

Memo

Date: 19 July 2022

To: Rob Griffin

From: John Cooper

CC: Dandara Living Limited

Subject 133746/FO/2022 - Dandara, East Didsbury

Dear Rob

Further to our recent confirmation that we are not looking to withdraw the application and our agreement to the scheme being presented to Committee on 28th of July, please see below our rationale and responses to the reasons you have cited for refusal.

We would be grateful for your careful consideration of these points and urge the planning authority to reconsider their position and recommend the application for approval, consistent with the Council's own planning policy as well as that of the NPPF.

COMPLIANCE WITH POLICY H6:

With regard to Core Strategy Policy H6, we note that it states that "South Manchester will accommodate around 5% of new residential development over the lifetime of the Core Strategy." The proposed development will support this objective.

It goes on to states that:

"High density development in South Manchester will generally only be appropriate within the district centres of Chorlton, Didsbury, Fallowfield, Levenshulme, and Withington, as part of mixed-use schemes. Outside the district centres priorities will be for housing which meets identified shortfalls, including family housing and provision that meets the needs of elderly people, with schemes adding to the stock of affordable housing."

In this regard, whilst the policy appears to direct higher density development to District Centres, it does not remove the ability for such development to come forward in other locations across the broadly defined area that Policy H6 covers i.e. South Manchester. The introduction of the words 'will' and 'generally' together further appear to clarify that it is clearly not the stated intention of this policy to preclude development outside of the defined District Centres. Notwithstanding, Policy H6 states that outside district centres priorities will be for housing which meets identified shortfalls, with schemes which add to the stock of affordable housing. The proposed development would provide 15 affordable homes (20% provision consistent with policy), thereby adding to the stock of affordable homes and meeting the requirements of Policy H6. This position was confirmed by the Inspector for the recent Oakley, 188 Fallowfield appeal decision (ref; APP/B4215/W/21/3286831), who concluded for that proposal *'the second part of*

Policy H6 does not relate the priorities that it sets for housing outside of district centres to permitting high density development’.

Other material considerations that support the provision of new homes, relate to the fact that the site is previously developed (indeed it previously accommodated a sizeable building in the form of a bus station), which now represents an underutilised part of the car park that has been evidenced as surplus to Tesco’s requirements. This represents an opportunity for Manchester to add to its brownfield housing land supply and deliver new homes that would broaden the local housing offer including the provision of 20% affordable housing.

The site is in a highly accessible location with excellent access to sustainable forms of transport, within walking distance of Didsbury Centre and in very close proximity to Parrs Wood Entertainment complex which offers a wide range of services and facilities that would in any case be associated with a District Centre. This is a prominent site on a main arterial route into the city that comfortably supports a scheme of the scale and architectural quality proposed, as evidenced with the supporting documentation.

Similarly, paragraph 125 of the NPPF states that higher density should be supported where it makes optimal use of the potential of each site. The density of the development is considered to be reflective of the accessibility of the area and makes efficient use of land.

TRIP GENERATION, TRAFFIC IMPACT AND SURVEYS:

As reported in the TA, traffic surveys were undertaken on 17 September 2022. The TA also notes that the surveys were undertaken during school term time, with no COVID-19 restrictions or roadworks in place within the study area at the time of the survey.

The Institute for Government has prepared a timeline of UK Government coronavirus lockdowns and measures from March 2020 to December 2021. This timeline confirms that on 19 July 2021 most legal limits on social contact were removed in England, and the final closed sectors of the economy reopened. The move to implement Plan B measures to tackle the spread of the Omicron variant over the winter were not imposed until much later in December 2021. The traffic surveys were therefore undertaken during a period where COVID-19 restrictions were not in place.

The Department for Transport (DfT) publish statistics on the use of transport modes in Great Britain since 1 March 2020, to monitor the use of the transport system during the coronavirus (COVID-19) pandemic. An extract from this dataset is included in Appendix C to the rear of this letter. The dataset shows that on the day of the surveys, the total number of motor vehicles on the highway network was approximately 102% of the equivalent day in the first week of February 2020 (i.e. before the pandemic). This suggests that traffic surveys undertaken on 17 September 2022 would result in a similar number of vehicles on the highway network than just before the pandemic. It is concluded that these surveys remain appropriate and valid for use.

The Transport Scoping Report referred to above was submitted to MCC Highways and TfGM. This report proposed that new traffic surveys were undertaken in September 2021 to inform the traffic impact assessment. The formal response received from MCC Highways on 06.10.2021 included the following statement:

“Highways notes that up to date traffic counts would be undertaken for the TA. This is acceptable to Highways.”

The latest comments that raise significant concerns regarding the use of this data are therefore disappointingly contrary to earlier advice.

The A34 Kingsway (to the east of the site) is a main arterial route into Manchester city centre, with traffic signal junctions that regulate flows along the route. The TA notes that this route is unlikely to experience notable levels of traffic growth from year-to-year. An analysis of raw count data available from DfT road traffic statistics for count sites in the locality confirms a downward trend of traffic volumes since 2001 in terms of total daily traffic flows and during typical peak hours. Daily traffic flow charts have been prepared from this data for count points on the A5145 (site

number 7713) and the A34 (site number 46357) to demonstrate these trends, which are included in Appendix D attached to this note.

