered by the applicant as set out in the ES and in other parts of the submission. They confirm that having established their search parameters (12 hectare site, available within 2 years, accessible to staff and pupils/students, planning potential) an assessment of alternative sites was undertaken with advice sought from Council planning officers. All potential brownfield sites were discounted as being either unsuitable, unavailable or unaffordable given the generally greater development potential of brownfield sites and therefore higher value.

Other MEDS sites in Stockport were also considered. Most were discounted as being unavailable or unsuitable with only the Offerton School and Woodford Aerodrome sites being considered further. They state that discussions were held with the Council over the Offerton School site but this site was discounted as being both unaffordable and unavailable. The Woodford Aerodrome site was discounted as both unsuitable and unaffordable in 2011 due to the redevelopment opportunities identified in the Core Strategy.

Other greenfield and Green Belt sites were considered but discounted as unavailable or unaffordable due in part to landowners promoting their sites for residential development through the GMSF process.

Importantly, it was accepted in 2012 when planning consent was granted for the new housing on the campus (planning permission ref: DC/049833) that there were no other sites which SST would be in a position to purchase and develop in order to minimise Green Belt harm.

It is also important to recognise that even if alternative preferable sites were available, other reasons exist that realistically prevent SST relocation including: the considerable investment recently made to buildings on the campus including the new, recently completed specialist housing; the additional costs associated with acquiring a new site and redeveloping it prior to relocation; the disturbance caused to existing, vulnerable residents that are sensitive to change; and implications for the workforce arising from relocation.

It is therefore considered that alternative sites have been fairly and reasonably discounted as being either unsuitable, unavailable, unaffordable or undeliverable.

Could the school and wider campus be modernised on the application site in an alternative way to reduce the scheme's overall impact on the Green Belt?

As set out above, it is the proposed, enabling housing development that has generated the most objections and is most harmful to the Green Belt with many objectors including HGHAG and HGLLRA arguing that alternative funding options and design solutions are available to the Trust that should be pursued instead to minimise Green Belt harm.

HGHAG have submitted numerous, topic based objections to the proposed development as summarised above. Their central argument is that the scope of the proposed Transformation Project is unnecessarily excessive. Having undertaken a detailed analysis of comparative maintained school build costs using the Government's relevant Building Bulletin school design guidance as a benchmark, they argue the costs of the Transformation Project are extravagant and unnecessary and that *"Seashell Trust can build a superb new school, as well as improving and upgrading their valuable facilities, within the £15m funds they have stated they are able to raise. There is simply no need to sell Green Belt land."* They believe that SST argument is based on desire rather than need and therefore it cannot amount to very special circumstances justifying the harm that would arise.

SST have responded in detail in their submissions arguing that the proposed new school building is an appropriately sized, bespoke design solution that has been developed in response to the specific needs of its pupil and student cohort, stressing that SST only cater for children with the most complex and specific teaching and learning needs. They also state that:

- Building Bulletins are guidance only and stress the need for flexibility in light of particular circumstances
- Building Bulletins are also used as a funding benchmark for maintained schools and SST is not a maintained school
- their cohort's needs are so specialised that higher staffing ratios are required with 2 staff for every child compared to a more typical ratio of 1 member of staff for every 2 pupils.
- SST has smaller class sizes than typical special schools and there is a requirement for individual teaching spaces, sensory, therapy and hygiene space.
- The needs of the cohort also require expensive design interventions in respect of acoustics, ventilation, heating, lighting, adaptable room layouts etc.
- The costs of providing hydrotherapy and swimming facilities are also expensive and need to include special features such as a moveable floor to adjust its depth to ensure it is available to all.

Colleagues in Education, including the Council's Strategic Lead for Special Educational Needs and Inclusion, have reviewed the submission in detail in light of the objections received and have responded above by concluding that the proposal would *"deliver a fit for purpose learning and social environment for the pupils and staff"*. They also confirm that Building Bulletin 102 and 104 are not an appropriate tool to assess SST's proposals given the very specialist nature of the accommodation required at SST. It is therefore considered that, despite the

objections received, the proposed design solutions are an appropriate solution and proportionate to the particular needs of the pupils and students at SST.

Could the Transformation Project be delivered at a lower cost on the application site and thus reduce Green belt harm?

Closely related to the educational need based design objections received are the objections made on the basis that the financial need case has not been successfully made and that some of the cost assumptions made by SST are excessive and result in undue Green Belt harm given the cross-funding basis of the application. Again, detailed submissions have been made by HGHAG and others on this basis. Detailed financial information has been submitted in support of the application that has been independently reviewed by the Council's Consultant Surveyors and Cost Consultants, who conclude that based on the scope of the proposed Transformation Project, the cost assumptions made by SST are reasonable with only a 6% difference between the parties on the total proposed budget costs. Some of the main differences of opinion relate to allowances for inflation, contingencies, consultant fees and VAT. It is therefore considered that subject to the inclusion of the recommended 'clawback' or overage arrangements based on assessments of actual rather than projected costs and revenue in any accompanying Section 106 legal agreement to address the policy shortfall in respect of affordable housing provision, that the objections to the overall project costs cannot reasonably be sustained. It follows that the proposed quantum of cross-funding housing development is both proportionate and necessary in order to deliver the TP.

In their submissions, SST also detail their activities in seeking alternative sources of funding including from central government. They state that meetings have been held with Mary Robinson MP, a government minister and senior civil servants to discuss options. SST explain that the conclusion of those meetings was that no government funding streams could fund the TP given SST's non-maintained status and that even if SST were to convert to academy status, central government funding for transition (currently limited to circa £25k) and any capital funding awarded would not extend to cover the costs of the TP. It is therefore concluded that central government funding has been reasonably discounted as an unavailable alternative option.

Overall conclusion

For the reasons set out above, it is considered that the educational need for SST's Transformation Project as an essential objective with clear public and educational benefits has been successfully made and that alternative, less harmful ways of delivering it have been fairly and reasonably discounted. NPPF Paragraph 72 is clear that 'great weight and importance' should be given to the need to alter schools and to development that would widen choice in education. The need to apportion 'great weight' to the clear educational benefits offered by the proposal are reflective of and supported by the legal duty to ensure the best interests of the children directly affected by the proposals (i.e. SST service users) are a primary consideration in decision making. PPG provides advice on these matters (see above).

It is therefore considered that the first two requirements of a very special circumstances case, as outlined above, are satisfied.

Housing need

Paragraph 49 of the NPPF states that *“relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5-year supply of deliverable housing sites.”* Core Strategy Policy CS2 identifies Stockport’s overall housing requirements based on the evidence base supporting the now abolished North West Regional Spatial Strategy (NWRSS). Both the NPPF at Paragraph 47 and PPG highlight the need for an up-to-date housing need evidence base identifying the objectively assessed housing needs of the area. The NWRSS based evidence base can no longer be considered up to date following the publication of the Draft GMSF and the evidence base supporting it. This position has been recently confirmed in an appeal decision in Fareham who are in a very similar position to Stockport in terms of their existing development plan and their emerging plan (see appeal ref: APP/A1720/W/16/3156344).

Whilst the Council maintains that the adopted Core Strategy, in which the current housing target is contained, is not out-of-date per se, the housing target itself does date back several years and there has been a recent assessment of objectively assessed need (OAN) to inform the Draft GMSF, albeit that document has not yet reached the stage of being submitted for examination. In addition to the difference in timeframes for the two documents (Core Strategy is for 2011-26 and the GMSF is 2015-2035) there are complicating factors in making a direct comparison due to delivery backlog and a variable trajectory in the Core Strategy. Nevertheless, in comparing the two, taking the Core Strategy target as the basis for the five year supply figure and applying a 20% buffer to that and related backlog, the Council has 3.9 years of supply. The comparable figure based on the GMSF OAN figure is 1.9 years.

Members should also be aware that the government recently consulted on a standardised methodology for calculating housing need to simplify the plan making process and provide greater consistency. The governments proposed methodology identifies a requirement for 1078 dwellings per annum in Stockport between 2016-2026 which is significantly more than the 1011 required under GMSF.

It is therefore clear that Stockport is in a position of significant housing undersupply, the magnitude of which has grown considerably in light of the GMSF OAN. Relevant policies for the supply of housing, most notably Core Strategy Policy CS2, must therefore be considered out of date triggering NPPF Paragraph 14. The ‘tilted balance’ based on a presumption in favour of sustainable development is therefore engaged.

Despite being in the Green Belt, it is clear the delivery of up to 325 new homes on the site would make a significant contribution towards addressing Stockport’s housing need and this should be afforded significant weight in decision making.

In terms of affordable housing, the proposed portion of affordable housing to be delivered on the site has been negotiated upwards from 10% to 30% that could equate to 98 new affordable homes. Core Strategy Policy H3 however makes clear that a 50% requirement applies to housing development on Green Belt sites. Given the cross-funding, enabling basis of the application and the need to ensure Green Belt harm is minimised it has been agreed with the applicant that the development would be subject to 'clawback' or overage based on an assessment of actual costs ensuring that any surplus funds generated would be paid to the Council to fund additional affordable housing off-site up to the defined 50% policy ceiling. The tenure of the affordable housing realised would be a policy compliant mix of 50% social rented homes and 50% intermediate (e.g. shared ownership) homes and would reflect the mix of house types delivered on site unless otherwise agreed by both parties. This arrangement is considered to represent a fair and appropriate balance given the need to enable the delivery of TP whilst minimising Green Belt harm.

Core Strategy Policies CS3 and H3 identify an overall strategic target of 50% of new dwellings in Stockport to be affordable. An analysis of completions since 2011 to date has confirmed that 24.3% of new homes have been affordable. Stockport is therefore suffering from a significant undersupply of affordable housing and it is considered that the positive contribution the development would make to increasing supply, albeit at a level potentially lower than policy requirements, should be afforded significant weight in the overall planning balance.

The fact that the Draft GMSF proposes that the application site and land around it be removed from the Greater Manchester Green Belt and allocated for upwards of 3,700 dwellings and supporting infrastructure (alongside the SST campus) in order to help accommodate Stockport's and Greater Manchester's housing needs highlights the scale of the challenge Stockport faces in meeting its housing needs. The GMSF is at the very early stages of development and is currently subject to a 'radical re-write' and therefore the draft allocation can only be afforded very limited weight in decision making, nonetheless, it remains a material consideration relevant to the determination of this planning application, albeit one that can only be afforded very limited weight in the overall planning balance.

The submitted illustrative masterplan indicates a housing density of circa 30 dwellings per hectare. Core Strategy CS3 makes clear that housing developments should achieve a minimum density of 30 dwellings per hectare, therefore, no conflict with development plan policies are considered to arise. This requirement would be revisited at the reserved matters stage if planning permission is granted.

Whilst national policy makes clear that housing need in itself is unlikely to constitute 'very special circumstances' justifying inappropriate and harmful development in the Green Belt, the positive contribution the development would make in helping Stockport meet its overall housing needs should be afforded significant weight in the overall planning balance in accordance with the NPPF.

Landscape and visual impact

As detailed above, the applicant has assessed landscape and visual impacts as part of the ES informed by a Landscape Impact and Visual Impact Assessment (LIVIA). This was revised and updated during the application process to address comments raised by officers and to reflect a revised baseline position arising from the demolition of the Quad and Gayton buildings on the SST campus prior to determination. The conclusions of that assessment are set out above.

The entire application site is located in the Heald Green Fringe Landscape Character Area as defined by SUDP Policy LCR1.1. That policy makes clear that development in the countryside will be strictly controlled, and will not be permitted unless it protects or enhances the quality and character of rural areas. These objectives are also emphasised in SUDP Policy LCR1.1a which relates to defined areas of urban fringe considered to be of value in terms of landscape, ecology and the important role they play in meeting the need for recreation in a natural setting. These conserve and enhance objectives are also reflected in Core Strategy Policies CS8 and SIE3. NPPF Paragraph 109 makes clear that *“the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes”* whilst Paragraph 113 emphasises that a proportionate response when assessing impacts commensurate with the hierarchy of international, national and locally designated sites.

The submission has been reviewed and assessed by the Council’s Landscape Officer who agrees with the conclusions made in the ES and LIVIA.

The description of the Heald Green Landscape Character Area (above) emphasises the importance of the remaining areas of open agricultural land within this local designation and the need for their protection and therefore the loss of the open agricultural land will clearly have a major adverse impact on the Heald Green fringe Landscape Character Area and sensitive receptors neighbouring the site. Similarly, in terms of the site’s recreational value, although access to the public right of way network would be safeguarded and enhanced by the proposals, users of network would suffer from experiential losses in terms of their ability to undertake recreation activities in a natural setting.

