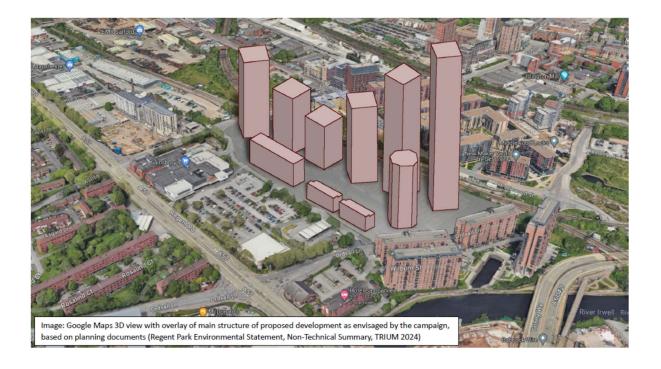
Community Objections to Regent Retail Park Planning Application PA2024/0962



Save Regent Retail Park Campaign

Contents

Ref	Section	Page
0.0	Introduction	2
1.0	Affordable Housing	3
2.0	Traffic and Transport	7
3.0	Loss of Shops and Employment	11
4.0	Green Infrastructure	14
5.0	Local Character and Distinctiveness	19
6.0	Sustainable Neighbourhoods	21
7.0	Daylight, Sunlight, Overshadowing, Noise and Pollution	29
8.0	Climate Change	31
9.0	Appendix A: Planning Applications Ordsall	32
10.0	Appendix B: Recent developments Ordsall and surrounding areas	33
11.0	References	34

Introduction

Save Regent Retail Park Campaign Group is a constituted residents group established for the following purposes:

- Campaign to save Regent Retail Park as an essential local shopping centre which meets the needs of the local community.
- Support people-focused approach to urban regeneration which listens and responds to the needs of the whole community.

The objection report has been agreed and submitted by the group following consultation with the community and in response for concerns raised for the outline planning application PA2024/0962 submitted by Henley Investment Management to Salford City Council for the proposed redevelopment of Regent Retail Park.

The main body of this report is split into the specific areas of concerns, as set out in the above contents list. Each section outlines the local context and objections, with details of related policy where relevant.

Save Regent Retail Park Campaign would like to thank Planning Aid England for their support in the production of this report.

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1.0 Affordable Housing

1.1 Local Context

1.1.1 Reduced affordability of housing has impacted across England in the past 20 years. Table 1.1 shows data from the Office for National Statistics over this period, where the ratio of house price versus average annual earnings in Salford has widened along with the rest of the country. Salford's population growth and growing demand for housing has seen an affordability challenge which is higher than the average for the North West since 2016. As growth continues in future years increasing supply of affordable housing is the key challenge for Salford and for areas driving that growth like Ordsall.

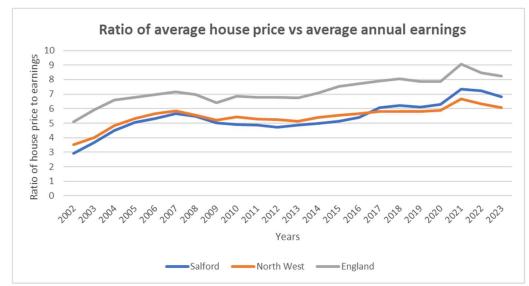


Table 1.1: Ratio of house prices for residence-based earnings between 2002 and 2023: ONS 2023

1.1.2 House Price Statistics for Small Areas data from the Office for National Statistics shows as average property sale prices have increased in Salford over the past 20 years, house prices in Ordsall have mostly stayed above the Salford average.



Table 1.2: Median property sale price Salford & Ordsall between 1996 and 2023: ONS 2023

1.1.3 UK government housing live table data shows Total Net Supply of housing in Salford has been increasing significantly since 2016/17. The percentage of affordable housing of new net supply has struggled to keep up with that increase in recent years. Between 2015 and 2018 new affordable housing was approx. 20% of the total net supply. Since this period new affordable housing is around 10% of Total Net Supply.

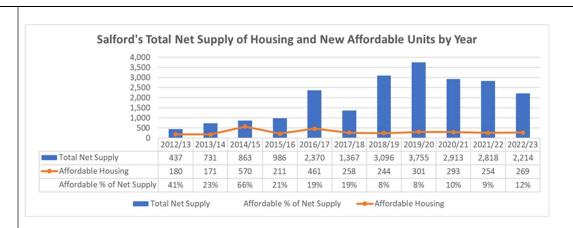


Table 1.3: Salford's net supply and new affordable housing for 2012 to 2023: HOC 2024

1.1.4 A review of the Salford Council Planning Portal identifies between 2016 and 2021 shows planning applications approved for over 4,400 dwellings. During this period the Ordsall ward includes areas which now form part of the Blackfriars & Trinity ward and Quays ward following boundary changes in 2021.

Since 2021 over 1,300 dwellings have been approved in Ordsall, with over 4,800 currently under consideration including Regent Retail Park with 3,300 dwellings. Based on this trend of growth Ordsall will be a key driver of Salford's future net supply of new housing and therefore opportunities to maximise affordable housing delivery. For further details of planning applications see Appendix A.

1.2 Objections

1.2.1 The 2023 National Planning Policy Framework (NPPF) introduces achieving sustainable development in paragraph 7 by stating:

"The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner."

We believe the application is a direct contravention of NPPF policy for sustainable development. The oversupply of expensive luxury apartments without affordable housing or sufficient level of family housing, neither meets the need of the present or future generations of Salford residents. The application does not provide supporting evidence that it will deliver homes, commercial development or supporting infrastructure in a sustainable way. The application does not provide evidence that the type and mix of housing responds to local needs. It does not provide evidence for how the redeveloped commercial space will successfully replace the current well-used Local Shopping Centre which forms an essential part of the local economy. The application viability study confirms the application cannot support the infrastructure improvements needed for an additional 4,600 plus people. For these reasons the application should be refused.

1.2.2 | Salford Local Plan (SLP) Policy H1 Type of Housing sets out:

"Individual new residential developments shall contribute to the provision of a broad mix of housing options across Salford and within the local area, ensuring that identified housing needs can be met."

Paragraph 11.7 of the policy states:

"Smaller dwellings have an important role in meeting housing needs and enabling more people to secure their own home, whilst reducing the amount of land that is required to accommodate new housing. However, smaller dwellings are generally less adaptable and will only be able to meet the requirements of some households. If too many are provided then this could restrict the type of households that are able to live in Salford and the ability of people to remain in their home or find a new home within the same community as their needs evolve."

We believe the application is a direct contravention of SLP Policy H1 Housing Mix. The development does not meet current or future housing needs through creating a sustainable neighbourhood with a sufficient diverse mix of housing including family housing. Nearly 50% of the development will be 1 bed flats and nearly 90% will be 1 and 2 bed flats. The oversupply of smaller dwellings at the site restricts the type of households able to live in Ordsall and the ability of people to remain in the community as their needs evolve.

1.2.3 | Salford Local Plan (SLP) reports:

"As of 1 September 2019, there were 6,514 households on the housing register seeking affordable housing in Salford ... the 2019 Greater Manchester Strategic Housing Market Assessment identifies a need for 613 affordable homes per annum in Salford if the backlog of need were to be addressed over the next five years."

