

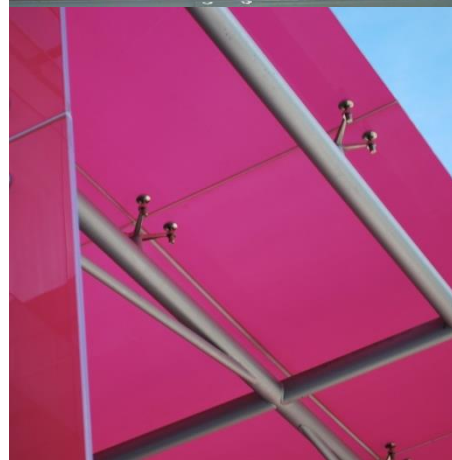
Land Junction of Parrs Wood Lane, Manchester

Highways Proof of Evidence

Curtins Ref: 082673-CUR-XX-XX-T-TP-00004
Revision: P02
Issue Date: 25 April 2023

Client Name: Dandara Living Developments Limited

Planning Inspectorate Ref. APP/B4215/W/23/3314646
Manchester City Council Application No. 133746/FO/2022



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Rev	Description	Issued by	Checked	Date
P01	Draft	CP	CP	17 April 2023
P02	Final	CP	CP	25 April 2023

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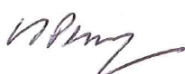
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1.0 Introduction

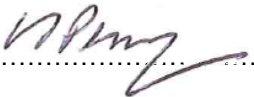
1.1 Context

- 1.1.1 This appeal is against Manchester City Council's ('MCC') refusal of Dandara Living Developments Limited ('Dandara Living') proposal for the erection of a 6 storey residential building (Use Class C3) comprising 75 no. apartments together with ground floor residential amenity space, landscaping, cycle parking, car parking and associated works at the site located at Land Junction Of Parrs Wood Lane, Manchester, M20 5AA (MCC planning application no. 133746/FO/2022).
- 1.1.2 This Highways Proof of Evidence ('HPoE') has been prepared by Carl Peers of Curtins in relation to the appeal pursuant to Section 78(2) of the Town and Country Planning Act 1990 (as amended) (Planning Inspectorate Reference APP/B4215/W/23/3314646).

1.2 Qualifications and Experience

- 1.2.1 My name is Carl Peers. I am a Transport Planner and a Chartered Member of The Chartered Institute of Logistics and Transport and a Fellow of The Chartered Institution of Highways & Transportation. I have a Master of Science degree in Transport Planning and Practice (Distinction) and a Bachelor of Arts degree (2:1 with honours) in Human Geography. I am a Business Unit Director at Curtins, an engineering consultancy specialising in the development sector, with offices across the UK and Ireland. I am responsible for the northern transport planning teams in England, across the Manchester and Liverpool offices.
- 1.2.2 I am and have been responsible for a wide range of transport and development planning projects for both private and public sector clients and have worked in the transport planning field for over 18 years. I manage projects at all stages of the planning process from initial site feasibility to detailed planning submissions and the discharge of planning conditions. I have represented a wide range of residential clients throughout the planning process with developments ranging from tens to thousands of homes.
- 1.2.3 My areas of expertise include Transport Assessments, Travel Plans, transport chapters of Environmental Statements and traffic engineering for a range of land uses including residential and mixed-use sites.
- 1.2.4 Curtins was appointed by Dandara Living in April 2020 to provide highways and transport advice in relation to a proposed residential development located at Land Junction of Parrs Wood Lane, East Didsbury, Manchester M20 5NP (referred to as 'the Site'). I have been providing highways and transport advice to Dandara Living in relation to the Site since this time, and I am fully familiar with the Site and the surrounding transport network.

1.2.5 The evidence that I have prepared and provide for this appeal (Planning Inspectorate Ref. APP/B4215/W/23/3314646) in this Proof of Evidence is consistent with my professional code of practice and is true. I confirm that the opinions expressed are my true and professional opinions and is provided irrespective of by whom I am instructed.

Signed  Carl Peers, BA (Hons) MSc CMILT FCIHT

Dated25/04/2023..... Business Unit Director for Curtins (on behalf of
Dandara Living)

2.0 The Planning Application

2.1 Introduction

- 2.1.1 This section of my evidence provides an overview of the application proposals, the transport submissions that were made with the planning application and in preparation for the appeal, and a summary of consultation with MCC as the local highway authority (referred to as 'MCC Highways') and Transport for Greater Manchester ('TfGM'). I conclude this section by setting out the scope of evidence that is presented in the remainder of this report.

2.2 Application Proposals

Overview

- 2.2.1 Dandara Living's vision for the site is to create a sustainable development in a sustainable location, promoting a car-free lifestyle and low carbon travel choices. The site is conveniently located to access local amenities within walking and cycling distance of the site, with public transport services, including East Didsbury Metrolink station, East Didsbury rail station and several local bus stops for journeys further afield.
- 2.2.2 The proposed development comprises 75 build to rent (BTR) apartments with a mixture of 25 one-bedroom, 40 two-bedroom and 10 three-bedroom homes across 5 floors above ground, with 20% of the units being provided at an Affordable Private Rent. Ancillary flexible community use is also proposed on the ground floor totalling c. 53sqm Net Internal Area (NIA). The flexible community use would be accessible on foot for residents of the development and the local community within walking distance of the site.
- 2.2.3 Dandara Living recognises that some residents may still require access to a car. The development proposals therefore include 36 car parking spaces (48% provision) located on the ground floor with associated landscaping. The proposed car park comprises 31 standard spaces, 2 accessible spaces, 2 visitor spaces and 1 car club space inclusive of 1 vehicle for shared use. The car club vehicle located within the car club space would be available for use by residents as well as the local community in order to promote shared transport and reduce the need to own a car.
- 2.2.4 Originally it was proposed that all car parking spaces would be equipped with passive electric vehicle charging infrastructure, with 20% active provision (with the charger in place) upon completion of the development. The level of active provision would be expanded over time in response to demand. In light of recent changes to Building Regulations, all of the car parking spaces within the proposed development will now be equipped with active electric vehicle charging provision.

- 2.2.5 Additionally, there would also be 75 cycle parking spaces within a secure, covered cycle store on the ground floor for residents, and a further 12 short-stay cycle parking spaces for visitors. There will also be charging facilities (i.e. plug sockets – sufficient to meet demand by e-bike users) located within the cycle store to accommodate e-bikes.

Vehicular Access

- 2.2.6 Vehicular access into the site would be taken from the existing Tesco access road located off the A5145 Parrs Wood Lane. Vehicles would enter in the same manner to Tesco customers, travelling ahead then bearing right along a reconfigured internal access road. Tesco customers would then turn left at the entrance to the car park aisles, whilst users of the proposed development would continue along the access road then turn right into the car park entrance.
- 2.2.7 The entrance to the residential car park would be located c. 115m away from the A5145 Parrs Wood Lane access junction, therefore it is highly improbable that vehicles accessing the site during the busiest periods would ever impact upon the adjacent highway network.
- 2.2.8 The proposed access arrangement drawing submitted as part of the planning application (**Drawing 076118-CUR-XX-00-D-TP-75001-P08**) also highlights proposed improvements to the existing Zebra crossing on the site access road to include wider dropped kerbs with improved tactile paving and the introduction of Belisha Beacons at the crossing. This would improve the accessibility of the site and the Tesco Superstore for pedestrians, and also assist with pedestrians crossing the site access road, and thereby provide a safety improvement.

Pedestrian Access

- 2.2.9 Pedestrian access into the building is proposed along the west side of the site, along the existing Tesco access road. The main access to the building leads towards a stairwell and lifts to upper floors. An additional stairwell and lift can be accessed from the north side of the site via the car park.
- 2.2.10 The pedestrian route would be defined through the use of different surfacing materials to the rest of the car park; the car park would however operate as a shared surface for all users.
- 2.2.11 The flexible community use on the ground floor can be accessed directly from the footway on the site access road.

Cycle Access

- 2.2.12 The cycle store can be accessed directly via doors at the corner of the site access road with Parrs Wood Lane that open onto a wide section of footway and steps towards the A5145 Parrs Wood Lane. The cycle store would also be accessible through the internal circulatory areas of the building.

2.3 Transport Submissions

Application Documents

- 2.3.1 Curtins prepared a Transport Assessment (TA) (**Report 076118-CUR-XX-XX-T-TP-00004-P04**) and Interim Travel Plan (**Report 076118-CUR-XX-XX-T-TP-00005-P04**), both dated 5 May 2022, to accompany the planning application (MCC application number: 133746/FO/2022) submitted on 11 May 2022.
- 2.3.2 The TA also comprised plans of the site location and indicative walking, cycling, and public transport catchments, and drawings of the proposed site access arrangement, and swept path analyses of a large car and large refuse vehicle accessing and egressing the site.
- 2.3.3 Since the planning application was submitted, the 2021 edition of the Building Regulations 2010 document has taken effect as of June 2022. Within the 2021 edition includes 'Approved Document S – Infrastructure for the Charging of Electric Vehicles', which applies to new residential buildings alongside other types of building work. Consequently, all of the car parking spaces within the proposed development will now be equipped with active electric vehicle charging provision.

Post-Application Documents

- 2.3.4 Curtins commissioned an independent Stage 1 Road Safety Audit of the proposed access arrangement drawing that was appended to the TA. A Stage 1 Road Safety Audit Response Report was prepared by Curtins (**Report 076118-CUR-XX-XX-T-TP-00007-P01**) and submitted to MCC Highways on 16 May 2022.
- 2.3.5 Comments were received from MCC Highways on 16 May 2022, which led to a minor revision of the proposed access arrangement, with the final version as **Drawing 076118-CUR-XX-00-D-TP-75001-P08**, that was submitted to MCC Highways on 17 May 2022.
- 2.3.6 A post-application email from Robert Griffin, Principal Planner at MCC as the local planning authority (referred to as 'MCC Planning'), received on 8 July 2022, included comments from MCC Highways and TfGM. These comments were responded to via a Memo submitted by Deloitte to MCC Planning (subject ref. 133746/FO/2022 – Dandara, East Didsbury dated 19 July 2022). Curtins provided input to this letter.

2.4 Consultation Summary

Pre-Application Discussions

- 2.4.1 Initial pre-application discussions led by Dandara Living were held with MCC Planning between March 2021 and August 2021. Given the planning history at the site, MCC Planning focused upon the need to understand highways impact and road safety, as a consequence of the proposed development, as well

as the impact of losing car parking spaces currently available to Tesco customers and the adequacy of the remaining car park.

- 2.4.2 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 76118-CUR-00-XX-RP-TP-003-V02**). This report included details of the development proposals, the level of car parking provision proposed at the site, and that new traffic surveys would be undertaken in September 2021 to inform the traffic impact assessment. The formal response received from MCC Highways on 6 October 2021 (provided as Appendix B of the TA) included the following statement:

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

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

- 2.4.3 The proposed level of car parking provision was therefore justified and explicitly accepted by MCC Highways during the pre-application process, together with the acceptance of new traffic survey data.
- 2.4.4 TfGM also provided comments directly to MCC Highways, accordingly, their comments were included within the formal response received on 6 October 2021. Traffic surveys comprising junction turning counts and queue lengths were surveyed in accordance with the requests from TfGM. The surveys were undertaken in September 2021 during school term time; it is noted that no COVID-19 restrictions or roadworks in the study area were in place at the time of the survey. The traffic impact assessment included all junctions that were surveyed in accordance with the request from TfGM, due to the inter-linked nature of the traffic signals.
- 2.4.5 Since the Transport Scoping Report was submitted, the scheme has evolved in response to feedback from MCC Highways and public consultation events. One of the main changes included an increase in car parking provision from 45% to 48%. Hence, car parking was increased slightly above the level that was previously confirmed as being acceptable to MCC Highways. Other changes to the scheme that were made after the Transport Scoping Report was submitted were:
- A reduction in height of the building from 6 floors above ground to 5 floors above ground (with an associated reduction in the number of homes from 88 to 75);
 - An increase in affordable homes (Affordable Private Rent) from 10% to 20%; and
 - The introduction of two visitor parking spaces and a car club space inclusive of 1 vehicle for shared use.
- 2.4.6 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.”

- 2.4.7 This request was unexplained with no commentary or justification provided. Curtins position remained unchanged that 48% car parking provision remains justified and acceptable for the reasons set out in the TA, which is in line with earlier pre-application agreements with MCC Highways.
- 2.4.8 Prior to the submission of the planning application, a significant amount of pre-application engagement was undertaken with MCC Highways and TfGM. A summary of the consultation is provided in **Table 2.1** below:

Date	Summary
13/09/2021	Transport Scoping Report (Curtins report ref. 76118-CUR-00-XX-RP-TP-003-V02) submitted to MCC Highways and TfGM. This report included details of the development proposals and the level of car parking provision proposed at the site. At this time, the level of car parking provision proposed at the site was 40 spaces (45% based on 88 apartments).
06/10/2021	Formal response from MCC Highways included the following statement: “The development proposes 40 car parking spaces (45% parking provision). This provision is acceptable.”
29/11/2021	A public consultation webinar was hosted by Dandara. At this time, the level of car parking provision proposed at the site was 27 spaces (28% based on 95 apartments).
03/12/2021	Meeting with MCC Highways to discuss the latest version of the scheme that was at public consultation on 29/11/2021. MCC Highways agreed to review the latest parking proposals following the meeting.
08/12/2021	Email sent to MCC Highways requesting a formal response to the latest car parking provision. The reply from MCC Highways on 09/12/2021 stated: “We are in the process of discussing this with the planners and hope to have a response from them next week”.
12/04/2022	Meeting with MCC Highways and TfGM to discuss the latest version of the scheme, including adjustments made following the public consultation event. At this time, the level of car parking provision proposed at the site was 33 spaces (44% based on 75 apartments). It was noted by MCC Highways that the parking was “about right” which was consistent with earlier advice on 06/10/2022.
19/04/2022	Summary of road safety review and parking issued to MCC Highways for comment ahead of the planning application. The parking section reviewed existing parking use, proposed parking provision (44%), and car park management.
21/04/2022	Email from MCC Highways received on 21 April 2022 stating: “Having discussed further the on-site parking requirements, we will need 100% provision for this site.” This request was unsubstantiated with no commentary or justification provided. It also contradicts the earlier acceptance of 45% provision.
11/05/2022	The planning application was submitted with the Transport Assessment Report (Curtins report ref. 076118-CUR-XX-XX-T-TP-00004-P04) based on a development proposal with 75 apartments and 36 car parking spaces (48% provision). This level of provision exceeds the earlier agreement with MCC Highways.

Table 2.1 – Consultation Summary

- 2.4.9 As shown in **Table 2.1**, the scheme initially presented to MCC Highways included 88 apartments with 40 car parking spaces equating to 45% provision. Despite the number of residential apartments reducing following further design development, 45% provision had been considered to be acceptable. The current (revised) proposals provide a marginally increased proportion of parking of 48%.

