

Development Management
Manchester City Council
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Our ref EKPS/230707/KP

Submitted via the
Planning Portal

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FAO Jennifer Connor

Dear Sir or Madam,

Application for Full Planning Permission: Proposed Change of Use 124 Longley Lane, Sharston Industrial Estate, Manchester, M22 4SP

On behalf of our client, Daycare4Dogs Limited ('the Applicant'), we are pleased to enclose an application for full planning permission for the change of use of the building at 124 Longley Lane, Sharston Industrial Estate, in South Manchester, to be utilised as a dog daycare facility (herein referred to as "the Proposed Development"). The Proposed Development does not fall within one of the defined Planning Use Classes and is therefore *sui generis*. The Proposed Development does not include any alterations to the external elevations or appearance of the building.

The application has been submitted via the Planning Portal (Ref. PP-11924922).

This letter provides a full planning and design justification for the Proposed Development and is therefore submitted in lieu of a Planning Statement and Design & Access Statement, which is considered proportionate to the nature and scale of the proposals.

About the Applicant

Daycare4Dogs Limited was established in 2007. Since this time it has operated from two units within Sharston Industrial Estate:- firstly on Leestone Road and secondly on Bradnor Road, from which the business currently operates. The company specialises in providing high quality, kennel-free daycare.

The lease on the current unit at Bradnor Road is due to expire in two-years time and the Applicant is therefore looking to relocate their business. 124 Longley Lane has been identified as a suitable site which is nearby and can provide the accommodation which the business requires over the long term.

The Site and its Surroundings

124 Longley Lane (herein referred to as "the Site") comprises circa 1300 square meters of floorspace, mostly at ground floor level but with a mezzanine level located at the front part of the building. The building was most recently occupied by Siltint, a precision engineering firm who undertook light industrial activities at the premises (we understand the existing use would likely be classed as B2 light industrial use but also includes some ancillary office use falling within Planning Use Class E).

The existing accommodation includes ancillary offices, meeting rooms, kitchen, and other staff facilities. The building is currently sub-divided into a number of spaces of varying size (this is shown on the commercial agent's video of the property which can be viewed on YouTube¹).

¹ <https://www.youtube.com/watch?v=IE1yAXhqU88&t=316s>

The Site is located within Sharston Industrial Area and the surrounding building comprises a mix of industrial and commercial uses. On the opposite side of Longley Lane there are residential properties (located on Bronington Close) with the closest property (no. 11) located circa 67 metres away from the front of the Site. Also located on the opposite side of Longley Lane, directly opposite the Site, is the Longmire Centre, which is understood to be an Adult Education Centre, and a children's day nursery².

The Site is accessed directly from Longley Lane, which is a main route with a 30 mile per hour (mph) speed limit. The Site is in a highly sustainable location with transport interchanges in walking distance, providing access to train and bus services across the City and beyond.

The nearest bus stops to the site are located on Sharston Road (270m away). The bus stops have shelters, seating, and timetable information. Further bus stops are provided on Longley Lane, 350m north of the site.

The site is served by nine buses per hour in the peak periods (each way) and 11 buses per hour during the day (each way). A Greater Manchester Accessibility Level (GMAL) calculation has been undertaken for the site. A GMAL is calculated using the interactive tool managed and maintained by TfGM. This tool measures accessibility by public transport of a point of interest and provides a score between 1 and 8, where 1 is a low level of accessibility and 8 is the highest level of accessibility found in city centre areas.

The site has a GMAL of index of 5 (score: 10.87), which is a good level of accessibility in a suburban area. It is notable that the proposal has a better level of accessibility than the current facility at Bradnor Road (score: 9.81). The assessment shows that the site is well placed for public transport trips.

The Proposed Development will be serviced from the front of the building, which is accessed from the Site entrance on Longley Lane, in accordance with current site servicing arrangements. The proposed daycare will be accessible to disabled users, with the provision of a level access from Longley Lane, together with an accessible toilet/changing room at the ground floor level.