The Local Plan concludes:

"Given this scale of need and the fundamental right of people to have access to a decent home at a cost they can afford, it will be necessary for all major housing developments to support the delivery of new affordable homes as far as possible. This will be vital to ensuring that inclusive communities are achieved and housing needs are met."

Policy H4 Affordable Housing: Salford Local Plan sets out minimum affordable housing requirements as follows:

"All developments that provide 10 or more net additional dwellings, or are on a site of 0.5 hectares or more in size and provide any number of dwellings, shall deliver at least 20% of those dwellings as affordable housing. The policy further states "A reduced proportion of affordable housing from the above requirements may be considered acceptable only where:

1) It has been clearly demonstrated that all practicable options have been exhausted for delivering the minimum affordable housing requirement, including by partnering with registered providers and accommodating affordable homes financed through various sources such as Homes England, investment funds and commuted sums from other sites; and 2) The requirements of criteria i-iv in Policy PC1 have been met."

We believe the application is a direct contravention of SLP Policy H4 Affordable Housing. With high levels of deprivation and barriers to affordable housing in Ordsall and wider Salford this application does not meet current or future housing needs in Salford. The viability study also does not demonstrate all practicable options have been exhausted to meet Salford Local Plan's requirement for affordable and social housing. The viability study reports two appraisals one which includes 20% affordable housing of total units and S106 contributions and one with 100% market sale/rental and no S106 contributions. The

application's viability appraisal for a £1billion scheme indicates proposals do not support affordable housing noting the high-cost of the tall buildings. The viability study also indicates a relaxing of S106 contributions required for the application to proceed.

No further information is provided from the viability study that practical options have been exhausted for modelling a development delivering the minimum affordable housing requirement for Policy H4. The proposed development seeks to overdevelop the site at a scale and cost which includes building the tallest building outside of London. It seeks to do this without the benefit of comparable land values of London to support such a development which may more likely support minimum contributions for an affordable housing mix. Such a mix could be achieved by a high-density lower-rise development which has been recently demonstrated with approval on the neighbouring Middlewood Lock scheme for a new a Salford Local Plan policy compliant affordable housing scheme. It is for these reasons the proposed development should be rejected as unsustainable and unsuitable for meeting Salford's housing priorities and requirement for more affordable housing.

1.2.4 The relevant criteria SLP Policy PC1 for reduced planning obligations confirms as follows:

"Development will be permitted with reduced planning obligations compared to policy requirements only where:

- i) The applicant has submitted a viability appraisal that is based upon and refers back to the viability assessment that has informed this plan, and provides evidence to justify the level of planning obligations proposed;
- ii) The value of the planning obligations has been maximised having regard to likely viability; iii) A clawback mechanism has been incorporated into a legal agreement, where appropriate, to ensure that additional mitigation is provided if final development viability is better than anticipated in the viability assessment; and
- iv) The benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations."

We believe the application is a direct contravention of SLP Policy H4, there is insufficient evidence provided as part of the viability information to justify relaxing of planning obligations. Figures quoted within the viability assessment are inconsistent with information provided in the planning statement and elsewhere in the application documents, which suggests a flawed assessment of what the application is providing. The main mitigation for relaxing of planning obligation relates to the new green infrastructure which benefits are overstated and do not outweigh the material adverse impacts resulting from the application.

1.2.5 | Salford Local Plan Policy F3: Inclusive Places states:

"All places and developments shall be as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life, where no one is potentially excluded because of disability, age, gender, sexuality, ethnicity or social class."

Point 6 in the SLP highlights the importance for:

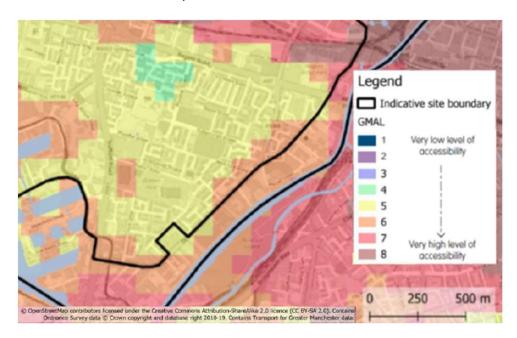
"6) Delivering a diverse mix of decent and adaptable homes, including affordable housing"

We believe the application contravenes Policy F3: Inclusive Places. The development results in a population increase in the Ordsall ward of 4,616, noting the population at 2021 census was 10,094. According to 2021 census nearly 80% of homes in Ordsall are rented and half of these are social housing. Local property and rental prices have significantly increased in recent years resulting from new development, which increases the need for more affordable housing for the local community. The oversupply of 3,300 expensive luxury apartments in the local housing market at the highest price points pushes up local average property and rents prices and worsening affordability for local housing. Close proximity to areas with the highest levels of deprivation in the country including for access to affordable housing not only worsens local deprivation but widens inequalities locally and is counter to the main objectives of the Salford Local Plan.

2.0 Traffic and Transport

2.1 Local Context

2.1.1 Significant areas of Ordsall have reduced available access to public transport. Map 2.1 is an extract of a recent local connectivity and movement assessment by Salford Council showing the Ordsall triangle estate in yellow with lower accessibility for public transport using Greater Manchester Accessibility Level data.



Map 2.1: Ordsall Public Transport Accessibility- Greater Manchester Accessibility Level data: Salford Council 2024:

Trams services heading to Salford Quays are not accessible and bypass most areas of Ordsall. Four bus services are limited to three routes and the routes' bus stops don't cover significant areas of Ordsall. Services are infrequent with poor reliability due to a lack of bus lanes in the area and high levels of traffic, there is limited scope for improved infrastructure to tackle congestion. Main bus services are as follows:

- 79 Pendleton to Streford
- 33 & 33B Worsley to Manchester City Centre
- 53 Pendleton to Cheetham Hill

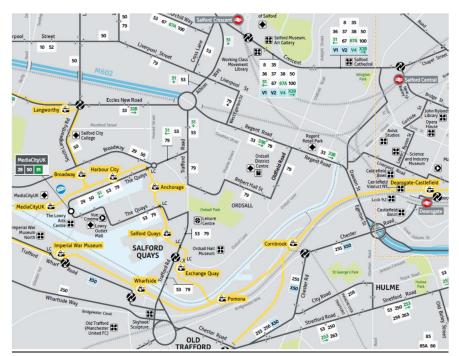
The 79 bus was rerouted in April 2024 and the only buses that currently directly serves Regent Retail Park is 33 & 33B. There is a 4.3 metre height restriction on the railway bridge

on Ordsall Lane and 7.5 tonne weight restriction for the railway bridge on Oldfield Road, this restricts vehicle movement in the area as shown in Photos 2.2 & 2.3. Map 2.4 is Transport for Greater Manchester map detailing available local services and their access points.





<u>Photo 2.2 & 2.3: Height and weight restriction signs Ordsall Lane and Oldfield Road Railway Bridges.</u>
<u>Google Maps 2024</u>



Map 2.4: Ordsall public transport map: TFGM 2024

- 2.1.2 Ordsall has some of the lowest car ownership in the City of Salford. According to Office for National Statistics 2021 census data for Ordsall:
 - 49.3% of households with no access to cars or vans.
 - 51.4% residents in Ordsall rely on bicycle, foot or public transport to get to work.