Notwithstanding these downward trends, background traffic growth was applied in the TA using factors derived from the DfT's TEMPro program to ensure a robust assessment. Queue demand was also added to the surveyed flows at the request of TfGM. The baseline traffic flows therefore provide a robust basis for the traffic impact assessment.

It is also worth noting that traffic surveys were undertaken on Thursday 7 October 2021 with no COVID-19 related adjustments, or TEMPro traffic growth factors applied for a development site on another main arterial route into Manchester city centre – the A5103 Princess Road. These assessments were accepted by MCC Highways and TfGM and the development has since received planning consent (application ref. 132513/VO/2021).

The above comments note that the modelling assessments have been undertaken using the sites proposed 48% parking provision. Curtins can confirm that the trip rates used in the TA, which have been derived directly from the TRICS database, have not been adjusted to account for below 100% parking provision. The resulting trip generation throughout the day has however been compared with the available parking via a parking accumulation assessment to confirm that demand does not exceed supply.

Finally, despite the heavily trafficked nature of the local highway network (and the A34 in particular as acknowledged in the TA), the TA demonstrates that the impact of the proposed development on the operation of the local highway network is minimal. It is concluded that the proposed residential development would not result in a severe residual impact on the highway network and is therefore in accordance with Paragraph 111 of the NPPF.

TRIP DISTRIBUTION:

The information requested has been collated and is included in Appendix A attached to this note.

PARKING AND ACCESS:

As set out in the Transport Assessment (TA) (report ref. 076118-CUR-XX-XX-T-TP-00004-P04), there are no specific parking standards for residential dwellings in Manchester, therefore residential parking should be considered on a case-by-case basis. The Manchester Residential Quality Guidance is referenced, which permits reduced on-site provision (i.e. below 100% provision) where justified, although in accordance with Para 129 of the NPPF the Manchester Residential Quality Guidance, and this 100% parking provision, cannot be afforded any weight for decision making as it not part of a plan or an SPD. Section 3.4 of the TA provides detailed justification for the proposed level of provision at 48%, with a summary of the main reasons provided at Paragraph 3.4.68.

Curtins has been engaged in pre-application discussions with MCC Highways and TfGM since 13 September 2021 when a Transport Scoping Report was submitted (report ref. 76118-CUR-00-XX-RP-TP-003-V02). This report included details of the development proposals and the level of car parking provision proposed at the site. The formal response received from MCC Highways on 6 October 2021 included the following statement:

“The development proposes 40 car parking spaces (45% parking provision). This provision is acceptable.”

The proposed level of car parking provision was therefore justified and accepted. Since the Transport Scoping Report was submitted, the scheme evolved in response to feedback from MCC and public consultation exercises. One of the main changes included an increase in car parking provision from 45% to 48%, as per the current proposals. Hence, car parking was increased slightly above the level that was previously confirmed as acceptable by MCC Highways.

As set out in Section 1.4 of the TA, MCC Highways position subsequently changed following receipt of a note on 21 April 2022 stating the following:

“Having discussed further the on-site parking requirements, we will need 100% provision for this site.”

This request remains unsubstantiated with no commentary or justification provided. Curtins position remains unchanged that 48% car parking provision is justified and acceptable for the reasons set out in the TA, which is in line with earlier pre-application agreements with MCC Highways.

The TA has demonstrated that the proposed level of car parking provision will be sufficient to serve the development based on the typical occupier profile of Build To Rent (BTR) schemes and the accessibility of the site, amongst a wide range of other factors. It is therefore concluded that overspill onto the local highway network is very unlikely to occur.

The concerns of MCC Highways are that development-related parking could take place on surrounding residential roads that are already heavily congested in parking terms. In line with paragraph 108 of the NPPF, maximum parking standards should only be set where there is a compelling justification and, as such, the development's parking provision has been optimised in light of the highly sustainable and accessible location.

The potential source of on-street parking of concern to MCC Highways could be residents or visitors and we have clarified how this would be managed for each below:

- **Residents:** Section 3.4 of the TA demonstrates that the proposed levels of parking at the site are adequate to meet the need of residents. As set out in Section 2.4 of the TA, off-site parking away from the development would be highly undesirable for residents from a convenience and security perspective, as residents would have to walk a number of minutes to access their vehicle, which would be parked out-of-sight in locations some distance from the proposed development. Moreover, as there are limited on-street parking opportunities within walking distance of the site, it is concluded that on-street parking would be very unlikely to occur.
- **Visitors:** The site is highly accessible by sustainable modes of transport, as demonstrated in Section 4 of the TA. Visitors would therefore be able to easily access the proposed development via public transport, or by walking or cycling to the site. Notwithstanding, some visitors may need or prefer to drive to the site, hence the inclusion of 2 visitor car parking spaces (and 12 visitor cycle parking spaces) as part of the development proposals.

