TETRA TECH

Our ref: 784-B072972

Your ref: CDN/25/0615

10 September 2025

Sent by Email Only

Dear Planning Team (Manchester City Council)

Retail and Residential Development: 67 Cheetham Hill Road

Discharge of Conditions 22 & 23 (Travel Plans) attached to Planning Permission 141647/FO/2024

Introduction

1. Planning application 141647/FO/2024 was determined in March 2025. The Decision Notice includes conditions 22 and 23 which relate to Travel Plans. Those state:

"22) Before the first occupation of the authorised development, a residential travel plan shall be submitted to and agreed in writing by the City Council as Local Planning Authority. In this condition a Travel Plan means a document which includes:

i. The measures proposed to be taken to reduce dependency on the private car by those [attending or] employed in the development;
ii. A commitment to surveying the travel patterns of staff during the first three months of use of the development and thereafter from time to time;
iii. Mechanisms for the implementation of the measures to reduce dependency on the private car;
iv. Measures for the delivery of specified travel plan services;
v. Measures to monitor and review the effectiveness of the Travel Plan in achieving the objective of reducing dependency on the private car. Within six months of the first use of the development, a revised Travel Plan which takes into account the information about travel patterns gathered pursuant to item (ii) above shall be submitted to and approved in writing by the City Council as local planning authority. Any Travel Plan which has been approved by the City Council as local planning authority shall be implemented in full at all times when the development hereby approved is in use.

*Reason - **To assist promoting the use of sustainable forms of travel to and from the authorised apartments, pursuant to policies SP1, T2 and DM1 of the Core Strategy for the City of Manchester and the Guide to Development in Manchester SPD (2007).**"*

2. And:

"23) Before the first occupation of the authorised development Class E units, a staff travel plan shall be submitted to and agreed in writing by the City Council as Local Planning Authority. In this condition a Travel Plan means a document which includes:

i. The measures proposed to be taken to reduce dependency on the private car by those [attending or] employed in the development;
ii. A commitment to surveying the travel patterns of staff during the first three months of use of the development and thereafter from time to time;
iii. Mechanisms for the implementation of the measures to reduce dependency on the private car;
iv. Measures for the delivery of specified travel plan services;
v. Measures to monitor and review the effectiveness of the Travel Plan in achieving the objective of reducing dependency on the private car. Within six months of the first use of the development, a revised Travel Plan which takes into account the information about travel patterns gathered pursuant to item (ii) above shall be submitted to and approved in writing by the City Council as local planning authority. Any Travel Plan which has been approved by the City Council as local planning authority shall be implemented in full at all times when the development hereby approved is in use.

*Reason - **To assist promoting the use of sustainable forms of travel to the school, pursuant to policies SP1, T2 and DM1 of the Core Strategy for the City of Manchester and the Guide to Development in Manchester SPD (2007).**"*

Review of the Conditions

3. Condition 22 which relates to the 4 x 1-bedroom apartments requires a commitment to survey the travel characteristics of "staff" (Item ii). There are no staff at the residential aspects of the development and therefore this item cannot apply to the proposals. The ongoing monitoring is pursuant to item II, which does not apply to the proposals.

4. The reason for Condition 23 is to assist in promoting the use of sustainable forms of travel to the school. There is no school proposed and therefore the reasoning for the condition is not applicable.

Submitted Travel Plan Statement

5. In June 2025, a discharge of conditions application was submitted, which included a Travel Plan Statement prepared by Tetra Tech.

6. The Travel Plan Statement demonstrated that:

   - The site is in a location which is highly accessible via sustainable modes, scoring 8 out of 8 (highest level possible) in the Greater Manchester Accessibility Level (GMAL) assessment.

- The Department for Transports Travel Plan pyramid shows that the location of the site in terms of proximity to existing facilities and services is the most important part of a Travel Plan. In this instance, the location of the site scores as high as it possibly can in the GMAL assessment.
- The floorspace of the retail aspect of the proposal is only a 75sqm, which is just 30% of the floorspace threshold (250sqm) for which TfGM require a Retail Travel Plan. Travel Plan Toolkit - Do I need a Travel Plan?
- The NPPF paragraph 118 states that developments that will generate **significant** amounts of movement should be required to provide a Travel Plan. The residential aspect of the proposals, which is only for 4 apartments, is expected to generate 16 people trips a day, which is not significant. The residential aspect is car free, so all 16 trips will be made by sustainable modes of travel. Given this there should be no requirement for a Residential Travel Plan.

7. Notwithstanding the above, a Travel Plan Statement was provided, which contained an overview of accessibility via sustainable and some Travel Plan Measures, however ongoing surveys were not specified as the development does not warrant Travel Plan.

MCC Response

8. MCC's response to the Travel Plan statement is:

> *"A Travel Plan has been submitted and includes details on the proposed measures. However, there is no commitment to surveying travel patterns of residents or measures to monitor and review the effectiveness of the Travel Plan. Therefore, the information is currently insufficient to allow us to recommend the discharge of the condition from a Highways perspective."*

Tetra Tech Response

9. The conditions requiring Travel Plans are very onerous for the size and context of the development, it is simply not necessary to make the development acceptable in planning terms, with reference to National Planning Policy Framework (NPPF). Notwithstanding this a Travel Plan Statement has been prepared and submitted.