2.2 Objections

2.2.1 Policy A7: Motor Vehicle Parking Provision and Drop-off Facilities in New Developments states:

"The amount of parking provided within new developments shall:

- Ensure that the development is inclusive and accessible to all users;
- Reflect the type, mix and use of the development;
- Not lead to a level of off-site car parking that would have an unacceptable impact on:
 - The safe and efficient operation of the highway network; or
 - o The environmental quality or residential amenity of the local area; and
- Car parking for disabled people in accordance with the minimum standards"

We believe the application contravenes Policy A7 as the proposed on-site parking is insufficient for access and will result in overspill parking which would be a major adverse impact to the safety of local highways and local resident amenity. The application proposes 600 parking spaces of which 500 will be reserved for future residents and 100 for visitors to the site. The application is unclear if the 100 visitor spaces will be available to retail users of the site or visitors of future residents. The current retail shops provide 440 car park spaces. With a proposed additional resident population of 4,600 plus, the allocated car parking does not meet the requirements for proposed number of dwellings or the future retail users. Reduced accessibility to the site will particularly impact users with disability and mobility issues which are supported by vehicle use.

The lack of available parking will likely result in overspill parking reducing existing residential amenity in the surrounding areas plus problem parking impacting highway safety. The impact of new developments in recent years already causes significant problems for existing residents with difficulty finding available parking. On many local developments, car parking spaces are now sold separate from apartments for high premiums pushing more vehicles onto surrounding streets. The extent of insufficient on-site parking is highlighted by ongoing problem parking on pavements and paths reducing pedestrian safety. This has resulted in ongoing extensive traffic restriction orders being introduced in the area. Significant areas of Ordsall are not suitably served with public transport options. Residents without designated parking who rely on vehicle use for their employment or mobility needs are being placed in an unbearable and unsustainable position in their community.



Photo 2.4: Problem pavement parking on Oldfield Road

2.2.2 NPPF paragraph 114 states applications for development should ensure:

- "Safe and suitable access to the site can be achieved for all users"
- "Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

NPPF paragraph 116 further indicates applications for development should:

 "Address the needs of people with disabilities and reduced mobility in relation to all modes of transport"

Policy A6: Highway network states:

"The efficient, effective and safe operation of the city's highway network will be supported through:

- 1) Requiring developments that would be likely to generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment, including transport modelling where appropriate;
- 2) The refusal of development on transport grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe, having regard to issues such as likely traffic generation, access, parking and servicing arrangements and proposed mitigation measures;"

We believe the application contravenes NPPF policy by not providing a safe and accessible site for all. We further believe the application is in contravention of SLP Policy A6 Highway network as it will have a major adverse impact on the efficient, effective and safe operation of the city's highway. The site is an island location bordered by major busy roads. Height and weight limits to the railway bridges restricts traffic movement to the site for larger vehicles which impacts delivery vehicles and bus routes. The proposed reduction of available on-site retail parking will significantly restrict safe and efficient access to proposed future retail. The island location of the site does not support the increased pedestrian flows resulting from the application, particularly for journeys from the south across Regent Road. Regent Road as the main artery from the motorway network into the city centre prioritises vehicles flows; this therefore impacts the ability for safe and efficient higher volumes pedestrian journeys resulting from reduced on-site parking at Regent Retail Park and promotion of increased non-vehicle journeys.

The application's proposed access restrictions to Ordsall Lane for residents only will further impact safe and efficient journeys with increased congestion onto Oldfield Road, impacting Regent Road and surrounding areas. These impacts will be particularly acute over the 10-year construction period with increased construction traffic and potential impacts of temporary road closures related to the site construction works.

The application's Travel Assessment has used Greater Manchester Accessibility Levels data just at Regent Retail Park site but ignores the wider context of lower accessibility in the areas that surround the site. The loss of current available shops over 10 years will result in pushing car journeys to a wider area to sites such as Salford Shopping City, White City and Manchester Fort. This will increase car journeys, congestion and pollution for residents. The future retail units at the site without suitable levels of on-site parking will result in a very different retail offer of smaller commercial units therefore permanently pushing more car journeys to retail centres located further away. However, households without cars will not have the option to travel to alternative retails sites as they are not supported by available and suitable public transport options.

The application's Travel Assessment (TA) document states in paragraph 3.19:

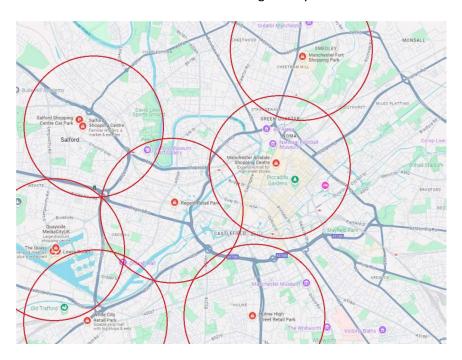
"Overall, the site is considered that there is good potential for residents and visitors to Regent Park to access all the amenities they require on foot. There are some barriers to movement which are physical, such as the presence of the Railway Line to the north and some that are perceived such as the gloomy railway underbridge on Ordsall Lane."

Within the TA there is lack of assessment for access to the site from the south across Regent Road for increased pedestrian and wheel movement. Regent Road as a major artery road to the city centre, supports prioritisation of vehicle flows over pedestrian flows currently. TFGM comments on the Planning Portal have highlighted various incorrect assumptions used within the TA supporting the application. Also, within the TA there are ten references to "Project Maple" it is unclear if this information relates to Regent Retail Park or if this information has been included in the TA in error. It is also noted with the TA that SLR Consulting services are currently retained by the developer as the interim Travel Plan Coordinator. The retail park is a significant strategic site which serves tens of thousands of existing and future residents locally and surrounding areas, it is adjacent to major road and rail networks near the city centre and is part of GMCA Core Growth area. The application is not supported by a suitable comprehensive and independent assessment for the local transport and highway network impacts which considers not just the site but the wider area as part of a strategic master planning exercise.

3.0 Loss of Shops and Employment

3.1 Local Context

3.1.1 Regent Retail Park is located outside the western edge of the city centre, centrally located to three shopping centres located at Manchester Arndale, Salford Shopping City and Lowry Outlet at Salford Quays. The other main Retail Parks in the surrounding area are at White City, Manchester Fort and Hulme Retail Park. Map 3.1 shows main retail parks and shopping centres located at the centre of red circles showing nearby catchment areas.

