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31991/A5/HW

3rd July 2020

Dear Sir/Madam,

RE: APPLICATION NUMBER 127053/FO/2020 – REQUEST FOR OPEN SPACE ASSESSMENT

This letter is submitted on behalf of One Manchester ('the Applicant') in support of planning application number 127053/FO/2020 for the proposed erection of 4 no. two storey houses with associated car parking and landscaping on vacant land on the corner of Victory Street and Claremont Road, Rusholme, Manchester ('the Site').

The planning application was formally submitted by Bowker Sadler Architecture ('the Agent') on behalf of the Applicant in May 2020. On the 3rd June 2020, the Agent received a letter from Manchester City Council's ('the Council's') Planning Technical Support Team stating the application is incomplete. The letter listed three reasons the first being:

1) *"You have identified the site as public open space. As such an Open Space Assessment based upon Policy EN10 of the Manchester Core Strategy and paragraph 97 of the National Planning Policy Framework is required to be submitted alongside this application."*

The purpose of this letter is to respond to the Council's request for an open space assessment.

From the outset, we do not believe Policy EN10 of the Manchester Core Strategy and paragraph 97 of the NPPF are relevant to the determination of this application because the Site is not formally designated or identified as open space by the Council and has no open space function.

Notwithstanding this, we acknowledge that the Site has been described as *'public open space'* in the application documentation, therefore, this letter seeks to respond to the request for an open space assessment by:

1) Setting out why the policies cited within the letter are not relevant to this application;
2) Demonstrating that the Site has no sport, recreation, or amenity function; and
3) Demonstrating there is sufficient open space within the locality of the Site to meet the needs of residents.

Each of these matters is discussed later in this letter. However, we first provide a brief description of the site, the proposals, and the relevant planning policies context which has informed our assessment.

The Site and Surroundings

The Site is located within the Central Manchester area of the City at the junction of Victory Street and Claremont Road in Rusholme.

The Site extends to approximately 0.1 hectares and comprises areas of grassland and bare ground along its eastern edge where vehicles have parked on the Site. The western, northern, and southern parts of the Site include dense trees and vegetation, identified as being of low quality and value within the submitted Arboricultural Impact Study. There is a footpath and bench that cut diagonally across the northern part of the Site. However, as shown on the photographs attached, the Site is currently uncared for with evidence of fly tipping and litter.

The area surrounding the Site is predominantly residential in character with some commercial uses along Wilmslow Road to the east. The Site is bound by residential development to the north, south and east and Heald Place Primary School to the west. Platt Field Park is located circa. 300m to the south of the Site and Whitworth Park is located circa. 750m to the north.

Proposed Development

The application seeks planning permission for the proposed development of 4 no. two storey houses with associated car parking and landscaping. All dwellings will have an active frontage onto Victory Street, and each will have 2 x side parking spaces and a rear garden. The footpath and surrounding trees in the northern part of the Site will be retained and enhanced as part of the proposed development and new hedgerows are proposed to the front of each property.

Planning Policy Context

As set out in the Council's letter, Policy EN10 of the Manchester Core Strategy and paragraph 97 of the NPPF provide the planning policy framework for assessing the loss of public open space across the City.

Policy EN10 of the Manchester Core Strategy seeks to retain and improve existing open spaces, sport and recreation facilities to the standards set out in the Core Strategy and provide a network of diverse, multi-functional open spaces.

The policy goes on to state that proposals on existing open spaces will only be permitted where:

> *"Equivalent or better replacement open space, sport or recreation facilities will be provided in the local area; or*
> *The site has been demonstrated to be surplus for its current open space, sport or recreation function and the City wide standards set out above are maintained, and it could not fulfil other unsatisfied open space, sport or recreation needs, and a proposed replacement will remedy a deficiency in another type of open space, sport or recreation facility in the local area; or*
> *The development will be ancillary to the open space, sport or recreation facility and complement the use or character."*

Like Policy EN10, paragraph 97 of the NPPF seeks to protect existing open spaces, sports and recreational buildings and land from development unless:

> *"a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
> *b) 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; or*
> *c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."*

We set out the reasons why we consider these policies not to apply to this application below.