With regards to parking availability at the site, Section 3.5 of the TA sets out the car park management strategy. All residents will be made aware of the Travel Plan and the parking arrangements at the site, which they, in turn, would relay to visitors when planning travel to the site. The availability and use of visitor parking will be monitored by Dandara Living, alongside Travel Plan monitoring at the site, with visitor parking managed accordingly.

As set out in Section 2.4 of the TA, parking off-site would be highly inconvenient for visitors due to the walking distances involved. Notwithstanding, if on-street parking were to occur, it would be very unlikely that visitors would park in the same location at the same time, therefore any impacts on residential amenity would be minimal, and certainly not significant or severe in the context of the National Planning Policy Framework.

AUDIT OF PEDESTRIAN AND CYCLE ROUTES:

We note the requirements that, should the application be approved, the applicant will be required to enter into a Section 278 agreement for the alterations to the existing highways on Parrs Wood Lane. This will require the agreement with MCC's Highways Applications and Network Resilience teams and will be funded at the applicant's expense.

CYCLE PARKING:

Noted regarding the position on cycle parking and we can confirm that the applicant will provide the necessary cycle parking spaces and supporting facilities as set out in the planning application.

BOUNDARY TREATMENTS:

All fencing / railings adjacent to the adopted highway will be designed to be visually permeable from a distance of 600mm upwards to ensure adequate visual permeability for child pedestrians. All gated accesses will be provided by inward opening gates to ensure they do not impact on the adopted footway or highway.

REFUSE AND SERVICING:

The on-site team will be available to manage refuse collections to prevent any obstruction to passing pedestrians on the adjacent footway. We can confirm that any servicing is to be undertaken outside of the peak hours and a service management plan will be produced and controlled by way of planning condition.

STAGE 1 ROAD SAFETY AUDIT:

This request was accepted and completed by Curtins. The proposed access arrangement drawing was updated and issued to MCC Highways on 17 May 2022. A copy of this drawing (ref. 76118-CUR-XX-00-D-TP-75001-P08) is included in Appendix B attached to this note.

Again, on this basis, we do not believe that there are substantive grounds for refusal of this application, as demonstrated by the submission information lodged as part of the application, which demonstrate the proposed development would be in accordance with Local Plan policy and the NPPF

