

MADDOX PLANNING

**SUPPLEMENTARY
SUBMISSION
RESPONDING TO
REPRESENTATIONS
RECEIVED**

LONDON & MANCHESTER

0345 121 1706

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SUPPLEMENTARY SUBMISSION
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CARMOOR ROAD, MANCHESTER
FEBRUARY 2023

Description of development

Demolition of existing buildings and construction of purpose-built student accommodation with 172 beds in a mix of studio and cluster units alongside ancillary facilities and shared amenity space, site access and other associated works in a development of three to six storeys

Type of application

Full planning application

Applicant

Tiger Developments Limited

Contents of this statement

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1. Consultation response table

1.0 Introduction

- 1.1 On behalf of Tiger Developments Limited, Maddox Planning has prepared this supplementary submission in respect of planning application ref: 135576/FO/2022. It addresses consultation responses received from the case officer, the Council design team, statutory consultees and third parties.
- 1.2 This supplementary submission should be read alongside further technical submission addressing comments raised in respect of: design; acoustics; and daylight/sunlight supply.
- 1.3 The application submission seeks full planning permission. The description of development is:

Demolition of existing buildings and construction of purpose-built student accommodation with 172 beds in a mix of studio and cluster units alongside ancillary facilities and shared amenity space, site access and other associated works in a development of three to six storeys
- 1.4 The purpose of this supplementary statement is to address the matters raised during the statutory consultation phase of the planning application determination. This document sets out a summary of how the applicant has addressed comments raised. Full details of the responses provided are in the table attached at **Appendix 1**.
- 1.5 The separate supplementary reports dealing with design, acoustics and daylight/sunlight supply are submitted alongside this statement

2.0 Summary of responses to received representations

- 2.1 Set out below is a summary of how the applicant has addressed matters raised during the statutory consultation period. Full responses are provided in the table set out at **Appendix 1**. This statement should be read alongside the separate supplementary reports dealing with design, acoustics and effects on daylight/sunlight supply.

Design

- 2.2 Comments from the Council design team were provided as part of a case officer email dated 10 February 2023. The comments raised some design queries. The applicant acknowledges that the queries justify a further design response from the project architect. These design matters raised concern regarding window design, the relationship between the ventilation strategy and the external appearance, vertical and horizontal interpretation and decorative screen finishes. The project architect has prepared an addendum to the Design and Access Statement by way of a comprehensive design response to the matters raised. Clarification is provided on a number of points, including that the design incorporates already a full brick reveal to windows.

Daylight/Sunlight

- 2.3 The applicant has commissioned a further daylight/sunlight assessment in context with third party comments received. The applicant has provided all that is required to demonstrate that the development does not raise any issues in respect of impact on light supply to habitable rooms. The future relationship with the adjoining community centre is considered in context with its non-residential use, paying due regard to the position of windows, particularly in its south elevation, the rooms that those windows serve and the fact that there is external community space to the rear of the community centre. There is no pre-requisite for an application submission to consider impact on daylight/sunlight supply to non-habitable rooms within a community centre or its external space, but it is acknowledged that this is a matter raised in consultation responses and so is a material consideration. The further assessments undertaken in respect of light supply are in the interests of helping the LPA to interpret matters.
- 2.4 A further assessment was not requested in statutory consultee responses or by the case officer, but an addendum report is completed to consider daylight/sunlight supply to the neighbouring community centre and its outdoor space. The findings demonstrate that post-development daylight/sunlight supply to the community centre and its external space, taking account of overshadowing, remains in accordance with recognised industry standards. The future relationship between the proposed development and the community centre does not raise any concerns in terms of light supply, and has no bearing on the principal conclusion that this is a development which should benefit from the presumption in favour of sustainable development.

Noise

- 2.5 The applicant has commissioned a further noise assessment in context with third party comments received. The applicant has provided all that is required to demonstrate that the development does not raise any issues in respect of its future relationship with the adjoining community centre in context with restriction imposed in its Premises Licence over noise generation. The further work undertaken in respect of noise impact is in the interests of helping the LPA to interpret matters.
- 2.6 A further assessment was not requested in statutory consultee responses or by the case officer. However, a further assessment is undertaken in the interests of seeking to interpret the impact on baseline noise levels of events taking place at the community centre. This has to be considered in context with the

explicit requirement in the Premises Licence for the community centre that activities at the site do not generate excessive noise.