The buildings on the Site are not listed and the Site is not located within a designated Conservation Area. The nearest designated heritage assets are the (former) Wythenshawe Bus Depot located on Bradnor Road and Rose Hill located on Bronington Close. Both are Grade II* Listed but will not be affected by the proposed change of use.

The Proposed Development

The description of development that is proposed by the planning application is as follows:

"Change of use of building to accommodate dog daycare (sui generis) including the installation of 2-metre-high boundary treatment."

Key elements of the Proposed Development include the following:

- Reconfiguration of the interior of the building to accommodate the proposed dog daycare business, including:
 - Removal of some of the existing partitions and insertions of others to create a variety of size of spaces which will accommodate different areas of play, as well as other associated uses e.g. dog groom room (for grooming dogs already attending daycare that day and not as a separate offering) and storage;
 - Provision of staff facilities including a shower and changing room; bike store; and kitchen; and,
 - On the first-floor area provision of a large staff room and meeting room facility for training and other group meetings.

² <https://kidsstart.net/>

- Installation of enhanced boundary facilities – the Site currently benefits from Palisade fencing but this would need to be replaced with 2m high V-mesh fencing which is proposed to be cranked at the top.
- The creation of an outdoor exercise area to the rear of the building.
- Provision of 5 car parking spaces for pick-up and drop off along with 4 spaces for use by staff (two of which will be fitted with an EV charging point).
- The proposal will provide eight cycle parking spaces for use by staff.

External signage will be the subject of a separate application for advertisement consent, to be submitted following determination of this planning application.

Relevant Local and National Planning Policies

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.

Local Planning Policy

The adopted Development Plan for Manchester City Council ("MCC") comprises the MCC Core Strategy 2012-2027, which was adopted on 11 July 2012, and the 'saved' policies of the Unitary Development Plan ("UDP").

The Core Strategy outlines the Council's vision and spatial principles for Manchester to 2027, along with the planning policies which will be used to deliver that vision. The policies of most relevance to the determination of the application are as follows:

- **Policy SP 1 Spatial Principles** – provides the Core Development Principles and states that development in all parts of the City should:- create well designed places that enhance or create character; make a positive contribution to the health, safety and wellbeing of residents, considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income; protect and enhance the built and natural environment; minimise emissions, ensure efficient use of natural resources and reuse previously developed land wherever possible; and, 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.
- **Policy EC 2 Existing Employment Space** – states that the Council will seek to retain and enhance existing employment space and sites. Alternative uses will only be supported if it can be demonstrated that:
 - The existing use is un-viable in terms of business operations, building age and format;
 - The existing use is incompatible with adjacent uses;
 - The existing use is unsuitable for employment having regard to the Manchester Salford - Trafford SFRA; or
 - On balance, proposals are able to offer greater benefits in terms of the Core Strategy's vision and spatial objectives than the existing use.

The supporting text states:

*"The Council wishes to ensure there is provision of a wide selection of business space, types, sizes, quality and cost. **In appropriate situations the policy will allow redevelopment of sites to provide the opportunity for alternative uses of land. Leaving land vacant is not an efficient use of land and should be avoided if an appropriate alternative use can be considered.**"* (Para 8.12 – our emphasis)

It goes on to state:

*“Although the Council values employment land, **there are circumstances where it will be appropriate to support alternative uses**. These circumstances are outlined in the policy, and broadly aim to acknowledge situations in which it would be unproductive to protect the land for employment uses, either because:*

- Employment is un-viable, particularly if the site has remained empty or vacant for a period of time although it has been marketed and the employment space no longer serves the needs of businesses due to its age and the conditions of the property; or,
- An alternative use would bring more benefits to the City, either because the employment use is not the optimum use for the site or because any harm is outweighed by the benefits of the new use. Judgements on the net value of such benefits will be based on the key strategic objectives in the Core Strategy.” (Para 8.13 – our emphasis)
- **Policy EC 9 South Manchester**– states that South Manchester is not expected to make a significant contribution to employment provision within the City. It goes on to state that development proposals and planning applications should have regard to ensuring efficient use of existing employment space; and; improving public transport, walking and cycling connectivity between residential neighbourhoods and employment locations.
- **Policy T 1 Sustainable Transport** – encourages development which supports a sustainable, high quality, integrated transport system to encourage modal shift away from car travel to public transport, cycling and walking, and improves choice by supporting alternatives to the car.
- **Policy DM 1: Development Management** – requires all developments to have regard to a range of specific issues including: impact on the surrounding area in terms of design, scale and appearance; effects on amenity such as privacy, light, noise, odours, litter, road safety and traffic generation; accessibility (for disabled people and sustainable transport modes); community safety and crime prevention; refuse storage and collection; vehicular access; and green infrastructure.