- 2.4.10 MCC Highways were initially supportive of 45% car parking provision. It is difficult to understand the reasons for the volte-face during the application on the part of MCC Highways, which does not appear to have been based upon any new evidence.

Post-Application Discussions

- 2.4.11 An email from Robert Griffin, Principal Planner at MCC Planning, received on 8 July 2022, includes comments from MCC Highways and TfGM. These include informative comments, points of agreement, information requests, and points of concern.
- 2.4.12 These comments were responded to via a Memo submitted by Deloitte to MCC Planning (subject ref. 133746/FO/2022 – Dandara, East Didsbury dated 19 July 2022). Curtins provided input to this letter, addressing the information requests and points of concern.

Planning Committee Decision

- 2.4.13 A Planning and Highways Committee report was prepared by MCC for the Committee held on 28 July 2022 where the proposed development was on the agenda. I respond to the comments raised in **Section 5** of my evidence.
- 2.4.14 The decision notice from MCC was issued on 2 August 2022, stating that the planning application has been refused for three reasons, two of which relate to highways and transport. These reasons for refusal (RfR) are as follows:
- 2) *“The proposals fail to provide an adequate level of on-site car parking to serve the proposed residential units contrary to policies DM1 and T2 of the adopted Manchester Core Strategy.*
 - 3) *The applicant has failed to demonstrate that the proposed development would not give rise to unacceptable impacts to congestion on the highway network contrary to policy T1 of the adopted Manchester Core Strategy.”*

Conclusions

- 2.4.15 A significant amount of pre-application engagement was undertaken with MCC Highways and TfGM, as summarised earlier in **Table 2.1**. Detailed application documents were submitted as part of the planning application, with supplementary information submitted post-application in response to comments and requests from MCC Highways.
- 2.4.16 I conclude that all highways and transport matters were adequately documented, and that Curtins pro-actively engaged with MCC Highways and TfGM during the course of the planning application process to seek agreement of key issues.

2.5 The Appeal and Further Highways Evidence

- 2.5.1 Following the lodging of the appeal, a report was prepared and submitted to MCC Highways and TfGM to present further highways and transport related evidence (**Report 082673-CUR-XX-XX-T-TP-00003-P02**). Primarily this includes the presentation of a parking survey in relation to RfR2, and a new traffic survey and updated traffic modelling results in relation to RfR3. This report is referred to as 'Further Highways Evidence'.
- 2.5.2 The survey results, traffic figures, traffic model, and traffic model results summary were shared and discussed with MCC Highways and TfGM in February and March 2023. This further information was discussed with officers at MCC Highways and TfGM on 15 March 2023 and the findings subsequently agreed on 23 March 2023.
- 2.5.3 Following the submission of the Further Highways Evidence, MCC do not now intend to defend the appeal based upon RfR 2 and 3. Nonetheless, there has been significant interest from third parties, that raise similar concerns to the RfR. This HPoE therefore continues to respond to these RfR in full in response to third party concerns.
- 2.5.4 It is also worth noting that a Unilateral Undertaking (UU) has been drafted between Dandara Living/Tesco and MCC. This includes planning obligations relating to the car club, public transport voucher, Car Park Management Plan, and on-site and off-site highway works to support the proposed development. I refer to the UU at various points throughout my evidence.

2.6 Scope of Evidence

- 2.6.1 My evidence responding to RfR2 is set out in **Section 3** of this report, while my evidence responding to RfR3 is set out in **Section 4**.
- 2.6.2 Third party comments are responded to in **Section 5**, covering comments from ward members and the public in the Planning and Highways Committee report, and third party comments following the appeal submission.
- 2.6.3 A summary and the conclusions from my evidence are provided in **Section 6**.

3.0 Evidence re Car Parking

3.1 Introduction

- 3.1.1 This section of my evidence responds to RfR2: *"The proposals fail to provide an adequate level of on-site car parking to serve the proposed residential units contrary to policies DM1 and T2 of the adopted Manchester Core Strategy"* and comments made by third parties related to car parking.

3.2 Parking Standards and Guidance for Residential Development

Places for Everyone Submission Plan (August 2021)

- 3.2.1 Places for Everyone is a draft strategic development plan prepared by the Greater Manchester Combined Authority (GMCA) on behalf of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). At the time of writing a lengthy hearing session examining the plan has recently come to an end.
- 3.2.2 The focus on promoting sustainable transport networks and supporting residential development in areas of excellent accessibility are demonstrated through the draft transport and highways related policies set out within the Plan. The content of the plan is considered to be in general terms consistent with national policy, albeit the weight to be afforded to specific policy matters will be a matter for my planning colleague.
- 3.2.3 Policy JP-C 1 'An Integrated Network' aims to deliver an accessible, low carbon Greater Manchester by locating and designing development to deliver a significant increase in the proportion of trips that can be made by walking, cycling and public transport.
- 3.2.4 Policy JP-C 7 'Transport' requires new development to be located and designed to enable and encourage walking, cycling and public transport use, reducing the negative effects of car dependency and help deliver high quality and sustainable environments.
- 3.2.5 The policy aims to increase the connectivity and permeability of developments by:
- Prioritising safe and convenient access to the site and buildings for all users;
 - Ensuring that new developments are planned and constructed with walking and cycling as the primary means of local access, and fully integrated into the existing walking and cycling infrastructure; [Following the recent examination, this wording is to be modified to read as follows: "Ensuring that the layout, design and landscaping of development prioritises the provision of safe, secure and attractive access to local services and facilities for pedestrians, cyclists, and people with a disability"]
 - Ensuring that new development is connected visually and physically; within the site and to the surrounding built environment;

- Ensure appropriate connectivity to the existing highway network; and
- Reducing the need to travel by ensuring that community facilities, services and amenities are provided within the site or within walking distance of new development.

3.2.6 In terms of parking infrastructure, developments should ensure that parking provision is well integrated and unobtrusive and where appropriate parking provision should be flexible and be adapted over time to reflect demand.

3.2.7 Cycle parking provision should be included in the form of secure and covered storage to meet long-term demand from occupiers and visitors.

3.2.8 Promoting alternatives to car ownership will also be supported, such as the use of Ultra Low Emission Vehicle (ULEV) car clubs rather than the provision of private car parking spaces.

3.2.9 I demonstrate through my evidence that the development proposals are fully in line with these emerging policies and the Development Plan for Greater Manchester, notably the provision of residential development in areas of excellent accessibility, with amenities within walking distance of the site, and flexible parking that reflects demand to reduce car dependency over time.

3.2.10 The current adopted parking standards in Manchester are set out in the Core Strategy Development Plan, details of which are provided below.

Manchester's Local Development Framework – Core Strategy Development Plan Document (2012)

3.2.11 RfR2 refers to two Core Strategy policies, Policy DM1 and Policy T2, neither of which set minimum parking standards for residential development.

3.2.12 Policy DM1 'Development Management' notes that all development should have regard for vehicular access and car parking but does not provide any specific standards, only noting that further detail may be set out within a Supplementary Planning Document (SPD). There are no adopted SPDs that state the level of car parking provision that should be provided for residential development.

3.2.13 Policy T2 'Accessible areas of opportunity and need' notes that all development should make "appropriate" car parking provision and comply with the car parking standards set out within Appendix B of the Core Strategy. The standards in Appendix B are noted as maximums, there are no minimum standards set out within the Core Strategy, and standards for residential use are not stated. This is consistent with the national transport policy then in place at the time of the consideration of the draft of the Core Strategy which expressly deprecated the use of maximum car parking standards for new residential development.

- 3.2.14 As there are no minimum car parking standards for residential development, I conclude that the level of car parking is reviewed on a case-by-case basis, dependent on the location of the site and the accessibility to sustainable travel modes. I am advised that there is clear national policy in NPPF Paragraph 125(c) to the effect that land should be used efficiently otherwise permission should be withheld. Providing an excess of car parking beyond the minimum which is reasonably needed would risk conflicting with that guidance. As such, the development's parking provision has been carefully optimised in light of the highly sustainable location of the site.

Manchester Residential Quality Guidance (RQG) (2017)

- 3.2.15 The Planning Committee Report notes that the Manchester RQG (2017) is of relevance to the proposed development. The Manchester RQG provides guidance on residential parking in Manchester, and allows reduced on-site provision (i.e. below 100%) where justified, which is the case for this site, as explained below.
- 3.2.16 For car parking in residential developments outside the city centre, the RQG outlines recommended parking standards for new apartment developments as 100% provision as a starting point. The subsequent paragraph then states circumstances (discussed further below) where reduced on-site provision (i.e. below 100%) can be justified.
- 3.2.17 However, in accordance with Paragraph 129 of the NPPF, the Manchester RQG (and the recommended 100% parking provision) is not part of the statutory development plan, nor is it an SPD – accordingly I am advised that it therefore holds limited weight in the consideration of planning applications. Notwithstanding, my evidence demonstrates that parking provision 100% is justified and in line with the circumstances outlined in the guidance.

Manual for Streets (MfS) (2007)

- 3.2.18 Section 8.3 of MfS, titled 'Car Parking', states that the availability of car parking is a major determinant of travel mode. The section cites several studies from the Commission for Architecture & the Built Environment (CABE), one of which is dated 2005 and titled 'What Home Buyers Want: Attitudes and Decision Making amongst Consumers'.
- 3.2.19 The CABE research relies on a dataset of homebuyers instead of renters, the latter of which is the target occupier of the proposed development. Therefore, it is important to note that future occupiers of the proposed development would have different attitudes and circumstances than homebuyers, as they would be renting on a temporary basis rather than buying for the long-term. Notwithstanding, the CABE study states that:

"The deficiencies of public transport were put forward as an important reason for regarding a car as an absolute necessity."

3.2.20 This is supported in Paragraph 8.3.6 of MfS, which states:

“Provision [of car parking] below demand can work successfully when adequate on-street parking controls are present and where it is possible for residents to reach day-to-day destinations, such as jobs, schools and shops, without the use of a car. This will normally be in town and city centres where there will be good public transport and places that can be accessed easily on foot and by cycle. For residents who choose not to own a car, living in such an area may be an attractive proposition.”

3.2.21 The TA has demonstrated that the accessibility of the site is excellent, with the highest public transport accessibility level in Greater Manchester. Further evidence of the multi-modal accessibility of the site to a wide range of local amenities, facilities and services, is provided in later in this section.

3.2.22 With reference to the quotation above, I consider that the provision of car parking at the proposed development is emphatically not below demand, rather that a lower level of car parking is proposed as the demand for parking at this site will also be lower. Further evidence on this point is provided later in this section.

Proposed Parking Provision

3.2.23 The development proposals include 36 car parking spaces, which equates to 48% provision. This level of provision was arrived at in dialogue with MCC as the local highway authority, and supported by evidence of the excellent multi-modal accessibility of the site, the availability of local amenities within walking distance of the site, and likely occupier demand, as summarised in this section of my evidence. This level of provision, which equates to one space for nearly half of all apartments, remains appropriate for these reasons.

3.2.24 The car park comprises 33 resident spaces (31 standard, 2 accessible), 2 visitor spaces and 1 car club space inclusive of 1 vehicle for shared use. There are also 3 motorcycle parking spaces. The car club vehicle located within the car club space would be available for use by residents as well as the local community in order to promote shared transport and reduce the need to own a car.

3.2.25 All of the car parking spaces within the proposed development will now be equipped with active electric vehicle charging provision.

3.2.26 Additionally, 75 cycle parking spaces for residents (long-stay) and 12 cycle parking spaces for visitors (short-stay) would also be provided. The cycle parking would be provided in the form of a secure, covered cycle store with 75 spaces for residents, with 12 spaces provided as Sheffield stands for visitors. This is one of the many initiatives to encourage more residents to travel by sustainable modes, in addition to the initiatives outlined in the ITP.

3.2.27 As outlined above, the RQG outlines circumstances where reduced car parking can be acceptable. The circumstances relevant to the proposed development include the following:

- *“Secure cycle parking in excess of 50% provision relative to apartment numbers.”*

A total of 75 apartments are proposed with 100% secure cycle parking provision for residents (75 spaces) and an additional 16% provision for visitors (12 spaces). This level of cycle parking provision significantly exceeds the 50% provision quoted;

- *“Demonstrating that provision of full parking provision will unacceptably comprise the development’s active frontages and relationship with the street, and evidence that alternative parking solutions cannot be viably accommodated.”*

The provision of full car parking (i.e. 100% provision) at the site would require additional space at ground floor level, which would remove other uses and activity at ground floor level, including the flexible community use. The ground floor is mostly required for plant, refuse store, cycle store, cores, and parking, all of which are required to service the building.

The provision of 100% car parking would also likely require a multi-level parking solution. The proposed development has already been reduced in scale by one floor following public consultation, therefore a further reduction in the number of apartments to accommodate additional car parking, either in an additional level above ground floor or within a basement level, would render the scheme commercially challenging for Dandara Living. Moreover, provision of dedicated car parking for every unit would run counter to fundamental principles of national policy to encourage homeowners to reduce the use of private vehicles;

- *“Provision of robust research and market evidence to demonstrate that lower levels of car parking demand will be appropriate for a particular scheme.”*

This point is addressed later in this section, which set out the profile of residential occupiers at BTR schemes. This concludes that the proposed level of car parking is suitable for typical residents of BTR schemes.

3.2.28 Pages 87 and 88 of the RQG also state the following which support the case for providing suitable amounts, rather than maximum provision, of car parking at new developments:

“...there is a need to balance the provision of sufficient parking with the need to encourage different, more sustainable modes of transport and working towards reducing the dependence on the car.

... the emerging build to rent sector is very much targeted at a younger demographic attracted to the city centre lifestyle and who have a higher potential and tendency to view car ownership as more of a constraint than a requirement.”

3.2.29 Whilst the BTR sector is mentioned in relation to a city centre context in the RQG, the location of the site in effect has a similar level of accessibility to city centre sites. Notwithstanding, the location of the

proposed development outside of the city centre is reflected in level of parking provided on-site, which at nearly 50% is significantly higher than would typically be provided at a city centre site.

3.3 Accessibility

Multi-Modal Accessibility and Local Amenities

- 3.3.1 There is a clear focus on promoting sustainable transport networks and reducing the need for car travel across Manchester. This is reflected in policy and guidance at a national, regional and local level.
- 3.3.2 The proposed development is a highly accessible, previously developed site within the existing urban area of East Didsbury. The site affords excellent accessibility to pedestrians, cyclists, public transport users to local day-to-day community facilities, services and amenities, as well as excellent linkages by sustainable modes to higher order commercial centres such as Manchester city centre. Moreover, the land uses in the vicinity of the site are akin to a district centre given the wide variety of uses nearby. Residents of the proposed development would have access to a wide range of local services, many within very easy walking distance.
- 3.3.3 The accessibility of the site is reviewed in detail in Section 4 of the TA. The site is situated within a highly accessible area, with a number of complementary uses and amenities within walking and cycling distance. The site is well located to take advantage of the excellent existing public transport facilities, including bus, Metrolink and rail, with a Greater Manchester Accessibility Level rating of 8, which is the highest rating and described as 'excellent' by TfGM. These services, in addition to walking and cycling opportunities, would provide realistic and viable alternatives to travel by the private car, and reduce the need to own a car as well as the propensity to use one.
- 3.3.4 Furthermore, the site is located near two of the six 'Cycleways' in Greater Manchester, and cycle parking is provided at the site to encourage active travel. These Cycleways now form part of, and are referred to generically as, the Greater Manchester Bee Network.
- 3.3.5 The National Model Design Code, Part 2 (2021) prepared by the Ministry of Housing, Communities & Local Government, states the following in relation to accessibility and car dependency:

"24. Access to public transport is key to providing people with choice for everyday journeys beyond the immediate neighbourhood, such as to town centres, schools and employment locations. Good access to public transport helps reduce reliance on the private car.

