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Your Ref: 142888/FO/2025
Our Ref: ATE/25/00825/FULL
Date: 08 July 2025

Active Travel England Planning Response
Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: Manchester City Council

Application Ref: 142888/FO/2025

Site Address: Cambridge Halls of Residence Cavendish Street, Manchester, M15 6TT

Description of development: Demolition of existing halls of residence and erection of two buildings of 30 and 24 storeys above ground, plus basement and rooftop plant levels, comprising: purpose-built student accommodation with internal and external rooftop communal amenity space (Sui Generis); ground floor commercial and community uses (Flexible Use Classes E, F1(a) or F2(b)); hard and soft landscaping; and associated highway works.

Notice is hereby given that Active Travel England's formal recommendation is as follows:

- a. ~~**No Objection:** ATE has undertaken a detailed assessment of this application and is content with the submission.~~
- b. ~~**Conditional approval:** ATE recommends approval of the application, subject to the agreement and implementation of planning conditions and/or obligations as set out in this response.~~
- c. **Deferral:** ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.
- d. ~~**Refusal:** ATE recommends that the application be refused for the reasons set out in this response.~~

1.0 Background

Active Travel England (ATE) welcomes the opportunity to comment on the ATE/25/00825/OUT outline planning application. This is ATE's first involvement with the proposed development.

ATE has considered the application against the criteria set out in its planning assessment toolkit, national planning policy and active travel design guidance. With regards to the aligned assessment criteria, various issues have been identified. These are in accordance with the relevant criteria in ATE's assessment toolkit and are detailed below:

2.0 Trip Generation Assignment & Mode shares

Rating: MORE INFORMATION REQUIRED

The Applicant has used data from the PBSA development on Upper Brook Street promoted by McLaren Property Ltd and Kadans Science Partner 8 UK Ltd (Planning Ref: 137399/FO/2023) in the Transport Statement (TS, pp. 27-29). This allows for greater accuracy for trip forecasting and more local sensitivity. However, these forecasts only include peak hours.

While the applicant recognises that trips in peak hours are not always university-related it is crucial that non-peak hours are also considered to allow for the likely high numbers of students who access the university and facilities at various times. In consideration of this, ATE requests that the Applicant includes journeys outside of peak hours to better represent all trips made from the development.

ATE recognises the distinction between walking, cycling and public transport trips as a positive aspect of the application. This is especially promising given the predicted mode split for walking and cycling is 62.5% (walking - 50%, cycling 12.5%) in total, which is above the government's vision in Gear Change that half of all journeys in towns and cities shall be walked, wheeled or cycled by 2030.

The Applicant has submitted a full Travel Plan. The ambitious modal split forecasts are not reflected proportionally reflected in travel plan targets (TP, p. 1), where cycling is only 1.2%. This is caused by the Applicant using the TRICS database for these targets instead of the 'sister' 137399/FO/2023 application, which would be more relevant. ATE requires that travel plan targets are more consistent with the predicted modal split and are ambitious about both walking and cycling levels. The Travel Plan (p.11) explains the strategy to negotiate cycle/pedestrian conflict resulting from cyclists using a gap in guard railing instead of the crossing to move between the site and Higher Cambridge Street/Cavendish Street junction.

The Design and Access Statement identifies public realm improvements around the site and highlights some measures to be taken to encourage active modes. For walking, ATE sees personal alarm provision as a positive initiative especially for improving safety for women living in central Manchester. For cycling, ATE would like to see the Applicant encourage residents to use the Starling Bank bikes, especially considering the nearby docks along Oxford Street.

3.0 Off-Site Infrastructure

Rating: AREA OF CONCERN > CONDITION/CONTRIBUTION RECOMMENDED

The Transport Statement assessed walking/cycling connectivity (Sections 2.1-2.2, pp. 3-4) with maps but limited route quality reflection. Some photographs appear in the Design and Access statement (pp. 19, 81, 104-114) for design purposes.

ATE requests a comprehensive active travel route audit with qualitative analysis, including maps, photographs, and comments addressing compliance with Active Design (Sport England), Designing for Walking (CIHT), Inclusive Mobility, LTN 1/20, PAS 6463, National Model Design Guide, National Model Design Code, and NPPF. Specifically, Junction Assessment Tool (LTN 1/20 Appendix B) outputs are needed for the Cavendish Street/A5067 junction due to safety concerns (TS, p. 11). The Transport Statement (TS, p. 9) only identifies education destinations but does not comment on the quality of routes leading to them for all active travel users. It only assesses the quality of streets accessing the development from a car-centred perspective. The Design and Access Statement engages with some walking route issues in Section 8.4 (p. 81).