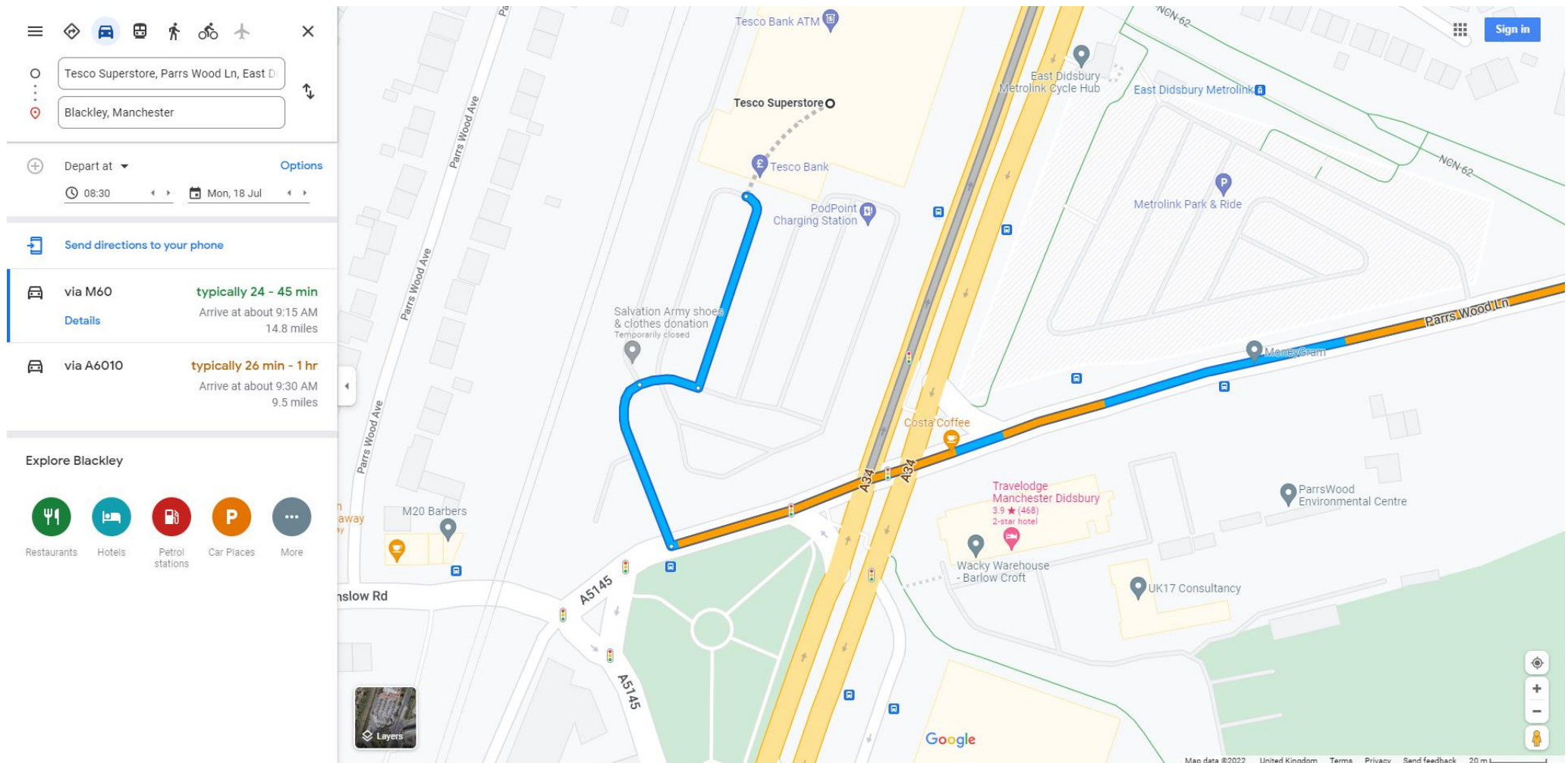
Appendix A – Distribution Areas

North onto A34 (i.e. towards Manchester city centre):

The screenshot displays the Google Maps interface for a journey from 'Tesco Superstore, Parris Wood Ln, East Didsbury' to 'Manchester'. The left sidebar contains navigation icons, a search bar, a departure time of 08:30 on Monday, 18th July, and three route options. The first route is via Kingsway/A34 and A34, taking 20-50 minutes. The second route is via Kingsway/A34, taking 22-50 minutes. The third route is via Kingsway/A34 and A5103, taking 26 minutes to 1 hour. The map view shows a blue route line starting from the Tesco Superstore, passing through the PodPoint Charging Station, and heading towards Manchester. Various landmarks and businesses are labeled on the map, including the Tesco Bank ATM, East Didsbury Metrolink Cycle Hub, East Didsbury Metrolink, Metrolink Park & Ride, MoneyGram, ParrisWood Environmental Centre, UK17 Consultancy, Wacky Warehouse - Barlow Croft, Travelodge Manchester Didsbury, Costa Coffee, Salvation Army shoes & clothes donation, M20 Barbers, and Parris Wood Ave. The Google logo is visible in the bottom right corner of the map area.

North onto A34 (further out to North Manchester, where there are two possible route options via the motorway):

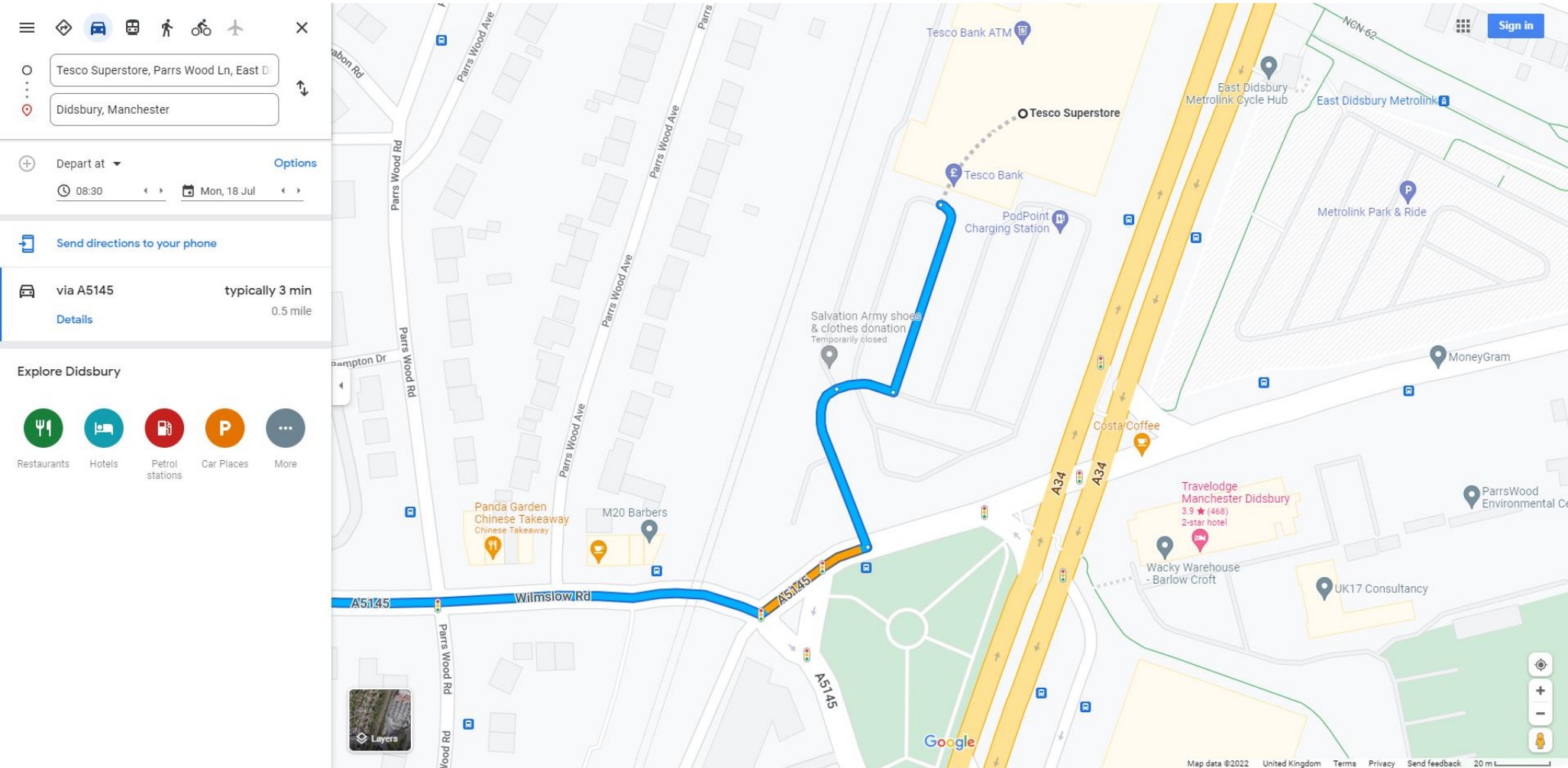
In these cases, traffic is distributed across the two different options (north onto the A34 and east onto Parrs Wood Lane, as both routes have a similar journey time and are feasible options).