It is not considered that the proposed redevelopment of the SST campus would have significant adverse landscape and visual impacts given its containment within its existing boundaries and the proposed mitigation measures set out in the ES. Those measures include boundary vegetation retention and planting enhancements and will help to soften the development’s impact. Nonetheless, it is clear that the impacts of the development would be harmful in landscape and visual impact terms and it is considered that this should be given significant, but less than ‘great’, weight in the overall planning balance. This is considered a fair weighting given the need for a proportionate response to harm to reflect the importance and status of local landscape designations relative to the ‘great’ weight that must be afforded to the landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty required by NPPF Paragraph 115.

A condition is recommended requiring the development to be carried out in full accordance with the landscape and visual impact mitigation measures set out in the ES.

Historic Environment

The applicant has submitted a detailed Historic Environment Assessment of the development in support of their application. This alongside other supporting information has been assessed by both the Council's Conservation Officer and the Greater Manchester Archaeological Advisory Service (GMAAS) whose detailed comments are set out above.

The Council's Conservation Officer concludes that the development would adversely affect the setting of designated and undesignated heritage assets to the west of the application site – the Grade II listed Griffin Farmhouse and the undesignated Outwood House (not locally listed but is identified on Stockport's Historic Environment Record as being of some significance). Having carefully reviewed the Council's Conservation Officer's response to the application, I fully concur with their conclusion that the application will adversely affect the setting of these assets with and without mitigation in terms of layout, planting etc. given their intrinsic link to the open farmland around them. CS Policy SIE3 makes clear that *“loss or harm to the significance of a heritage asset, through alteration, destruction or development within its setting, will require clear and convincing justification”*. Unlike the NPPF, this policy does not distinguish between designated and undesignated heritage assets. NPPF Paragraph 134 makes clear that *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal”* whereas a *“balanced judgement”* is required when assessing applications that affect undesignated assets under Paragraph 135.

In accordance with the Conservation Officer's conclusions, the harm caused to both assets is considered “less than substantial” and should therefore be weighed against the public benefits of the proposal set out above and below. The statutory duty to have ‘special regard’ to the desirability of preserving listed buildings and their setting set out in Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that considerable weight and importance be afforded to the harm to the setting of Griffin Farm and given its setting is shared with Outwood House it is considered that significant weight should be given to that cumulative harm in the overall planning balance.

In terms of below ground heritage assets, CS Policy SIE3 requires that archaeological field evaluations are carried out where a site is expected to reveal material of archaeological significance and that appropriate recording and interpretation be carried out where appropriate. This policy requirement is echoed in NPPF Paragraph 128 detailed above. GMAAS has assessed the application and whilst confirming that there is no known significant archaeology within the application site they do highlight the potential for the housing land to yield evidence of early periods (Prehistoric, Roman and Medieval) noting that a mid-4th century Roman Coin was found nearby that could relate to a possible Roman road from Cheadle to Alderley Edge. GMAAS therefore recommend that a condition be applied to the

housing component of the scheme requiring a written scheme of investigation to be submitted, formally approved and implemented in full. Subject to the imposition of such a condition no significant harm would arise ensuring that the development's impact on potential below ground heritage assets should be assessed as neutral in the overall planning balance.

For the reasons set out above and in accordance with the Council's statutory duties, it is considered that significant weight should be given to the harm the development would have on both Griffin Farm and Outwood House in the overall planning balance. Clearly, if planning permission is granted it will be critically important to carefully assess detailed layout proposals for the housing component at the reserved matters stage(s).

Traffic, transport and accessibility

Core Strategy policies CS10, T1, T2, T3, AS2, H2 and UDP Policies L1.7, L1.9 and CTF1.1 set out the Council's policies in respect of traffic, transport and accessibility. These policies are broadly echoed by Section 4 of the NPPF 'promoting sustainable transport' – Paragraphs 32, 35, 36 and 38 are considered to be of particular relevance.

The ES and other submissions has been assessed in detail by the Council's Highway Engineer above who concludes that the site is in a sustainable location; that the proposed development can be accommodated on the highway network without generating residual cumulative impacts that are judged to be severe in terms of traffic generation, capacity, congestion and highway safety; and that subject to securing off-site improvements sustainable transport choices will be available to adequately accommodate the needs of existing and future users. Despite the public objections made to the development on these grounds, it is therefore reasonable to conclude that subject to the imposition of the recommended conditions and securing the planning obligations detailed above and below, no significant harm or conflict with development plan policy or the NPPF would arise in traffic, transport and accessibility terms. In the absence of significant harm, it is considered that traffic, transport and accessibility matters should be considered neutral in the overall balance. Clearly, it will be critically important to very carefully assess detailed access proposals for the housing component at the reserved matters stage(s) should planning permission be granted.

Ecological impacts and mitigation

Core Strategy Policy SIE3 sets out the Council's development management policies on protecting the natural environment stating that net losses of biodiversity and geodiversity will be prevented using a hierarchical approach to conserving and enhancing designated sites and habitats. It goes on to state that applications for development that would harm the borough's biodiversity will be determined in accordance with the key principles set out in former government policy (PPS9). It goes on stress the requirements for biodiversity enhancements through the development of green infrastructure networks to improve connectivity between habitats. Importantly, the policy then states that planning applications should identify mitigation measures that keep disturbance to a minimum and provide alternative

habitats to sustain at least the current level of population as well as setting out a long-term management plan for the site. Finally, the policy then highlights the importance of retaining trees and vegetation that make a positive contribution to amenity and makes clear that replacement, compensatory planting where losses arise is necessary.

Paragraph 118 of the NPPF broadly aligns with these policy objectives when coupled with legal obligations in The Conservation of Habitats and Species Regulations 2010 (the Regulations) transposed from the Habitats Directive; the Wildlife and Countryside Act 1981; Protection of Badgers Act 1992 and the Natural Environment and Rural Communities Act 2006. ODPM Circular 06/05 Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system is also of relevance (signposted in PPG) particularly Paragraph 99 that states:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted. In appropriate circumstances the permission may also impose a condition preventing the development from proceeding without the prior acquisition of a licence”.

The application submission has been carefully assessed by Natural England, the Greater Manchester Ecological Unit and the Council’s own Nature Development Officer whose comments are set out above.

Surveys have shown that bats and great crested newts (GCN), both European Protected Species (EPS) protected by the Habitats Directive and Regulations, are present on the application site and will be harmed by the proposed development. A derogation licence(s) will therefore be required before the development can proceed. The local planning authority are also required by law to have regard to the requirements of the Directive and apply the three derogation tests set out in the Regulations before reaching a decision. Each test is addressed, in turn, below:

That the development is in the interest of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequence of primary importance for the environment

The public benefits of the proposed development are considered in detail above and below in the context of a Green Belt ‘very special circumstances’ assessment and it is concluded that the public benefits of the proposals, in terms of educational need,

housing need and other benefits highlighted in the report are imperative reasons of overriding public interest that clearly outweigh the cumulative harm caused by the proposals including ecological harm, Green Belt harm, the negative effect on designated heritage assets etc.

That there is no satisfactory alternative

For the reasons detailed above in the context of the Green Belt 'very special circumstances' assessment, no satisfactory alternatives exist that would secure the public benefits of the proposed development established under the first derogation test above.

That the derogation is not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range.

The applicant has submitted an Ecological Assessment with the application that set out a series of proposed mitigation measures to mitigate the impacts of the development on EPS shown to be present on site. This was further supplemented by a revised GCN Mitigation Strategy in August 2017.

In terms of bats, the proposed mitigation measures have been assessed by the Council's Nature Development Officer who considers that the proposed measures would be adequate to maintain the favourable conservation status of the species affected. Mitigation measures include further surveys including the detailed inspection of buildings prior to demolition by a licenced bat worker using an endoscope; the capture and transfer/release of bats as required; utilising a soft demolition method for sensitive buildings; and the provision of bat boxes across the campus area. Details of bat friendly external lighting will also be required to prevent any adverse effects. It is considered that a positive outcome and compliance would be secured through the imposition of a planning condition and therefore I am satisfied that all three derogation tests would be satisfied in respect of bats.

In respect of GCN, the updated GCN Mitigation Strategy 2017 highlighted a number of concerns raised by Natural England about the adequacy of the proposed mitigation measures. No objections were raised to the provision of on-site mitigation that includes the adoption of reasonable avoidance measures (RAMS) across areas considered to be unsuitable or unattractive to GCN; creation of three new ponds and enhancements of pond 7 to provide optimal breeding habitat in a corridor running east/west between the campus and the A34; ongoing management of the habitat in this corridor; and capture and translocation to the corridor from areas affected by the development. However, Natural England, as the licencing authority with the lead role in implementing the requirements of the Directive, have stated that off-site habitat creation in the form of terrestrial habitat provision will be required before a licence could be granted. Details of such provision remains outstanding, however, the applicant is having ongoing detailed discussions with Natural England about possible solutions who have clearly stated that a series of options remain available to the applicant and that they are confident that *"an acceptable compensatory solution is forthcoming and that imposing a planning condition at present will assist in providing reassurance that the scheme will go forward while providing that extra time required to finalise the compensation proposal"*. In light of Natural England's clear

position statement, GMEU are now supportive of this approach and are comfortable that subject to the imposition of suitably worded conditions legislative and policy requirements would be satisfied. Members should be aware that recent case law has clarified the primary role of Natural England in implementing the Habitats Directive and that if local planning authorities are satisfied that Natural England are likely to grant a licence for a development then the derogation test can be considered passed and there is no impediment to the grant of planning permission. Given the clear and unambiguous response from Natural England the derogation tests in respect of GCN are considered to be satisfied. Suitably worded planning conditions requiring details of all GCN mitigation measures, including off-site compensatory habitat creation would of course be required if planning permission is granted. It is considered that such a condition requiring works off-site would satisfy the legal tests applied to the imposition of planning conditions as there is a 'reasonable prospect' that the applicant will be able to satisfy them.

Surveys have also identified the presence of badgers, barn owls and other nesting birds on the site that are protected under separate legislation. Invasive species have also been identified. The ES sets out in detail a series of mitigation measures that would be implemented as part of the development and a series of conditions have been recommended by the Council's Nature Development Officer and GMEU to produce optimum outcomes in accordance with the development plan and NPPF. Subject to their imposition, the proposed development is considered acceptable in planning policy terms. However, despite safeguarding the favourable conservation status of species and securing habitat enhancements, the proposals would nonetheless disturb and the result in the loss of habitat of protected species and therefore must be assessed as harmful in the overall planning balance. Given the mitigation proposed, it is considered that this negative effect should be given limited weight.

Flood risk and drainage

UDP Policy EP1.7 states that the Council will not permit development where it would be at risk of flooding; increase the risk of flooding elsewhere; hinder future access to watercourses for maintenance purposes; cause loss of a natural floodplain; result in extensive culverting; affect the integrity of existing flood defences; or significantly increase surface water run off unless sustainable mitigation are in place to overcome adverse effects. It goes on to state that development should incorporate so far as is practicable, sustainable drainage systems taking account of current Government guidance. Core Strategy Policies SD6 and SIE3 states that development should comply with national planning policies managing flood risk and where planning permission is required, areas of hard-standing or other surfaces, should be of a permeable construction or drain to an alternative form of SUDS. SD6 also makes clear that brownfield sites are required to reduce unattenuated run-off by a minimum of 50% and on greenfield sites, such as the housing land, rates should not exceed existing greenfield rates.

Paragraphs 99 to 104 of the NPPF set out government policy on managing flood risk through the planning system, supplemented by the Ministerial Statement on sustainable drainage systems (dated 18 December 2014) and the national Planning Practice Guidance. The Ministerial Statement makes clear that it is *"the*

Government's expectation that sustainable drainage systems will be provided in new developments wherever this is appropriate".

As described above the applicant has assessed flood risk and drainage matters in the ES that includes an appended Flood Risk Assessment in accordance with national policy requirements.

Baseline conditions note that the both parts of the site generally fall to the north with the western and eastern sides of the residential part of the site falling towards Bruntwood Hall Brook (main river with 8 metre easement), that in turn outfalls into Mecker Brook approximately 3km to the north. Existing surface water drainage on the SST campus outfalls into Bruntwood Hall Brook.