25. A site or location has good public transport accessibility when dwellings have a public transport stop within walking distance.

26. The distances that people are prepared to walk from their dwelling to reach public transport are determined by the nature and quality of the public transport service, how attractive and safe

the walk feels, and the total length of their journey. Generally, people are prepared to walk further to a railway station or tram stop (10 minutes) than to a bus stop (5 minutes)."

- 3.3.6 It continues that *"accessibility to public transport may be linked to other coding on mix of uses, local amenities, housing types, densities, and parking arrangements"*. Hence, there is an evident link between accessibility, a reduction in reliance on the private car, and planned parking arrangements.
- 3.3.7 An updated version of the walking catchment plan that was appended to the TA has been produced, which shows walking distances and times from the site. This plan identifies the local amenities, facilities and services that are accessible within walking distance of the site, and is included to the rear of this report (**Plan 082673-CUR-XX-XX-G-TP-06001**).
- 3.3.8 The analysis below focusses on destinations within a 5 and 10-minute walk (400m and 800m respectively) from the site, following the principles of a walkable neighbourhood. A distance of 800m is referenced in the National Design Guide (2021) prepared by the Ministry of Housing, Communities & Local Government, as "walkable" where local facilities are within walking distance.
- 3.3.9 The Tesco East Didsbury Superstore is located immediately adjacent to the site. This Superstore provides food shopping opportunities for residents, as well as clothing, a pharmacy, and a Costa Coffee café. The Tesco website highlights other popular services and counters at this Superstore, such as Tesco Mobile and MoneyGram services. The Superstore also caters for other day-to-day needs, such as gift cards, money and postal services (including an ATM), recycling facilities, and printing and cleaning services.
- 3.3.10 The plan clearly shows the adjacency of the Superstore, less than a minutes' walk from the proposed development. Other amenities within a 5-minute walk of the site include health/medical facilities, a Post Office (with Amazon hub lockers), place of worship, and college. The Parrs Wood Entertainment Centre, with facilities including a cinema, bowling, restaurants, and a Starbucks Coffee store, is also within a 5-minute walk of the site. There are also a wide range of public transport opportunities within a 5-minute walk, comprising Parrs Wood Bus Interchange and various other bus stops, East Didsbury Transport Interchange (Metrolink stop), and East Didsbury rail station.
- 3.3.11 The plan shows additional facilities within a 10-minute walk of the site, comprising employment opportunities at Towers Business Park, a butchers, convenience store, sports facility, additional health/medical facility, and secondary schools.
- 3.3.12 This analysis has focussed on community facilities, services and amenities within an easy walk of the site, in line with the principles of walkable neighbourhoods, where local facilities are generally located within a 10-minute walk (800m) of the site. Notwithstanding, the walking catchment plan shows a wider range of other employment, education, healthcare, shopping, religious, leisure, and sustainable transport facilities that are available within walking distance of the site, but beyond a 10-minute walk,

including East Didsbury high street at just over a 15-minute walk from the site. The full range of amenities are listed in Table A.1 in **Appendix A** to the rear of this report, complete with walking distances and times up to the maximum acceptable walking distance of 2,000m (a 25-minute walk) based on the Chartered Institution of Highways and Transportation (CIHT) document entitled 'Providing for Journeys on Foot' (2000).

- 3.3.13 The Department for Transport (DfT) National Travel Survey (from Tables NTS0308a and NTS0601) shows that walking is the most frequent mode used for short trips: 80% of all trips and 74% of walking trips were under 1 mile (1.6km) in 2019 – with the 1.6km distance broadly comparable with the CIHT's 2.0km 'Preferred Maximum'. Almost all walking trips (96%) were under 2 miles (3.2km) in 2019. This indicates that walking is the natural first choice for most local trips.
- 3.3.14 The above analysis clearly demonstrates that residents would be able to reach day-to-day destinations without the need to use a car.
- 3.3.15 An updated version of the cycling catchment plan that was appended to the TA has also been produced, which is included to the rear of this report (**Plan 082673-CUR-XX-XX-G-TP-06003**). This catchment plan focusses on destinations local to the site within a 5 and 10-minute cycle (1.6km and 3.2km respectively). This catchment plan demonstrates that Didsbury (including East and West Didsbury), Heaton Mersey, Withington, and parts of Burnage, Cheadle, and Gatley, which offer a wide range of additional facilities and services, are within an easy cycle distance and highly accessible from the site by bike and would not require the use of a car.
- 3.3.16 Additional catchment plans are also included to the rear of this report, showing the maximum walking distance of 2km (25 minutes) (**Plan 082673-CUR-XX-XX-G-TP-06002**), and average and maximum cycling distances of 5.5km (17 minutes) and 8km (25 minutes) respectively (**Plan 082673-CUR-XX-XX-G-TP-06004**). The 2km walking distance is based on the CIHT guidance referenced above. The 5.5km cycling distance is deemed the average cycling distance according to the DfT walking and cycling statistics in 2021, whilst the 8km maximum acceptable cycling distance is based on the 2019 National Travel Survey statistics and the National Model Design Code – Part 2 (2021), which states that: *"the aim that walking and cycling should be the first choice for short local journeys, particularly those of 5 miles [8 kilometres] or less"*. This is supported by the second cycling and walking investment strategy (released in March 2023) prepared by Active Travel England and the DfT, which outlines the Government's ambition to make cycling and walking the natural choices for shorter journeys, or as part of a longer journey by 2040.
- 3.3.17 These additional plans have been included to demonstrate the extent of the areas that are accessible in the wider area on foot and by bike, which offer a wide range of additional facilities and services to those immediately local to the site. The site is therefore highly accessible by active travel modes to local amenities, without the need to use a car.

Encouraging Sustainable Travel Modes

- 3.3.18 Core Strategy Policy T1 aims to encourage a shift from car travel to public transport, cycling, and walking, to support the needs of residents. MCC notes support for developments that will improve the choice by developing alternatives to car travel as well as facilitating modes of transport that reduce carbon emissions such as Electric Vehicle Charging Points.
- 3.3.19 As noted above, the site is situated in a highly accessible area with a range of sustainable travel modes within close proximity, providing justification for the development including less than 100% car parking provision. The nearest bus stops, Metrolink stop, and rail station located in East Didsbury are all within a few minutes' walk of the site.
- 3.3.20 There is also a clear commitment from MCC to meet climate change targets and become zero carbon by 2038, as set out in Manchester Zero Carbon Framework approved by MCC's Executive Committee in March 2020.
- 3.3.21 Areas for action in the Framework include improving the energy efficiency of local homes; generating more renewable energy to power buildings; creating well-connected cycling and walking routes, public transport networks and electric vehicle charging infrastructure; plus the development of a 'circular economy', in which sustainable and renewable materials are reused and recycled as much as possible.
- 3.3.22 The proposed development situated in a highly accessible location, with full electric vehicle charging provision, supports these areas for action.
- 3.3.23 There is also a shift towards a focus on promoting sustainable transport networks and reducing the need for car travel across Manchester, which is reflected in Places for Everyone, which upon adoption will form part of the Development Plan for Manchester.
- 3.3.24 Being close to transport links is a unique selling point that Dandara Living will highlight on advertising for the proposed development. Based on experience across different BTR developments, Dandara Living notes that residents that do not need parking have a higher budget for rent, therefore it is within their commercial interest to market the proposed development to car-free tenants to maximise the pool of potential occupiers.
- 3.3.25 Dandara Living recognises that some residents may still require access to a car, therefore a level of parking provision is proposed at the site. However, the level of car parking proposed (below 100%) would encourage active and sustainable travel.

3.4 BTR Schemes

- 3.4.1 Dandara Living has undertaken extensive market research for the proposed development, which has shown that within a 3km radius of the site, there are c. 11,947 car-free households as shown in the

2011 Census. This shows that living in this area without a car is a feasible and desirable lifestyle for a significant segment of the existing population living nearby.

The proposed development would result in 42 additional car-free households (difference between 75 apartments and 33 resident parking spaces proposed), which is 0.35% of the number of car-free households within only a 3km distance from the site. This is a tiny proportional increase in car-free households in the locality, and there are many more car-free households across Greater Manchester. People who move to this development will patently be self-selecting and will be drawn from the existing significant population for whom car ownership is not important.

Resident Demographic Profile

- 3.4.2 The development comprises 75 BTR apartments with 20% Discounted Market Rent. The apartments will therefore be occupied by private rented tenants and social rented tenants.
- 3.4.3 The 2011 Census dataset 'DC4416EW1a' titled 'Tenure by car or van availability by number of usual residents aged 17 or over in household' suggests that across the Manchester merged local authority area, 62% of all households can be categorised as rented or living rent-free. Of these rented households, 65% of social rented households do not own any cars or vans, whereas 53% of private rented or living rent-free households do not own any cars or vans.
- 3.4.4 The guidance document 'Residential Car Parking Research' prepared by the Department for Communities and Local Government (DCLG, now the Ministry of Housing, Communities & Local Government) in 2007, notes that: *"Dwelling size, type and tenure are among factors in determining car ownership levels. Households occupying rented accommodation can have up to 0.5 fewer cars than owner-occupied households in dwellings of similar size and type"*. This further reinforces that the rental occupiers will own fewer cars than owner-occupiers.
- 3.4.5 These datasets demonstrate that there would likely be a significant number of residential occupiers in BTR schemes who do not own any cars or vans, and therefore would not require a parking space. The proposed level of provision would satisfy the likely demand for spaces based on these car availability statistics.
- 3.4.6 Furthermore, the majority of the apartments will be 1 and 2-bedroom dwellings, which together comprise c. 87% of the total development. The remaining c.13% will be 3-bedroom dwellings. The smaller 1 and 2-bedroom dwellings would provide lower levels of residential occupancy (typically 1.3 persons in 1-bed apartments and 1.7 persons in 2-bed apartments, based on Dandara Living developments) and would be less likely to appeal to families with higher levels of car ownership.
- 3.4.7 As prospective occupiers come forward, they would be aware of the parking availability at the site and would decide on whether to rent such a property. The proposed level of parking on-site would therefore

serve as a demand management measure and attract residents with low car ownership that are comfortable walking, cycling and/or using public transport.

- 3.4.8 It is also worth noting that as a tenure, BTR offers flexibility. The parking spaces will be managed based on demand – if a resident's circumstances change and they decide to buy a car then, unlike market flats, they can acquire a space, if available. The rental model also means that residents can more easily move elsewhere if the property no longer suits their needs, including if they need a car parking space and none are available. Similarly, if a resident had a car parking space when they moved in and no longer required it, they can easily change their tenancy and release that space for a reduced day to day cost.
- 3.4.9 Dandara Living operates various BTR schemes across Greater Manchester and other towns and cities throughout the UK. Their research has shown that whilst their developments meet a broad age range, the average age of the occupants is 27 years old, with approximately one third moving in from other parts of the town or city in which the development is situated. This suggests that the occupants of the proposed development would be predominately young residents, local to Manchester. This profile of residents is also likely to have materially lower car ownership compared with other groups, such as families in a more suburban setting.
- 3.4.10 This is further evidenced in the 2011 Census dataset 'DC4109EW1a' titled 'Car or van availability by sex by age', which suggests that across the Manchester merged local authority area, an average of 41% of people aged 20 to 29 do not have cars or vans in their households. In comparison, for people aged 30 to 49, the average number of people with no cars or vans in their household is lower at 32%.
- 3.4.11 These datasets demonstrate that the profile of prospective occupiers indicates lower car ownership potential.
- 3.4.12 The 2011 Census data referenced are included in Appendix D of the TA. The equivalent datasets from the 2021 Census are not yet available at the time of writing.
- 3.4.13 The lower car ownership of younger occupiers is also reflected in the Greater Manchester Transport Strategy: 2040, which states that: *"attitudes to owning and using a car are also evolving. Many younger people no longer see car ownership, or indeed a driving licence, as essential."* The provision of an on-site car club space inclusive of 1 vehicle for shared use would further reduce the need to own a car, and promote travel by sustainable modes.
- 3.4.14 The reduction in car ownership and use, is reflected in the 'All Change' report prepared by the Commission on Travel Demand (2018). This report states that: *"Younger people, and in particular younger males, are far less likely to have a driving license and to subsequently drive less than previous generations"*. The report cites factors that contribute to such trends in youth travel, which include the decline in home ownership and re-urbanisation, and substituting face-to-face interaction with digital

communication, amongst others. This reinforces the lower car ownership potential of prospective occupiers.

- 3.4.15 In March 2019, the DfT released a document titled 'Future of Mobility: Urban Strategy', which describes a strategy comprising various modes of transport along with information and payment functions into a single mobility service. An example of such services includes those that allow customers to purchase monthly subscription packages giving them access to public transport and private taxi and bike hire schemes. The integration of these options is defined as 'Mobility as a Service' (MaaS).
- 3.4.16 The document included a study from the Carplus Annual Survey of Car Clubs, indicating that the number of car club members across the UK increased almost eight-fold between 2007 and 2017, from 32,000 to 245,000 members. Whilst around three quarters of this growth occurred in London, there is increasing rapid growth in many cities elsewhere within the UK.
- 3.4.17 The document also identifies changes in demand for transport, stating that travel demand is rising overall (driven by population growth), but falling at an individual level (people are travelling less per person now than one or two decades ago). Reasons behind reduced individual travel include a decline in commuting for employment due to the increase in flexible working, working from home, part-time, and self-employment, and a rise in online shopping.
- 3.4.18 It also concludes that the UK population is ageing and travel choices show clear generational differences, where the 65+ population is projected to grow by around 50% in both rural and urban areas between 2016 and 2039, whereas the younger population is only projected to grow by 8% in urban areas. Older people are driving more, but younger people are less likely to own cars due to factors such as staying in education for longer, moving into long-term employment and starting families later, the increasing cost of driving, as well as increased sensitivity to the environmental impacts of driving. The younger population, which is likely to be the dominant demographic within the scheme, is therefore more likely to engage with MaaS and shared transport solutions such as car clubs.
- 3.4.19 In conclusion, the proposed level of car parking provision would adequately suit the profile of typical BTR residents as young, low car ownership occupiers.