East onto Parrs Wood Lane (towards Tameside):

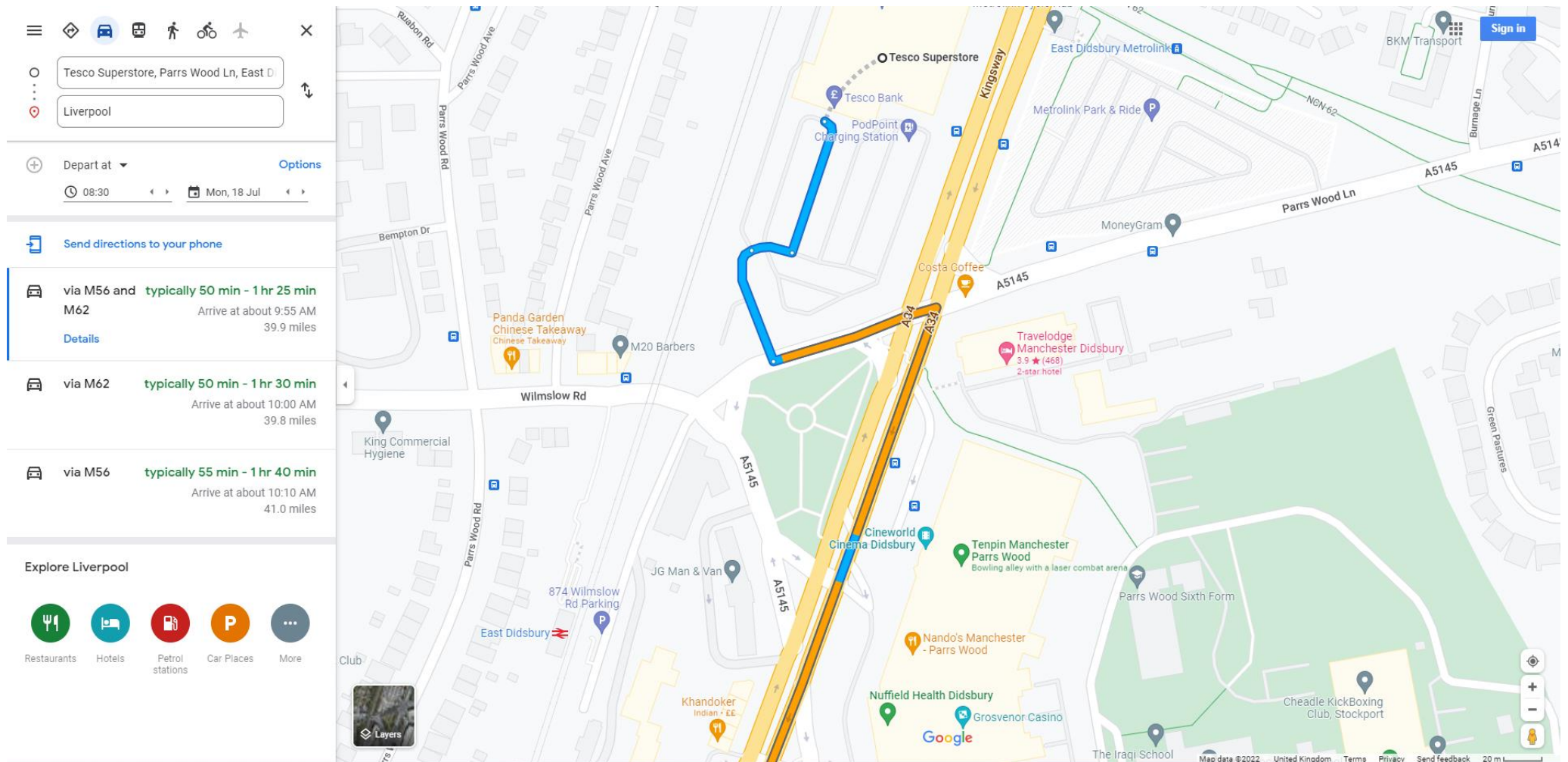
The screenshot displays the Google Maps interface on a desktop browser. The main map area shows a route from 'Tesco Superstore, Parrs Wood Ln, East Didsbury' to 'Borough of Tameside'. The route is highlighted in blue and orange, passing through Kingsway and A34. The interface includes a search bar at the top, a sidebar on the left with navigation options, and a bottom panel with map controls. The route is labeled 'via M60' and 'typically 22 - 45 min'. The sidebar also shows 'Explore Borough of Tameside' with icons for Restaurants, Hotels, Petrol stations, Car Places, and More. The bottom panel includes a 'Layers' button and a 'Sign in' button.