Walking routes:

Manchester Metropolitan University buildings and All Saints Park: Footways around the campus are generally wide, reaching 3-4 metres. However, they sometimes have pinch points below 2.5 metres, or even 1 metre. Some surfaces like Sidney Street are poorly sealed, posing challenges for mobility aid users (Inclusive Mobility, p. 29). Outside of main public spaces and pedestrianised Higher Chatham Street, seating is infrequent, creating barriers for people with limited mobility. Since these are commonly used pedestrian areas, seats should be provided at intervals of no more than 50 metres (Inclusive Mobility, p. 31). Many campus buildings have poor quality activation at ground floor and inactive frontages, causing poor natural surveillance and giving pedestrians the sense they are walking at the 'back' of buildings. Streets would benefit from a wayfinding system. Crossings often miss desire lines and are infrequent, for example 220 metres distance between crossings on Rosamond Street West and Booth Street West. Routes are well-lit with street lighting.

Best-one and SPAR Stretford Road: Future residents will use Cavendish Street to access nearby convenience shops. This route is concerning given unsealed surfaces and lack of tactile paving on crossings, making it inaccessible for disabled users. The nearest large supermarket is ASDA Hulme Superstore, 1.4 km away. The route to ASDA leads along Cavendish Street, Hulme Arch Bridge and Archway. While the route is generally walkable with some pedestrian-only sections, pedestrians, especially disabled ones, may struggle to navigate the car-centric environment of Hulme Retail Park.

Cycling routes:

Manchester Metropolitan University buildings and All Saints Park: A network of cycle routes is available around the campus, with Oxford Road as the main artery featuring fully kerbed segregation. The inner network has speed limits of 20 mph and is generally suitable for on-street cycling due to low traffic volumes. However, ATE notes that parking around the university campus could be better managed to minimise the risk of dooring. Booth Street West acts as a major barrier for walking and cycling through the neighbourhood.

Central Manchester employment areas and stations: Routes to Manchester Oxford Road, Manchester Piccadilly, and Manchester Victoria include junctions on Oxford Street where cycle movements are not protected (junction with B6469 and Portland Street). Cyclists on Portland Street, Princess Street, Cross Street and Corporation Street mix with

traffic, including trams in the last three locations. The most common provision is Advanced Stop Lines, which are insufficient for the level of traffic on these roads. This route is likely to generate critical issues in ATE Route Check regarding conflict at signal junctions, motor traffic speed and volume, and effective width next to tram lines. This situation excludes most users (LTN 1/20 Table 10-2) and residents will be unlikely to cycle to Manchester Victoria and Manchester Piccadilly.

NCN6: NCN6 is accessible via Cavendish Street/Stretford Street via a painted-on cycle lane. Given the 6147 vehicles per day traffic count, this provision excludes some potential users and later down Stretford Street excludes most users due to lack of segregation despite a 20 mph speed limit. The route has places where the combined width of the cycle lane and adjacent traffic lane is 3.7 metres, generating a critical issue in ATE Route Check, indicating a major safety concern.

The Applicant proposes three main changes to off-site infrastructure, which are connected to on-site infrastructure as well. Each proposal requires specific considerations and modifications.

3.1 Changes to Chatham Street: No major concerns have been identified with this proposal. For additional placemaking comments, see the Masterplanning and Permeability section.

3.2 Proposed Non-Mortised User Access and 3.2.1 Cavendish Street movement strategy: The proposed changes raise concerns due to safety, directness and coherence of routes in and around the site (see Masterplanning and Permeability). ATE requests that the Applicant provides an alternative solution, which involves working with the Highway Authority to adopt the route via Section 38 agreement of the Highways Act or other means, and provision of a bi-directional cycle track and footway through the site on Cavendish Street, which is compliant with LTN 1/20 and Inclusive Mobility standards. ATE requests that the redesign stretches between the Cavendish/Cambridge Street and Cavendish/Lower Ormond Street junctions, and includes junction redesign in line with ATE Junction Assessment Tool (see ATE website or LTN 1/20 Appendix B). Note that there is a similar junction at Oxford Road/Cavendish Street already, which provides a successful design with a separate traffic lights phase for cyclists. ATE Crossing Selector Tool also provides some relevant examples.