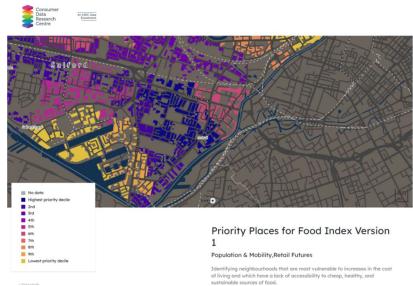


Map 3.1: Main shopping centre locations Central Salford and Manchester with red circles showing approx. 20 minutes walking distances. Google Maps 2024

- 3.1.2 Regent Retail Park is identified in Salford Local Plan as a Local Centre and key shopping area. The established shopping centre benefits from a prominent and accessible location enabling it to contribute to the economy and social wellbeing of Salford and surrounding areas. The current retail offer includes a range of discount food, homewares, clothes, pharmacy, vets, gym and coffee shop. This retail offer is not replicated elsewhere locally and requires travel to the shopping and retail parks located in other areas.
- 3.1.3 The Consumer Data Research Centre Priority Place for Food index research by the University of Leeds show parts of Ordsall are currently within 10% of areas with the highest levels of deprivation in the country. This includes deprivation for access to affordable food as shown in Map 3.3 below. The index identifies neighbourhoods that are most vulnerable to increases in the cost of living and which have a lack of accessibility to cheap, healthy, and sustainable sources of food. The example in Table 3.2 of a data output area on the Ordsall estate with the highest overall deprivation decile score of 1 linked to issues such as socio economic barriers, family food support and access to online deliveries. As shown in Table 3.2, currently there are improved scores for supermarket proximity and accessibility locally due to Regent Retail Park. A reduction of available range of food and retail options will directly reduce access for communities experiencing the highest levels of deprivation.

Salford 028B E01005667	Decile Score
Overall decile	1
Supermarket proximity	6
Supermarket accessibility	7
Access to online deliveries	1
Socio-economic barriers	1
Non-supermarket food proximity	7
Family food support	1
Fuel poverty	1

Table 3.2: Deprivation decile scores for Ordsall lower output area E01005667. CDRC 2024



Map 3.3: Ordsall Priority Place for Food Index Map showing highest deprivation areas dark blue.

<u>CDRC 2024</u>

3.2.1 Objections

SLP Policy TC1: Network of designated centres

"The following network of centres within Salford, as shown on the Policies Map, will be protected and enhanced:

Local centres (listed in no priority order)

Within Central Salford

Regent Road

The network of local centres will have an important role in providing local shops, leisure opportunities, food and drink uses (subject to policy TC4), services and community facilities for the surrounding neighbourhoods. "

We believe the application contravenes SLP Policy TC1 to enhance and protect a network of designated centres. As shown in Map 3.1 the site exclusively serves thousands of residents within walking distance as well as tens of thousands of residents travelling by other forms of transport from the wider area. Regent Retail Park is identified as a local centre within the Salford Local Plan and the application lacks assessment or evidence that it protects or enhances the Local Centre. What is evident is that the demolition of existing shops and the 10-year development of the site will result in a loss of local jobs as well as essential available and affordable busy shops over the period.

3.2.2 Policy TC3: Changes of Use and Redevelopments within Designated Centres

"The role of Salford's centres in meeting a wide range of local needs will be protected and enhanced. A strong shopping function will be retained for each centre, and the primary shopping areas of the town centres will have a particularly important role in this regard. Retail uses will be complemented by a broad range of other services, community uses and leisure opportunities.

Redevelopment proposals and change of use that constitute development within designated centres will be carefully controlled to ensure that they support, rather than detract from, the successful functioning of the centres and their ability to meet local needs. All such proposals will be required to:

- 1) Make a positive contribution to the vitality, viability and diversity of the centre;
- 2) Not unacceptably impact on daytime footfall;
- 3) Maintain a strong role for the centre in providing a varied range of convenience goods and meeting other day-to-day needs;
- 4) Positively restore and/or enhance the character and appearance of the frontage;
- 5) Maintain the continuity of active frontages; and
- 6) Be of a scale and type of use appropriate to the size and function of the centre, or part of the centre concerned."

We believe the application contravenes policy TC3 for changes of use and redevelopments within designated centres. The application's reduction of available car parking will ensure that the future retail provided at the site will not recreate the current retail offer for larger units providing consumer choice and a competitive range of available and affordable shops. The future retail offer will oversupply smaller commercial units with convenience stores and food/drink outlets catering mainly for new residents, this is similar to what has happened at other recent developments in the areas such as Middlewood Locks. The new retail offer

will not meet the majority of the everyday needs of Salford residents for affordable range of shops.

3.2.3 Policy F2: Social Value and Inclusion

"All development shall be located, designed, constructed and operated so as to maximise its social value and contribution to making Salford a more socially inclusive city reflecting the city council's vision and "Great Eight" priorities.

All major developments shall submit a Social Value Strategy at the planning application stage for the approval of the city council.

The Social Value Strategy shall identify how the development will support social inclusion and deliver social value throughout its lifecycle. This shall include demonstrating how the development will maximise its positive contribution, as relevant, to:

- 1) Reducing inequalities in Salford and their adverse impacts on residents;
- 2) The ability of local residents and vulnerable groups to fully participate in society;
- 3) Inclusive places, in accordance with Policy F3;
- 4) Economic inclusion"

We believe the application contravenes Policy F2 Social Value and inclusion. The proposals cause a loss of local jobs, removes well used affordable shops worsening deprivation and local food poverty particularly for the most vulnerable members of the community. Priority Places for Food research has highlighted Ordsall as a priority area in need of affordable food access due to factors including a lack of retail provision, poor access to online supermarket deliveries or high level of deprivation and need. During a cost-of-living crisis Ordsall needs more affordable food retail and not the demolition of the affordable shops on Regent Retail Park.

3.2.4 Policy F3: Inclusive Places states:

"All places and developments shall be as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life, where no one is potentially excluded because of disability, age, gender, sexuality, ethnicity or social class."

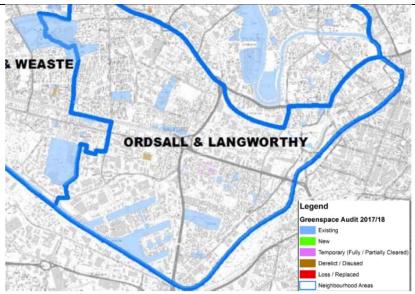
We believe the application contravenes Policy F3 Inclusive Places: With a lack of available public transport and low car ownership in the area, the removal of the existing well used affordable shops at Regent Retail Park will directly worsen access to affordable food and retail. Residents on low incomes, unable to utilise limited options for online deliveries with minimum spend limits and fees, are forced to rely on smaller local convenience stores which do not provide a range of healthy and budget products.

4.0 Green Infrastructure

4.1 Local Context

4.1.1 The Infrastructure Delivery Plan- Open Space Chapter Supplementary Planning Document Adopted January 2019 in terms of Public Access to Greenspace highlights that Ordsall has some of the lowest levels of green space in the City stating that:

"The area of greenspace continues to be significantly less in Central Salford than in the west of the city, with Ordsall and Langworthy having a particularly low level, especially when public accessibility is taken into account."



Map 4.1: Ordsall greenspace audit. Salford City Council 2019.

4.2 Objections

4.2.1 SLP Policy GI1: Development and Green Infrastructure states:

"Development shall protect and enhance the green infrastructure network in Salford by helping to maximise.

- Ensure that green infrastructure is central to the design, rather than being relegated to 'left-over' land;
- Use land and building surfaces creatively to maximise on-site green infrastructure provision, particularly within areas where there are currently major green infrastructure deficits such as City Centre Salford and Salford Quays;
- Seek to maximise the benefits, and where appropriate public use, of the green infrastructure, with an emphasis on promoting healthier communities"

We believe the application contravenes policy GI1: Development and Green Infrastructure. More local green spaces are needed in Ordsall however the proposed park does not meet with local needs, expectations or aspirations for a new public park.