West onto A5145 Wilmslow Road (towards Didsbury):

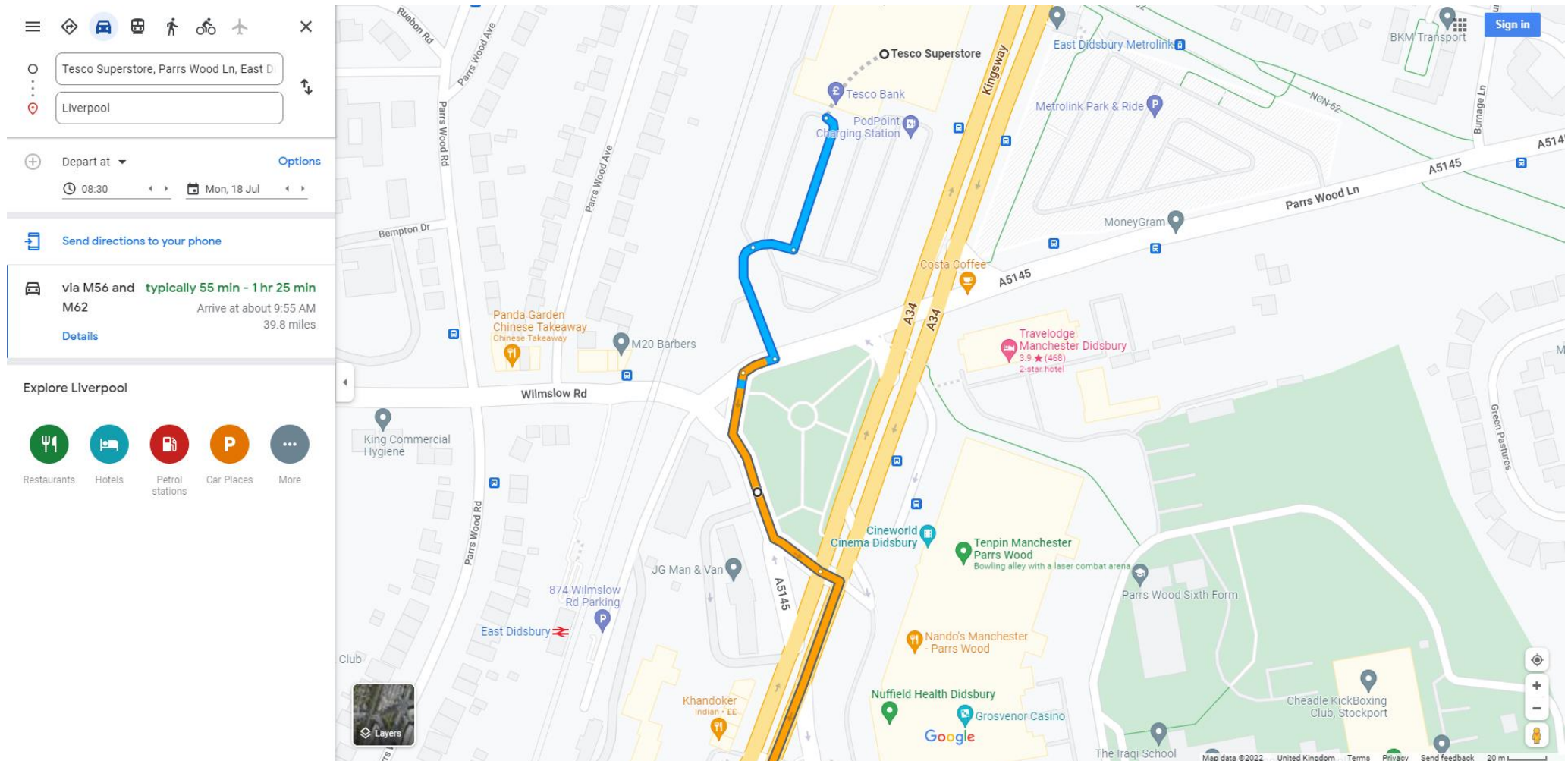


South onto A34 (i.e. towards M60):

75% of the traffic has been routed through the A34 / A5145 junction to the east of the site, as shown below:



25% of traffic has been routed through the A5145 / A34 junction to the south of the site, as shown below:



Curtins has applied professional judgement in the 75% / 25% split based on the following factors:

- The A5145 Parrs Wood Lane / East Didsbury Access Road junction is less busy compared to the A34 Kingsway / A5145 Parrs Wood Lane junction; and
- Residents in the area would have local knowledge on alternative routes to take when one of the main junctions is busy.