A review of the EA flood maps confirms that the site is at low risk of surface water flooding (Flood Zone 1) with the only medium/high risk areas following a narrow corridor along the route of the brook. Although parts of the site are identified as being at risk of groundwater flooding, risks are considered low if appropriate mitigation measures are employed (e.g. damp proof membrane installation). Flooding from other sources (tidal, sewer and artificial sources such as reservoirs) are not considered to be a risk.

The ES proposes a series of mitigation measures, including controlling surface water drainage in accordance with the SUDS management train and hierarchy with no increase in surface water discharge. With mitigation in place residual effects are assessed as 'negligible'.

A detailed drainage scheme has been submitted for the proposed school component comprising foul water connections to the existing foul sewer network and an engineered solution to surface water drainage comprising connections to the Trust's existing surface water sewers to the north that eventually discharge to the watercourse to the north of the campus. Flows would be attenuated by hydrobrakes and underground geo-cellular storage tanks to achieve greenfield run off rates and prevent creating or increasing flood risks upstream in accordance with local and national policies. Whilst this engineered solution is less preferable to soft or natural SUDS solutions based on prevention and infiltration techniques it nonetheless ensures that flood risks would appropriately managed. SST have explained this approach by stating that soft or natural solutions could severely limit the functionality of greenspace around the proposed school building for teaching, learning, play and welfare purposes. The Environment Agency have raised no objection to this solution but both the LLFA and United Utilities responses are less supportive. In response, SST have confirmed that further ground investigations are required to assess the suitability of natural infiltration techniques such as permeable hard surfaces but support their inclusion if they can be successfully reconciled with teaching and learning needs. The applicant has suggested a condition to allow for further investigation to take place. It is considered that given the accessibility problems discharging to the outdoor amenity space around the school building could create and the emphasis on appropriateness in the 2014 Ministerial Statement, a surface water drainage condition would be an appropriate remedy to secure an optimum, policy compliant outcome. A condition is recommended accordingly.

Given the housing and campus elements of the proposals are in outline, detailed drainage proposals for these components are obviously not yet known and therefore conditions are recommended to require detailed surface water drainage proposals incorporating SUDS to be submitted at a later date, formally approved and implemented in full. The documents and indicative plans submitted to date do however highlight the potential and opportunity for a number of natural SUDS solutions on the site such as the creation of a series of detention basins along the brook corridor. Indicative plans also incorporate an easement along the length of the Brook in accordance with the Environment Agency's requirements. It should be noted that additional ground infiltration testing is required across the entire site to establish the potential for natural soakaways etc. It is therefore considered that the imposition of planning conditions will secure sustainable and policy compliant solutions. This conclusion is supported by the LLFA, the Environment Agency and United Utilities.

Subject to recommended conditions, it is considered that in the absence of any significant harm in flood risk and drainage terms these matters are assessed as neutral in the overall planning balance.

Socio-economic effects

Socio-economic effects of the development were assessed in the ES and are summarised above. The educational benefits of the SST campus redevelopment proposals are assessed in detail above as part of the Green Belt very special circumstances case. There are however a number of other socio-economic effects that are in themselves important material considerations in the determination of this application, considered in turn below.

Employment benefits

SST are identified as a major employer in the Borough in both the ES and in the Core Strategy. Core Strategy policies CS7 and AED6 seek to protect employment sites outside protected employment areas such as this whilst recognising that employment uses include other uses beyond traditional office, industrial and warehousing sectors. This position is supported by the NPPF at Paragraph 19 which states that significant weight should be placed on the need to support economic growth through the planning system.

The submission indicates that SST currently employ in excess of 400 members of staff from the application site. It is stated that this figure would rise to approximately 430 jobs if SST were able to operate at their full capacity and that the proposed development has the potential to increase that figure to approximately 470 jobs through expansion of outreach services etc. The ES notes that approximately 40% of SST staff live within the Borough and approximately 90% live within a 30 minute drive of the site.

Whilst it is not considered likely that a refusal would lead to the imminent closure of SST as highlighted by a number of objections to the development, it is clear that the delivery of the TP would help to secure a long term, sustainable future for SST as a major and growing employer on their current site within the Borough. When this is

coupled with the construction job creation benefits (identified as circa 180 jobs over a 5-6 year period) and retained expenditure effects, it is clear that significant employment benefits would accrue if the proposed development was allowed to proceed. Paragraph 19 of the NPPF makes clear that this should weigh in favour of the development and be afforded significant weight in the overall planning balance.

Impact on Social and Community Infrastructure – Education

A large number of objections have been received from local residents expressing concerns that community infrastructure, in the form of mainstream school places in the area, is inadequate to meet existing and the additional demand generated by the proposed housing development. Although no development plan policies require the provision of education facilities as part of large housing developments, Paragraph 70 of the NPPF does make clear that planning decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

The applicant assessed the likely impacts of the development in the Socio-economics section of the ES. That concluded that existing primary and secondary schools within nationally defined catchment areas would be able to absorb the additional demand on school places.

The position has been recently reviewed by colleagues in Education who conclude that whilst the additional demand for secondary places could be accommodated in existing schools and the new Laurus Cheadle Hulme High School (free school due to open in September 2018), the demand for additional primary school places is likely to exceed supply roughly equivalent to a 0.5 form entry primary school. Colleagues have indicated that the expansion of an existing school to accommodate that demand would cost approximately £900,000.

It is clear that the proposed housing development is likely to have a significant adverse effect on the availability of primary school places in the local area particularly if primary schools outside the Borough are unable to absorb unmet demand. Given no mitigation is proposed, it is considered that significant weight should be afforded this negative effect in the overall planning balance. However, given the proposed housing development would generate circa £30M of funding for the provision of a new school and college at SST; the fact that there are no local policies in place requiring large housing schemes to make financial contributions or dedicate land for new schools to meet development generated demand, and the fact that 'basic need' funding (albeit limited) is allocated to local authorities to increase capacity of schools to cater for population growth it is not considered that this negative effect would, in itself, justify the refusal of the application.

Impact on Social and Community Infrastructure – Health Services

A large number of objections have been received from local residents expressing concern that there is inadequate community infrastructure in the form of public health and social care services to meet the needs of the proposed future residents; citing existing problems accessing public health services, particularly primary care facilities (getting GP appointments etc.). Although no development plan policies require the

provision of new public health services as part of major new housing developments Paragraph 70 of the NPPF does make clear that planning decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

The ES assesses this in detail concluding that existing GP surgeries, hospitals and dental surgeries either have sufficient capacity to service the anticipated additional demands or that the public and private sector will respond to meet need. In order to assess the accuracy of these claims, the health centres and GP surgeries identified in the ES were contacted by the Council's Director of Public Health to clarify their position. As described above only 2 of the 6 practices responded, but the Cheadle Hulme and Bridge House Medical Centres confirmed that the application site was in their catchment area and they would be able to accommodate the likely increase in demand. The centre is located approximately one mile from the application site so is considered a sustainable solution. It is therefore reasonably concluded that no significant harm would arise in planning policy terms. This matter is therefore considered neutral in the overall planning balance.

Local finance considerations

The ES estimates that the proposed housing development could generate:

- £440,000 in New Homes Bonus each year for six years;
- £482,100 in annual Council Tax revenue per annum.

It should however be noted that it is not considered that there are any local finance considerations that are material to the application as no decisions have been taken to allocate any funds realised to mitigating the effects of the development.

Ground conditions and contamination risks

CS Policy SIE3 states that development of contaminated land will be permitted provided that it can be clearly demonstrated that there are no remaining risks from contaminants or that satisfactory remediation measures will be undertaken to make the site suitable for end-users. This policy position is reflected in NPPF Paragraph 120.

The applicant has submitted the following assessments:

Proposed housing development land:

- Phase 1 Desk Study and Preliminary Risk Assessment
- Phase 2 Ground Investigation

The geo-environmental assessment concludes that the risks to human health, plant life and controlled waters are considered low and no specific remedial measures are required. It does however highlight the need for basic ground gas protection measures for each new dwellinghouse, noting that ground gas monitoring work has not been completed. These conclusions are supported by the Environment Agency in respect of controlled waters and the Council's Contaminated Land Officer who

recommends that only conditions requiring further ground gas monitoring and mitigation if proved necessary.

Proposed new school and wider campus development:

- Phase 1 Desk Study and Preliminary Risk Assessment

Based on historic uses of the site, risks from contamination are considered very low to moderate and therefore further intrusive investigations, testing and analysis is considered necessary. It also recommends that further assessment of risks from unexploded ordinance is included given the proximity of historic military installations associated with RAF Handforth. Both the Environment Agency and the Council's Contaminated Land Officer agree with these conclusions and recommend that planning conditions requiring further investigation, including ground gas monitoring, and mitigation if proved necessary.

Subject to the imposition of appropriate conditions, no conflict with these policy requirements are considered to arise and therefore this matter is considered neutral in the planning balance.

Noise

CS Policy SIE3 seeks to prevent new development from being exposed to unacceptable noise impacts. NPPF Paragraph 109 contains broadly the same policy objectives. The applicant has submitted an Acoustic Planning Report in support of their application. Noting that the application site does not lie within the defined noise contours generated by the Manchester Airport flight path, no significant adverse effects that cannot be adequately mitigated with standard double glazing and other mitigation measures identified in the report were identified. The Council's Environmental Health Officer (EHO) has reviewed the report and offers no objection subject to conditions requiring the development to be carried out in full accordance with the mitigation measures and plant noise restrictions set out in the report.

Subject to the imposition of the recommended condition(s), the proposal is considered to accord with noise policy and therefore this matter is considered neutral in the planning balance.

Air Quality

CS Policy SIE3 seeks to ensure that adequate levels of air quality are achieved within buildings and that development that would exacerbate existing poor air quality levels within designated Air Quality Management Areas (AQMA) will only be permitted where it is demonstrated that exacerbation will be mitigated. NPPF Paragraph 124 states that *"planning decisions should ensure that any new development in AQMAs is consistent with the local air quality management plan"*.

The application site is not located in a designated AQMA. The nearest AQMAs are along the A34 corridor and at the junction of Wilmslow Road and Stanley Road. Given the traffic impacts of the proposed development are assessed in the ES as negligible no adverse effects are expected to arise. This echoes the decision to

scope out an assessment of air quality impacts from the ES as significant effects were not considered likely. Despite reaching these conclusions, a significant number of objections to the development have been received on air quality and pollution grounds and in response the applicant has submitted an Air Quality Assessment based on data provided by the Council. That assessment concludes that effects on air quality are 'not significant or neutral' given the limited additional traffic flows generated by the development. The assessment has been critically reviewed by the Council's Air Quality Management Officer who agrees with the conclusions.

Despite not being necessary in air quality terms, the applicant has confirmed that electric car charging points are proposed for the residential development by way of mitigation. Conditions requiring the provision of some electric car charging points across the entire development are nonetheless recommended in accordance with NPPF Paragraph 35.

Despite the objections received, given the absence of significant harm or conflict with local and national planning policies it is considered that air quality effects have a neutral effect on the overall planning balance.

Loss of agricultural land

SUDP Policy GBA2.1 seeks to protect the best and most versatile agricultural land from loss unless it is demonstrated that the agricultural value of the land is outweighed by other factors. This position is echoed by Paragraph 112 of the NPPF that seeks to direct any necessary development to poorer quality agricultural land.

The applicant has submitted a detailed assessment of the agricultural land that would be lost to the housing development if planning permission is granted. The land is currently grassland used for grazing or rough grassland. The assessment confirms that the land is of 'moderate quality' capable of producing moderate yields of a narrow range of crops or lower yields of a wider range of crops - Grade 3b. As the 'best and most versatile' agricultural land is defined in the policy explanation as Grade 1, 2 or 3a land no conflict with these policy requirements arise.

It should be noted that Natural England only become a statutory consultee on agricultural land grounds if more than 20 hectares of Grade 1, 2 or 3a would be lost to a development not in accordance with the development plan. The amount of Grade 3b agricultural land that would be lost to the proposed housing development is approximately 14.8 hectares and therefore this requirement does not apply.

As no conflicts with policy arise from the proposed loss of agricultural land, this matter is considered neutral in the planning balance.

Design considerations

CS Policy SIE1 states that *"development that is designed and landscaped to the highest contemporary standard, paying high regard to the built and/or natural environment within which it is sited, will be given positive consideration"*. This emphasis on design quality is echoed in the NPPF in Paragraph 17 which states that

planning should “*always seek to secure high quality design*” and in Paragraph 54 that states that “*good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*”.