The following extract is from the applications Statement of Community Involvement showing Stage 2 consultation information provided to residents:

We want to make Salford a greener place. An urban park will sit at the heart of our new neighbourhood, on the scale and ambition of that delivered at Mayfield.

Providing 5 acres of public open space, of which 3.5 acres will be West Union Park, our visionis to create a new green central heart for this part of Salford, seamless stitching into the wider ecological network from Peel Park and Meadows to the north and the River Inwell to the east.

Our plans will strengthen Salford's connection with wildlife and the natural world as well as providing new functional spaces for people to enjoy.

Extract 4.2: Stage 2 resident consultation statement on new park. Lexington 2024

The green infrastructure is 2.4 acres not the 3.5 acres new park still advertised on the developer's website but is instead the left-over land in between the buildings being squeezed onto the site. The size and benefits for proposed new public park are overstated by the applicant. This is particularly concerning as the applicants planning statement indicates that the provision of a new public park and associated public realm of circa £27M is the main contribution for its exceeding requirements for planning obligations.

4.2.2 Policy BG2: Development and Biodiversity states:

"All development shall deliver a net gain in biodiversity value. All major development shall deliver at least a 10% net gain in biodiversity value."

We believe the application contravenes Policy BG2: Development and Biodiversity. The site currently has 400 metres of thick hedges with more than 40 trees and two woodland habitant greenspaces with diverse trees, bushes, and wildlife. The new park does not provide an increase or improvement compared with what is currently provided at the site. Assystem who have provided the application Biodiversity Net Gain report highlight:

"An assessment was undertaken of an Illustrative Masterplan, which describes only one potential option and is subject to change, to provide an early indication of how biodiversity net gain may be achieved for the proposed development. This assessment found that the Proposed Development will likely achieve an onsite net loss for area-based habitats when comparing the developed site against the pre-construction baseline and as such offsetting is likely to be required when fully assessed at later stages of the development. Linear habitats see an increase of 4.43 hedgerow units, however as there are no linear habitats present in the baseline, this cannot be shown as a percentage increase."

Their report further confirms:

"The BNG assessment of the Illustrative Masterplan demonstrates that the current Proposed Development cannot deliver a net gain for biodiversity on-site. In combination with offsite habitats however, a net gain can be achieved and will offset individual deficits to comply with Trading Rules."

The report comments on Trading rules:

"Defra's Biodiversity Metric provides an assessment of this, identified as compliance with Trading Rules, with 'like-for-like' delivered through provision of a similar broad habitat type or 'better' delivered through provision of a higher distinctiveness habitat type."



Map 4.3: Existing Regent Retail Park aerial view. Google Maps 2024

The application's viability study indicates a relaxing of S106 contributions is needed so the development is viable. A "new park" and associated green infrastructure is cited in the application as a justification for mitigation of planning obligations. However, the development is identified as only being compliant in biodiversity if it is subject to planning obligations to deliver offsite habitats in other areas of Salford.

4.2.3 | SLP Policy R1: Recreation Standards states:

"New residential development shall contribute to the achievement of all of the following recreation standards, and the management and maintenance of any facilities provided or improved for at least a 20-year period, proportionate to the additional demand that they would be expected to generate"

We believe the application contravenes policy R1 Recreation Standards. The development's green infrastructure does not suitably provide sufficient green spaces required for the leisure and recreation needs of the increased local population. The application should be rejected as any benefits of green space within the new developments do not sufficiently mitigate the detrimental impact for lack of necessary affordable housing and S106 contributions for local infrastructure.



Map 4.4: Proposed new park. Trium 2024

The proposed development states 21,351 m2 of public open space with the defined West Union Park being 2.4 acres or 9,743 square metres of which 4,400 square metres will be play space. This despite the advertising of a new park of 3.5 acre or 14,164 square metres. The park area estimates include the perimeter space of the new buildings. The core park green area, excluding areas directly bordering the tower blocks, will likely be reduced further as detailed building designs come forward dealing with spaces adjacent to the buildings.



Map 4.5: Core park area of proposed new park. Trium 2024

As a size comparison the new park is just over half the size of a football pitch.



Map 4.6: Overlay of new park and football pitch onto aerial map. Google Maps 2024, Wikipedia 2024, Trium 2024

The applicants proposed benefits for green space are overstated. As a comparison Mayfield Park in Manchester is a new, small urban park at 6.5 acres and would fit within it several West Union Parks.



Map 4.7: Overlay of new park onto aerial map of Mayfield Park Manchester. Google Maps 2024, Trium 2024



Map 4.8: Overlay of new park onto aerial map of Mayfield Park Manchester. Google Maps 2024, Trium 2024

5.0 Local Character and Distinctiveness

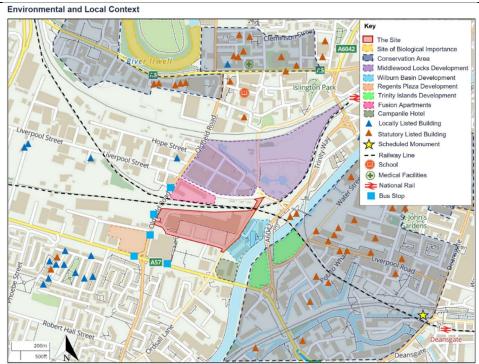
5.1 Local Context

Etymology for Ordsall's name has been suggested as the Ord as Saxon word for "primeval "or "very old" and hal meaning "den" proving Ordeshal meaning "very old den". Within Ordsall was located a local cave known as Wodens Den.

From the creation of the Manchester Shipping Canal and Salford Docks in 1894 developed Victorian terrace housing in Ordsall for local workers. Around this time New Barracks was created as one of the first council housing estates in the North West. Much of the Victorian housing was cleared from the 1960s. This included Archie Street in Ordsall which was the inspiration for the TV series Coronation Street. Housing from this period has been preserved in Ordsall, notably at the New Barracks estate located near Regent Retail Park.

The impact of dock closures in 1970s and resulting unemployment along with demolition of terrace housing had an adverse impact on the community. In the years that followed Ordsall became one of the areas with the highest levels of deprivation in England.

Various regenerations projects since the 1990s have seen significant investment in the area. A focus of urban regeneration has seen improvement in local housing. By the 2021 Census 80% of households live in rented accommodation including 36% in social housing. Previously, existing housing in Ordsall has been predominately low-medium rise dwellings with exception of three high rise blocks, the tallest being Nine Acre Court built in 1972 at 50 metres. Since 2017, Ordsall has seen the addition of six towers ranging in height of 50-70 metres. Ordsall remains home to various heritage assets including Ordsall Hall, New Barracks, Salford Lads Club and St Clements Church as shown in the below extract from the planning application document.



Map 5.1: Map showing key sites including heritage assets in Ordsall area, Trium 2024

5.2 Objections

5.2.1 We believe the application contravenes Policy D2 Local Character and Distinctiveness due to the scale and density of the application proposals.

Policy D2: Local Character and Distinctiveness states:

"Development shall protect, enhance and respond to any positive character and distinctiveness of the local area, and contribute towards local identity. It shall be a positive addition to the surrounding area, being integrated within the townscape and landscape."