Other BTR Schemes

- 3.4.20 The Dandara Living Chapel Wharf BTR scheme in Salford is located within an area with similar characteristics to the site at Tesco Parrs Wood, with a GMAL of 8, which is described as 'excellent' by TfGM. The level of car parking provision is 26% compared with the proposed level of provision at Tesco Parrs Wood of 48%. Chapel Wharf also comprises the same percentage of affordable units (20%).
- 3.4.21 Dandara also operate similar BTR schemes in cities outside of Manchester, for example Leodis Square in Leeds (further south of the city centre, but within a 300m walk from the nearest bus stops and a 450m walk to Bridgewater Place, a mixed-use office and residential tower with restaurants, cafés, and a Tesco

Express supermarket). The Leodis Square development comprises 33% parking provision, with a lower proportion of affordable units (5% instead of 20% at Chapel Wharf and the proposed development).

3.4.22 At both the Chapel Wharf and Leodis Square developments, Dandara Living has confirmed that only 90% of the car parking spaces have been let. Hence, there is spare parking capacity at these developments, which have a lower level of car parking provision than proposed at the site at Tesco Parrs Wood. This reflects that having good public transport facilities and local amenities can result in lower parking provision sought at these sites.

3.4.23 Besides Manchester city centre, the only other areas in South Manchester with a GMAL rating of 8 are Stockport town centre, Altrincham town centre, East Didsbury, and the Oxford Road / Wilmslow Road corridor through Rusholme, Fallowfield, Withington, and West Didsbury. Similar BTR schemes in these areas, in terms of the level of car parking proposed and with similar multi-modal accessibility and locational characteristics/amenities, have been reviewed. the level of car parking for BTR schemes proposed / consented in the past 5 years is summarised in **Table 3.1** below:

Scheme	No. of Units	Parking Provision	Parking Ratio
Manchester			
McCauls Group, 32 – 34 Laystall Street Manchester M1 2JZ (128911/FO/2020)	89	0	0%
Affinity Living, Port Street Manchester M1 2EQ (132489/FO/2021)	481	47	10%
Stockport			
Rise Homes, The Mailbox, Former Sorting Office 1 Exchange Street Stockport SK1 1AA (DC/068017)	117	45	38%
Rise Homes, Former Stockport Bus Station, Stockport Interchange Chestergate Stockport SK1 1NP (DC/071417)	196	41	21%
*Amstone, No1 Knightsbridge, Sainsbury's Warren Street Stockport SK1 1UB (DC/083694) – 50% of total residential provision (281 out of 563) BTR, others social housing and private sale, but no separation between car parking for different uses	563	119	21%
Capital & Centric, Weir Mill, Chestergate, Stockport (DC/079225)	253	11 accessible spaces	4%
Heaton Group, Milliners House, 32-36 Lower Hillgate Stockport SK1 1JE (DC/071126)	22	0	0%
Investar, Royal George Village, Stockport College Greek Street Campus Greek Street Stockport SK1 3UQ (DC/076785)	442	51	12%
South Manchester (adjacent to Oxford Road corridor)			
Salboy, Burlington Square Apartments (11182/FO/2016/S1, with an increase in amount of car parking submitted as part of 117848/JO/2017)	273	88	32%

Highways Proof of Evidence

Scheme	No. of Units	Parking Provision	Parking Ratio
Average	1,811	340	17%

Table 3.1 – Build to Rent Car Parking Examples

*Denotes developments that are not yet approved at the time of writing.

3.4.24 A comparison of these sites to the proposed development in terms of locational characteristics and access to local amenities is shown in **Table 3.2** below:

Scheme	Nearest Bus Stop	Nearest Rail / Metrolink Station	Nearest Major Road	Amenities Accessible within 500m Walking Distance
Tesco Parrs Wood	100m	East Didsbury rail and Metrolink (300 – 350m)	A34 (adjacent to site)	Tesco Superstore, Parrs Wood Sixth Form and High School, dentist, place of worship, Parrs Wood Entertainment Centre, leisure centre and sports clubs
32 – 34 Laystall Street	86m	Manchester Piccadilly, New Islington Metrolink (700m)	A665 (adjacent to site)	Urban Exchange (retail centre), Aldi, public houses, bars, gyms, chemist, New Islington Medical Practice
Port Street	100m	Manchester Piccadilly rail and Metrolink (750m)	A665 (adjacent to site)	Ancoats, New Islington, Northern Quarter (leisure, retail, food and drink, supermarkets), Ancoats Marina, Cotton Field Wharf, Urban Exchange
The Mailbox	100m	Stockport (250m)	A6 (adjacent to site)	Stockport Central Library, Grand Central Retail Park, Stockport bus and rail station, Merseyway Shopping Centre, Stockport Council Offices
Stockport Interchange	50m	Stockport (500m)	A6 (adjacent to site)	Merseyway Shopping Centre, Heaton Norris Park, Redrock, The Light, Life Leisure Grand Central, Stockport Exchange
No1 Knightsbridge	50m	Stockport (1,000m)	A560 (adjacent to site)	ASDA, Merseyway Shopping Centre, The Peel Centre Retail Park, ALDI, St Joseph's RC Primary, Redrock Shopping Centre
Weir Mill	50m	Stockport (450m)	A6 (500m)	Acorn Business Park, Stockport Ambulance Station, Decathlon, Hollywood Park, Stockport Fire Station, Hollywood Park Nursery School, places of worship, hot food takeaways, Stockport Exchange, restaurants
Milliners House	200m	Stockport (900m)	A6 (550m)	Lower Hillgate High Street, bars, restaurants, cafés, place of worship, Stockport Marketplace, ASDA
Royal George Village	50m	Stockport (600m)	A6 (adjacent to site)	Stockport College, places of worship, Stockport Masonic Guildhall, Co-Op, Stockport Dialysis Unit, St Thomas' C of E Primary School, Mottram Street Playground, Stockport Town Hall, Life Leisure Grand Central, Sainsbury's

Scheme	Nearest Bus Stop	Nearest Rail / Metrolink Station	Nearest Major Road	Amenities Accessible within 500m Walking Distance
Burlington Square Apartments	150m	Manchester Oxford Road (1,500m)	A5103 (500m)	University of Manchester, Trinity Sports Centre, Trinity High Sixth Form, Manchester Science Park, place of worship, Denmark Road Sports Centre, Alan Gilbert Square

Table 3.2 – Comparison of BTR Sites

- 3.4.25 Whilst it is acknowledged that sites are considered on a case-by-case basis, this comparison indicates that the development proposals are similar to other BTR developments with similar multi-modal accessibility and locational characteristics/amenities. The provision of parking at Tesco Parrs Wood for nearly 50% of the apartments is at the upper end of the range typically provided at BTR schemes in Greater Manchester.

Comparable Parking Precedents in Didsbury

- 3.4.26 Dandara Living is aiming to bring a new type of residential living (BTR) into East Didsbury. In the absence of other BTR schemes in Didsbury, other similar residential developments have been reviewed to determine the level of car parking consented, which set a precedent for the proposed development. These have been summarised in **Table 3.3** below:

Name	Reference	Number of dwellings	Car Parking Spaces	Parking Ratio
494 Wilmslow Road	105514/FO/2014/S1 107434/FO/2014/S1 APP/B4215/W/15/3136755	25	0	0
Former Stagecoach Site Moss Side (Rowlinson)	113982/FO/2016	92	74	0.80
Didsbury Point	135235/FO/2022	76	35	0.46

Table 3.3 – Comparable Parking Provision in Didsbury

- 3.4.27 The recently consented **Didsbury Point** application (ref. 135235/FO/2022) was submitted to MCC for residential development with associated car parking for 35 resident spaces equating to 46% provision.
- 3.4.28 This lower level of car parking provision was set following surveys of the surrounding streets and the conclusion that these do not reach capacity, even at peak times. Additionally, the target market for the residential development was taken into account when assessing the likely car ownership and car parking provision.

- 3.4.29 The development also includes membership to a conveniently located car club space managed by Enterprise.
- 3.4.30 The **494 Wilmslow Road, Manchester** appeal (ref. APP/B4215/W/15/3136755) considered the impact of the residential development in relation to pressure for parking on surrounding streets and the harm to highway safety and living conditions of local residents.
- 3.4.31 The Inspector noted that it would be *“wrong to presume that the proposed development would automatically result in increased car ownership and visitor traffic to the area”*. The site is located in a highly accessible area which is particularly well served by frequent bus, train and Metrolink services. The Inspector considered that under these circumstances it was a *“reasonable assumption”* that a high percentage of the future residents of the development would walk, cycle or use the proximate sustainable travel services to access work or home.
- 3.4.32 Additionally, the Inspector weighed in the balance that the target market of young professionals would likely be attracted to the sustainable location of the site and that the provision of cycle parking spaces and a car club parking space for the residents would reduce the need for car ownership.
- 3.4.33 As shown through the evidence above, there have been precedents within Didsbury for lower levels of car parking provision following the adoption of the Core Strategy in 2012. The developments reviewed have good accessibility to public transports infrastructure and a GMAL rating of 5 or above and have all provided a lower level of car parking provision than 100%.

3.5 Demand Management

- 3.5.1 The restriction of car parking can be used to manage parking demand at a site, particularly when there are parking controls (or limited parking opportunities) on roads surrounding a site.
- 3.5.2 Section 2.4 of the TA demonstrated that there are limited on-street parking opportunities within 400m (or 5-minute walk) of the site, and that off-site parking away from the development would be highly undesirable for residents from a convenience and security perspective. The latter point is due to the fact that residents would have to walk up to 5 minutes to access their vehicle, which would be parked out-of-sight in locations some distance from the proposed development. Both of these points are considered further later in this section.
- 3.5.3 It is noted that Transport for London (TfL) has published in 2017, as part of the London Plan evidence base, a ‘Residential Car Parking’ research paper. One of the key findings within the document is the ‘self-selection’ issue which states that developments with more car parking have residents who are more likely to own cars, and that as people’s alternatives get better, fewer choose to own a car.
- 3.5.4 The research paper continues that areas with higher levels of car ownership have higher levels of car use, and the availability of off-street parking has a particularly strong effect on the probability of car

ownership. For example, the probability of car ownership for two adults with children living in inner London, on a low income, with reasonable access to public transport goes from 34% without off-street parking, to 57% with it, based on analysis of households with similar characteristics. This evidence suggests that a reduced level of car parking should lead to reduced car ownership.

- 3.5.5 Another key finding of the research paper is that reducing the maximum provision of parking could encourage those who could consider a car-free lifestyle to adopt one. To some extent, the availability of parking attracts existing car owners, which in turn increases the car use generated by a development. However, there are also people who will find the decision to own a car more marginal, such as those who use their car infrequently or those who do not own one, but would consider buying one.
- 3.5.6 Hence, with limited parking opportunities at the site at Tesco Parrs Wood, prospective residents would consider whether this meets their needs and whether or not to live there.
- 3.5.7 Demand for car parking spaces would be managed from the outset by encouraging residents and visitors to travel by sustainable modes. This would be implemented via a robust Travel Plan at the site. The Travel Plan would highlight the health, environmental, financial and social benefits of travelling by active and sustainable modes of transport, and include measures, initiatives and incentives to increase travel to the site on foot, by cycle, and by public transport.
- 3.5.8 This is supported by the conclusions reached by Planning Inspectors on a number of recent appeal cases regarding planning applications for new residential development. Further details of the following appeal cases are provided in Section 3.4 of the TA:
- APP/L5240/V/17/3174139;
 - APP/R5510/W/19/3230503; and
 - APP/L5240/V/17/3174139.

Parking Demand and Accumulation

- 3.5.9 A parking accumulation assessment has been undertaken for the development scheme using the trip rates derived from TRICS (detailed in Section 5 of the TA). The TRICS trip rates account for all vehicular activity at the site, generated by residents, visitors and other vehicles accessing the site, such as servicing and delivery vehicles.
- 3.5.10 The assessment shows that the proposed level of car parking at the site would be sufficient to accommodate the forecast parking demand. In other words, the proposed levels of parking at the site are adequate to meet the need of residents and visitors. The parking accumulation assessment is included in Appendix E of the TA.

3.6 Car Park Management Strategy

- 3.6.1 Dandara Living is committed to managing the car park so as to ensure that the on-site car parking provision is limited to those who are able to justify their need for a private car parking space on an ongoing basis such as those with mobility issues or shift workers. The parking will be actively managed and subject to a Car Park Management Plan, which is included in the UU.
- 3.6.2 The car parking on-site would be available to all residents, but as there are a finite number of spaces, they would need to apply for a permit from Dandara Living. Spaces would be allocated on a needs basis (i.e. disabled users) and only then on a first come, first served basis.
- 3.6.3 All spaces would be subject to an additional charge, which would be pitched so as to further discourage occupiers from owning a car. There would be a fixed number of permits in circulation that would be no more than the number of spaces, which would manage demand to ensure it remains within the available supply. Residents would be available to park in any of the available spaces, rather than being allocated a specific space.
- 3.6.4 Hence, only residents with access to a car would apply for a permit, with the remaining apartments being car-free households. The use of the car park would be monitored as part of the Travel Plan. The flexibility of renting also allows people to surrender their parking space / parking permit if they no longer need a car. The proposed permit scheme was welcomed by MCC Highways in their pre-application response.
- 3.6.5 Overall, the proposed approach to parking provision and management at the site would maximise the efficiency of the car parking provision.
- 3.6.6 A Car Park Management Strategy is outlined in Section 3.5 of the TA to ensure that there is adequate management and enforcement of parking at and adjacent to the site. This strategy has been updated and includes the following measures prior to residents moving in:
- All residents will be made aware of the Travel Plan, the aims and objectives, and the measures and initiatives contained within it, and communications would be aimed at dissuading car ownership and use, thereby encouraging those that do move in with a vehicle to consider alternative modes of transport;
 - All future residents (regardless of whether they are allocated a parking space or not) will be made aware of the parking arrangements as part of their tenancy agreement. These are summarised as follows:
 - Parking spaces within the site would be allocated on a needs basis (i.e. disabled users) and then on a first come, first served basis, for residents moving into the scheme who own a car, and priced with a view to providing time for some residents to divest themselves of their vehicles;

- Spaces would be leased for a fixed term of 6 months and then on a rolling monthly basis. This would encourage a move away from the use of the private car and gives the flexibility for residents to move into the development with a car to then give up their space when their lifestyle has adapted to location and mobility options;
- The pricing of the leased parking is intended to act as a significant disincentive to retaining a space if a vehicle is not being used regularly;
- The leases for spaces will contain a break clause to enable Dandara Living to maintain flexibility regarding the future use of the parking spaces and to encourage residents to give-up spaces that they no longer require; and
- If all of the parking spaces are taken up (which is very unlikely based on other Dandara Living developments), a waiting list for spaces would be drawn up, with allocation on a needs basis as outlined above.
- A condition of tenancy for new occupiers will require that residents cannot park within the Tesco car park, and will also include an informative on not parking on-street, off-site.