Aside from changes to mentioned improvements, ATE requests that the Applicant provides seating and shelters for bus stops on Cambridge Street to accommodate higher passenger volumes due to increased number of student accommodation residents. These need to be compliant with Section 6.10 of LTN 1/24 (pp. 49-50) and have appropriate kerb heights (Section 6.6, p. 46).

4.0 Masterplanning and Permeability

Rating: AREA OF CONCERN > CONDITION/CONTRIBUTION RECOMMENDED

The applicant has provided a comprehensive, high quality design proposal for public spaces within the development in the Design and Access Statement in Section 8. Comments on individual sections can be found below:

8.11 Cambridge Street: No major concerns. ATE requests that the applicant provides seating every 50 m along the redesigned stretch of the street in line with Inclusive Mobility 4.5 (p. 31). ATE requests that the applicant ensures the materials used for paving are of sufficient contrast to the tactiles (Guidance on the Use of Tactile Paving Surfaces, Section

1.5.4, pp. 12-13). The planting right in front of the junction will likely need to be redesigned with the reintroduction of a bid-directional cycle track.

8.12 Chatham and Boundary Street: No major concerns. ATE welcomes the introduction of inset parking bays to reduce the risk of cyclists being doored and SUDS to help with drainage. ATE requests that the applicant provides seating every 50 m along the redesigned stretch of the street in line with Inclusive Mobility 4.5 (p. 31).

8.13 Cavendish Walk: The Applicant proposes closing part of Cavendish Street to cyclists, rerouting them via Boundary Street West. While ATE acknowledges pedestrian safety concerns, poor cycling behaviour stems from inadequate infrastructure quality, which does not meet LTN 1/20 five core design principles (Sections 4.2 and 5) - being neither coherent, direct, safe, comfortable, nor attractive. The design excludes cyclists on non-standard bikes who cannot dismount. Rerouting creates additional safety concerns, while further reducing route coherence and directness. Given high cycle volumes and e-bike usage (TP, p. 11), ATE is concerned that residents and delivery drivers will continue cycling illegally through the site if closed, creating enforcement issues and maintained safety risks. Rather than closure, ATE recommends improving infrastructure quality to address the root cause of cycling conflicts through proper design compliant with LTN 1/20 standards, as outlined in the Off Site Infrastructure section.

8.15 The Courts South: No major concerns. ATE encourages the Applicant to consider whether seating in the study garden allows healthy and ergonomic positions for reading, writing and typing.

8.16 The Courts North: Wheelchair users do not have the same access to this space. If a ramp is not possible due to the need to match appropriate landing heights, ATE requests that the Applicant provides appropriate wayfinding leading wheelchair users to that space. ATE does not consider 8.17-8.20 The Terraces to be within the scope of commentary, as they are considered to be an element of the building and do not facilitate active travel on site.

5.0 On-Site Facilities

Rating: MORE INFORMATION REQUIRED

The Applicant has provided a detailed outline of planned cycle parking. While the Applicant has justified the provision of 140 cycle spaces, this is way below the one per bedroom requirement set out in LTN 1/20 Table 11-1 (p. 132). ATE requests that the Applicant reassesses the number of required cycle parking spaces based on the predicted modal split and upgraded travel plan targets. With 140 cycle parking spaces, 3 accessible spaces are below the 5% threshold in LTN 1/20 11.3.2 (p. 133). ATE requests that the applicant increases the total number of accessible spaces to reach the 5% threshold. Phase 1 cycle storage is located in a different place in the Design and Access Statement and the Transport Assessment. ATE requests that the Applicant confirms the final location of cycle storage. ATE highlights that Phase 1 cycle storage in drawing 998-CPA-ZZ-00-DR-A-0221 has indirect access from the street, and since residents cannot cycle in the courtyard, this is inaccessible to disabled cyclists who cannot dismount. ATE requests that the applicant provides details of security arrangements and lighting of cycle storage in Phase 1 and 2.

Additional cycle parking spaces are predominantly integrated into the landscape strategy of the development. A total of 22 Sheffield stands would be provided across the site, equating to 44 shortstay cycle parking spaces.

6.0 Next Steps

ATE requests that the local planning authority shares this correspondence with the applicant and their agents. ATE would welcome the opportunity to review further submitted information to help address the identified deficiencies as detailed above, with a view to providing a further response and recommended conditions.