Policy D2 further states:

"New buildings shall use a consistent architectural style, individual elements adding up to a coherent whole, designed to relate to the positive context of its surroundings. Buildings shall have a sufficient texture, depth and detailing to provide visual interest, particularly at street level where buildings will need to relate to a human scale."

The site sits in the centre of the Ordsall community. The seven towers up to 273 metres in height are not in keeping and do not integrate with the surrounding buildings including recent development at Middlewood Locks and Wilburn Basin. The development overlooks and overshadows the surrounding buildings and housing estates in Ordsall dramatically negatively impacting the visual landscape which includes local heritage sites.



Image: Google Maps 3D view with overlay of main structure of proposed development as envisaged by the campaign, based on planning documents (Google Maps 2024, Regent Park Environmental Statement, Non-Technical Summary, TRIUM 2024)

6.0 Sustainable Neighbourhoods: Density, Amenity and Local Infrastructure

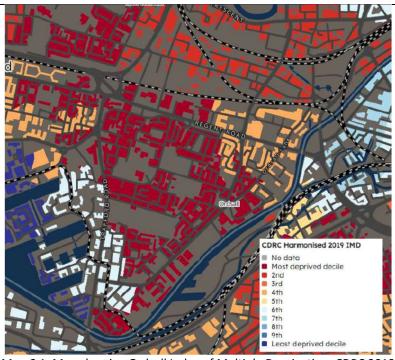
6.1 Local Context

Since 2021 planning applications approved and under consideration for Ordsall ward include over 6,000 new dwellings. Over half of these dwellings result from the application for Regent Retail Park. In the two years 2021/22 & 2022/23 the total net supply of new dwellings for the whole of Salford was just over 5,000.

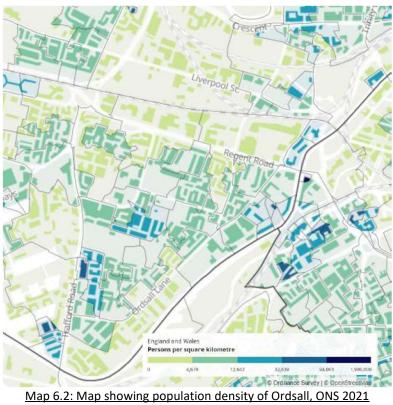
2021 census data shows Ordsall population was just over 10,000. With the level of dwellings planned in future years Ordsall population is likely to double by 2030s. These estimates based on the number of flats are likely conservative, as the high costs of renting in the area, results in higher occupation levels through shared flats.

The Regent Retail Park site location is an area of particularly high density already with recent new developments like Wilburn Basin and Middlewood Locks. Directly opposite the site are new developments of Trinity Islands and Water Street part of the Manchester City area.

As highlighted within this report, areas within Ordsall have the highest levels of overall deprivation in the country this includes areas for income, housing, education, health and family food. Recent population increases, impacts access to local services particularly for deprived communities. It is essential for sustainable development to provide the necessary infrastructure and services so as not to worsen access to services and the current levels of deprivation and inequalities. It is not possible to assess new developments within the area without understanding the local wider context to produce sustainable neighbourhoods for the benefit of new and existing residents.

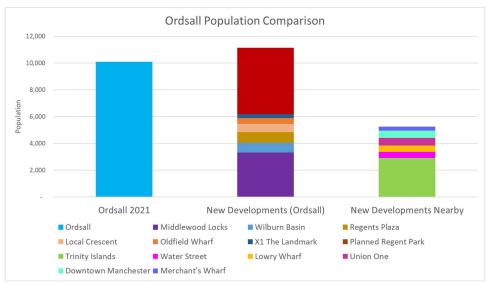


Map 6.1: Map showing Ordsall Index of Multiple Deprivation, CDRC 2019

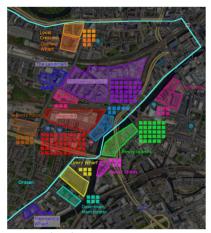




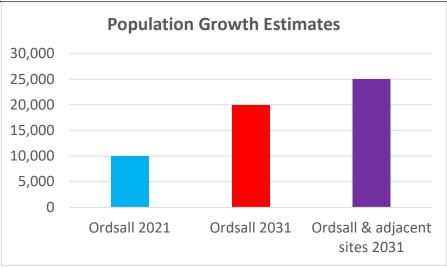
Map 6.3: Aerial map of Ordsall showing locations of recent new developments, Google 2024



<u>Table 6.4: Table showing population estimates of new developments based 1.5 times persons per indicated number of flats (the developments offer flats with one to three/four bedrooms)</u>



Map 6.5: Map of Regent Retail Park (red) and surrounding developments with visualisation of population density increase estimates (one square equals 100 residents). Google 2024



<u>Table 6.6: Population Growth estimates Ordsall and adjacent sites</u>

6.2 Objections

6.2.1 We believe the application contravenes Policy EF1: Efficient Use of Land and Policy EF2 Coordinated Development and GMCA Policy JP-Strat1: Core Growth Areas. The application should be refused as it does not contain the necessary detail and consideration of the wider local context which a clear and detailed masterplan would provide. Proposed development should be refused due to the detrimental and unsustainable impact on the wider local area.

Policy EF1: Efficient Use of Land states:

"Developments shall use land efficiently. All parts of a site shall have a clear and positive purpose.

The density of a development shall:

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

The development results in a population increase in the Ordsall ward of 4,616 or more, noting the population at 2021 census was 10,094. The local population will likely more than double by 2031 due to other new developments (including Regent Park) and new developments directly outside the Ordsall boundary. The application has provided an illustrative master plan which lacks necessary detail. Due to the size and scale for what is proposed, the application should be refused as it is not supported by a suitably detailed masterplan which considers its connectivity with the wider area and its impacts on it. This is required to produce the high-quality neighbourhoods with the necessary infrastructure, amenities and local services for this important strategic area situated between Salford Quays and the City Centre.



Map 6.5: Illustrative Masterplan, LDA Design 2024

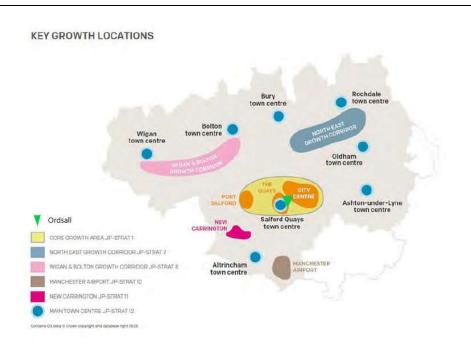
Policy EF1: Efficient Use of Land further states:

"6.5 Whilst masterplans and development frameworks will not be required in the majority of cases, they may be necessary in some locations to ensure that development is properly co-ordinated and contributes to high quality neighbourhoods. This will be especially important for coordinating infrastructure delivery.