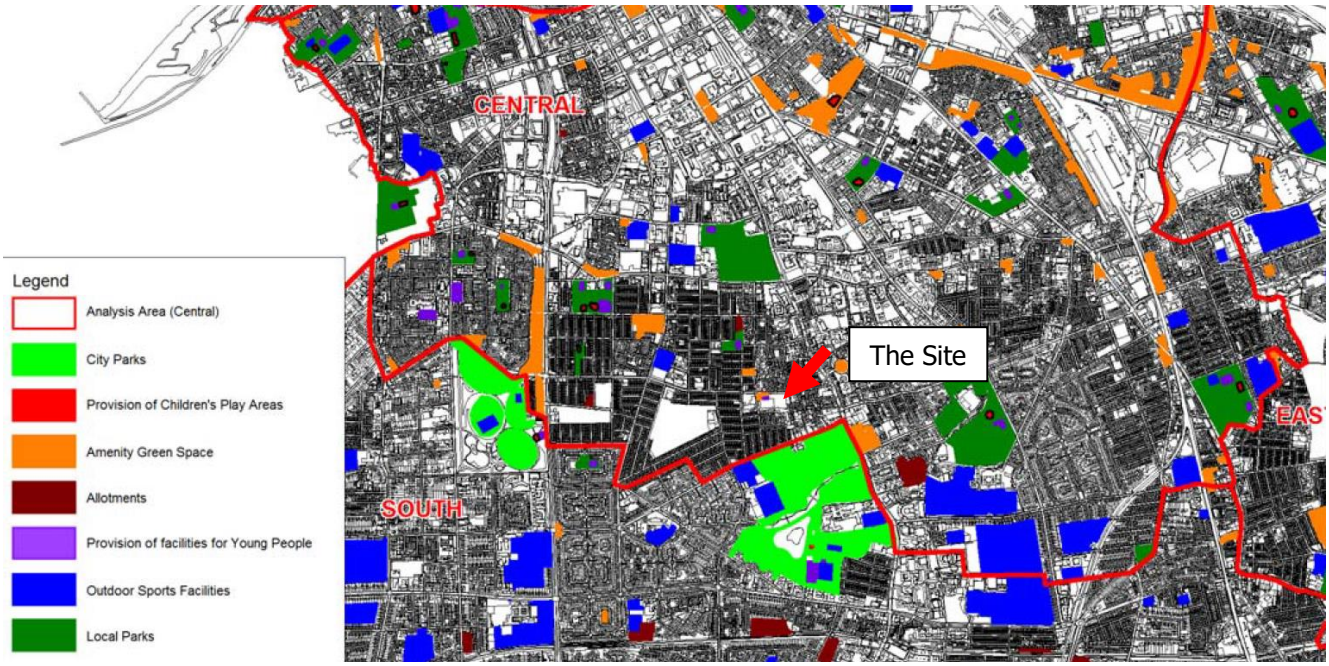
Application of Planning Policies

As set out above, both Policy EN10 of the Manchester Core Strategy and paragraph 97 of the NPPF seek to protect existing open spaces from redevelopment unless it can be demonstrated that it is surplus to requirements or alternative provision would be provided.

Firstly, it should be noted that the Site is not designated as protected open space on the Manchester Development Plan Framework Proposals Map. However, it is acknowledged that the Council does not designate open space or green infrastructure for plan making purposes in this way. Instead, the Council refers to the City-Wide Open Space, Sports and Recreation Study ('Open Space Study') when identifying open space provision across the City.

The Open Space Study was published as part of the evidence base to the Manchester Core Strategy to support the implementation of Policy EN10 and EN11. The Study provides the Council's latest audit and evidence on open space across the City. The Site sits within the Central Manchester area for the purposes of the audit and as shown on the extract of Map 15.2 below, the Site is not identified as an area that functions as open space.

Figure 1: Extract of Map 15.2, Open Space Study



In this context, Policy EN10 of the Manchester Core Strategy and paragraph 97 of the NPPF are not applicable given the Site is not formally designated or identified within the Council's evidence base as having any function as open space. As such, there would be no loss of public open space or need to apply these policies for decision-making purposes.

We also maintain and agree that the Site was correctly excluded from the Open Space Study carried out in 2009 because it has no function as public open space. The reasons for this are set out in further detail below.

Open Space Function

As set out above, the Site comprises a grassed area of land with areas of bare ground and some trees and vegetation along its boundaries. The Site is accessible from both Victory Street and Claremont Road. However, the area proposed for development has no sports or recreational function due its size and shape. There is no formal pitch provision, children's play area or street furniture in this part of the Site for people to play and dwell. The Site is also overgrown, heavily littered and poorly lit making

it an unattractive place for people to use for informal recreational. There is a footpath and bench in the north eastern corner of the Site. However, both the pedestrian route, bench and surrounding trees would be retained and enhanced as part of the proposed development.