3.6.7 During the operation of the development, the following measures will be enforced:

- Ownership and control of the car park will remain with Dandara Living;
- Residents will be able to contact building management 24 hours per day to report any misuse (i.e. unauthorised) car parking and other community matters. The car park will be monitored by CCTV in any event;
- Dandara Living will operate a permit-based system, as outlined above;
- All permit holders will be required to display their allocated permit within their vehicle, on the front windscreen (as seen from the inside) at all times; and
- Dandara Living will support Tesco in enforcing the car parking restrictions to prevent the abuse of car parking spaces within the site and adjacent supermarket car park. The Tesco Superstore already issues £70 parking fines for unauthorised use (i.e. where customers exceed a maximum 2-hour stay, which is managed through ANPR – automatic number plate recognition).

3.6.8 The visitor parking spaces would be managed by Dandara Living via a booking system. Residents would be able to book the spaces for their visitors ahead of their arrival, enabling unauthorised parking to be easily identified by on-site management and any appropriate enforcement measures to be taken.

3.6.9 The proposed mix of resident and visitor spaces is based on the anticipated use of the site. The spaces will be monitored and managed by Dandara Living post-occupation to ensure the most appropriate and optimised mix of spaces for the development to ensure a sustainable development.

3.7 Off-Site Parking

Safety and Security

- 3.7.1 On-street parking is not being provided as part of the proposed development; however, it is recognised that on-street parking is a contentious topic that was particularly raised by local councillors and within objection letters to the planning application, stating that the proposed parking ratio of the development would encourage future residents to park on surrounding residential roads.
- 3.7.2 Section 2.4 of the TA demonstrated that there are limited on-street parking opportunities within 400m (or 5-minute walk) of the site. This section of the TA also highlighted that off-site parking away from the development would be highly undesirable for residents from a convenience and security perspective, which would discourage its use.
- 3.7.3 This is reinforced by Section 11 of the Manual for Streets 2 – Wider Application of the Principles (2010), which discusses on-street parking and servicing in particular, stating that the decision whether or not to provide on-street car parking should take into account its positive and negative effects as summarised in MFS 1. It notes that one of the negative effects of on-street car parking is that cars parked on-street can be more vulnerable to opportunistic crime than off-street spaces. This would be a deterrent for residents/visitors of the proposed development.
- 3.7.4 The National Model Design Code, Part 2 (2021) reinforces the above position as it states that: “*well-considered parking is convenient, safe and attractive to use*”. Parking off-site would hold none of these attributes. In addition to the security concerns of parking off-site, having to walk up to 5 minutes to access a private car would clearly be inconvenient and unattractive, and therefore a deterrent.
- 3.7.5 I therefore conclude that off-site parking by residents or visitors would be both highly inconvenient and a potential security concern, and as such this is very unlikely to occur to any significant degree.

Site Observations from TA

- 3.7.6 As noted within Section 2.4 of the TA and further expanded upon in my evidence, there are limited opportunities for off-site parking in the surrounding area, assessed as within a 400m walking distance from the site.
- 3.7.7 Whilst there is car parking available at Parrs Wood Entertainment Centre and East Didsbury Metrolink Park & Ride, these car parks are privately operated and managed. The Entertainment Centre car park has clear signage that parking restrictions apply and that a Parking Charge Notice of up to £100 can be issued. Similarly, the Metrolink car park has clear signage that the parking is for Metrolink passengers only and that parking charges of £100 can be issued. The Tesco Superstore only provides car parking for customers, with £70 parking fines issues for unauthorised use.

On-Street Parking Surveys

- 3.7.8 Section 2 of the Further Highways Evidence provides details of an on-street parking survey that was undertaken to respond directly to MCC Highways' concerns as to the adequacy of on-site car parking and therefore the potential for overspill onto adjacent roads. This survey was only undertaken to respond to MCC's concerns and has not changed my conclusions that on-street parking by residents and visitors of the proposed development is very unlikely to occur. My evidence demonstrates that the proposed supply of parking will be sufficient to meet the likely on-site demand, and any on-street parking would be highly inconvenient and insecure.
- 3.7.9 The majority of the roads in the surveyed study area are subject to single yellow (no waiting between specified times) and double yellow parking restrictions (no waiting at any time) and are therefore not available for daily parking by residents.
- 3.7.10 The results of the survey demonstrate that Parrs Wood Avenue and the unnamed road next to East Didsbury rail station have significant spare capacity for lawful, on-street car parking. Parrs Wood Road also has spare capacity at the weekend, with limited spare capacity on the surveyed weekday.
- 3.7.11 Paragraph 111 of the National Planning Policy Framework (NPPF) states 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."

- 3.7.12 The starting point is it that it is considered to be highly unlikely that on-street parking will take place. However, responding directly to concerns by MCC Highways and third party objectors the survey evidence has demonstrated that were some on-street parking to occur, then there is demonstrable spare capacity on-street within walking distance of the site. It seems unlikely that residents or visitors would park in the same location at the same time, therefore any impacts on residential amenity would be minimal, and certainly not significant let alone 'severe' in the context of Paragraph 111 of the NPPF.

3.8 Travel Plan

- 3.8.1 A Travel Plan will be implemented to promote sustainable travel choices. An ITP has been prepared to accompany the planning application, which aims to minimise the number of car trips generated by the development and encourage residents to use sustainable modes of transport.
- 3.8.2 The benefits of Travel Plans are well-documented, with various case studies of success in encouraging use of active and sustainable modes of transport, and reducing private car use. For example, the DfT document 'Making Residential Travel Plans Work' (2007) includes a case study for Queen Elizabeth Park (QEP) to the north of Guildford town centre. QEP is a mixed-use development comprising 525

residential units (35% of which are affordable), employment space, creche, a health and fitness centre, a nursing home, and a community core with shop units.

- 3.8.3 The main elements of the Travel Plan included restrictions to car parking, design of the site to be attractive for walking and cycling with good connections to the surrounding network, provision of facilities that reduce the need to travel, bus travel and cycle vouchers offered to each household, and Welcome Packs given to residents containing walking, cycling, train and bus information along with information about claiming cycling and public transport discounts.
- 3.8.4 A review of the Travel Plan after a 75% occupancy rate revealed that single occupancy car travel contributed to 37% of total trips, and that there was emerging good practice whereby the 'green transport' credentials of the site were included from the outset in the marketing of properties to potential residents. The sales staff was briefed by consultants who had prepared the Travel Plan, and the travel benefits were sold as a positive extra for new residents.
- 3.8.5 There are various parallels between this case study and the proposed development, which demonstrates the benefits that can be realised from a successful Travel Plan, notably reducing private car use.

3.9 Car Club

- 3.9.1 A car club space inclusive of 1 vehicle is proposed within the development site car park for shared use by local residents and the wider community. The MfS states the benefits of car clubs in encouraging reduced car ownership:

“One way of encouraging reduced car ownership is to provide a car club. Car clubs provide neighbourhood-based short-term car hire to members for periods of as little as one hour, and have been shown to reduce car ownership and use. To function effectively, car club vehicles need to be made available close to members’ homes.”

- 3.9.2 Collaborative Mobility UK (CoMoUK), a national charity focused on integrated mobility solutions, produces annual publications and summaries on car clubs, in which the 2020 Annual Report states that car clubs:
- Contribute to carbon savings for England and Wales outside London equivalent to the lifetime CO₂e absorption of around 1,150 trees [per car club car compared with the average UK car and van];
 - Take out substantial numbers of private cars from the wider vehicle fleet (car club users told CoMoUK that wider availability of car club cars was a critical issue in encouraging them to dispose of car) – with a statistic of 9 private cars taken off the road by each car club in England and Wales, and an estimate of 12,790 total number of cars removed from UK roads due to car clubs;

- Produce 84% less NO_x emissions, 71% less PM_{2.5} emissions, and 25.5% less CO₂ emissions in England and Wales compared to the average UK car;
- Are often used by people who need a shorter journey time, need to carry luggage / bulky items, are going to more than one place, and / or those who find car clubs are their cheapest option; and
- Boost use of public transport and walking and cycling, as car club members have higher use of sustainable modes than national averages. In the period surveyed by CoMoUK, 30% of respondents used a bicycle three times a week; whereas on average 11% of people in England cycle more than once a week.

3.9.3 The provision of a vehicle for shared use via a car club, combined with the accessibility of the site by active and sustainable modes of transport, would therefore support people living at the development site without a car.

3.10 Summary and Conclusion

3.10.1 My evidence has demonstrated why the proposed level of car parking is appropriate and sufficient to meet the expected level of demand, and why there is less need to own a car in this location. It has also demonstrated how the on-site car parking is proposed at a sustainable level for the type of development and the typical profile of occupiers, based on the accessibility of the site and supported by demand management measures and a car park management strategy. The level of car parking is also in-keeping with other BTR schemes in Greater Manchester and similar residential developments in Didsbury.

3.10.2 The evidence has explained how potential occupiers will select whether or not to live at the proposed development, and how BTR occupiers are typically young, with low car ownership and low driving licence holders.

3.10.3 My evidence has also justified why on-street parking by residents and visitors of the proposed development would be both highly inconvenient and a potential security concern, and as such this is very unlikely to occur to any significant degree. Further evidence has been presented to respond to concerns by MCC Highways and third party objectors, that were there to be some on-street parking then any impacts on residential amenity would be minimal, and not significant or severe.

3.10.4 Overall, I conclude that the site is situated within a highly accessible area, with a number of complementary uses and amenities within walking and cycling distance. The site is therefore well located to take advantage of the excellent existing public transport infrastructure, including bus, train, and Metrolink, in addition to walking and cycling opportunities, which would provide viable alternatives to travel by car. The proposed development will be further supported by a Travel Plan and car club operating from the site that would encourage active and sustainable travel, and further reduce private car use.

- 3.10.5 The evidence also demonstrates that for other comparable schemes the proportion of spaces is towards the higher end of the approved range. Given the sustainability credentials of the site, were additional parking to be provided then this would amount to a profligate and inefficient use of land.

4.0 Evidence re Traffic and Congestion

4.1 Introduction

- 4.1.1 This section of my evidence responds to RfR3: *“The applicant has failed to demonstrate that the proposed development would not give rise to unacceptable impacts to congestion on the highway network contrary to policy T1 of the adopted Manchester Core Strategy”* and comments made by third parties related to traffic and congestion.

4.2 Policy Tests

- 4.2.1 RfR3 refers to the *“unacceptable impacts to congestion on the highway network contrary to policy T1 of the adopted Manchester Core Strategy”*.
- 4.2.2 Core Strategy Policy T1 advises that MCC will support proposals which *“would reduce the negative impacts of road traffic, for example, congestion, air pollution and road accident casualties”*.
- 4.2.3 Paragraph 111 of the NPPF states 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.”*
- 4.2.4 The policy tests to make development acceptable are whether: 1) there would be an unacceptable impact on highway safety, or 2) the residual cumulative impacts on the road network would be severe. RfR3 refers to congestion and therefore the second policy test (i.e. whether the impacts would be ‘severe’ rather than ‘unacceptable’ as referred to in RfR3). The first policy test would also apply, but this is not referenced in RfR3. Safety is however raised by third party objectors.
- 4.2.5 This section of my evidence responds to both policy tests and therefore RfR3 and concerns raised by third party objectors.

4.3 Highway Safety

- 4.3.1 Section 2.7 of the TA includes a detailed highway safety review of the study area covering the most recent five-year period available prior to submission of the planning application (February 2016 and January 2021).
- 4.3.2 There were no fatal incidents recorded within the study area, and no personal injury reported collisions were recorded at the site access junction on Parrs Wood Lane, which demonstrates that the existing junction operates safely.

- 4.3.3 The serious incidents which have occurred locally appear to have been isolated incidents which were mostly caused by either drivers or pedestrians who failed to look properly. Road layouts were not cited as contributory factors in any of the serious incidents.
- 4.3.4 The slight incidents were dispersed across the study area with varying circumstances and contributory factors. The road layout was one of the contributory factors, but not the sole contributory factor, for a single slight collision.
- 4.3.5 The TA concluded that there is no existing safety issue in the study area that is likely to be exacerbated by the proposed development.
- 4.3.6 Section 6.8 of the TA included an additional highway safety assessment for the A34 Kingsway/A5145 Parrs Wood Lane junction, which has the largest number of collisions at any individual junction within the study area over the 5-year period.
- 4.3.7 This assessment clearly demonstrates that the actual number of collisions that has occurred at the junction is significantly lower than would be expected at this type of junction using the national accident rate forecasts. The actual number of collisions therefore does not indicate that the junction is unsafe.
- 4.3.8 The likely change in collisions at the junction resulting from the increase in traffic associated with the proposed development has also been calculated. The rate of change equates to one potential additional collision at the junction every 25 years as a result of the additional development traffic.
- 4.3.9 The TA concludes that the highway safety impacts arising from the development are not significant or severe within the context of paragraph 111 of the NPPF.
- 4.3.10 Further to the TA, I have undertaken a review of collisions that have occurred in the study area between January 2021 and December 2021. This is the most recent validated data available at the time of writing (the STATS19 reporting system states that final annual data will only be released in early October of the following year).
- 4.3.11 During this period, there have been three additional 'slight' severity incidents, with two occurring at the A34 Kingsway/A5145 Parrs Wood Lane junction, and one other occurring near the A34 Kingsway/Parrs Wood Entertainment Centre junction. These were no additional serious or fatal incidents within the study area or period.
- 4.3.12 On this basis, I conclude that the highway safety review presented in the TA remains valid, and that the additional collisions do not alter the conclusions of the TA.
- 4.3.13 An independent Stage 1 Road Safety Audit of the proposed access arrangement drawing that was appended to the TA has also been undertaken. This Audit raised two "problems" (a standard Audit term), relating to the design of the dropped kerbs and tactile paving, and traffic signs and road markings

within the Tesco car park. Both recommendations to resolve these problems were accepted in the Design Response Report, and the 'problems' have therefore been addressed.

- 4.3.14 Section 4.4 of the TA included an audit of pedestrian and cycle routes to and from key destinations in the vicinity of the site. It was found that most routes to key destinations are well-maintained and in good condition. The main deficiencies to footways were limited to those along the site boundary, which are addressed in the UU. The off-site highway works include the rationalisation of signposts and street furniture adjacent to the site, and resurfacing of the footway along the site frontage (being the A5145 Parrs Wood Lane between the Site access road and the A34 Kingsway), to improve the accessibility of the site.
- 4.3.15 Nothing further has come to light since these documents were prepared that would lead me to believe that there are any existing road safety issues in the locality that would be exacerbated by the proposed development.
- 4.3.16 It is also worth reiterating that the proposed development is forecast to generate a low level of traffic in its own right, but also when compared to existing traffic levels on the surrounding highway network. The traffic generated by the proposed development would be imperceptible to other road users, with no likely material adverse impact on road safety.