Appendix B – Access Arrangement



GENERAL NOTES:

1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ARCHITECTS AND ENGINEERS DRAWINGS AND SPECIFICATIONS.
2. DO NOT SCALE THIS DRAWING. ANY AMBIGUITIES, OMISSIONS AND ERRORS ON DRAWINGS SHALL BE BROUGHT TO THE ENGINEERS ATTENTION IMMEDIATELY. ALL DIMENSIONS MUST BE CHECKED / VERIFIED ON SITE.
3. ALL DIMENSIONS ARE IN METRES UNLESS NOTED OTHERWISE.
4. FOR GENERAL NOTES REFER TO DRAWING.
5. THE CONTENT OF THIS DRAWING IS FOR INDICATIVE INFORMATION ONLY AND NOT SUITABLE FOR CONSTRUCTION PURPOSES.
6. BASED ON HODDER & PARTNERS' LAYOUT: 'L(-)000_Ground Floor Plan-P1'.
7. LANDSCAPE LAYOUT BASED ON LAYER' STUDIOS' LAYOUT: '262-LYR-XX-ZZ-DWG-L-1001'
8. BACKGROUND BASED ON LAND SURVEY PROVIDED BY HODDER & PARTNERS.

KEY:	PLANNING BOUNDARY
	PROPOSED RAISED KERB
	PROPOSED ROAD MARKINGS
	INDICATIVE LANE CENTRELINE
2.40 x 25.00m	PROPOSED VISIBILITY SPLAYS (20mph)
2.40 x 43.00m	PROPOSED VISIBILITY SPLAYS (30mph)
11.00m	PROPOSED FORWARD VISIBILITY (10mph)
	PUBLIC HIGHWAY EXTENTS (FROM PUBLIC RECORDS)

P08	Tactile paving updated	17/05/22	DD	CP
P07	Access arrangement updated following Stage 1 RSA	13/05/22	DD	CP
P06	Layout updated	05/05/22	DD	CP
P05	Layout updated	26/04/22	DD	CP
P04	Layout updated	01/04/22	DD	CP
P03	Layout updated	08/12/21	DD	DD
P02	Layout updated	25/11/21	DD	CP

Rev:	Description:	Date:	By:	Chkd:
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Civils & Structures • Transport Planning • Environmental • Infrastructure • Geotechnical • Conservation & Heritage • Principal Designer
Birmingham • Bristol • Cambridge • Cardiff • Douglas • Dublin • Edinburgh • Glasgow • Kentish • Leeds • Liverpool • London • Manchester • Nottingham

Status:

FOR PLANNING

Project:

TESCO PARRS WOOD
MANCHESTER

Orig Title:

PROPOSED ACCESS ARRANGEMENT

Size:	Date:	Drawn By:	Designed By:	Checked By:
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A1	02/11/21	DD	DD	CP
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Scale: 1:250

Project No:	Originator:	Volume:	Level:	Type:	Role:	Category / Number:	Rev:
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Appendix C – COVID-19 Transport Use Statistics