The following ‘saved’ policies of the UDP are also relevant:

- **Policy DC26: Development and Noise** – aims to reduce the impact of noise on people living and working in, or visiting, the City by considering both:
 - a) The effect of new development proposals which are likely to be generators of noise; and
 - b) The implications of new development being exposed to existing noise sources which are effectively outside planning control.

The Policy adds that where the Council believes that a new proposal might generate potentially unacceptable levels of noise, it will require the applicant to provide an assessment of the likely impact and of the measures proposed to deal with it satisfactorily. It goes on to state that the Council will control noise levels by requiring, where necessary, high levels of noise insulation in new development as well as noise barriers where this is appropriate.

It is understood that the Site does not fall within an area covered by one of the MCC’s adopted Strategy Regeneration Frameworks, or any other relevant local policies.

National Planning Policy

The revised National Planning Policy Framework (“NPPF”) was published by the Ministry of Housing, Communities & Local Government (“MHCLG”) in July 2021 and is a material consideration in planning decisions.

The NPPF identifies three overarching objectives for the planning system, namely an economic objective (to help build a strong, responsive and competitive economy), a social objective (which aims to support strong, vibrant and healthy communities, and to foster well-designed, beautiful and safe places with accessible services) and an environmental objective (aimed at protecting and enhancing the built and historic environment, including making effective use of land, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy).

The policies of most relevance to the determination of the application include the following:

- **The presumption in favour sustainable development (paragraph 11)** – states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:
 - ‘approving development proposals that accord with an up-to-date development plan without delay; or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework when taken as a whole.’
- **Section 6: Building a strong, competitive economy** – states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 80).
- **Section 8: Promoting healthy and safe communities** – promotes planning decisions which seek to ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; (paragraph 93).
- **Section 9: Promoting Sustainable Transport** – seeks to ensure that proposed development provides appropriate opportunities to promote sustainable transport modes; safe and suitable access to the site; good design which reflects current national guidance; and any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree (Paragraph 110).
- **Section 11: Making Effective Use of Land** – states that planning decisions should promote and support the development of under-utilised land and buildings (paragraph 120).

Justification for the Proposed Development

Having introduced the Applicant, the Site and surroundings, the Proposed Development and the relevant local and national planning policies, it is now important to present the justification for the proposals.

Principle of Development

The Proposed Development would bring a vacant building back into use to accommodate an established and popular dog daycare facility, which would complement the mix of employment uses, whilst also contributing positively to the economy of South Manchester and the City generally, in accordance with the objectives of Core Strategy policies **SP 1, EC 2 and EC 9**.

Specifically, as noted earlier in this letter, **Policy EC2** makes provision for alternative uses to be considered in certain circumstances and the supporting text for the policy provides further guidance on when alternative uses may be suitable, noting that *‘In appropriate situations the policy will allow redevelopment of sites to provide the opportunity for alternative uses of land. Leaving land vacant is not an efficient use of land and should be avoided if an appropriate alternative use can be considered’*.

In this instance, the business which previously operated from the Site has now ceased trading and the owners of the building have put it up for sale. With this in mind, the building does not currently have any active employment generating use and is currently vacant.

It is noted that the proposed development comprises a 'Sui Generis' use as it does not fall cleanly within the Use Class Order, and therefore is not considered to be a "traditional" employment use (which is typically considered to constitute B2/B8 development). Notwithstanding, the proposed use of the unit as a Dog Daycare Facility does sustain meaningful levels of employment – with 16 people (FTE) employed by the business.