The proposed new school (detailed application)

Green Belt related impacts on openness aside (assessed above), the proposed new school building is considered to be a bespoke and high quality design solution that responds positively to its context.

Access to the new school building would be from the existing access point from Stanley Road leading to a new parking and drop off area comprising 47 disabled parking bays and 10 minibus bays. Hard surfaced areas would be tarmacadam, coloured to delineate pedestrian areas and with edge details to create a smooth surface accessible to its users. Parking areas would be interspersed with planting to soften its visual impact. Access to the new school would be via three access points from the eastern side of the building – one leading to the formal reception area; one student entrance leading to the courtyard and external dining area and a community access to the pool area in the northern ‘shared block’.

The position of the building on campus is set well back from the Stanley Road frontage to maintain the open, parkland campus feel and minimise its visual impact from public vantage points. A 30+ metre soft landscaped buffer including a small orchard is incorporated and retained trees and new planting form a soft landscaped boundary to define the site’s edges. Hard landscaped areas wrap around the southern and western sides of the building to allow teaching, learning and play to spill out from the buildings directly outside. Shelter is provided by an overhanging canopy. A hard and soft landscaped courtyard is also included which serves to provide both useable, sheltered outdoor space whilst ensuring natural light and fresh air can penetrate what would otherwise be a relatively deep-plan building.

The scale and massing of the building is dictated largely by the needs of its users and is limited to a single storey with some double height space. It is significantly lower at 7.8 metres than the former Quad building it replaces (10 metres to ridge) but has a bigger footprint.

In terms of the development’s appearance, it has a high quality, modern appearance and includes a mixed palette of natural looking materials with extensive areas of glazing. The main facing materials proposed are textured facing brickwork with recessed joints and feature bond joints and copper coloured rainscreen cladding. Although the proposed materials are supported in principle, materials specifications and detailing drawings remain outstanding and therefore conditions requiring details to be formally approved are proposed.

In terms of landscaping, high quality trees would be retained wherever possible and new extra heavy trees planted across the site. The proposed landscaping scheme is supported by the Council’s Arboricultural Officer subject to the imposition of appropriate conditions regarding retained tree protection, further planting details etc. Critically, the proposed development respects the parkland feel of the campus. A

fencing plan has been submitted in support of the planning application that includes relatively low level fence types within the site and a new 2.1 metre high weldmesh fence along the southern Stanley Road boundary. The visual impact of this fence would be softened by existing retained trees, hedges and new planting. A section of the submitted Arboricultural Method Statement provides a methodology for its installation to prevent undue harm to existing, retained vegetation. Conditions requiring further details of the proposed fencing along the southern boundary, including colour, together with detailed planting proposals based on the submitted landscape framework proposals are recommended to secure a high quality outcome.

Overall and subject to recommended conditions, the proposed new school development is considered to be in full accordance with the design policies in the development plan and NPPF.

The proposed campus buildings and facilities (outline application with all matters reserved except access)

The proposed development of the remainder of the campus included within the application site is in outline form with all matters reserved except access. Detailed parameters for these proposals are described above and shown on the plans appended to this report. Those parameters are considered appropriate and respectful of the site's context and it is recommended that conditions are attached to any consent limiting the development to those parameters. Detailed design solutions would be assessed at the reserved matters stage(s), access however is included as a detailed matter to be considered at this outline stage.

The submitted site masterplan provides an appropriate access framework showing the proposed access routes into and around the campus component, although detailed designs and specifications remain outstanding. It is therefore considered necessary to impose conditions requiring further details of all access routes and specifications for them; parking provision including cycle and motorcycle parking provision.

Access to the campus remains from Stanley Road although a widened access slightly to the east of the current access point is proposed that will improve visibility splays making it easier for vehicles of all sizes enter and leave the site. This will result in the loss of trees and some vegetation but compensation would be secured at the reserved matters stage.

At this outline stage and subject to recommended conditions no conflicts with design policies in the development plan and NPPF are considered to arise.

Proposed housing development (outline application with all matters reserved)

Following a period of negotiation, the proposed development of up to 325 new houses is in outline with all matters of detail reserved for determination at a later date. Where all detailed matters are reserved, applicants are still required to state the area or areas where access points to the development proposed will be situated. The applicant has submitted a revised plan showing vehicular access to the housing land from Wilmslow Road only at the junction with Queensway to create a

crossroads. Discussions during the course of the application highlight the need for a signal controlled junction to accommodate traffic generated by the development and the Council's Highway Engineer is comfortable that this would provide a safe and effective access point. A separate pedestrian access would also be retained by incorporating the existing public right of way that crosses the site that connects to services, facilities and neighbourhoods nearby.

Despite all detailed matters remaining reserved for consideration at a later date, the submission includes a detailed design appraisal of the site. Illustrative masterplans are provided showing how a high quality design solution could be delivered on the site incorporating existing landscape/green/blue infrastructure features such as the brook corridor, hedgerows and field patterns, linear greenspace along the route of the public right of way; the required elements of public open space in the form of play areas, SUDS attenuation features etc. In order to promote a positive outcome conditions are recommended requiring the reserved matters to be in accordance with the landscape and visual impact mitigation measures set out in the ES.

It should also be noted that at approximately 30 dwellings per hectare (net), the proposed density of the development is relatively low and reflects the suburban character of neighbouring homes and streets in accordance with CS Policy H1. Similarly, CS Policy CS3 requires all residential development to be built to minimum densities of 30 dwellings per hectare to prevent an inefficient use of land but given minimum densities would be achieved, no conflict with this policy would arise. It should be noted that the densities proposed in the Draft GMSF are significantly higher at 40+ dwellings per hectare (net).

Overall, and subject to the recommended conditions, the proposals are considered to accord with relevant design policies in the development plan and NPPF, however, given these fundamental requirements apply to all development requiring express consent compliance is considered neutral in the overall planning balance in this case.

Sustainable Design and Construction

CS Policy CS1 states that the Council will seek to ensure that all development meets an appropriate recognised sustainable design and construction standard where viable to do so particularly in respect of the achievement of carbon management standards. CS Policy SD3 requires all major developments such as this to achieve levels of CO₂ reduction based on a benchmark set by the Target CO₂ Emissions Rate (TER) embodied in the 2006 Building Regulations. In this case, CS Policy SD3 requires a 40% reduction in CO₂ for the proposed new dwellings and a 30% reduction for the proposed new school and campus buildings. Policy SD6 requires development to avoid, mitigate or reduce the impacts of climate change through the incorporation of sustainable urban drainage systems (SUDS) and measures to mitigate the urban heat island effect. These policy objectives and requirements are broadly reflective of the policies contained within the NPPF Paragraphs 93-108.

The applicant has submitted a Sustainability Statement in support of their application.

In terms of energy reduction, the application site is not located in a decentralised energy network development area and therefore CS Policy SD4 is not considered relevant in this case; instead, Target 2 CO₂ TER applies to the development. The submitted statement confirms that the residential development will achieve a 40% minimum reduction in CO₂ through a 'fabric first' approach utilising improved levels of thermal insulation; highly efficient windows; energy efficient lighting, high levels of air-tightness etc. A detailed energy statement has been submitted in respect of the proposed new school building that states that the new school will achieve a 42% improvement against the 2006 TER in accordance with policy again by utilising a 'fabric first' approach. The applicant has also clarified that the Energy Centre built as part of the new housing development on campus will serve the entire SST campus akin to a district heating network. This Energy Centre is powered by efficient gas fired boilers supplemented by solar thermal technologies. The applicant has confirmed that the Energy Centre can be adapted to support biomass use and that this will be considered at a later date as part of the proposed wider campus development. The Energy Centre does not have the capacity to serve the proposed housing development.

In order to ensure a satisfactory outcome, it is considered necessary to impose conditions requiring the proposed school building to be delivered in accordance with the submitted details and conditions requiring the submission, written approval and implementation of energy statements for the proposed housing and campus buildings before development commences.

In terms of the use of SUDS this requirement is addressed in the flood risk and drainage section above. Similarly, the provision of green infrastructure and biodiversity considerations are considered elsewhere in the report.

The broad support of the Council's SMBC Energy and Sustainability Officer for the development is noted as is the applicant's pre-assessment ratings in respect of both Stockport's Sustainability Checklist (silver rating anticipated) and Building for Life 12 (green score with the potential for an 'outstanding' award).

Subject to the recommended conditions, the proposals are considered to accord with relevant sustainable design policies in the development plan and NPPF, however, given these fundamental requirements apply to all development requiring express consent, compliance is considered neutral in the overall planning balance in this case.

Crime prevention

CS Policy SIE1 confirms that the safety and security measures should be incorporated into designs whilst not compromising overall design quality. In response, the applicant has submitted a Crime Impact Statement prepared by Greater Manchester Police (GMP) in support of their application.

In response to consultation, GMP confirm their overall support for the development subject to the adoption of their detailed design recommendations relating to the proposed school building. GMP state that the security of the school building is very good but go on to make a series of detailed design recommendations relating to the school building's design and its management. It is considered necessary to impose

a condition requiring details of how those recommendations will be addressed prior to first use of the new school building.

Advice is also provided on the outline campus and housing elements of the proposals but given detailed matters have been reserved for consideration at a later date a detailed assessment cannot be made at this stage.

Subject to the imposition of the recommended condition and detailed assessments of the outline components at the reserved matters stage, the proposal is considered to accord with policy and therefore this matter is considered neutral in the planning balance.

Residential Amenity

CS Policy SIE1 seeks to ensure adequate levels of privacy and amenity for existing and future residents are provided. NPPF Paragraph 17 reflects this policy objective. It is not considered that the proposed school building will adversely affect the amenity of existing residents given its position within the campus relative to the nearest sensitive receptors. An assessment of any adverse effects arising from the proposed housing development and campus buildings and facilities would be undertaken at the reserved matters stage(s) when detailed layouts and designs are known. Given the current absence of any harm, the development is considered to comply with policy and therefore these matters are considered neutral in the overall planning balance.

Recreation, open space provision and public rights of way (PROW)

Enhanced sports and recreation facilities on campus

CS Policy AS2 seeks to provide sufficient and improve indoor sports provision in Stockport with specific reference to educational establishments providing dual use facilities, especially where the proposal would help to address inequalities. It also states that the redevelopment of existing indoor sports facilities will only be appropriate where it is sufficiently demonstrated that alternative provision of no less quality and of appropriate scale is provided...where this would contribute to addressing inequalities. This policy reflects the requirement in Paragraph 74 of the NPPF.

The proposed inclusion within the Trust's proposals of improved, replacement, indoor sports facilities, including new swimming and hydrotherapy pools in the new school building and a new sports hall in the northern part of the site adjacent to the proposed new 3G all weather pitch approved under planning permission ref: DC/059242 (see above), would deliver significant improvements to existing facilities that are now dated and in the case of the Sports Hall, undersized. SST already actively promote dual use of their facilities by making them available to the wider community when not in school or college use whilst also promoting inclusive children's sports activities under their CADS scheme (children's able and disabled sports) with clubs offering activities such as climbing, football and young people's gym sessions. Multi-sport CADS events are also provided during school holidays. Swimming lessons and aqua classes are also offered together with community

access to their fitness suite. SST are committed to continuing to actively promote community use of their new facilities and this is clearly valued by the users of the facility as reflected in the public expressions of support received. Sport England and the Council's Director of Public Health have also confirmed their support for proposals.

It is therefore clear that, subject to the use of planning conditions requiring community use agreements to be submitted, approved in writing and implemented in full, the provision of new and improved dual use sports facilities on the SST campus are beneficial in recreational, public health and planning policy terms. It is considered that this is a material consideration that should be afforded moderate weight in favour of the proposals.

Recreation and children's play space provision to serve the proposed housing

CS Policies CS8 and SIE2 make it clear that developments must provide sufficient and adequate recreation and amenity space to meet the needs of its users and occupiers. Similarly, UDP Policies L1.1 and L1.2 seeks to ensure sufficient land for active recreation and children's play is provided to meet the needs generated by new development. This requirement is echoed in Paragraphs 70 and 73 of the NPPF.

The proposed housing development of up to 325 new will generate the need for both the provision of children's play space within the housing development and the provision of formal recreation facilities. As precise needs are based on population calculations and the number, size and mix of dwellings is not yet known, precise requirements cannot yet be calculated. Nonetheless, the applicant's Design and Access Statement have indicated that children's play space and facilities, likely to comprise a 3 Neighbourhood Areas of Play (NEAP) and three Local Areas of Play (LAP), would be provided as part of the proposed housing development. This would be assessed in detail at the reserved matters stage when details of landscaping layout are considered.

