



Paul Butler Associates

Planning, Development & Heritage Consultants

21 December 2023

Mrs Julie Roscoe
Head of Planning
Manchester City Council
Town Hall
Albert Square
Manchester
M60 2LA

Our Ref: 23.1971

Dear Mrs Roscoe

Location: 7 Rainforth Street, Manchester, M13 0RP
Proposal: Application to remove condition attached to Planning Permission 135684/JO/2022 under section 73 of the Town and Country Planning Act 1990

Introduction

We are pleased to submit this application on behalf of our client Kaam Ltd. The application seeks permission for the removal of condition 8 attached to planning permission 135684/JO/2022.

The full description of development approved under 135684/JO/2022 is as follows:

Variation of conditions 2 (specified plans) 3 (number of units) 4 (use) 5 (elevation details) 6 (ground floor elevations) 8 (off site car parking) 10 (waste management) and 14 (glazing) attached to planning permission referenced 126006/FO/2020 to allow alterations to the building height, number of units and parking layout.

The original planning application (application number: 126006/FO/2020) was approved on the 23 June 2020 and allowed for:

Change of use to provide 8 apartments (Class C3) within upper floors (4 x 1 bed and 4 x 2 bed) including the insertion of additional floor within the fabric of the existing building, elevational alterations (including the raising of the side and rear elevations to allow the formation of a continuous flat roof) and refuse and cycle storage at ground floor.

Proposed Change

It is proposed that condition 8 is removed from the planning permission. The applicant considers that the minor parking demand from the development can be accommodated on street without detriment to highway safety.

For reference, condition 8 is repeated below.

8) Before the occupation of the approved development, a scheme shall be submitted to and approved in writing by the City Council as local planning authority, detailing the arrangements for the provision of 6 (six) off-site car parking for use by residents of the authorised apartments. The arrangements for off-site car parking shall be made available to residents prior to the occupation of any of the authorised apartments and shall be maintained in situ thereafter.

Reason - To ensure that the development is supported with satisfactory car parking provision and in the interests of residential amenity and pedestrian and highway safety pursuant to policies SP1, T1 and DM1 of the Core Strategy for the City of Manchester.

The application is supported by a Highways Technical Note prepared by Focus Transport using data on local car ownership census data, site accessibility data and parking beat surveys. Notably the original application included little analysis in respect of accessibility and parking.

The supporting Highways Technical Note from Focus Transport demonstrates that in the first instance, and based on the sustainable location and type of accommodation proposed, it is highly unlikely that any resident of the scheme would own a car. Should there be any demand for parking, the survey results show that a level of on street parking is available, especially during the overnight peak period that would be suitable for occasional resident / visitor parking when required. Given these factors, and the precedents of similar approvals highlighted in the report, it is considered that the proposed car free approach is entirely appropriate.

Policy Appraisal

Policy T1 (Sustainable Transport) states that to deliver a sustainable, high quality, integrated transport system, to encourage modal shift away from car travel to public transport, cycling and walking, to support the needs of residents and businesses and to prepare for carbon free modes of transport, the Council will support proposals that will improve choice by developing alternatives to the car, that promote regeneration and economic vitality, that improve access to transport services and facilities, improve pedestrian routes and pedestrian movement and develop further Manchester's cycle network.

The proposed scheme with zero parking supports the policy aim of moving towards more sustainable modes of transport. The development places greater emphasis upon the use of more sustainable forms of transport such as walking, cycling and public transport. It should be noted that any prospective resident considering moving into the proposed apartments would be doing so in the full knowledge that there is no dedicated car parking available. This key fact will essentially be a self-regulating factor in the profile of residents and will, by definition, deter many car owning individuals from living at the Site. By actively deterring cars and promoting sustainable transport modes in this way, this approach complements MCC's aspirations to become a carbon neutral city by 2038 and supports the policy set out in T1 (Sustainable Transport).

Policy DM1 lists a number of criteria that all development should have regard to, these include: access to new development by sustainable transport modes; and vehicular access and car parking. The development being car free in its approach will make the best use of public transport in the locality and encourage the modal shift towards the use of more sustainable modes of travel. In addition, as per the supporting Technical Note from Focus Transport it is

demonstrated that any minor residual demand for parking that is generated from the 6 apartments can be accommodated on the surrounding streets. We therefore consider that the application proposal to remove condition 8 satisfies policy DM1.

Chapter 9 of the NPPF 'Promoting Sustainable Transport' sets out that in considering development proposals – appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location. The proposed development is for apartments within the centre of Longsight in a highly sustainable location. The car free approach in itself promotes opportunities for sustainable transport and measures to achieve this can be advanced through a Travel Plan should MCC consider this to be necessary.

The NPPF goes on to state at paragraph 115 that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'. The submitted evidence with this application demonstrates that any demand for car parking would be extremely minor and that this can be accommodated on the local highway. It is therefore not considered that the resulting impact on the road network would be severe and for these reasons we submit that the application should be approved.

Sustainable Travel

As noted in the Focus Technical Note, it is proposed that the highly accessible location of the 7 Rainforth Street site could be supported by a Travel Plan, secured by a suitably worded planning condition, should the LPA/LHA consider this to be of merit. It is considered appropriate for a Travel Plan for the site to consider implementation of the following measures, with the aim of ensuring that residents do not require access to a car whilst residing at the site:

- Provision of new resident travel pack, to include local walking, cycling and public transport maps, details of locations of key local services and facilities and details of the Travel Plan including Travel Plan Coordinator contact details.
- Provision of on-site cycle parking and puncture repair facility with basic cycle supplies on site.
- Provision of details of walking, cycling and public transport journey planning websites/apps.
- Advertisement of local cycling proficiency training opportunities.
- Provision of a public transport 'taster' ticket.

Summary

The report demonstrates that the proposed development would not cause detriment to the safety or operation of the local highway network with regards to any car parking demand that may arise due to the lack of on-site car parking provision. This has been informed by the expectation that prospective residents will likely not own cars based on an analysis of local census data on car ownership levels, the Site's excellent accessibility by non-car modes of travel and an appraisal of the availability of on-street parking in the vicinity of the Site.

The application also sets out a range of initiatives that could be implemented at the Site in order to remove the need for car ownership amongst residents and encourage the use of sustainable and alternative modes of travel to the private car. Should MCC consider it to be necessary,

condition 8 can be replaced with a Travel Plan style condition that will secure measures to promote the use of sustainable modes of transport.

Supporting Information

The application is supported by this covering letter and the Highways Technical Note prepared by Focus Transport. A fee of £357 is payable with this application, payment has been made online via the planning portal.

We trust that the information submitted in support of the application is sufficient to enable the positive determination of the application. However, if you require any further information please do not hesitate to get in touch.

Yours sincerely

A handwritten signature in black ink that reads "Julian Austin". The script is cursive and elegant, with the first letters of each word being capitalized and prominent.

Julian Austin BSc (Hons) MPLAN MRTPI
Associate Director

c.c Kaam Ltd