As noted above, Daycare4Dogs already operate from a unit on Bradnor Road, however the business is reaching the end of its current lease agreement. As such the proposed change of use will facilitate the move from their existing unit on Bradnor Road, safeguarding a popular and well-used service to the community and retaining the current associated employment within Sharston Industrial Estate. The existing unit, which is a similar size to the application Site, would (following Daycare4Dogs vacating the unit) become available for a traditional employment generating uses, and therefore there would be no net loss of 'employment' space within the Sharston Industrial Estate as a whole.

The use of the Dog Daycare business, as an employment generating use, is therefore considered to be an appropriate alternative and efficient use of the Site in this instance and would ensure the Site does not remain vacant, in Line with **Policy EC2, Policy EC 9 and Paragraph 120 of the NPPF**.

Retaining the business within the locality would also align with the objectives of **Paragraph 80 of the NPPF** which states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development, and be supported by **Section 8 of the NPPF**, which highlights the need to take account of local business needs, to ensure established facilities and services are able to develop and modernise, and are retained for the benefit of the community, and to promote the development of under-utilised buildings.

In view of the above, it is considered that the principle of the development proposed is entirely acceptable in planning policy terms.

Impact on Amenity

Noise Impact

The planning application is supported by a Noise Impact Assessment prepared by Hann Tucker Associates. This was informed by a 5-day noise survey to establish baseline daytime and night-time noise levels during weekday and weekend periods.

The environmental noise impact upon the nearby dwellings has been assessed in the context of BS4142:2014 + A1:2019, and national and local planning policies. The assessment shows the site is suitable for commercial development in terms of noise, without the need for any specific acoustic mitigation measures.

Hann Tucker has concluded that based on their understanding of the operation of the proposed site, including the source noise survey undertaken as part of their assessment, it is expected that the number of bark events per assessment period will be significantly lower than the limits stated in their assessment.

This is based upon an the understanding that the presence of staff on site at all times, coupled with the unique operation of the daycare facility, will significantly reduce the likelihood of the number of bark events reaching those calculated.

The planning application is also supported by an Operational Plan, which contain additional measures which successfully proven over a number of years to minimise the noise that could be generated by the daycare.

The Assessment therefore concludes that the Proposed Development is not anticipated to generate unacceptable levels of noise.

In view of the above, it is considered that the Proposed Development would be in compliance with UDP Policy DC26.

Accessibility

The planning application is supported by a Transport Statement ("TS") & Travel Plan document prepared by SK Transport Planning. The TS has been prepared in line with standard appraisal methods and the scope of the assessment was agreed with the LHA at the outset.

The TS identifies that:

- The site will replace the existing facility on Bardnor Road.
- The Site can be accessed from a range of modes of sustainable transport modes, albeit given the nature of the business most customers are likely to access the Site via private car, in linked trips to other destinations.
- The site access is a priority arrangement onto Longley Lane and the appropriate visibility is available. TRO are in place in the vicinity of the site that restrict parking on the western side of Longley Road and allow parking outside 8am and 6pm on the eastern side of the road. The assessment also confirms that there have been no accidents at the site access during the five-year period assessed. The existing access arrangements will be retained to serve the proposal site.
- Parking is provided at the site for five vehicles in front of the building and additional space is provided on the side of the building on the access road. The parking at the front of the building will be used as the drop-off / collection zone, and the parking on the side of the building will be used for staff parking. A turning head will be created at the end of the access road to allow cars and smaller service vehicles to turn and leave the site in a forward gear. Larger service vehicles, expected to only be associated with refuse collection, will be able to turn in the area at the front part of the site.
- A survey has also been undertaken at the applicant's existing facility and this has been used to establish the traffic flows and parking and drop-off / collection demand associated with the operation of the site. The survey shows that the maximum staff parking demand of four spaces will be generated and a maximum drop-off / collection demand of five spaces. The level of parking at the site is sufficient to meet the demand associated with the proposed operation and will therefore not cause overspill parking onto the highway network. The existing TRO controls limit the possibility of drop-off / collection or parking activity occurring on street.
- The traffic forecast shows that the proposal will not result in a significant change in site traffic flows during the lunchtime peak period. The assessment shows that the uplift of traffic in the AM and PM peak hours will be above DfT significance thresholds and given this the operation of the site access has been modelled using PICADY. The PICADY assessment shows that the access will work well within capacity.
- An accessibility assessment has been undertaken that shows that the site is served by appropriate walking, cycling and public transport infrastructure. The site has a GMAL of 5, which is a good level of accessibility in a suburban area. It is also shown that the GMAL for the site is higher than that associated with the existing site off Bradnor Road.
- The series of Travel Plan type measures are also proposed, aimed at encouraging staff to travel to and from the proposed development by sustainable and active modes.