6.6 If any sites in Salford are allocated in the joint DPD of 9 Greater Manchester districts (Places for Everyone), then they will, by definition, be of strategic significance. Hence, it will be important for each of them to be subject to a masterplan in accordance with the following policy. "

Greater Manchester Combined Authority Places for Everyone document identifies the Regent Retail Park site as located between Manchester City Centre and Salford Quays and within Policy JP-Strat1 Core Growth Area. The Development Plan Documents states:

"Policy JP-Strat1: Core Growth Area: The economic role of the Core Growth Area will be protected and enhanced, with sustainable development supporting major growth in the number of jobs provided across the area providing opportunities to create jobs for local communities. Complementary to, but not at the expense of, its economic function it will see a significant increase in the number and range of homes in areas with good connections to employment, training and education facilities. Infrastructure provision will support the growth and continued capacity of the Core Growth Area."



Map 6.6: Map showing Ordsall in Core growth Area JP Strat1, GMCA 2024

We believe the application contravenes Policy EF1: Efficient use of land and GMCA DPD Policy JP-Strat1: Core Growth Area due to its strategic significance and as it is not supported by a detailed, clear and comprehensive masterplan or demonstrates sufficient detail for the impact that a development of this size and scale will have with it being located at the centre of the GMCA Core Growth Area.

6.2.2 We believe the application contravenes Policy EF2 Coordinated Development, as a major development, the application without a detailed masterplan, does not consider its wider impacts in the existing local context and for wider urban regeneration with other developments coming forward in the area. Noting that this is not a development of another unused brownfield site, but over a 10-year period it removes a well-used local shopping centre which benefits current and future residents. The development is a major increase in the local population needing associated infrastructure, but unlike other nearby new developments, the application does not co-ordinate with wider urban regenerations as it does not sit in a Local Authority Master Plan and has not provided a suitable detailed masterplan in the wider local context to mitigate its likely impacts.

Policy EF2: Co-ordinated Development states:

"Development will not be permitted if it would unacceptably hamper or reduce the development options for adjacent sites or the wider area. Development must make provision for, and be phased with, supporting infrastructure, facilities, and appropriate environmental mitigation, appropriate to the scale of development proposed."

Policy EF2: Co-ordinated Development further states:

"The production process for the masterplan/framework shall:

i) Ensure the proper consultation of the local community and other stakeholders within and adjoining the masterplan/framework area, meeting the principles set out in Policy F1;

ii) Seek to maximise social value and inclusion in any resulting development in accordance with Policy F2"

We believe the application contravenes Policy EF2 and Policy F1. Despite carrying out a twostage consultation the developer has failed to listen to the needs of the local community and understand the detrimental impacts of their planning application proposals.

Policy F1: An Inclusive Development process states:

"Developers are strongly encouraged to involve local residents, businesses and other stakeholders throughout the development process, including:

1) Understanding the varied needs of residents, businesses and other stakeholders and how the development could help to meet them;"

The information shared during the consultation for what will be delivered is inconsistent within what is in the application, for example the overstated size of the new park. The developer has also ignored the priorities of Salford Council and the local community for affordable housing. Within the developer's main planning statement document there is no mention of the overall outcome of consultation, which is that overwhelmingly residents were opposed by nearly 70% to the plans. The mention for this in the application can be found separately on page 46 of the Statement for Community Involvement document.

Policy F2: Social Value and Inclusion States:

"All development shall be located, designed, constructed and operated so as to maximise its social value and contribution to making Salford a more socially inclusive city reflecting the city council's vision and "Great Eight" priorities."

Policy F2 further outlines:

"The Social Value Strategy shall identify how the development will support social inclusion and deliver social value throughout its lifecycle. This shall include demonstrating how the development will maximise its positive contribution, as relevant, to:

- 1) Reducing inequalities in Salford and their adverse impacts on residents;
- The ability of local residents and vulnerable groups to fully participate in society;
- 3) Inclusive places, in accordance with Policy F3;
- 4) Economic inclusion, with positive consideration given to:"

We believe that the application contravenes Policy F2, the £1 billion development does not maximise a positive social value contribution, but instead increases inequalities and adverse impacts on the community's social, economic, and environmental wellbeing. As highlighted within this report, the development delivers 3,300 luxury apartments without affordable housing and over 10 years removes access to affordable retail. What is proposed will directly increase inequalities in an area with the highest levels of deprivation in the country. This will impact the ability of local residents and vulnerable groups to fully participate in society. Using 2019 End Child Poverty data, Greater Manchester Poverty Action group has highlighted that the Ordsall ward is ranked 4th in Greater Manchester for highest rates of child poverty. The application directly makes access to housing, food and retail less affordable and will increase poverty levels locally. The proposed £1 billion development provides no affordable housing, within the application the developers Social Value report

has offered during 10 years of construction to provide 5 hours each year of voluntary work to assist with local homelessness providing a proxy social value of £16.93. The current YMCA shop to be demolished at Regent Retail Park provides more social value to impact homelessness in one day than the application provides in one year.

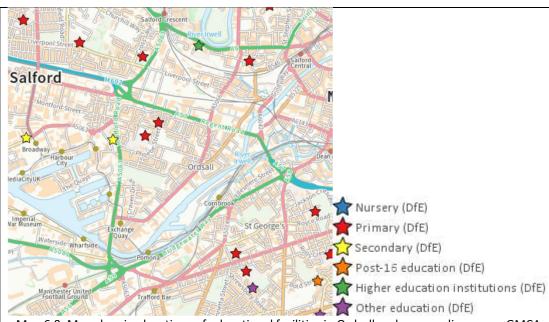
Theme: Affordable Housing and Reducing Homelessness

More working with the community

Measure reference	Measure	Unit	Proxy value	Potential community partnerships	Policy F2 criteria which the measure contributes to	Development phase
SCC57	hours volunteering time	year of construction period and 5 hours per		Old Trafford Community Academy Build Salford	i) Reducing inequalities in Salford and their adverse impacts on residents 2) The ability of local residents and vulnerable groups to fully participate in society 3) Inclusive places 4) Economic inclusion 5) Good mental and physical health	Construction and in-use

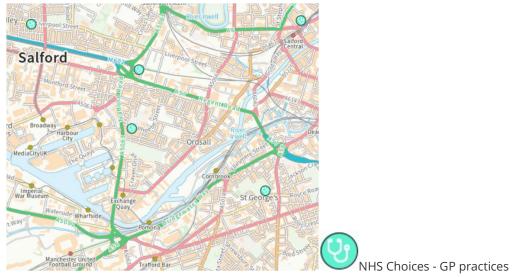
Extract 6.7: Application's proposed social value contribution to affordable housing and reducing homelessness. Savills 2024

6.2.2 We believe the application contravenes Policy ED2 Residential Development and Education Places. The Application Environmental Study: Likely Significant Effects document highlights demand for primary educational facilities will be a moderate adverse effect. Despite this the application's viability study indicates S106 contributions should be restricted.



Map 6.8: Map showing locations of educational facilities in Ordsall and surrounding areas: GMCA 2024.

6.2.3 We believe the application contravenes Policy HH1 Development and Health. The applications notes that demand for primary healthcare facilities will be a moderate adverse effect.

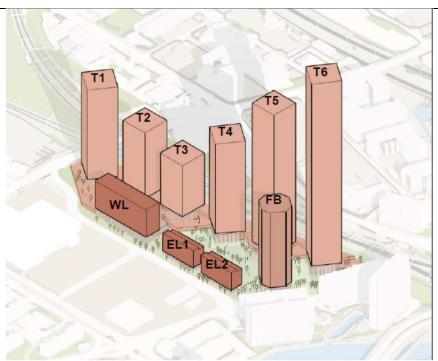


Map 6.9: Map showing locations of healthcare facilities in Ordsall and surrounding areas: GMCA 2024.