There are clusters of trees within the Site. However, these trees are identified as being of low quality and value within the submitted Arboricultural Implications Study and the Extended Phase 1 Habitats Survey confirms the Site is not of high ecological value that would give it any function as natural or semi-natural open space. In addition, the Site is absent of formal planting or any other natural features that enhance its amenity value.

Moreover, as shown on the enclosed photographs, the Site is unmanaged, overgrown, heavily littered and has become bare in places which significantly detracts from the contribution it makes towards the visual amenity of the area. It should also be noted that the trees in the northern part of the Site would be retained and enhanced as part of the proposed development and a Landscape Management Plan has been prepared to ensure this area is maintained in the future. As such, the proposed development would in fact enhance the appearance of the Site.

Our assessment demonstrates that the Site has no open space function from a sport, recreational or amenity perspective and given it is not identified in the Council's Open Space Study the Site should not be treated as public open space for decision-making purposes. In addition, the Council publicly advertised that the Site was proposed for redevelopment. There was no objection to the loss of this land from residents or stakeholders.

Notwithstanding the above, the Site also benefits from its proximity to other open spaces within the locality. As such, the redevelopment of the Site would not have an adverse impact on residents access to other public open spaces in the locality. We consider this in further detail below.

Access to Open Space Provision

We have assessed residents' access to public open spaces within a 10-minute walk time (800m) from the Site. This is widely considered a reasonable distance for residents to walk to such locations. Our analysis has been informed by the Council's Open Space Study. This has identified the following public open space provision with walking distance of the Site:

- Platt Fields City Park;
- Whitworth Park;
- Local park and allotments on Great Western Street;
- Amenity green space on Parkfield Street; and
- Amenity green space on Park Crescent.

Platt Fields Park is located circa. 300m to the south of the Site and is identified as a City Park in the Open Space Study. The Park hosts a wide range of facilities including a children's play area, 5 a side football pitch, tennis courts, bowling greens, BMX track, lake, boathouse, skate park and areas of parkland for recreation, leisure, and play. The quality of the park is assessed as very good and it is identified the highest quality City Park in Manchester scoring a maximum of 100% in the Open Space Study.

Whitworth Park is identified as a 'local park' in the Open Space Study and it is located circa. 750m to the north of the Site. The park includes an adventure play area alongside planting, parklands and seating offering formal areas of open space for recreation, leisure and play. The park itself, is well maintained, secure, well-lit, generally free of litter and deemed to be good quality for the purposes of this assessment.

There is a small local park and allotments to the south of Great Western Street circa. 400m to the north west of the Site in Moss Side. The park includes a secured multi-use games area with hard standing and basketball nets. The surrounding areas of open space are generally well maintained and well-lit and there is seating within the park for people to sit and dwell. There is evidence of litter

which detracts from the attractiveness of the park. However, overall, the park is considered to offer residents good opportunities for recreation and play.

There are two areas of amenity green space within walking distance of the Site at Parkfield Street to the north west of the Site and Park Crescent to the north east. Both spaces are accessible to the public and provide attractive green pedestrian routes through residential areas. Both are well lit and well managed and the amenity green space at Park Crescent also includes benches for residents to sit and dwell.

Overall, our assessment demonstrates that residents have access to several good quality public open spaces within a 10-minute walk of the Site including Platt Fields City Park, identified as being the highest quality park in the City, as well as 2 x good quality local parks.

Conclusions

The purpose of this letter is to respond to the Council's request for an open space assessment based upon the requirements of Policy EN10 of the Manchester Core Strategy and paragraph 97 of the NPPF.

This letter has demonstrated that an open space assessment is not required to support this application because:

1) The Site is not identified as having an open space function on the Manchester Development Framework Proposals Map or in the Council's Open Space Study and because;
2) The Site has not been found to have any open space function based on our own assessment.

As such, there is no requirement to apply the policies set out above. Nonetheless, residents living within the locality have access to several good quality open spaces within a 10 minute walk of the Site. The proposed development would, therefore, not have an adverse impact on residents accessing public open space provision.

We trust this letter will be given due consideration in the determination of the planning application. However, should you have any further queries please do not hesitate to get in touch.

Yours faithfully

HANNAH WALKER
Planning Associate

SITE PHOTOGRAPHS

Photograph 1: Looking south from the junction of Victory Street and Claremont Road



Photograph 2: Looking north from Victory Street towards Claremont Road



Photograph 3: Junction of Victory Street and Claremont Road



Photograph 4: Site from Victory Street