4.4 Traffic Impacts

TA Traffic Data and Modelling

- 4.4.1 As reported in the TA, traffic surveys were undertaken on 17 September 2021. 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.
- 4.4.2 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.
- 4.4.3 The 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 was appended to the post-application Memo submitted by Deloitte to MCC Planning (subject ref. 133746/FO/2022 – Dandara, East Didsbury dated 19 July 2022). 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 2021 would result in a similar number of vehicles on the

highway network than just before the pandemic. The Memo concluded that these surveys remain appropriate and valid for use.

- 4.4.4 The Transport Scoping Report 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 8 July 2022 included the following statement:

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

- 4.4.5 Hence, the traffic surveys were accepted at scoping stage.
- 4.4.6 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 were appended to the post-application Memo.
- 4.4.7 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.
- 4.4.8 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).
- 4.4.9 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.
- 4.4.10 The capacity assessments within the supporting TA were undertaken as a linked LinSig model due to the proximity and interactions between the operation of the junctions.
- 4.4.11 The assessments were undertaken using the survey data from September 2021 and it was demonstrated within the TA that some junctions on the wider highway network were predicted to operate at/above capacity.

- 4.4.12 It was noted within the TA that the wider network performance is similar between the 'Base' and the 'Base with Development' scenarios, with the change in delay less than 1%. Overall, it was considered that the impact of the proposed development on the operation of the local highway network is minimal and mitigation beyond the implementation of the Travel Plan was not considered to be necessary.
- 4.4.13 Furthermore, the junctions assessed within the adjacent corridor on the A34 operate on SCOOT which provides dynamic optimisation to increase throughput and optimise delays and queues at junctions that operate at capacity. The benefits of SCOOT were not replicated in the assessments undertaken within the TA and therefore the modelling results presented the worst-case scenario; it is reasonable to conclude that the junctions on the network would operate more efficiently with less queueing and delays than presented in the TA.

Further Highways Evidence

- 4.4.14 Notwithstanding the above points regarding the appropriateness of the September 2021 traffic surveys, Section 3 of the Further Highways Evidence provides details of new traffic surveys for junctions in the TA study area to respond directly to third party and MCC Highways' concerns as to the adequacy of the 2021 traffic surveys in relation to COVID-19. The surveys were undertaken during school term time and there were no roadworks in the study area at the time of the survey.
- 4.4.15 Section 3 of the Further Highways Evidence utilises traffic survey data collected in November 2022 and provides updated traffic modelling results. The model has also undergone further internal auditing, as well as an independent external audit by JCT – the software manufacturer for LinSig. Additional comments from TfGM have also been addressed as part of the updated modelling.
- 4.4.16 The Further Highways Evidence shows that the increases in degrees of saturation, queues and delay are minimal as a result of the proposed development due to the low levels of development vehicular trips travelling through the junctions. The results also show that the overall network performance is similar between the 'Base' and 'Base + Development' scenarios, with the change in delay on the network less than 1% in all scenarios.
- 4.4.17 The benefits of SCOOT are not replicated in the assessments and therefore, the modelling results present the worst-case scenario. The application of over 7% of background traffic growth to the 2027 future year, adds to the worst case nature of the assessment results. It is therefore likely that the junctions would operate more efficiently with fewer queues and delay than forecast.
- 4.4.18 The Further Highways Evidence reaches exactly the same conclusions as the TA, that the impact of the proposed development on the operation of the local highway network will be minimal, and certainly not significant or severe in the context of paragraph 111 of the NPPF. I elaborate on this further below.

Driver Responses to Congestion

- 4.4.19 It is evident from the traffic modelling that has been undertaken that parts of the local highway network are congested and are operating at/over-capacity. This is most clearly demonstrated at Junction 2 – A34 Kingsway / A5145 Parrs Wood Lane Signalised Junction, and Junction 5 – A34 Kingsway / B5095 Wilmslow Road Signalised Junction.
- 4.4.20 The predicted change in results with the addition of the proposed development is small. Indeed, the predicted change is sufficiently small that the overall outcome is the same – localised congestion on the adjacent highway network. It is acknowledged that the highway network in this locality is heavily trafficked, with queueing and delays experienced by vehicles that already pass through it during peak hours. The addition of the proposed development would not materially change the operation of the junctions.
- 4.4.21 In practice, drivers have varied responses to congestion. These responses include taking alternative routes to optimise their journey times, through for example, the use of online route planners and in-car satellite navigation systems. Responses also include the re-timing of trips to avoid the busiest periods, which is commonly referred to as ‘peak spreading’. The other main response is a change of mode, where the level of congestion encourages the driver to switch to another mode of transport, such as public transport. Hybrid working practices also now provide the option of working from home where permitted by employers, where a previous journey is no longer undertaken (or undertaken less frequently).
- 4.4.22 In terms of potentially increasing congestion and queueing at junctions, the Secretary of State and Inspector in the seminal call-in decision at Land at Grange Farm Hartford, Cheshire and Land to the East of School Lane, Hartford, Cheshire (ref. APP/A0665/A/12/2179410 and APP/A0665/A/12/2179374), dated 18 November 2013, were examining a proposal that created a one minute extra delay to an existing 6 minute delay within an additional 66 vehicles added to 518 queueing vehicles in the peak hour. In response, the Inspector stated at paragraph 14.45 of the decision (and endorsed by the SoS at paragraph 24 of the call-in decision):

*“Any additional delay however carries less weight as **it is not the aim of policy to protect the convenience of commuting car drivers.**” (emphasis added)*

- 4.4.23 Whilst the appeal proposals will in fact generate significantly less congestion and delays, the argument still stands that it is not the aim of policy to protect the convenience of commuting car drivers using the A5145 or A34 to travel to work, and to argue otherwise would be in direct tension with the direction of national policy for the last quarter century.
- 4.4.24 In summary, the traffic modelling that has been undertaken includes a range of worst case assumptions, whereas in reality, the results on the ground are expected to be better than the model forecast. Notwithstanding, parts of the local highway network do experience congestion at present, and the

proposed development would not materially change this. In reality, drivers will continue to travel along their normal routes until the level of congestion becomes unacceptable to them, and there are a range of potential responses that they would take.

- 4.4.25 The proposed development is located in a highly accessible location, therefore residents of the development will be afforded the opportunity to travel by alternative modes to the private car from the outset. The level of private car use is also expected to be low.

Definition of Severe Impact

- 4.4.26 Paragraph 112 of the NPPF states that applications should “*give priority first to pedestrians and cycle movements*”, facilitate “*access to high quality public transport*”, and “*be designed to enable charging of plug-in and other ultra-low emission vehicles*”.
- 4.4.27 My professional interpretation of the NPPF as a whole is that there is a clear presumption in favour of sustainable development as set out in Paragraph 11, with sustainability a further important requirement of Paragraphs 104, 105, 110 and 112. The sustainability of the site is therefore fundamental to the acceptability of proposals, and from a traffic and transport perspective, this largely relates to accessibility.
- 4.4.28 My evidence in **Section 3** clearly demonstrates the site is accessible, has sought to promote and maximise opportunities for sustainable transport modes, and constitutes sustainable development in accordance with the NPPF.
- 4.4.29 The NPPF confirms that if development can be demonstrated to be sustainable, it 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.
- 4.4.30 The term ‘severe’, in the context of highway capacity, was first introduced with the NPPF in 2012. Its introduction provided a major change in transport planning policy with the term setting a very high bar for applications to be refused on highways grounds, when compared to PPG13, the previous transport policy document.
- 4.4.31 Whilst the NPPF does not provide a definition of ‘severe’, a review of the Oxford and Cambridge dictionaries reveals definitions such as ‘very great’, ‘intense’, ‘extreme’, ‘very difficult’, ‘causing very great pain’ and ‘very serious’.
- 4.4.32 Discussions regarding the definition of the term ‘severe’ have formed part of numerous planning applications and appeals. In appeal decision APP/P3040/W/17/3185493 (dated 23 May 2018), Paragraph 11 makes reference to earlier decisions and states that the “*term ‘severe’ sets a high bar for intervention via the planning system in traffic effects arising from development; mere congestion and*

inconvenience are insufficient in themselves but rather it is a question of the consequence of such congestion.”

- 4.4.33 This position is reinforced in appeal decision APP/A0665/W/19/3220360 (dated 2 October 2019) where increases in journey time, route reassignment and delay are considered in Paragraph 13 as “a matter of driver convenience, where relevant local and national policy concerns the impacts on the highway network.”
- 4.4.34 The decisions demonstrate that at junctions operating at, or over capacity, the introduction of additional queuing, congestion, delay or driver inconvenience is not on its own sufficient for impacts to be considered ‘severe’.
- 4.4.35 I share the view that queuing, congestion, delay and driver inconvenience are matters that are experienced by many people across the UK as part of a daily commute, particularly in urban areas. An increase in queueing, congestion or delay may not even be perceptible to existing users, may result in a marginal impact, or may only occur for a brief period of time each day. In my opinion this is a long way from being severe.
- 4.4.36 Furthermore, where there are highway impacts, physical mitigation can often be implemented to reduce the severity of the impact. However, it must also be borne in mind that natural reductions in severity can occur. I provided various examples of potential driver responses to congestion above. Traditional modelling assessment techniques do not always capture this (which is the case at Tesco Parrs Wood), but these potential responses are important to note when considering if an impact is severe.
- 4.4.37 My evidence earlier in this section demonstrates that extensive traffic modelling has been undertaken and the results of this demonstrate there would be no severe residual cumulative impact as a result of the proposed development.

4.5 Summary and Conclusion

- 4.5.1 My evidence has considered the policy tests relevant to traffic and congestion. A detailed review of highway safety was included in the TA and the Design Response Report to the Stage 1 Road Safety Audit. These concluded that there would not be an unacceptable impact on highway safety as a result of the proposed development.
- 4.5.2 The traffic impacts of the proposed development have also been reassessed using new traffic survey data from November 2022. The Further Highways Evidence reaches exactly the same conclusions as the TA, that the impact of the proposed development on the operation of the local highway network will be minimal, and certainly not significant or severe in the context of paragraph 111 of the NPPF.
- 4.5.3 My evidence also includes a discussion about the potential responses by drivers to congested highway networks, and definitions of the term ‘severe’ in relation to traffic impacts.

- 4.5.4 Overall, I conclude 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 and Core Strategy Policy T1. The proposed development will be further supported by a Travel Plan and the planning obligations in the UU.

5.0 Third Party Comments

5.1 Introduction

- 5.1.1 A number of comments were made by third parties during the course of the planning application and following the appeal submission. These comments have been reviewed and grouped into themes. I provide a response to these themes in this section of my evidence.

5.2 Comments on Planning Application

- 5.2.1 A Planning and Highways Committee report was prepared by MCC for the Committee held on 28 July 2022 where the proposed development was on the agenda. The comments from ward members and the public have been summarised into the following themes:

- Traffic congestion on the local highway network;
- Traffic impacts during construction, maintenance and operation of the proposed development;
- Pedestrian and highway safety;
- Validity of the 2021 traffic surveys;
- Mitigation of traffic congestion;
- Unacceptable parking ratio and potential for on-street parking;
- Other apartments in the vicinity have at least 100% car parking;
- East Didsbury is different to other BTR locations;
- Surrounding roads at at-capacity in terms of on-street parking; and
- Unpredictable parking needs of tenants.

- 5.2.2 A small number of comments were also received in support of the proposals.

- 5.2.3 My response to comments relating to traffic congestion, the traffic impacts during operation of the proposed development, pedestrian and highway safety, and traffic surveys are responded to comprehensively in **Section 4** of my evidence. Additionally, my response to comments relating to parking provision and on-street parking, and precedent BTR schemes and Didsbury precedents, are responded to comprehensively in **Section 3** of my evidence. I respond to the remaining themes below.

- 5.2.4 In terms of construction traffic, based on my professional experience, the level of construction traffic for residential developments is typically less than the completed and operational development. The construction phase is therefore likely to have a direct, temporary, short-term (reversible), minor adverse effect at a local level. On this basis, the construction impacts would not be significant and would be managed via a Construction Management Plan (CMP). The CMP would identify a strategy for reducing, retiming, or consolidating construction traffic, managing transport for construction workers, particularly scheduling them outside network peak hours, in order to minimise any impacts on the local highway

network. A CMP is a conventional way of addressing such issues and would be likely to form a condition of planning.

- 5.2.5 With regards to maintenance of the apartment block, it has been demonstrated in the TA that satisfactory access can be achieved for refuse vehicles to the site, and that servicing and deliveries would be contained within the site, without any overspill onto the surrounding roads. These trips could also be coordinated to take place outside of peak hours to minimise disruption to local residents, shoppers and other users of the local highway network.
- 5.2.6 In terms of mitigation of traffic congestion, it has been demonstrated that whilst the existing highway network does experience levels of congestion at present, the proposed development does not have a significant or severe impact. Highway mitigation is therefore not necessary to make the development acceptable; nor would highway improvements in this locality be desirable. The A34 Kingsway and adjoining roads are already highways of significant scale with multiple lanes of approach. Further increasing the scale of the highway to accommodate more traffic would likely encourage further traffic to use the local highway network. The planning obligations set out in the UU to support the proposed development would facilitate access to the development, improve accessibility for pedestrians, and encourage active and sustainable travel, which aligns with national and local policy.
- 5.2.7 With regards to car parking provision at other apartments within the vicinity of the site that have been constructed over the past half century, it is not fair or correct to draw comparison between the proposed development and historic, non-BTR developments. The profile of residential occupiers at BTR schemes is different to owner-occupied and private rented properties, as discussed in **Section 3** of my evidence. BTR schemes offer flexibility for a target demographic. Residents of purpose-built BTR developments would also have different expectations of their lifestyle from those who live in other types of rental properties on the market. Living arrangements, travel patterns, and car dependency have changed significantly over recent decades since these older properties were constructed.
- 5.2.8 In terms of the capacity of roads (for parking) in the vicinity of the site, there is a perception that there is no spare capacity. Whilst I conclude that off-site parking by residents or visitors would be very unlikely to occur to any significant degree, the results of the on-street parking survey in **Section 3** of my evidence, demonstrate that spare capacity does in fact exist on roads within walking distance of the site. The above perception is therefore a misperception, As set out in **Section 3** of my evidence, and responding directly to concerns by third party objectors that were some on-street parking to occur, there is demonstrable spare capacity on-street within walking distance of the site. It would be very unlikely that residents or 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 Paragraph 111 of the NPPF.
- 5.2.9 With regards to the parking needs of tenants, this is responded to in detail in **Section 3.6** of my evidence – Car Park Management Strategy. Further to this, Dandara Living has clarified that they run at an

average of six weeks ahead when filling vacancies in their developments. The six-week period includes viewing, reservation, up until tenants move into the development. Therefore, Dandara Living would have a good idea of prospective tenants' requirements for car / motorcycle / bicycle parking ahead of schedule, which is collated into their databases. The management team would therefore know, at any point in time, which tenants are utilising a car parking space, and if there is spare capacity for a prospective tenant who is also a car owner.