The housing development will also generate the need to make provision for formal outdoor sport and recreation in accordance with the Council's adopted standards. Clearly, the already consented 3G all weather pitch on the campus if delivered has the potential make a significant contribution to meeting these requirements providing community use of it is secured. Condition 13 of the planning permission requires the submission, written approval and implementation of a community use agreement that is yet to be discharged but during the course of the application process SST have made clear their intention to submit it in due course. It has therefore been agreed that a proportionate reduction in commuted sums would be applied if the 3G all weather pitch is delivered and community use secured following the formal approval of community use agreement. Residual commuted sums would then be payable for provision off-site secured by way of a legal agreement under Section 106 of the Act. Decisions on which improvement schemes/new facilities that the commuted sums would fund would be clarified at reserved matters stage once actual figures are known.

It is therefore clear that, subject to the use of planning conditions requiring community use agreements to be submitted, approved in writing and implemented in

full, the provision of new and improved dual use sports facilities on the SST campus are beneficial in recreational, public health and planning policy terms. It is considered that this is a material consideration that should be afforded moderate weight in favour of the proposals.

Subject to review at reserved matters stage and the completion of legal agreement securing the requisite commuted sums, the proposals are considered to accord with relevant recreation and open space policies in the development plan and NPPF, however, given these fundamental requirements are generated by the new housing and apply to all major housing developments requiring express consent, compliance is considered neutral in the planning balance in this regard.

Impacts on and improvements to PROW

UDP policies L1.7 and L1.8 seek to protect and enhance the public rights of way and other recreation routes. This policy objective is reflected in Paragraph 75 of the NPPF.

The proposed housing development encompasses PROW Cheadle and Gatley 96 that crosses the site in an east – west direction and goes on to connect to the wider public right of way network. The PROW is currently an unsurfaced field footpath crossing private agricultural land following the route of a field hedgerow. As all detailed matters are reserved on the housing component, details of how the PROW will be incorporated into the detailed design of the housing development remain unknown, however, the applicant's Design and Access Statement and the ES indicate that the route of the PROW and field boundary hedgerow would be retained and incorporated into a 'Green Lane' or green corridor. Its retention and inclusion form part of the proposed mitigation measures in the ES and it is considered necessary and appropriate to secure these measures by way of a condition(s) to ensure the development complies with relevant local and national policies. Furthermore, in order to deliver enhanced connectivity and promote sustainable transport choices, the applicant has agreed to fund surfacing enhancements to the PROW network to the east of the application site to promote greater usage and deliver seamless connections to the wider network that has recently been enhanced by the Council. Commuted sums would be secured in a Section 106 legal agreement.

These improvements are considered to offer significant public benefits that officers believe should that should be afforded moderate weight in favour of the proposals.

Airport safeguarding

SUDP Policy EP1.9 states that development that would adversely affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted. Manchester Airport have been consulted on the application and raise no objection subject to the imposition of conditions and informatives set out above. It is recommended that these conditions and informatives are added to any consent. Given the above, the proposal accords with policy and this matter is considered neutral in the planning balance.

Utilities infrastructure

The applicant has submitted a Utility Statement that provides confirmation that local utility providers' networks are able to support the proposed housing development.

Electricity North West have confirmed that they are able to supply the site with electricity based on the assumption that four new sub stations will be required within the application site.

National Grid operate the local gas network and have confirmed their network is able to support the proposed development in its entirety using the medium pressure main on Wilmslow Road as a connection point.

United Utilities own the local water and sewerage network and have confirmed they are able to serve the proposed development via new connections to existing mains on Wilmslow Road.

BT Openreach is the provider for connection to the UK telecommunications network who are obligated to provide capacity to serve the development.

Given the above no barriers to delivery in terms of utilities connections is anticipated.

Fire safety

CS Policy SIE1 confirms that the safety and security measures should be incorporated into designs whilst not compromising overall design quality. It is proposed that new school building be partially clad in rainscreen cladding. The Greater Manchester Fire and Rescue Service (GMFRS) have been consulted on the application and have raised no objection noting that the development will be subject to Building Regulations Approval.

Given we do not yet have a detailed specification of the proposed cladding materials and in light of recent events at Grenfell Tower, it is recommended that a condition be added to any consent requiring details of all external facing and roofing materials. As part of that approval process, GMFRS and SMBC Building Control will be consulted to ensure fire safety is duly prioritised. It is also recommended that an informative be added to any consent making clear that all cladding must be in accordance with BS 8414 Fire performance of external cladding systems. Given the above, this matter is considered neutral in the planning balance.

Planning obligations

In order to make the development acceptable in planning policy terms, it is recommended that planning permission only be granted for the proposed development if the Council enter into a legal agreement with the applicant to secure the following heads of terms:

- 30% affordable housing to be provided on site
 - Tenure: 50% social rent and 50% intermediate housing unless otherwise agreed by both parties

- Type/mix to reflect local demand, the housing mix delivered on the site and requirements of registered providers
- Any surplus funds realised following the delivery of the Transformation Project (subject to a 10 year long-stop date) will be paid to the Council for the delivery of affordable housing on alternative sites in accordance with the Council's adopted policies and guidance, up to a ceiling equivalent to the 50% policy requirement
- Open book accounting for all income and costs relating to the Transformation Project with annual reports subject to review by SMBC with appropriate dispute resolution mechanisms included (SMBC costs incurred would be borne by SST as part of the overall costs of the Project)
- SMBC to have oversight of residential land sale and construction contracts awards to ensure best value is achieved (SMBC costs incurred would be borne by SST as part of the overall costs of the Project)
- £27,500 to be paid to fund improvements to the PROW of network adjacent to the application site
- £15,000 to be paid to fund improvements to the Finney Lane/Wilmslow Road junction as detailed in the report
- £30,000 to be paid for the provision of cycle way along Wilmslow Road between Bolshaw Road and Stanley Road
- Open Space commuted sums to be paid for children's play and formal recreation provision in accordance with adopted policies (cannot be calculated now as population based formula – would be revisited at the reserved matters stage)

These heads of terms are considered to satisfy the legal tests that require planning obligations to be:

- necessary to make the development acceptable in planning terms
- directly related to the development
- fairly and reasonably related in scale and kind to the development

Other matters

In addition to the planning obligations detailed above and the conditions recommended earlier in the report it is also considered necessary to impose the following conditions should planning permission be granted:

- preventing the commencement of development of any new homes until a contract has been let for at least the new school development
- limiting the commencement of development of new homes to 250 unless contracts have been let for the outstanding 'outline' elements of the Transformation Project
- removing permitted development rights allowing any change of use of SST campus land and buildings without the express consent of the local planning authority

These conditions would minimise Green Belt harm whilst acknowledging the particular circumstances of the applicant.

Condition(s) are also necessary to require the submission of a residential phasing scheme at the same time as the first reserved matters application detailing the provision of on-site affordable housing and open space provision within each phase.

Responses to matters raised in the written representations not dealt with above are provided below:

- Construction related disruption would be managed through the imposition of a construction management plan condition(s).
- Refusing the application on the grounds of prematurity would be unreasonable given GMSF is only in the early stages of development – see national guidance above.
- A development's impact on house prices is not a material planning consideration.
- SST are a registered charity and the school and college are not 'maintained schools'. Local authorities placing children at SST pay a fee to SST for their services and are not responsible for management, maintenance and upkeep of the school/college.
- Although the Council place pupils and students at SST there is not considered to be any conflict of interest arising that would prevent the Council determining the application noting that local authorities are able to determine their own planning applications.
- Some financial and marketing information has been withheld in order to prevent commercially sensitive information being released. The Council has taken the view that it would not be in the public interest to release the information. It is understood that the Council's decision has been referred to the Information Commissioner for review.

Finally, for the avoidance of doubt, although a public right of way crosses the application site, the land upon which the housing development is proposed is private land not public open space.

Planning balance and overall conclusion

The proposed development is located in the Greater Manchester Green Belt and is in conflict with relevant Green Belt policies in the statutory development plan. Planning permission should therefore be refused unless material considerations exist that warrant a decision other than in accordance with the development plan. Importantly, the SUDP policies that are offended make no allowance for exceptions to be made to green belt protections where 'very special circumstances' exist. The NPPF is a material consideration that makes clear that exceptions can be made to the strong presumption against inappropriate development in the Green Belt in 'very special circumstances'. Given the age of the development plan policies that the proposals are in conflict with, it is considered that the NPPF should be afforded overriding weight in this regard. The determination of this application is therefore based on an assessment of whether 'very special circumstances' exist as explained and defined in the NPPF.

Earlier sections of the report identify that the first two ‘very special circumstances’ tests are satisfied – that safeguarding the future of SST in accommodation that is fit for purpose is an essential objective with clear public benefits; and that alternative, less harmful ways of meeting that objective have been fairly and reasonably discounted. The third test is clearly explained by NPPF Paragraph 88 as follows: *“‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”* Clearly, this test or part of the assessment, requires decision makers to weigh cumulative harm against the cumulative benefits of the proposals in planning policy terms and if the benefits clearly outweigh the harm caused then planning permission should be granted.

The development is inappropriate development in the Green Belt, and is therefore harmful by definition. It will also have a detrimental impact on the openness of the Green Belt, resulting in a reduction in openness on the SST campus land and the almost complete elimination of openness on land associated with the housing development. Finally, the proposed development will result in encroachment into the countryside, the protection of which is one of five purposes of Green Belt designation. In accordance with the Paragraph 88, *substantial weight* should be attributed to the harm to the Green Belt caused by the proposed development.

The marked loss of openness arising from the housing component of the development would also have a detrimental landscape and visual impact on the character and appearance of the area. It is considered that this harm should be afforded *significant weight* in the overall planning balance.

The settings of Grade II listed Griffin Farmhouse and the undesignated Outwood House would also be adversely affected, even after mitigation, arising from the loss of open farmland around the buildings. Although the harm caused would be less than substantial, *significant weight* should be afforded to the harm caused to the setting of these heritage assets in accordance with policy and the Council’s statutory duty.

The development would disturb and result in the loss of habitat for protected species that surveys have shown are present on the site. Although satisfied that these effects would be adequately mitigated, the proposals remain harmful nonetheless and therefore it is considered that *limited weight* should be attributed to this harm in the overall planning balance.

Finally, it is anticipated that the proposed housing would generate significant extra demand for mainstream primary school places in the local area that could not be readily absorbed by existing schools in the Borough and no mitigation is proposed. It is therefore considered that significant weight should be afforded this negative impact effect in the overall planning balance. It is important to note however that it is not considered that this negative effect would, in itself, justify the refusal of the application for the reasons given above.

In contrast, the educational benefits generated by the proposed development of the new school and wider SST campus are clear, both in terms of ensuring SST’s accommodation is fit for purpose but also in terms of providing choice in the SEND

sector. It is clear that SST play a very important and distinct role in caring for and educating children and young people with some of the most complex, low incidence and profound disabilities in society that many local authorities and special schools are unable to do themselves. It is also clear from SST's intake that the services SST provide are of more than local importance. NPPF Paragraph 72 is clear that *great weight* should be given these benefits. The importance of this weighting is further reinforced by the public sector equality duty required by Section 149 of the Equality Act 2010 (that recognises that this may involve treating some persons more favourably than others) and other legal obligations.

The proposed development would also make a significant and valuable contribution to meeting Stockport's housing needs both in terms of open market and affordable housing. Given the magnitude of unmet housing need in Stockport when measured against the most up to date objectively assessed need identified in the Draft GMSF and the engagement of the tilted balance in Paragraph 14 of the NPPF, this is considered to be a public benefit that carries *significant weight* in favour of the proposal. This weighting is clearly reinforced by the proposed removal of the site and land around it from the Green Belt and the site's housing allocation in the Draft GMSF, however, the allocation can only be afforded very limited weight in itself given this emerging plan remains in the early stages of development.

The proposed development would also safeguard and provide a sustainable future for SST on its existing site in Stockport. Given SST are a major employer, this together with construction related job creation benefits, is considered to be a clear public benefit that should be afforded significant weight in decision making, as required by NPPF Paragraph 19.

The proposed development will also play a valuable role in providing local residents with access to the new and improved indoor sports facilities helping to ensure that their recreational and sporting needs are met whilst promoting mixed, inclusive, able bodied and disabled sports on campus. The development would also deliver improvements to the local public right of way network. Both of these benefits should be afforded moderate weight in the overall planning balance.