10. However, there should be no requirement for ongoing surveys or monitoring, as this would be highly disproportionate requirement and not in the accordance with the NPPF.

11. The NPPF in para 58, states:

> *Planning obligations must only be sought where they meet all of the following tests:*
> *a) necessary to make the development acceptable in planning terms;*
> *b) directly related to the development; and*
> *c) fairly and reasonably related in scale and kind to the development.*

12. It has been clearly demonstrated that the Conditions are onerous, are not fairly and reasonably related in scale and kind to the development and are not necessary to make the development acceptable in planning terms.

13. The Conditions do not accurately relate to the proposals:

    - Condition 22 for the residential aspect requests surveys of staff, where there are no staff.
    - The reasoning for the retail condition (23) is to promote sustainable travel to and from the school. There is no school.

14. Furthermore, it is important to consider the reasons for including each condition. In the case of Conditions 22 and 23, the reason is to assist in promoting sustainable travel pursuant to Policies SP1, T2, and DM1 of the Core Strategy.

Policy SP1

15. Policy SP1 does not specifically mention Travels Plans. The travel related aspects of the policy are:

    "New development will maximise the potential of the City's transport infrastructure, in particular promoting walking, cycling and use of the public transport."

    "Improve access to jobs, services, education and open space by being located to reduce the need to travel and provide good access to sustainable transport provision."

16. The proposals are in a location which will maximise the potential of the City's transport infrastructure, in particular promoting walking, cycling and use of the public transport.

17. The proposals are in a location which will improve access to jobs, services, education and open space by being located to reduce the need to travel and provide good access to sustainable transport provision.

18. The proposals are clearly in compliance with Policy SP1.

Policy T2

19. Policy T2 "Accessible areas of opportunity and need" states:

    The Council will actively manage the pattern of development to ensure that new development:

    - *Is easily accessible by walking, cycling and public transport; connecting residents to jobs, centres, health, leisure, open space and educational opportunities. Particular priority will be given to providing all residents access to strategic employment sites including:*
        - *Links between North Manchester residents and key employment locations, including the City Centre,*

- *Includes **proportionate** Traffic Impact Assessments and **Travel Plans** for all **major applications and for any proposals where there are likely to be access or transport issues.***

20. The proposals are clearly in compliance with Policy T2:

- The site is located in easily accessible by walking, cycling and public transport; connecting residents to jobs, centres, health, leisure, open space and educational opportunities.
- The residential aspect of the development links to employment destination in Cheetham Hill and the city centre.
- The proposal is not a major application.

Even for major development Policy T2 mentions proportionate Travel Plans.

- The proposal is not expected to have transport or access issues, particularly given that it is in a highly sustainable location.
- Given the above, even though the development is not a major application, the submitted Travel Plan statement is more than proportionate to the development.

Policy DM1

21. Policy DM1 does not specifically mention Travel Plans. It relates to developments having regard to:

- effects of traffic generation,
- accessibility via sustainable modes
- refuse storage and collection
- vehicular access and parking.

22. The proposals include only 1 parking space and will generate a very low number of vehicles. The site is highly accessible via sustainable modes. A refuse storage and collection are illustrated on Create Studios drawing A1488(02)AP006, submitted in relation to condition 10. Given this, the proposals are clearly in compliance with Policy DM1.

Conclusions

23. A Travel Plan Statement has previously been prepared and submitted, which provides an overview of the accessibility via sustainable modes credentials of the site and some Travel Plan measures.

24. The sustainable accessibility review finds that the site scores the highest possible score via the Greater Manchester Accessibility Level assessment. The Department for Transport's Travel Plan pyramid shows that the site's location is the most important aspects of having a sustainably accessible site.

25. The Travel Plan Statement does not include ongoing surveys or monitoring. These is not required as:

    a. The proposals are in accordance with all the Policies mentioned in the Reasons for the Conditions.
    b. The requirement for a Travel Plan for this development is onerous and should not have been included as a planning condition. This is clearly demonstrated by MCC's policy T2 which states that requirements for Travel Plans will be proportionate and needed for major developments or developments which are likely to have access issues. The proposals fit into neither category and the Travel Plan requirement is in no way proportionate.
    c. The trip generation of the site will be very low, with the vast majority travelling via accessible modes already, particularly given the residential aspect is car free and the site has very high levels of access to sustainable modes. Given this, there will be little to no benefit to Travel Plan surveys and ongoing monitoring. The requirement is not necessary to make the development acceptable in planning terms with reference to NPPF.
    d. Condition 22 requests surveys for staff at the residential development, there are no staff at this development to be surveyed. It is therefore not applicable.
    e. The reason for Condition 23 is to promote sustainable travel to / from the school. There is no school and this condition is therefore not applicable.

26. Given the above, there is more than enough evidence to discharge the conditions without the commitment to ongoing monitoring.

Yours sincerely

Matt Thompson

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Associate

Transport Planning