5.3 Comments on Appeal Submission

5.3.1 A total of 92 comments have been received from third parties following the appeal submission. 5% of these comments were in support of the proposed development, with 95% generally opposed. My analysis of these comments highlights the following main areas of concern:

- 78% of comments relate to traffic impacts and congestion;
- 60% of comments relate to parking; and
- 28% of comments relate to road safety.

5.3.2 My response to comments relating to traffic impacts, congestion and road safety are responded to comprehensively in **Section 4** of my evidence. Additionally, my response to comments relating to parking are responded to comprehensively in **Section 3** of my evidence. In addition to this evidence, supplementary information is provided below.

5.3.3 With regards to road safety, most of these comments relate to the volume of traffic on the local highway network, and congestion. The safety of school children is also referenced in a number of these comments.

5.3.4 It is acknowledged that the site and the study area is located in close proximity to Parrs Wood High School, as such it is expected that school children will walk along the surrounding roads. A review of the collision data presented in the TA demonstrates seven incidents involving children under 18 years old, with six incidents where the children were pedestrians and one where the child was a cyclist.

5.3.5 Notwithstanding, none of the incidents occurred in the vicinity of the site access. The majority of collisions occurred at the A34 Kingsway/A5145 Parrs Wood Lane junction where there are controlled crossing facilities, of which the majority of collisions were attributed to the pedestrian failing to look properly before crossing.

5.3.6 A review of the additional incidents between January 2021 and December 2021 (outlined in **Section 4** of my evidence) shows that the incidents at the A34 Kingsway/Parrs Wood Entertainment Centre junction involved two child casualties, where the children were passengers in a car which collided with another vehicle. None of the three incidents involved any pedestrian casualties.

5.3.7 It is worth reiterating that most of the crossings local to the site are signal controlled, providing the opportunity for safe road crossings. The proposed access arrangements to the site include

improvements to the existing Zebra crossing to include wider dropped kerbs with improved tactile paving and the introduction of Belisha Beacons at the crossing. This would improve the accessibility of the site and also assist with pedestrians crossing the site access road. This controlled crossing would be available for use by school children as well as other members of the public.

- 5.3.8 I therefore conclude that the proposed development would not result in any material adverse safety impacts on the local highway network, and that the proposed access arrangements would in fact deliver road safety and pedestrian amenity benefits through localised improvements adjacent to the site.
- 5.3.9 Air quality related to traffic congestion is also referenced in a number of comments. An Air Quality Assessment was undertaken by Redmore Environmental and submitted with the original planning application. This considered the potential air quality impacts during the construction and operational phases of the development. The Assessment concludes that *“the site is considered suitable for the proposed end use from an air quality perspective”*. It continues that: *“Based on the assessment results, air quality issues are not considered a constraint to planning consent for the development.”*
- 5.3.10 From a highways and transport perspective, parking provision below 100% and the promotion of active and sustainable travel would serve to minimise the adverse impacts of traffic, including pollution and local air quality. Moreover, all spaces will be equipped with electric vehicle charging provision, which would incentivise the use of ULEVs, that minimise emissions at the tailpipe.
- 5.3.11 I therefore conclude that the proposed development would promote clean travel options, as well as low and zero carbon modes of transport.

5.4 Conclusion

- 5.4.1 The supplementary information and additional evidence provided in this section, together with my evidence presented in **Sections 3 and 4** of this report, respond fully to the main comments and concerns raised by ward councillors and members of the public. I therefore conclude that the proposals constitute a sustainable development, and that proposed development would not have an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would not be significant or severe in the context of Paragraph 111 of the NPPF.

6.0 Summary and Conclusions

- 6.1.1 A planning application was submitted on 5 May 2022 by Dandara Living Developments Limited ('Dandara Living') to Manchester City Council (MCC) for the following development proposal:

"Erection of a 6 storey residential building (Use Class C3) comprising 75 no. apartments together with ground floor residential amenity space, landscaping, cycle parking, car parking and associated works"

- 6.1.2 The site is located at Land Junction Of Parrs Wood Lane, Manchester, M20 5AA (MCC planning application no. 133746/FO/2022).
- 6.1.3 Curtins prepared a Transport Assessment (TA) (**Report 076118-CUR-XX-XX-T-TP-00004-P04**) and Interim Travel Plan (**Report 076118-CUR-XX-XX-T-TP-00005-P04**), both dated 5 May 2022, to accompany the planning application.
- 6.1.4 A post-application email from Robert Griffin, Principal Planner at MCC Planning, received on 8 July 2022, included comments from MCC Highways and Transport for Greater Manchester (TfGM). These comments were responded to via a Memo submitted by Deloitte to MCC Planning (subject ref. 133746/FO/2022 – Dandara, East Didsbury dated 19 July 2022). Curtins provided input to this letter.
- 6.1.5 The planning application was subsequently refused on 2 August 2022 with the following highways and transport related reasons for refusal (RfR):

"2) The proposals fail to provide an adequate level of on-site car parking to serve the proposed residential units contrary to policies DM1 and T2 of the adopted Manchester Core Strategy"

"3) The applicant has failed to demonstrate that the proposed development would not give rise to unacceptable impacts to congestion on the highway network contrary to policy T1 of the adopted Manchester Core Strategy"

- 6.1.6 An appeal subsequently has been lodged by Dandara Living pursuant to Section 78(2) of the Town and Country Planning Act 1990 (as amended) (Planning Inspectorate Reference APP/B4215/W/23/3314646).
- 6.1.7 A report was prepared and submitted to MCC Highways and TfGM to present further highways and transport related evidence (**Report 082673-CUR-XX-XX-T-TP-00003-P02**). Primarily this includes the presentation of a parking survey in relation to RfR2, and a new traffic survey and updated traffic modelling results in relation to RfR3. This report is referred to as 'Further Highways Evidence'.
- 6.1.8 Following the submission of the Further Highways Evidence, MCC do not now intend to defend the appeal based upon RfR 2 and 3. Nonetheless, there has been significant interest from third parties, that raise similar concerns to the RfR. My evidence therefore continues to respond to these RfR in full in response to third party concerns.

- 6.1.9 With regards to RfR2, my evidence has demonstrated why the proposed level of car parking is appropriate and sufficient to meet the expected level of demand, and why there is less need to own a car in this location. It has also demonstrated how the on-site car parking is proposed at a sustainable level for the type of development and the typical profile of occupiers, based on the accessibility of the site and supported by demand management measures and a car park management strategy. The level of car parking is also in-keeping with other BTR schemes in Greater Manchester and similar residential developments in Didsbury.
- 6.1.10 The evidence has explained how potential occupiers will select whether or not to live at the proposed development, and how BTR occupiers are typically young, with low car ownership and low driving licence holders.
- 6.1.11 My evidence has also justified why on-street parking by residents and visitors of the proposed development would be both highly inconvenient and a potential security concern, and as such this is very unlikely to occur to any significant degree. Further evidence has been presented to respond to concerns by MCC Highways and third party objectors, that were there to be some on-street parking then any impacts on residential amenity would be minimal, and not significant or severe.
- 6.1.12 Overall, I conclude that the site is situated within a highly accessible area, with a number of complementary uses and amenities within walking and cycling distance. The site is therefore well located to take advantage of the excellent existing public transport infrastructure, including bus, train, and Metrolink, in addition to walking and cycling opportunities, which would provide viable alternatives to travel by car. The proposed development will be further supported by a Travel Plan and car club operating from the site that would encourage active and sustainable travel, and further reduce private car use.
- 6.1.13 The evidence also demonstrates that for other comparable schemes the proportion of spaces is towards the higher end of the approved range. Given the sustainability credentials of the site, were additional parking to be provided then this would amount to a profligate and inefficient use of land.
- 6.1.14 With regards to RfR3, my evidence has considered the policy tests relevant to traffic and congestion. A detailed review of highway safety was included in the TA and the Design Response Report to the Stage 1 Road Safety Audit. These concluded that there would not be an unacceptable impact on highway safety as a result of the proposed development.
- 6.1.15 The traffic impacts of the proposed development have also been reassessed using new traffic survey data from November 2022. The Further Highways Evidence reaches exactly the same conclusions as the TA, that the impact of the proposed development on the operation of the local highway network will be minimal, and certainly not significant or severe in the context of paragraph 111 of the NPPF.
- 6.1.16 My evidence also includes a discussion about the potential responses by drivers to congested highway networks, and definitions of the term 'severe' in relation to traffic impacts.

- 6.1.17 Overall, I conclude 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 and Core Strategy Policy T1. The proposed development will be further supported by a Travel Plan and the planning obligations in the UU.
- 6.1.18 The supplementary information and additional evidence provided in response to third party comments respond fully to the main comments and concerns raised by ward councillors and members of the public.
- 6.1.19 I therefore conclude that the proposals constitute a sustainable development, and that proposed development would not have an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would not be significant or severe in the context of Paragraph 111 of the NPPF. On this basis, it is my professional opinion that the appeal should be allowed and permission granted on highways and transport grounds.

Plans



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Project: TESCO PARRS WOOD - MANCHESTER

Drg Title: ACCESSIBILITY
LOCAL WALKING CATCHMENT
KEY AMENITIES

Status: APPEAL

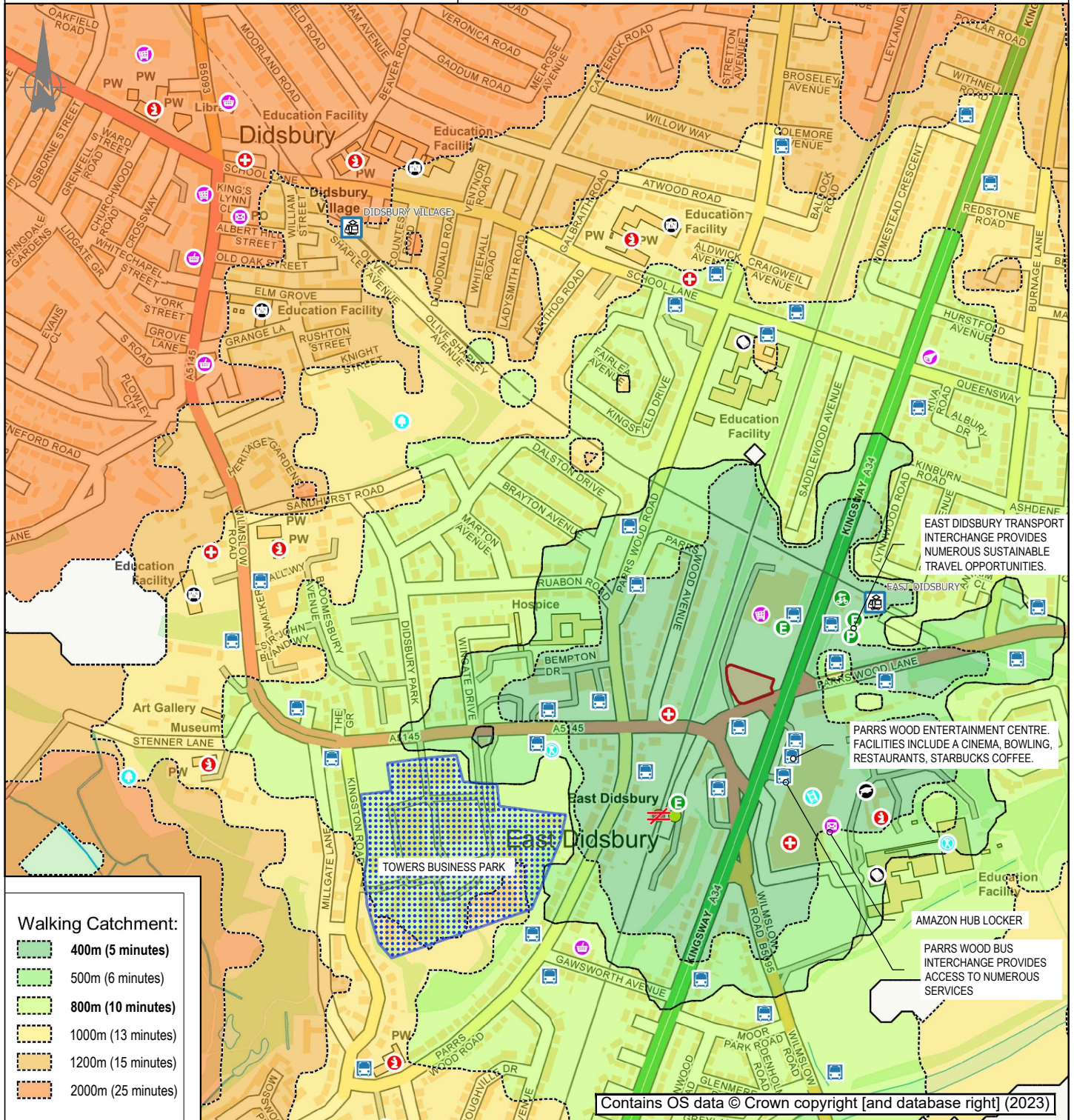
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Scale: NTS

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82673 - CUR - XX - XX - G - TP - 06001 - P02





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Project:
TESCO PARRS WOOD - MANCHESTER