7.0 Daylight, Sunlight, Overshadowing, Noise and pollution

7.1 Local Context

7.1.1 The proposed development is built to an unprecedented size and scale in Salford in an already high-density area in close proximity to thousands of residents. The significant adverse impacts for residents during 10 years of construction and post construction are highlighted in the applications Environmental Statement.



<u>Image 7.1: Image showing scale and impacts for proposed tall buildings on surrounding sites: Trium 2024.</u>



Map 7.2: Map showing likely significant effects of development of surrounding sites: Trium 2024.

7.2 Objections

- 7.2.1 We believe the application contravenes Policy PH1 Pollution Control. The Applications Environmental Study: Likely Significant Effects document highlights during construction noise and vibration on Wilburn Basin, Fusion, Campanile Hotel, Regent Plaza and Middlewood Locks development will have moderate to major adverse effect.
- 7.2.2 We believe the application contravenes policy D5: Amenity. The Applications Environmental Study: Likely Significant Effects highlights daylight on Wilburn Basin, Fusion and Middlewood Locks development will have moderate to major adverse effect. The applications note sunlight on Wilburn Basin, Fusion and Middlewood Locks development

will have moderate to major adverse effect. The applications note shadowing on Fusion and Middlewood Locks development will have moderate to major adverse effect.

8.0 Climate Change

8.1 | Local Context

8.1.1 Salford Council declared and a climate emergency in July 2019 and setting a date for 2038 for carbon neutrality in Salford. Global greenhouses gases emissions resulting from the built environment means that is essential that sustainable urbanisation produces best use space and energy efficiency of buildings. Salford Local Plan supports an approach for efficient use of land in a sustainable way and the highest density for development is supported by transport infrastructure, public services, community facilities, amenity and recreation.

8.2 Objections

8.2.1 We believe the application contravenes Policy CC1 Climate Change for Minimising Carbon Emissions through Development.

Policy CC1: Climate Change states:

Development shall support Salford becoming carbon neutral by 2038

NPPF paragraph 159 comments that new development should be planned for in ways that:

"can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards."

We believe the application contravenes NPPF and SLP Policy CC1 Climate Change as the application design increases greenhouse gas emissions in comparison to alternative design options that can achieve high density at the site using lower rise buildings. The application seeks to build seven towers including the tallest building outside London. Research by Edinburgh Napier University entitled "Decoupling density from tallness in analysing the life cycle greenhouse gas emission of cities" has shown that high-density low-rise environments are more space and carbon efficient than high rise buildings which have a drastically higher carbon impact of 142%. A major impact on the environment from the construction industry at 48% is the embodied carbon consumption of energy and resource at the design build stage. Use of concrete is the largest element at 80% for embodied carbon contribution and increased use of this material is essential as structural material for tall buildings. The increased carbon impact through the creation of the tallest buildings in the country does not support climate change policy priorities. Alternative designs for lower height buildings with lower carbon emissions can achieve comparable levels of density as tall buildings within a similar sized geographical area as highlighted by the Edinburgh Napier University research.

Appendix A: Planning applications and dwelling units approved for Ordsall Ward since 2016: Salford City Council Planning Portal. Available at www.salfrod.gov.uk

Reference	Application type	Units	Decision date	Status
16/68181/FUL	Full planning permission	191	28/07/2016	Approved
16/67809/FUL	Full planning permission	349	15/12/2016	Approved
16/68118/FUL	Full planning permission	22	25/01/2017	Approved
16/68723/FUL	Full planning permission	525	28/02/2017	Approved
16/69216/FUL	Full planning permission	270	31/03/2017	Approved
16/68977/FUL	Full planning permission	178	03/08/2017	Approved
16/67937/FUL	Full planning permission	140	11/09/2017	Approved
16/69223/FUL	Full planning permission	376	09/05/2018	Approved
<u>17/70156/FUL</u>	Full planning permission	180	25/05/2018	Approved
<u>17/70561/FUL</u>	Full planning permission	24	30/11/2018	Approved
17/70615/FUL	Full planning permission	127	08/01/2019	Approved
18/72424/FUL	Full planning permission	44	27/02/2019	Approved
18/72438/FUL	Full planning permission	29	21/03/2019	Approved
18/72242/FUL	Full planning permission	104	08/07/2019	Approved
<u>17/70278/FUL</u>	Full planning permission	196	29/11/2019	Approved
17/69345/FUL	Full planning permission	421	06/12/2019	Approved
<u>19/74447/FUL</u>	Full planning permission	280	11/02/2020	Approved
<u>19/74245/FUL</u>	Full planning permission	457	03/04/2020	Approved
20/75495/FUL	Full planning permission	14	04/09/2020	Approved
20/74637/FUL	Full planning permission	115	22/09/2020	Approved
20/75628/FUL	Full planning permission	368	23/10/2020	Approved
20/75419/FUL	Full planning permission	12	02/11/2020	Approved
20/75420/FUL	Full planning permission	35	02/11/2020	Approved
21/78164/FUL	Full planning permission	96	29/11/2021	Approved
19/74529/FUL	Full planning permission	500	24/03/2022	Approved
20/76384/FUL	Full planning permission	160	21/06/2022	Approved
20/76684/FUL	Full planning permission	164	28/09/2022	Approved
19/73607/FUL	Full planning permission	49	21/02/2023	Approved
22/80362/FUL	Full planning permission	85	01/08/2023	Approved
PA/2023/0425	Full planning permission	274	07/03/2024	Approved
PA/2023/0435	Full planning permission	578		Under Consultation
23/82036/FUL	Full planning permission	308		Under Consultation
PA/2024/1152	Full planning permission	90		Under Consultation
23/82372/FUL	Full planning permission	204		Under Consultation
21/77367/FUL	Full planning permission	394		Under Consultation
PA/2024/0962	Outline planning permission	3,300		Under Consultation
	Total Units	10,659		

Note: 2021 electoral wards boundary changes may impact some areas no longer part of the Ordsall but are now in neighbouring wards.

Appendix B: Recent developments Ordsall and surrounding areas

Development	Source
Middlewood Locks	https://bcegi.co.uk/projects/middlewood-locks/
Wilburn Basin	https://www.omiarchitects.com/works/wilburn-wharf/
Regent's Plaza	https://www.sourceddevelopmentgroup.com/regent-plaza
Trinity Islands	https://www.simpsonhaugh.com/projects/trinity-islands
Local Crescent	https://www.domisconstruction.co.uk/project/local-crescent/
Oldfield Wharf	https://unitedliving.co.uk/2023/09/19
X1 The Landmark	https://x1developments.com/development/x1-the-landmark/
Fusion	https://uniteconstruction.com/fusion-salford
Water Street	https://idealcombi.com/one-regent-water-street-completed/
Lowry Wharf	https://www.ladal.co.uk/salford
Union One	https://dentoncorkermarshall.co.uk/project/union-co-living
Downtown Manchester	https://www.downtown-manchester.com/
Merchant's Wharf	https://www.merchants-wharf.com/

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