

Our Ref: 04C101005

1 March 2023

Jennifer Atkinson

Planning Department
Manchester City Council
Town Hall Extension
Albert Square
Manchester
M60 2LA

By email only: j.atkinson@manchester.gov.uk

Dear Jennifer,

135278/FO/2022 – St. Gabriel's Hall, 1 Oxford Place

I write following the above application being considered at Manchester City Council's (MCC) Planning Committee meeting on 16th February 2023, where Members resolved they were "minded to refuse" the planning application on the grounds of insufficient disabled car parking. No other reasons for refusal or concerns were raised with the planning application.

Following further discussions with officers and the Applicants please see below further justification and amendments to the design in order to address the areas of concern raised by Members in their resolution. The Applicants hope that this additional justification will enable officers to take the application back to Planning Committee in March to present the proposed changes alongside reiterating the officers' recommendation for approval.

Correction of Erroneous References to Car Parking at February Planning Committee

It is first worth reiterating what has been proposed as part of the planning application given the discussion by Members at committee. In raising their concerns some Members erroneously quoted 18 visitor spaces in the development when discussing the quantum of car parking proposed. To be clear, the proposed development is intended as being car free with the exception of two disabled car parking spaces for students or visitors with mobility restrictions. The reference to 18 spaces relates to the number of visitor *cycle parking* spaces alongside a further 160 secure cycle spaces for the students.

It is therefore the case that 100% of the car parking spaces previously proposed were blue badge car parking spaces.

Justification for Quantum of Disabled Car Parking Spaces

The Applicants had arrived at the 2 no. disabled car parking spaces as this quantum was considered to be proportionate and appropriate in the context of a lack of planning policy guidance and based on the likely needs of users of the facility from their experience of operating purpose built student accommodation (PBSA) schemes elsewhere. This experience was derived from data collected by CRM Students who prepared a Parking Analysis Note (which is enclosed with this letter for ease). CRM Students are a national student operator and one of the biggest private PBSA platforms in the UK. They have worked with McLaren Property since its inception 12 years ago and operate most of McLaren's PBSA schemes.

The enclosed Note demonstrates that across CRM Students' portfolio of 89 PBSA sites throughout the UK, whilst there are ample accommodation provided for disabled user, there is actually a minimal number of residents who require a Designated Disabled Access (DDA) car parking space. For ease we have summarised the salient points from the Note below, which we hope provide some context and reassurance to Members that the proposals are proportionate and will not deter students from using the development if they have accessibility needs:

- Of the 89 sites referred to, 40 offer no parking whatsoever for the student tenants.
- The majority of the sites with no parking facilities are purpose built student halls. The principal reason for these halls having no parking facilities for students is that there is no, or very little, demand from students for car parking facilities; so PBSA developers rarely provide parking facilities.
- The remaining 49 sites do offer very limited car parking, mainly focused around DDA provision. Of these 49 sites, there are 153 DDA car parking spaces across the portfolio.
- Within the CRM portfolio there are 20 residents with a registered disability who live within our schemes. Of the 20 residents only 6 require the use of a car and therefore a DDA car parking space. All 6 residents simply require the use of their vehicle, with no adaptations required to the car parking space, access or any features of the development where they live. Only one resident is a blue badge holder but their vehicle is not adapted and they don't require the use of a wheelchair.

Based on the above analysis CRM Students confirms that based on their own experience and their current portfolio that the provision of the 2 no. DDA car parking spaces originally proposed for St Gabriel's Hall was appropriate and suitable for future residents and disabled visitors to the site.

The Policy associated with parking standards for the City is set out in the Manchester Core Strategy 2012 to 2027. This Policy (Appendix B) does not provide any car parking standards for residential land uses moreover no standards are specifically stated for PBSA. The Policy does,

however, note that new developments should provide 'appropriate car parking provision'. It was the view of the Applicants based on the characteristics of the site, market research and the likely needs of end users, that 2 no. blue badge spaces was appropriate. Moreover, dialogue with MCC's Highways department relating to parking (car, blue badge and bicycle) has not given rise to any concerns as to the proposed quantum.

Committee Feedback and Site Layout Revision

As set out above, Members of the Planning Committee resolved on 16 February 2023 that they were "minded to refuse" the planning application solely on the grounds of insufficient car parking for blue badge users, and this being disproportionate on the basis of its relationship to the erroneous reference to 18 car parking spaces.

Given the justification provided in the planning application, and the additional clarifications in this letter, the Applicants remain of the view that 2 no. spaces are appropriate. That being said, the Applicants are prepared to increase the quantum of disabled parking spaces in the development to directly address the proposed reasons for refusal.

Having reconsidered the site layout, and the desire to retain the proposed soft landscaping and trees identified for retention on the site, it has been possible to make a minor revision to incorporate a further 2 no. blue badge spaces on the site, resulting in a total now of 4 no. blue badge spaces being proposed. This represents a 100% increase from the previous position.

Although there is no policy position on the required for disabled parking for PBSA, upon review of the policy targets for other types of development, for example a hotel, the minimum number of blue badge parking that would be required for the number of "bedspaces" would be 3 no. Although not a direct comparison, it could reasonably be concluded that this revised proposal exceeds minimum provisions for other types of land use, as well as the anticipated demand for PBSA as set out in the CRM Parking Analysis Note.

Attached to the covering email, please see the revised Illustrative Landscape Layout (0919-RFM-XX-00-DR-L-000 Rev P04) and the revised proposed site plan (10349-SHP-Z0-A-B5D8-G100-PL-00-001 rev P02)

No other changes are proposed to the layout or proposals. We respectfully ask that officers present the revisions and additional justification to Members of the Planning Committee on 16th March and reiteration their previous recommendation for approval.

If you have any other queries, please get in touch.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Neil Lucas', with a long horizontal stroke extending to the right.

Neil Lucas

Principal, Senior Director

Neil.Lucas@avisonyoung.com

For and on behalf of Avison Young (UK) Limited