The TS therefore concludes that the change of use of the site will not result in significant effects on the transport network. The Proposed Development is therefore in compliance with Core Strategy Policy T1 Sustainable Transport as well as Section 9 of the NPPF.

Ecology

The planning application is supported by a Bat Roost Potential Survey Report, prepared by Collington Winter Environmental, to assess the potential impacts of the Proposed Development on bats, which are a protected species.

The Report concludes that the building holds 'low' bat roosting potential but recommended that one additional dusk emergence survey be undertaken between 1st May to 31st August. This survey was undertaken on 24 August 2023 and confirms the Proposed Development is not considered to pose a risk of injuring and/or killing bats or disturbing/destroying a known bat roost as a result of the proposed works. As such, Natural England European Protected Species License (EPSL) is not required to be obtained prior to any works being completed on the building. If in the unlikely chance a bat identified during the works, all works will cease and an ecologist contacted immediately.

Refuse Management

A refuse store is proposed to the rear of the property. This would be enclosed. The collection of refuse associated with the Proposed Development would be undertaken by a private licensed waste carrier. Further details are provided within the completed Waste Management Strategy Proforma being submitted as part of the planning application.

Design

The Proposed Development does not include any alterations to the external elements of the existing building. With this in mind, the only changes proposed to the building are to the internal layout to make building more useable from an operational perspective.

The proposals do include revisions to the existing boundary treatment, in the form of a 2m high V-mesh fencing which would need to be cranked at the top however this is considered to be in-keeping with the Site's location on an industrial site.

Pre-Application Consultation

Prior to this application being submitted correspondence has been exchanged with MCC Planning Officers to agree on the scope of the planning application submission, and the matters which the planning application should address. The submitted documentation takes full account of the points that were raised by Officers during this pre-application process.

Summary and Conclusions

With regards to the above planning appraisal of the Proposed Development it is considered the principle of development would be acceptable and that there are no technical considerations which should restrict the Proposed Development.

The Proposed Development would enable Daycare4Dogs to continue as well as develop their business operations and continue to encourage economic growth in the area – a local and national planning priority.

Supporting Plans and Documents

In addition to this covering letter, the planning application is supported by the following plans and documents:

- Planning Application Forms, Certificates and fee³;
- Red-edged Site Location Plan;
- Architectural Plans (prepared by Butterfield Architecture);
- Design & Access Statement (contained within this covering letter) prepared by Euan Kellie Property Solutions;
- Daycare4Dogs Operational Plan prepared by Emma Billington (the Applicant);
- Transport Statement & Travel Plan (incorporating proposed servicing arrangements) prepared by SK Transport Planning;
- Waste Management Strategy Proforma;
- Noise Impact Assessment prepared by Hann Tucker Associates; and
- Bat Roost Potential Survey Report, and results of nocturnal bat emergence survey prepared by Collington Winter Environmental.

I trust the submitted information is sufficient, however should you have any questions or require any further information, please do not hesitate to contact me by email or telephone (07904 225814).

Yours faithfully,



Kelly Paddick MCD MRTPI PIEMA
Company Director
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³ The required fee of £526 (including £64 service charge payable to the Planning Portal) has been paid via the Planning Portal