Having assessed and balanced the cumulative harm against the cumulative benefits of the proposed development above, it is considered that the benefits of the proposed development clearly outweigh the harm to the Green Belt, justifying the proposal on the basis of very special circumstances. It follows that the benefits of the proposed development would significantly and demonstrably outweigh adverse impacts in accordance with NPPF Paragraph 14.

This conclusion is supported by the outcome of a recent appeal that was recovered by the Secretary of State (Appeal Ref: APP/B1930/W/15/3051164). The application proposed the redevelopment of Oaklands College, a further education college in the Metropolitan Green Belt in St Albans, whose accommodation was ageing and no longer fit for purpose. The redevelopment of the college will be funded by enabling residential development comprising 348 dwellings, also in the Green Belt. In reaching his decision to grant planning permission for the development as a whole on 1st November 2017, the Secretary of State attributed substantial weight to Green Belt harm but concluded that the educational benefits weighed heavily in favour of

the proposals. Like Stockport, St Albans could not demonstrate a five year housing land supply and significant weight was also attributed to the benefits the proposed housing development would make to addressing this shortfall. Whilst every case raises different issues and must be considered on its own merits, it is clear that this decision raised many planning matters shared and in common with SST's application.

Finally, whilst officers are clear that in this case very special circumstances exist that justify the proposed development in the Green Belt, this recommendation is based primarily on the exceptional nature of the educational benefits offered by the proposals. Despite the housing need issues raised in the report, members will be reassured that Green Belt policy remains strong and applications for residential development in the Green Belt made solely on the basis of housing need are very unlikely to be supported.

RECOMMENDATION

Grant subject to conditions; the completion of a Section 106 legal agreement securing the heads of terms detailed above; and the application having first been referred to the Secretary of State to give him the opportunity to call in the application for his own determination should he wish to do so.

CHEADLE AREA COMMITTEE 12/12/17

Note: The summary provided below has been prepared by planning officers and is not a full transcript of the debate. A webcast of the meeting can be viewed online here:

<http://democracy.stockport.gov.uk/ieListDocuments.aspx?Cld=149&Mld=23125&Ver=4>

The Chair explained the advisory role of Cheadle Area Committee in the determination of the application and the processes associated with the committee's assessment of it. Officers then introduced the application.

Cllr Roberts questioned why the road layout was indicative only and expressed concern that assessments of traffic impact could be inadequate with that uncertainty. Officers explained that access became a reserved matter during the course of the application as SST have not yet sold or partnered with a housebuilder and if it weren't the road layout including all roads, pedestrian access paths and routes would be fixed prematurely.

Cllr Nottingham sought clarification on whether access to the housing land would be from Wilmslow Road. Officers explained that planning law requires applicants to identify indicative access points even when access is a reserved matter and that the applicant proposes that access would be taken from Wilmslow Road at its junction with Queensway. Cllr Nottingham also asked for an overview of the likely traffic

impacts of the development. The Council's Highway Engineer (HE) explained the likely traffic impact to members based on the evidence submitted and the Council's assessment of it. Whilst acknowledging levels of congestion at peak times in the area and indeed across the Borough, the HE directed members to the officer report that assesses traffic impacts. The HE highlighted the relief the opening of the A6 MARR scheme will create on the local road network notably on Wilmslow Road and Finney Lane; the modelling undertaken as part of the application that is considered robust; that the development would not make the traffic situation materially worse than at present; and importantly the impacts would not be 'severe' which is the policy test applied by the National Planning Policy Framework.

Cllr Charles Jones sought clarification on public transport services operating in the area and other alternatives to the car and questioned whether the proposed mitigation measures were adequate. Officers explained that the site's accessibility score is well in excess of the minimum standards required by Core Strategy Policy H2. The HE went on to clarify local bus service frequencies and routes concluding that the site is in an accessible location but that further interventions would be necessary to encourage modal shift and these would be secured if planning permission is granted; measures include cycle lane improvements, controlled crossings and public right of way enhancements.

Cllr Pantall made the point that bus services near the site are limited and finish early and asked whether traffic impact modelling took account of other existing and 'pipeline' developments in the area. HE confirmed that the proposed development of the North Cheshire Growth Village in Handforth has not been taken into account in the modelling as it does not have planning permission. HE also stated that the North Cheshire Growth Village development would be accessed from the A34, as would the proposed retail development and Handforth Dean, and given the proposed development would result in a less than 1% increase in traffic on the A34 they are of limited relevance.

Cllr Nottingham asked whether the beneficial traffic effects of the A6 MARR on Heald Green would be lost if the proposed development went ahead. The HE confirmed that some of the beneficial effects would be lost to the development but not in their entirety and that the proposed junction improvement works at Finney Lane would offer some, albeit minor, additional relief.

Cllr Nottingham then asked officers to clarify the purpose and function of Green Belt policy which they did referring back to the analysis in the report.

Cllr Charles Jones sought clarification on a statement at Page 49 of the report stating that the assessment of traffic impacts is 'tenure blind' and that a significant proportion of affordable housing will further reduce traffic impacts due to statistically lower levels of car ownership. The HE stated that amount of affordable housing being proposed on site is 30% and that impacts would be assessed again at reserved matters stage if planning permission is granted.

Eileen Jensen (a local resident) and Peter Burns of the Heald Green and Long Lane Ratepayers Association then spoke in objection to the development. Whilst

acknowledging the importance of SST, they stated that the officer's assessment failed to take account of the development of thousands of new dwellings in Handforth. They challenged the officers' conclusion that very special circumstances exist asserting that SST are comparable to other special schools and should not be considered 'a special, special school' and therefore cost assumptions on which the case is based are unproven stating that the school could be rebuilt for £4M rather than the £45M proposed. They then went on to state that the Oaklands College planning permission granted at appeal by the Secretary of State and referenced in the officer report at Page 162, is not comparable as this was for a far larger further education college accommodating 2500 full-time students. They argued that an important reason for granting planning permission in that case was that there were no feasible alternatives and in this case there are as evidenced in the objections submitted asserting that suitable new accommodation could be built with the £15M SST are able to raise themselves without the need for cross-funding housing development. They stated that the onus is on the developer to prove very special circumstances exist and SST have failed to do so particularly when the proposals are assessed against government guidelines.

Cllr Somekh then asked whether the objectors understand the profundity and complexity of the disabilities of the children and young people at SST. The objectors argued that they have compared like with like in their comparative assessments.

Cllr Pantall asked the objectors to clarify their position and confirm that they are supportive of the principle of the SST campus being redeveloped but are opposed to the proposed scale and scope of the redevelopment. The objectors confirmed that to be the case stating that the campus could be redeveloped with the £15M SST are able to raise without building houses in the Green Belt.

The applicant then spoke in favour of the application with Mark Geraghty (SST Chief Executive and Principal) and a parent of a child at SST sharing the 6 minutes allocated to them. They highlighted the specialist nature of SST work confirming that every child and student in their care have failed in local authority SEND school settings including many that have been judged outstanding by OFSTED. They highlight that the campus was built over 65 years ago for 250 intellectually able, ambulant deaf children and that the needs of their current cohort are very different and are not being met in their current accommodation and act as a significant barrier to the children's progress undermining their preparation for adulthood. They went on to highlight the need for highly bespoke building design solutions to meet the needs of the children and young people as proposed. They state that every child in the school requires one to one support. They stated that SST are a national centre of excellence and many parents of children at the school have searched the country in an attempt to find a suitable school for their child finding that SST is the only suitable option. They stated SST have exhausted all other alternative funding options including capital government funding and that the proposals will enable children at SST to flourish and thrive in suitable environment leaving a legacy for families now and in the future. A parent of an 18 year old young person at SST who is registered as deaf-blind, has multi-sensory impairment, is severely autistic, non-verbal, epileptic, double incontinent with the mental ability of a six month old baby amongst

other disabilities then spoke. They stated that their child moved to SST in 2013 travelling from their home town of Huddersfield but have since moved to Stockport. The young person used to be educated and cared for in a traditional special needs environment in Huddersfield for years without making any progress at all and indeed began to regress and started to self-harm. They moved to SST as their needs were not being met in the typical special school in Huddersfield.

In light of the objections made on the scale, scope and cost of the proposed school and campus facilities, Cllr Roberts asked Mark Geraghty to explain SST's position. He explained that the overall costs are far more than just the proposed new school and include the almost complete redevelopment of the campus as a whole to bring it up to specification. The parent of the child at the school also commented that the school her child left in Huddersfield was a new build school in Kirklees that cost £3M but failed to meet the needs of their child.

Cllr Charles Jones then stated that financial matters are of central significance and questioned what had been done to consider alternative sites. Officers confirmed that the consideration of alternative sites is addressed in the officer report and also formed an important part of the Environmental Statement submitted in support of the application.

Cllr Nottingham then stated that everyone recognises the value of SST and acknowledges the school's outstanding OFSTED rating but then questioned whether the proposed development was necessary given the recognised quality of SST services in their existing accommodation. Mark Geraghty made clear that OFSTED inspect teaching and learning and do not comment on the quality of school's accommodation unless there are clear safeguarding problems evident to inspectors.

Cllr Somekh, having visited SST with officers earlier that day, asked SST what the difference was between the children SST educate and care for compared to the children attending typical SEND schools. Mark Geraghty made clear that there are a range of children's special educational needs but made clear that there are groups of children who require specialist input. Teachers and carers at SST provide that service and have specialist mandatory qualifications to care for children who are deaf, blind or deaf and blind. He complimented the three Council run SEND schools in Stockport who are all rated outstanding but highlighted the fact that typical SEND schools refer children to SST as they are unable to meet those children's specialist needs due largely to their multi-sensory impairments. That is what sets SST apart from other SEND schools and that is recognised by the Council's Education Department in the officer's report.

Cllr Charles Jones then asked about the 'clawback' provisions in the officer report and the proposed 10 year long-stop date proposed. Officers explained the reason for that provision highlighting that elements of the campus proposals remain in outline form and that a ten year delivery period is a realistic and reasonable timescale given the scale of the project and the need for SST to raise £9M via charitable fundraising campaigns.

Cllr Pantall then asked how SST services complement the work of other service providers. Mark Geraghty explained that an important part of SST's work is to build capacity in typical SEND schools but again stressed that the children and young people at SST have been referred to SST by local authorities across the country as they are unable to meet those children's very specialist needs themselves.

Cllr Charles Jones then commented that smooth external surface finishes may not be accessible to cane users and guide dog users.

Cllr Nottingham commented that a cost breakdown is contained within the report.

Cllr Roberts, however, then stated that he believes insufficient evidence is available to persuade him that the proposed quantum of housing development in the Green Belt is necessary but noted the committee's advisory role. He believes further financial justification is required as insufficient information is before him to enable him to reach a conclusion. Cllr Pantall echoed that position and suggested that benchmarking against comparable schools would be helpful if possible.

Officers responded by highlighting that a detailed assessment of whether the scale, scope and cost of the proposed development were justified has been carried out by those with necessary expertise to make that assessment and their conclusions are already set out in the officer's report. They also highlighted that comparative assessments cannot be readily undertaken due to the very specialist nature of SST work and there is no data available to benchmark costs against.

Cllr Nottingham stated that everyone acknowledges the special nature of SST but highlighted the need to focus on the 'very special circumstances' planning policy test. He highlighted the fact that the objectors' case is in direct conflict with SST's position in terms of the scale, scope and cost of the proposed development and whilst acknowledging the housing pressures in Stockport, he also stressed the need for Green Belt protection as it's a finite resource. He acknowledged the need for the transformation of the campus noting the age of some of the campus buildings but stressed the need for a balanced judgement. He also emphasised the advisory role of the committee. He stressed that the application requires a balanced decision to be made about two precious commodities – children's welfare and the protection of the Green Belt – and expressed his concern that the application is based on the argument that in order to have one you must lose the other. He stated that he remains unconvinced that the £45M cost is justified and unless it is proved he would not recommend that the application be granted.

Cllr Porgess stated whilst he agrees with a lot of what Cllr Nottingham said he stresses the need to ensure the needs of the children and young people at SST are met and he is experiencing similar issues in his role as Chair of the Valuing People Partnership Board. He acknowledged the fact that the component parts of the application cannot be disaggregated but did express concern about problems of traffic congestion in the area and need for PHRC to carefully consider traffic impacts.