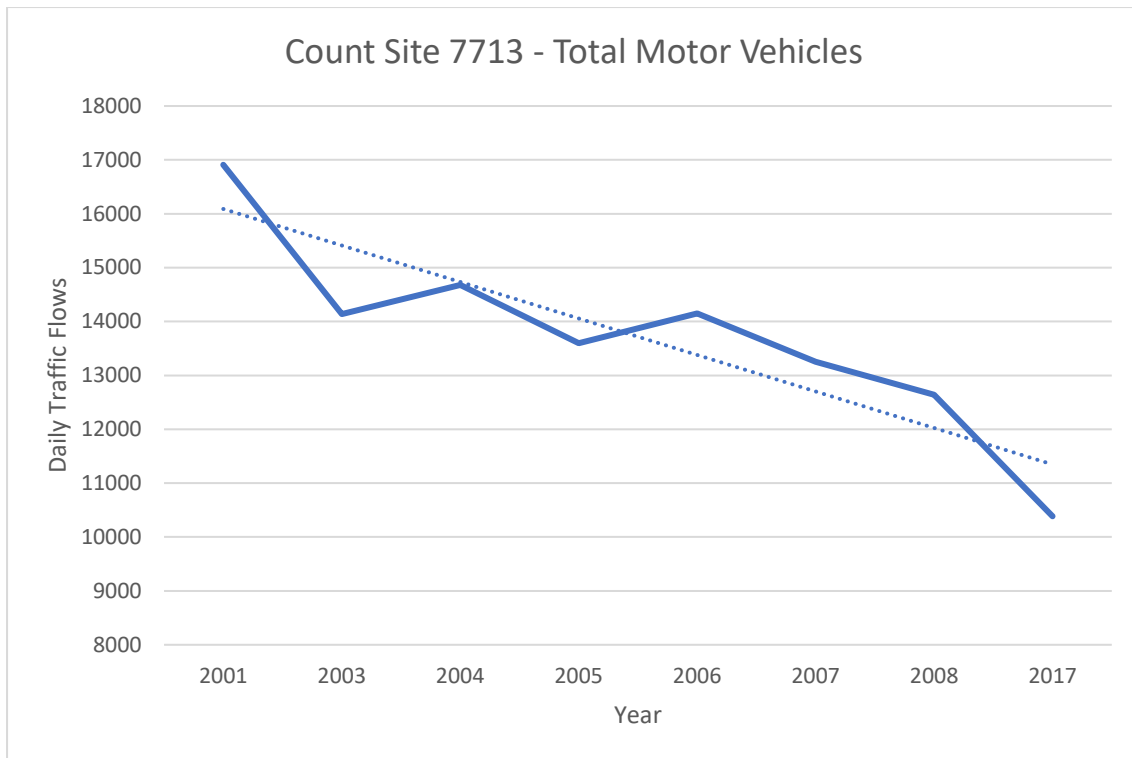
Department for Transport statistics

<https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic>
Use of transport modes: Great Britain, since 1 March 2020^a

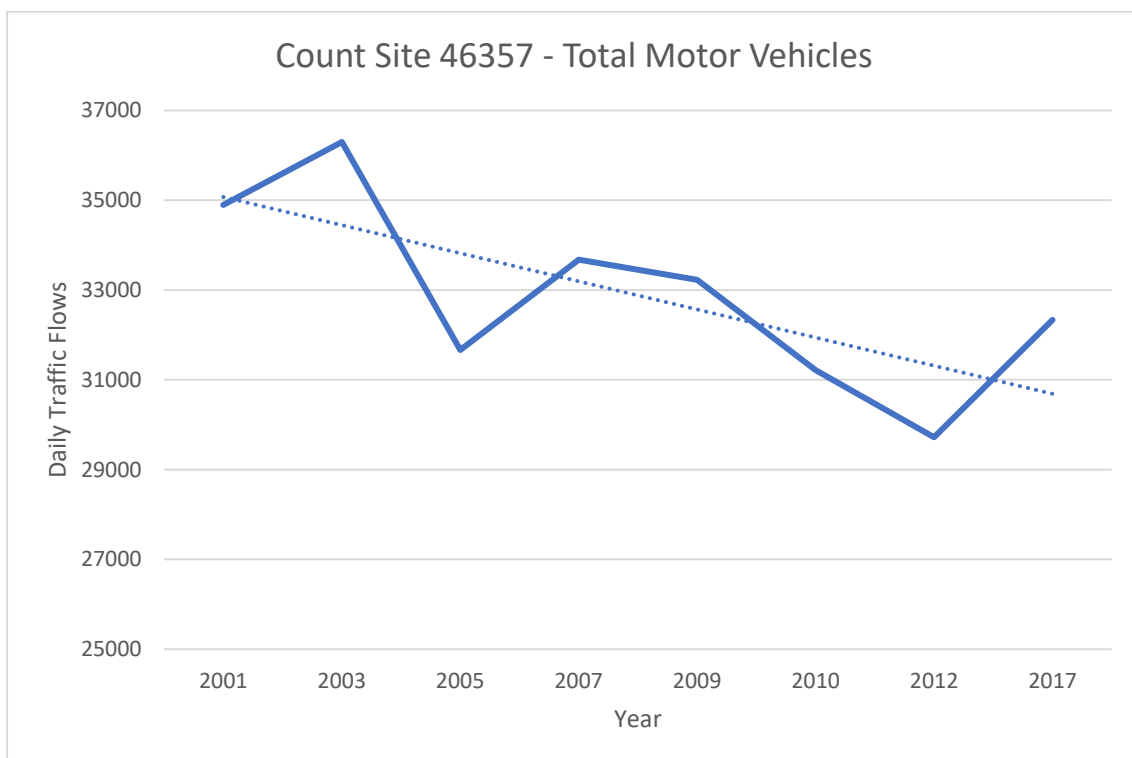
Figures are percentages of an equivalent day or week.

Percentage									
Date ^[note 1] (weekends and bank holidays in grey)	Cars ^[note 2]	Light Commercial Vehicles ^[note 2]	Heavy Goods Vehicles ^[note 2]	All motor vehicles ^[note 2]	National Rail ^[notes 3,4,12, 14]	Transport for London Tube ^[note 5]	Transport for London Bus ^[notes 5,7]	Bus (excl. London) ^[notes 6,8,9]	Cycling ^[notes 10,11]
13/09/2021	96%	112%	109%	100%	66%	51%	71%	74%	93%
14/09/2021	92%	108%	107%	96%	65%	52%	67%	75%	57%
15/09/2021	94%	110%	108%	98%	65%	54%	71%	75%	111%
16/09/2021	95%	108%	107%	98%	65%	55%	71%	77%	120%
17/09/2021	100%	111%	106%	102%	65%	54%	72%	75%	92%
18/09/2021	107%	125%	119%	111%	65%	67%	76%	75%	130%
19/09/2021	109%	135%	135%	114%	65%	63%	77%	82%	126%

Appendix D – DFT Count Site Charts



Source Data: <https://roadtraffic.dft.gov.uk/manualcountpoints/7713>



Source Data: <https://roadtraffic.dft.gov.uk/manualcountpoints/46357>