Drg Title:
ACCESSIBILITY
LOCAL CYCLE CATCHMENT

Status:
APPEAL

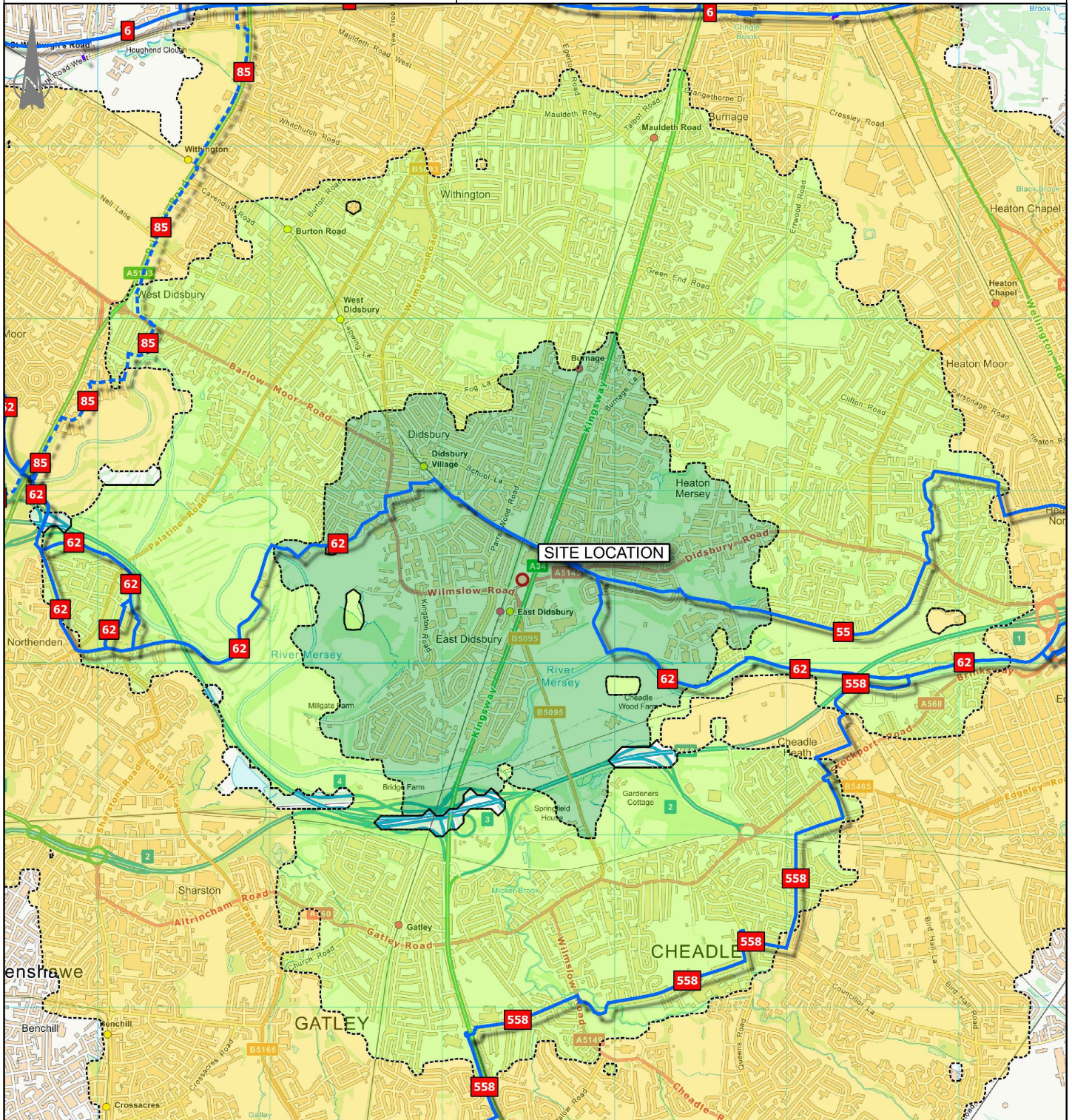
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Project No: Originator: Volume: Level: Type: Role: Category / Number: Rev:

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KEY: ● Site

Cycle Network:

- Local route not on Cycle Network
- - - Route on Regional Cycle Network
- Route on National Cycle Network

Cycle Catchment:

- 1.6km (5 minutes)
- 3.2km (10 minutes)
- 4.8km (15 minutes)

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Project:
TESCO PARRS WOOD - MANCHESTER

Drg Title:
ACCESSIBILITY
MAXIMUM WALKING CATCHMENT

Status:
APPEAL

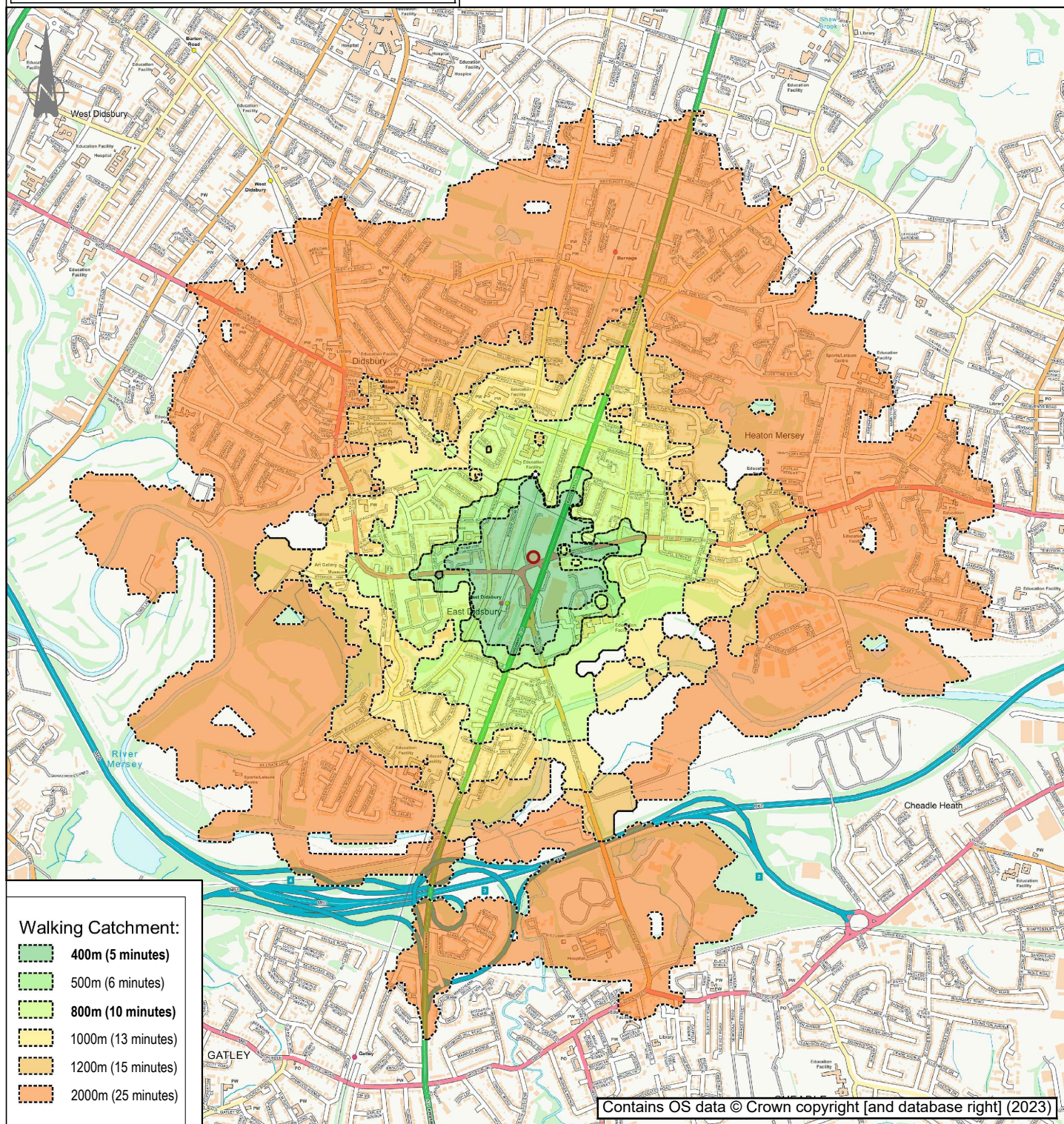
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Scale: NTS

Project No: Originator: Volume: Level: Type: Role: Category / Number: Rev:

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Walking Catchment:

- 400m (5 minutes)
- 500m (6 minutes)
- 800m (10 minutes)
- 1000m (13 minutes)
- 1200m (15 minutes)
- 2000m (25 minutes)

KEY:

- Site

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Project: TESCO PARRS WOOD - MANCHESTER

Drg Title: ACCESSIBILITY
MAXIMUM CYCLE CATCHMENT

Status: **APPEAL**

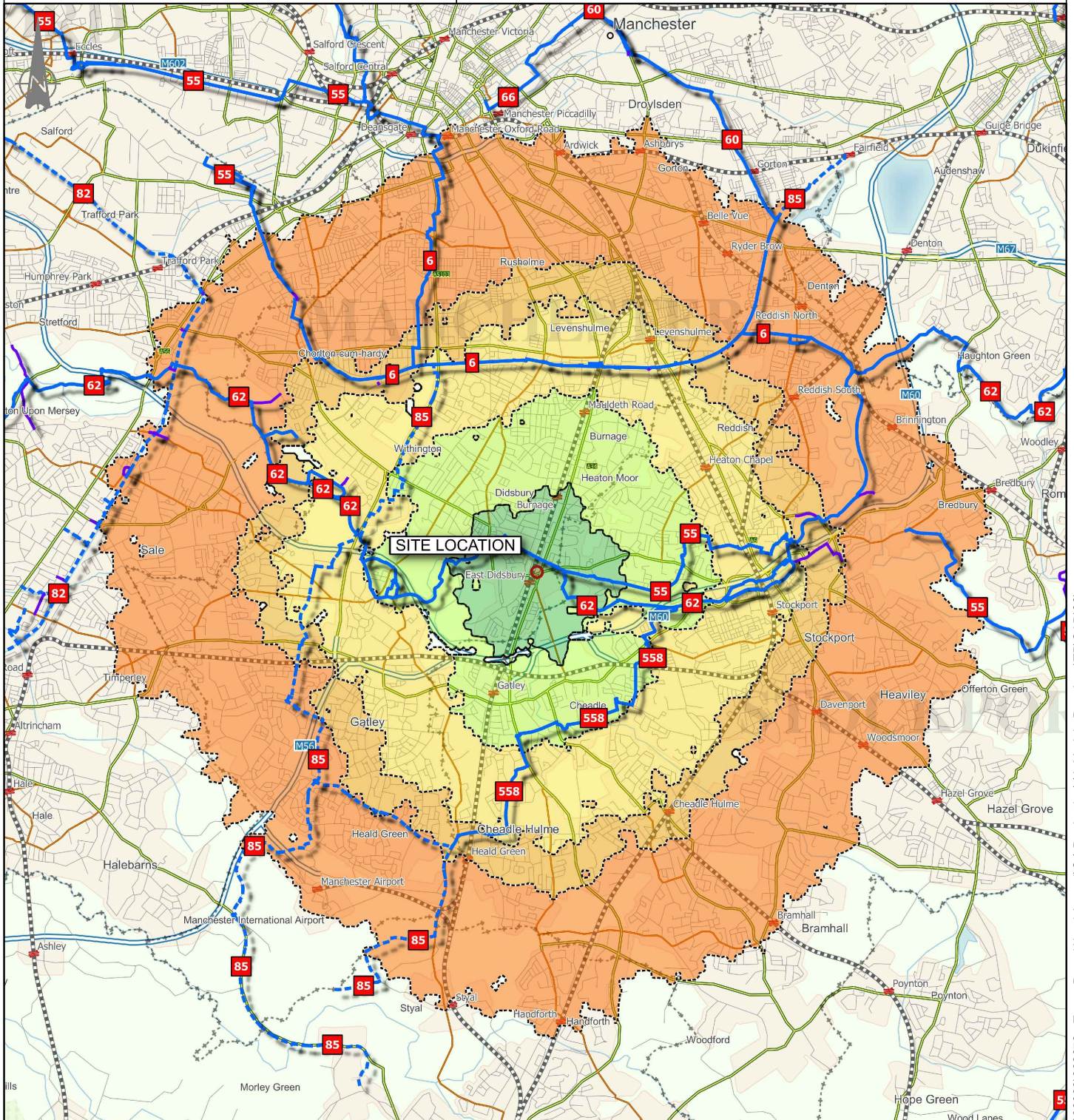
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Designed By: JM Date: 04/01/23

Scale: NTS

Project No: Originator: Volume: Level: Type: Role: Category / Number: Rev:

82673 - CUR - XX - XX - G -TP - 06004 - P01



KEY: Site

Cycle Network:

Local route not on Cycle Network

Route on Regional Cycle Network

Route on National Cycle Network

Cycle Catchment:

 1.6km (5 minutes)

3.2km (10 minutes)

4.8km (15 minutes)

5.5km (17 minutes)

8km (25 minutes)

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Appendix A – Accessibility Analysis

Amenities	Approximate Walking Distance from Site (m)	Approximate Walking Time from Site* (mins)	CIHT Suggested Walking Distances**		
			Desir-able	Accept-able	Preferred Maximum
Employment					
Towers Business Park	650	8		✓	
Heaton Mersey Industrial Estate	1,300	15			✓
Education					
Parrs Wood Sixth Form	300	4	✓		
Parrs Wood High School	400	5	✓		
The Barlow RC High School	650	7		✓	
St Catherines RC Primary School	800	10		✓	
Beaver Road Junior School	1,000	12		✓	
Didsbury Primary School	1,100	13			✓
Broad Oak Primary School	1,200	14			✓
St John's C of E Primary School	1,300	15			✓
St Winifred's RC Primary School	1,800	21			✓
Priestnall School	1,900	23			✓
Narazene Theological College	1,900	23			✓
Healthcare					
The Dentists of Didsbury	180	2	✓		
Didsbury Family Dental Care	760	9		✓	
Barlow Medical Centre	1,000	12			✓
The Dental Health Centre	1,200	14			✓
Shopping					
Tesco Superstore, East Didsbury	80	1	✓		
Amazon Hub Locker (Flirt) at Parrs Wood Entertainment Centre	550	7		✓	
Gawsworth General Store	650	8		✓	
Wheildon Butchers	650	8		✓	
M&S Simply Food, Didsbury Road	700	8		✓	
McColls Convenience Store, Didsbury Road	1,100	13			✓
Co-op Food, Didsbury	1,200	14			✓
Didsbury Village Post Office	1,200	14			✓
Religious					
Agape Christian Fellowship	450	5		✓	
East Didsbury Methodist Church	900	11			✓

Amenities	Approximate Walking Distance from Site (m)	Approximate Walking Time from Site* (mins)	CIHT Suggested Walking Distances**		
			Desir-able	Accept-able	Preferred Maximum
Church of St James	900	11			✓
St Catherines Presbytery	900	11			✓
Didsbury Methodist Church	1,000	12			✓
St John the Baptist Heaton Mersey	1,100	13			✓
Didsbury Baptist Church	1,100	13			✓
St Nicholas Church	1,200	14			✓
Leisure					
Parrs Wood Entertainment Centre	250	3	✓		
Nuffield Health Didsbury Fitness & Wellbeing Centre	350	4	✓		
Didsbury Greys Hockey Club	350	4	✓		
Cheadle Kickboxing Club	500	6	✓		
Didsbury Park	900	11		✓	
Heaton Mersey Village Cricket Club	950	11		✓	
Didsbury Lawn Tennis Club	1,000	12		✓	
Fletcher Moss Park	1,000	12		✓	
Waterside Leisure Centre	1,000	12		✓	
Burnage Rugby & Golf	1,300	15			✓
Heaton Mersey Park	1,300	15			✓
Old Bedians Sports Club	1,600	19			✓
Didsbury Sports Ground	1,600	19			✓
Abney Hall Park	1,800	21			✓
Fog Lane Park	1,900	23			✓
Life Leisure Priestnall	1,900	23			✓
Sustainable Transport					
East Didsbury Rail Station	250	4	✓		
East Didsbury Metrolink Station	300	4	✓		
East Didsbury Rail Station Cycle Hub	300	4	✓		
East Didsbury Park & Ride	300	5	✓		
Various Bus Stops	<400m	<5	✓		

Table A.1 – Walking Distances and Times to Local Amenities Near the Site

* based on an average walking speed of 1.4m/s.

** Based on 500m / 1,000m / 2,000m catchments for employment, education and leisure journey purposes, and 400m / 800m / 1,200m catchments for healthcare, shopping, religious, and sustainable transport facilities.

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