Cllr Roberts acknowledged the need to build more houses in Stockport but stated that he believed that previously developed sites should be developed first with the Green Belt only developed if absolutely necessary but he stressed that was not

relevant to this application and instead is a matter to be addressed as part of the development of a new Local Plan. He did express concern about traffic impacts, the adequacy of transport infrastructure and infrastructure provision problems that planning application led Green Belt release can create due to the limited thresholds for infrastructure contributions applicable to individual planning applications and the fragmented approach to traffic mitigation.

Cllr Charles Jones stated that local people would not really feel the benefit of the development if it were to go ahead given local residents can already access the existing sports facilities at SST. She expressed concern that the policy requirement for 50% affordable housing on the site was not being achieved. She also stated that Outwood and Bolshaw Primary Schools are already full to capacity forcing children and parents to travel further afield contributing further to the traffic impact of the development and that the £900,000 cost of school expansion would have to be met by the Council.

Cllr Pantall highlighted that PHRC have to either approve or refuse the application but stressed that there was some flexibility in the application given some campus elements are in outline only at this stage. He also stressed the need for PHRC to carefully consider the traffic impacts of the development. He also stressed the need to ensure that we build new communities not just houses and suggested PHRC visit the site on public transport.

To conclude, the Chair stressed the advisory role of the committee and sought members' agreement on the following summary of comments as follows:

- PHRC should carefully consider the appropriateness of the size and budgeted costs of the proposed Transformation Project with some members stating further information is required
- That the traffic and transport infrastructure provision in the area needs further assessment
- The Transformation Project would not benefit local people
- The Committee accepts that SST is a very special school that is highly regarded and does very good work and that SST should be supported within reason
- The loss of Green Belt is of concern and PHRC must ensure that an appropriate balance is struck between Green Belt Protection and the needs of the children and young people at SST
- PHRC must visit the site before making a decision

Members agreed that as a fair summary of their collective position.

BRAMHALL AND CHEADLE HULME SOUTH AREA COMMITTEE 14/12/17

Note: The summary provided below has been prepared by planning officers and is not a full transcript of the debate. A webcast of the meeting can be viewed online here:

<http://democracy.stockport.gov.uk/ieListMeetings.aspx?CId=142&Year=0>

The Chair and the Democratic Services Support Officer explained the processes associated with the committee's assessment of it. Planning officers then introduced the application highlighting the advisory role of the committee highlighting that due to its scale it must be determined by the Planning and Highways Regulation Committee on 11 January 2018 and the limited impact on the Bramhall and Cheadle Hulme South Area Committee area.

Cllr Bagnall then highlighted the fact that in July 2016 the Council wrote to the applicant stating that the case for very special circumstances had not been made and asked what has changed? Officers replied by stating that there has been a series of further submissions from the applicant since then as detailed in the report and that detailed negotiations have also taken place that have led officers to conclude that on balance very special circumstances do exist in this case. For example, the level of affordable housing proposed has increased from 10% to 30% with the potential for more should surpluses be realised. There has also been further submissions about the educational need for the proposed development.

Cllr Bagnall then stated that 30 dwellings per hectare is a low density and asked could this be increased at reserved matters stage and does an outline planning permission establish the principle of development of the Green Belt on this site? Officers confirmed that is indeed the case as all detailed matters in respect of the proposed housing development have been reserved for consideration at a later date.

Cllr Bagnall then stated that some financial information has been redacted and remains confidential and asked whether members could have access to that information. Officers explained that most but not all financial information has been made public as some of it is commercially sensitive and it is not considered that it would be in the public interest to release it as it would prejudice the Trust's ability to secure best value from the market. Officers then stated that all the financial information has been carefully assessed by officers and professional advisors and their conclusions are duly set out in their report. They also stated there is sufficient information before members to enable them to make a recommendation or determine the application.

Cllr Bagnall then asked whether development would affect the setting of the heritage assets. Officers confirmed that it would and those effects would be adverse as explained in the officer report.

Cllr Bagnall then queried the officer report in respect of whether the extension of existing secondary schools in the Borough will accommodate the increased demand for places highlighting the conclusions in the Schools Forum report dated 28 September 2017. He also asked officers to confirm that there is no contribution proposed to meet the £900,000 cost of expanding local primary schools to meet the increased demand for places generated by the proposed housing development. Officers confirmed that colleagues in Education have confirmed that there is no immediate need to expand secondary place provision in the south of the Borough

following the grant of planning permission and delivery of the new Laurus Trust Free Schools in Cheadle Hulme. Officers then explained that the development would generate the need for further primary school places equivalent to a 0.5 form entry primary school but that contributions were not sought from the Trust as there is currently no policy requirement for education contributions in Stockport.

Cllr Bagnall then asked what evidence has been provided that SST are different to other SEND schools. Officers responded that they have sought the input of expert colleagues in Education who have independently verified the difference between typical SEND schools and SST as set out in the report.

In respect of the housing development, Cllr Bagnall then asked whether we would build a community or just houses. Officers replied by stating that no other uses are proposed but if the houses were built residents would become part of the wider Heald Green community.

Cllr Wyatt asked for clarity on the 'very special circumstances' policy test for the benefit of the public. Officers explained that it essentially a planning judgement involving balancing the public benefits of the proposal against the harm, including Green Belt harm that would arise with particular reference to planning policy. They went on state that they have identified the benefits and harms that would arise and apportioned weight to each effect or factor in accordance with planning policy. Officers made clear that in their view the planning balance is tipped clearly in favour of granting planning permission.

Cllr Wyatt then asked how weight is apportioned to each factor in the overall planning balance. Officers confirmed that weight is apportioned in accordance with planning policy. For example, the National Planning Policy Framework makes clear that 'substantial' weight must be given to Green Belt harm and 'great' weight should be given to the need to expand, alter or create new schools.

Cllr McGahan then stated that the cost of additional primary school places would need to be met by the Council he also questioned whether a shortfall of secondary places would also arise questioning whether officers had answered the question properly stating that at the officer briefing members were told that Wilmslow High School would be unable to meet additional secondary school place demand. He also questioned whether the position taken in the July 2016 letter from the Chief Planning Officer should have changed highlighting that it found that the submission did not represent a robust case in respect of alternative solutions. It also highlighted the traffic impacts on Finney Lane and the lack of public transport in the area. He also highlighted the proposed low density of housing and asked what benefit would the development bring to residents in the area?

In response, officers confirmed that the Chief Planning Officer's letter was made during the course of the application process and that a lot has happened since that letter was written and that the application has been with the Council for nearly two years and officers believe that we now have sufficient information to enable members to make a decision. In terms of the increased demand for school places, officers confirmed that central government funding is allocated to local authorities to

help address increased demand ('basic need' funding). In terms of housing density, officers confirmed that whilst low the density is in accordance with local planning policies. In terms of accessibility, officers also confirmed that the site's overall accessibility is in accordance with local policy requirements. Officers also made clear that the applicant's submission also details how central government funding has been sought but was unavailable to the Trust. Finally, in terms of benefits to local residents officers confirmed that they are set out in the report. Officers then highlighted the housing need benefits and educational benefits offered by the proposal.

Cllr McGahan then asked for a geographical breakdown of those objecting to the proposal and those supporting it. Officers confirmed that expressions of support have come from across the country, including locally, reflecting the fact that the application is of more than local importance. Officers also confirmed that the objections have unsurprisingly been mainly from the local area.

Cllr McGahan then asked whether there was an intention to connect the site to the A34 at Eden Park Road and asked whether this would predetermine applications for further development in the Green Belt. Officers confirmed that there is no intention to prejudge other schemes but stressed that it must be acknowledged that the Draft Greater Manchester Spatial Framework is currently proposing the release of the application site and land around it from the Green Belt but this can only be given very limited weight in decision making given the plan is at a very early stage of development and significant changes are likely to follow. Officers explained they have been keen to ensure that any development would not prejudice the delivery of the plan allocation should it be formally adopted at a later date. Cllr McGahan commented that traffic lights have already been added to the roundabout at Eden Park Road.

Cllr McGahan then highlighted the potential for the scheme to create traffic congestion and asked what mitigation measures are proposed including public transport improvements. Officers responded by stating that the traffic impact of the development has been modelled and carefully assessed using data from the model adopted for the A6MARR and SEMMMS scheme. Officers acknowledged that there would be traffic impact on Wilmslow Road and at the junctions with Finney Lane and Stanley Road but none are considered 'severe' which is the policy threshold set by the National Planning Policy Framework. The reason impacts are not judged 'severe' is due to the relief on the local network created by the A6 MARR scheme currently nearing completion. Officers then stressed that the proposed scheme would not return traffic to the pre-A6 MARR levels. Officers then explained the benefits of the proposed mitigation measures at the Finney Lane junction and stressed that the impacts on the Cheadle Royal junction are considered negligible (less than 1%). The same is true at the A34 Stanley Road junction. Officers made clear that they do not think that an objection on traffic grounds could reasonably be sustained. In terms of public transport accessibility, officers confirmed that whilst not the most accessible location in the Borough its accessibility score is in excess of local policy requirements. Officers then explained their view that mitigation measures have been secured to improve and promote transport by sustainable

modes including improvements to the public right of way network, pedestrian crossing points and the addition of cycle lane infrastructure on Wilmslow Road.

Cllr Bodsworth asked officers to clarify the proposed affordable housing overage or clawback provisions to mitigate the shortfall in affordable housing provision, specifically whether or not policy compliant levels would be guaranteed. Officers confirmed that 30% on-site provision would be secured from the outset and the proposed overage or clawback provisions would also ensure that should surplus funds be realised then affordable housing commuted sums would become payable up to ceiling equivalent to the 50% provision local policy requirement. Officers confirmed that further contributions cannot be guaranteed at this stage as actual costs and revenue from any land sale are not yet known.

Cllr Hunter then clarified that the committee's role is advisory only and does not have the authority to determine the application. He also stated that regardless of your views on GMSF it is clear that difficult decisions on major housing developments in the Borough are on the horizon. He then stated that he disagreed with the officer's conclusions on the likely traffic impact of the development and assumptions made about likely direction of travel from the housing development on Wilmslow Road making clear that he thought a greater proportion of movements would be northwards towards Manchester than has been assumed. In response, officers confirmed that traffic distribution assumptions are based on 2015 survey data that are considered reliable.

Cllr Hurleston sought clarification from officers that were the housing development proposed in isolation would housing need be sufficient to demonstrate 'very special circumstances' justifying housing development in the Green Belt. Officer's confirmed that it would be very unlikely as clarified by the 2014 Ministerial Statement.

Cllr Bagnall then asked whether the additional capacity on the local highway network created by the A6 MARR would be taken up by the proposed development. Officers confirmed that some relief would still be realised after the development.

Cllr Bagnall then raised the possibility of a future road connection through to the A34/Eden Point roundabout. Officers confirmed that such a link does not form part of the application and if it were it would probably not be considered 'inappropriate development' in the Green Belt as necessary local transport infrastructure is expressly excluded from the definition of 'inappropriate development' in the National Planning Policy Framework.

In reference to the reasoned justification for Draft Greater Manchester Spatial Framework allocation set out on Page 42 of the report, Cllr Bagnall asked officers whether the scheme would deliver "*significantly improved public transport and highway infrastructure*" identified as a prerequisite. In response, officers explained that the scheme would deliver improved bus stops, cycle lane provision and significant enhancement to the local public right of way network and it would deliver clear benefits to public transport infrastructure in the area.

Cllr Holt expressed concern about the adequacy of public transport infrastructure in the area and asked officers if surveys of public transport infrastructure have

indicated they are actually used? Officers responded by confirming that the recently improved public right of way network to the east is now well used and the proposed enhancements would further promote walking and cycling. There is also clear evidence that the Wilmslow Road cycle paths are well used in terms of much improved accident data following the introduction of cycle lanes on Wilmslow Road. Officers also highlighted that local shops, services and schools are within walking and cycling distance of the site. Officers also stated that bus services do serve the site on Wilmslow Road and Stanley Road.

Cllr Holt also asked about the air quality impacts of the scheme. Officers confirmed that the site does not lie within an air quality management area and that an air quality assessment has been submitted as part of the application. Specialist officers have reviewed that assessment and agree with its conclusions that air quality impacts would be negligible.

Eileen Jensen (a local resident) and Peter Burns of the Heald Green and Long Lane Ratepayers Association then spoke in objection to the development. Whilst acknowledging the importance of SST, they challenged the officers' conclusion that very special circumstances exist asserting that SST are comparable to other special schools and should not be considered 'a special, special school' and therefore cost assumptions on which the case is based are unproven stating that the school could be rebuilt for £4M rather than the £45M proposed in accordance with Building Bulletin design guidance. They then went on to state that the Oaklands College planning permission granted at appeal by the Secretary of State and referenced in the officer report at Page 162, is not comparable as this was for a far larger further education college accommodating 2500 full-time students. They argued that an important reason for granting planning permission in that case was that there were no feasible alternatives and in this case there are as evidenced in the objections submitted asserting that suitable new accommodation could be built with the £15M SST are able to raise themselves without the need for cross-funding housing development. They stated that the onus is on the developer to prove very special circumstances exist and SST have failed to do so particularly when the proposals are assessed against government design guidelines and the costs of building other SEND schools as evidenced in objections.

Cllr Bagnall asked the objectors what dialogue they have had with the applicant. Peter Burns explained that the HGHAG have had some dialogue with the applicant but most had been through planning officers.

Cllr Bagnall then asked how the objectors researched the numbers contained within their objection. Peter Burns explained that the figures in their objections have come from reliable sources including central government figures and published guidance such as Building Bulletins. Cllr Bagnall asked if that data had been supplied to planning officers. Peter Burns confirmed it had.

Cllr Walker then asked whether the application had been twice rejected by officers as suggested by the objectors. Officers stated that there is no obligation on the applicant to rebut objections received to a planning application and that the obligation is on the local planning authority to determine the application based on the

evidence before them, relevant planning policies and any other material considerations.

The applicant then spoke in favour of the application with Mark Geraghty (SST Chief Executive and Principal) and a Mark Ascroft (SST Finance Director). They highlighted the specialist nature of SST work confirming that every child and student in their care have failed in local authority SEND school settings including many that have been judged outstanding by OFSTED. They highlight that the campus was built over 65 years ago for 250 intellectually able, ambulant deaf children and that the needs of their current cohort are very different and are not being met in their current accommodation. They highlighted that many of the pupils and students at SST live on site and require 24 hour support that families struggle to provide – a factor that also distinguishes SST from the other SEND schools quoted by the objectors. Those schools also cater for children with less severe needs. They went on to highlight the need for highly bespoke building design solutions to meet the needs of the children and young people of SST as proposed, stressing that standardised comparisons with other SEND schools is inappropriate and meaningless. They stated the current Royal School Manchester building fails to meet almost all of the Building Bulletin standards and the current accommodation acts as a significant barrier to the children's progress undermining their preparation for adulthood. They stated that every child in the school requires one to one support and that Stockport own Education department have independently verified the need for the proposed design solution and would provide a fit for purpose learning environment for pupils and staff. They asked members to consider why would local authorities place children at SST from all over the country if the same standard of education and care is provided in their own special schools? They stated SST have exhausted all other alternative funding options including capital government funding and that the proposals will enable children at SST to flourish and thrive in suitable environment. They then went on to state that SST is confident that the project cost and revenue budgets are as robust and accurate as possible. They also stated that each stage of the design process has involved input from families, management and staff led by external specialists all of whom have extensive experience in the design and construction of a wide variety of special schools to ensure the development meet the unique needs of the children at SST. They have also sought to ensure that the school's size and costs are minimised wherever possible. They went on to state that costs have been reviewed, challenged and approved by the council's independent advisors concluding that the costs are reasonable. They went on to explain that in a project of this scale actual costs and revenues may not be in full accordance with budget estimates and therefore there would be a fully transparent, open book approach to all actual costs and incomes on the project providing the council with the assurance that any monies raised are only spent delivering the Transformation Project.

Cllr Hunter then asked Mark Geraghty to explain in simple terms why the costs of the Transformation Project are as high as proposed that, on the face of it, seem astronomical compared to typical SEND schools. Mark Geraghty explained that the children at SST are those who have regrettably failed in their local special schools

and their needs and behaviour are so severe that they need a flexible environment that facilitates the delivery of the one to one support SST's pupils and students require for teaching and learning. He explained that in most SEND schools pupils leave the classroom to go to separate therapy rooms but in SST's case therapy needs be embedded within the classrooms themselves due to the complexity of the children's needs. He also stated that the buildings have to be acoustically treated to meet the needs of deaf and partially deaf pupils and students, the lighting of the buildings also has to be specially designed due to the children and young people's visual impairments. These are not matters that a typical special school has to deal with.

Cllr McGahan then asked whether SST have approached their bank and other commercial lenders for a loan as an alternative to what is proposed and how much could SST obtain from borrowing and donations?

Mark Ascroft replied by stating that SST can raise £3M from commercial borrowing, £3M from SST cash reserves and £9M from charitable fundraising activity. He confirmed that SST have approached the bank but as most of SST's balance sheet is tied up in fixed assets the banks don't consider that to be adequate security as they would not be comfortable repossessing a special school in the event of a default.

Cllr McGahan then asked why the Transforming Lives appeal has been put on hold pending a decision on the planning application as two additional years of fundraising activity has effectively been lost and given the timescales associated with the delivery of the project could more funding be raised to negate or reduce the need to build on the Green Belt. Mark Geraghty confirmed that they have discussed donations with various trusts and foundations but none are willing to commit money unless planning permission has been granted.

Cllr McGahan asked why SST's costs are far higher than other SEND schools and if a surplus were realised how would SST spend that money? Mark Ascroft replied by confirming that surplus would be spent on addressing the shortfall in affordable housing provision through the payment of commuted sums for off-site provision.

Cllr McGahan then stated that the floorspace of the buildings appear excessive and asked SST to comment. Mark Geraghty referred councillors back to previous statements about the very unique nature of the children and young people at SST whose needs cannot be met in typical local authority special schools including those who are deaf-blind. There are very few deaf-blind children in local authority SEND schools. SST have to offer a very different, specialist environment and service.

Cllr McGahan then queried why the annual accounts have been redacted as a charity they are a matter of public record and the need for commercial confidentiality do not really apply to SST. He then asked whether the accounts are publically available. Officers then clarified that SSTs accounts have not been redacted and are freely available it is only the project cost and revenue assumptions that remain confidential. Mark Ascroft then confirmed that SST's annual report and accounts for

August 2016 were made public in May 2017. SST's annual report and account for August 2017 are in draft stage and are subject to final audit before being released.

Cllr Bagnall then asked why it was unviable to build a further 65 affordable houses as part of the development? Mark Ascroft replied by stating that SST have always been very conscious of Green Belt policy and the planning balance that would be applied in terms of harm vs. benefit and that they have always sought to minimise the amount of development land in the Green Belt which is why only 10% affordable housing provision was initially proposed. As the application progressed and they became more comfortable with the cost and revenue assumptions following further dialogue in the market SST were able to increase the offer to 30% but do not currently believe it would be viable to increase that level of provision. They went to confirm that they have had numerous discussions with potential developer partners in 2016 as referenced in the planning application.

Cllr Bagnall then sought clarification on the number of pupils on roll at the school and that it would not increase as a result of the development. Mark Geraghty confirmed that numbers would not increase, instead, SST are focusing their attention on offering outreach and capacity building services to local authorities across the country, initially in the North West, partially in recognition in the increase of children needing to access specialist services across the country due to the improved survival rates of premature babies.

Cllr Bagnall then asked whether the label 'special, special school' is a formal designation. Mark Geraghty confirmed it is not rather it is a label to distinguish SST from typical SEND schools and confirmed that SST does not fit into any of the formal SEND school categories as it covers them all.

Cllr Bagnall then asked whether the project would fall if SST fail to secure the £30M for the land sale. Mark Ascroft confirmed that a £4M contingency has been included within the project cost model to provide a cushion if income falls short of that projected.

Cllr Bagnall then stated that the current designs appear very aspirational and asked if other designs or locations have been considered as part of the process. Mark Geraghty confirmed that SST have undertaken extensive visits to other special schools, designs, structures and layouts and there have been numerous iterations leading to the proposed designs. Finally, he stressed again that none of those schools provide for the complexities of disabilities that SST do.

Cllr Bodsworth then asked why significant surpluses have been shown in SST's accounts in the past and how has the money been spent. Mark Ascroft stated that earlier significant surpluses were attributable to SST completing their fundraising for the new residential accommodation on the campus that have since been built and are occupied.

Cllr Walker then sought clarification that housing was that referred to in the officer report and when it was built. SST confirmed it was and that the housing was built in two phases over a two year period and completed approximately three years ago at a cost of just under £10M. SST confirmed that those houses would be retained and

that the old 1950s residential accommodation they replaced is the location for the proposed new school that have recently been demolished.

Cllr Hurleston then asked SST what their assessment of the risk of them not being able to raise £30M for the housing land was and what happens in that scenario. Mark Ascroft replied by stating that they estimate the total cost of Transformation Project to be £41M but that a £4M contingency has been added to cushion against any variance. He also stated that they have had extensive dialogue with housebuilders last year and now have confidence that the £30M assumptions is realistic and has enabled SST to increase the level of affordable housing provision on the site to 30%. If insufficient income is secured SST confirmed that the scope of the Transformation Project would not change significantly but that they would have to seek to deliver it over a significantly longer period of time by extending the capital fundraising appeal. He explained that would have serious consequences and would result in SST operating within a partially completed site that would create operational difficulties for students and staff. They also highlighted the likelihood of increased costs as costs tend to rise continuously. Finally, SST confirmed they are now comfortable with the risk profile given the level of contingency included but that they do believe that the project can be delivered as proposed.

Officers then summarised their position in light of the discussions heard. They confirmed that the test to be applied all planning applications is to determine in accordance with the development unless material planning considerations indicate otherwise. In this case there is clear conflict with Green Belt policies in the development plan which points to refusal unless material considerations indicate otherwise. In this case, it is not really in dispute that SST's current facilities are lacking and in need of improvement. The new facilities proposed are intended to provide the best possible environment for the children they will serve and that has been challenged by the objectors leading them to ask are these of the right specification and necessary to meet SST's needs and are the costs appropriate. Those same questions have been asked by officers who have sought the expert advice of colleagues in Education who have confirmed that what is proposed is fit for purpose they are the right facilities. Having established that, the second question that arises is whether the costs of the project are appropriate and again the Council's cost consultants confirm that they are within reasonable tolerances. That leads officers to conclude that both the scope and costs attributable to Transformation Project are appropriate. Finally, a planning judgement has to be made as to whether the benefits of the developments clearly outweigh the harm that would arise. Officers believe that the educational and social benefits offered combined with the new housing do clearly outweigh the considerable harm that would arise.

Cllr Hunter stated that the application is finely balanced and it is not an easy decision but stressed that the committee is not the decision maker in this case. Cllr Hunter proposed that the committee recommend that PHRC visit the site before making a decision.

Cllr Bagnall stated that this is a very sensitive planning application and nobody can dispute the great work the SST do, however, this proposal has to be judged against

planning policy and the proposal is in conflict with Green Belt policy, would adversely affect the setting of a listed building and the new housing would generate significant extra demand for mainstream school places and no mitigation measures are currently proposed. Cllr Bagnall then requested that members be given access to all supporting financial information. He concluded by stating he was not convinced the proposed solution is the only option available to SST. He highlighted the harm that would arise and concluded that he was not convinced that the benefits would clearly outweigh that harm. He recommended that PHRC undertake a site visit but also stated that in his opinion planning permission should be refused. He then stated that he would like to work with SST and the wider community to find an alternative solution that would meet the SST's needs whilst protecting the Green Belt.

Cllr Bodsworth agreed that the application is finely balanced but stressed he did not support the officer position on affordable housing and considered the failure to satisfy the 50% policy requirement a negative factor. He was also disappointed with the proposals in respect of sustainable design and construction believing they lacked ambition. He then confirmed that he would support Cllr Hunter in recommending that PHRC undertake a site visit.

It was then:

MOVED AND SECONDED – That the Planning & Highways Regulation Committee be recommended to undertake a site visit to assess the overall impact of the proposed development.

AMENDMENT MOVED AND SECONDED - That the Planning & Highways Regulation Committee be recommended to refuse planning permission on the grounds that the proposed development would have a significant detrimental impact on the openness of the green belt and that the Planning & Highways Regulation Committee be further recommended to undertake a site visit to assess the overall impact of the proposed development.

At the request of the mover and seconder and with the consent of the Area Committee, the amendment was then withdrawn.

It was then:

RESOLVED - That the Planning & Highways Regulation Committee be recommended to undertake a site visit to assess the overall impact of the proposed development.