- 2.7 A supplementary noise assessment has been prepared by MZA Acoustics. Further noise surveys were undertaken with the specific objective of recording the noise generated by community centre activities across a number of weekends and a broad spectrum of times. The findings found that on occasions the noise level exceeded acceptable levels, which potentially places these activities in contravention with the Premises Licence which explicitly states that activities at the centre shall not create excessive noise. The supplementary noise assessment sets out solutions how to mitigate appropriately these incidences of noise exceeding an acceptable level. These frame, glazing and ventilation specification solutions are proposed to be incorporated into the detailed design. It is agreed that a condition is attracted stating that the development should be in accordance with the noise assessments undertaken by MZA Acoustics.
- 2.8 The statutory consultee response from the MCC environmental health team sets out proposed conditions. The planning application submission included a robust noise impact assessment and a consideration of overheating. Given this, the condition needs to be reworded to reflect the findings of the technical work already undertaken and its conclusions on the need or otherwise for acoustic insulation having regard to the ventilation strategy which itself is informed by an analysis of overheating. It is agreed that a condition is attracted stating that the development should be in accordance with the noise assessments undertaken by MZA Acoustics.
- 2.9 The proposed condition relating to the planned on-site gym is considered to be overly onerous. This might be justified were a larger scale commercial gym proposed. The gym proposed is small scale, ancillary to the primary function of the site as a PBSA development and only available for use by residents of the development. It is not a commercial gym operation. The suggestion that acoustic insulation needs to be considered for a small-scale, ancillary gym use goes above and beyond what could be reasonably said to be in accordance with the six tests for planning conditions (Framework paragraph 55).
- 2.10 The applicant will consider a full schedule of conditions once provided by the LPA, and work with officers to minimise the number of conditions needed and avoid pre-commencement conditions where possible.

Highways

- 2.11 MCC highways has concluded that the level of cycle provision and on-street parking is acceptable. It is also noted that the highway authority is in support of the disabled parking provision and this supports the approach adopted which reflects accepted levels of provision provided elsewhere in the city. The case officer however has asked that further consideration be given to the level of cycle parking to be provided. In response to the case officer, further provision has been illustrated on the plan to show the future expansion of the cycle parking if demand was greater than predicted following occupation. This will be monitored as part of the approved travel plan. The zone allocated for future expansion would accommodate one further shelter providing an additional 30 spaces. With the expansion, the development would provide the following cycle parking provision:
- Secure resident's cycle spaces: 90 spaces
 - Secure cycle hire spaces: 10 spaces
 - Visitor cycle spaces: 4 spaces
- 2.12 This increases the potential cycle parking provision significantly, providing for plentiful parking spaces for residents' and visitors' bicycles. This cycle hire scheme ensures that 100% of residents have access to a bicycle.
- 2.13 Standard conditions and expectations are put forward in respect of off-site highway works (to be achieved through a s278 Agreement), a resident management strategy, provision and implementation of a travel

plan, a waste management strategy and construction management plan. The applicant will consider a full schedule of conditions once provided by the LPA, and work with officers to minimise the number of conditions needed and avoid pre-commencement conditions where possible.

Ecology

- 2.14 The preliminary ecological appraisal (Revision C, September 2022) as prepared by Verity Webster ecology sets out that:

Given the time lapse since the evening bat survey work was undertaken, a precautionary evening emergence survey in May – July 2023 is proposed to ensure that the use of the nursery by bats has not altered, that is, that the building does not support a bat roost.

- 2.15 The proposed development is not likely to disturb a potential bat roost, given the findings of surveys undertaken; that is, that the building does not support a bat roost.
- 2.16 The further evening emergence survey is proposed as a precautionary measure.

Environmental Health

- 2.17 Standard conditions are proposed with regard to demolition and construction management plan, noise (including sound insulation), overheating, external plant/equipment/servicing, refuse management plan, contamination, and surface water drainage. The applicant has provided comments to conditions where necessary in the relevant discipline sections. In line with highways comments, it is agreed that a condition is attracted stating that the development should be in accordance with approved waste management strategy.
- 2.18 The applicant wishes to agree two separate construction management conditions, requiring a demolition management plan and a construction management plan, such that demolition of the existing buildings on site might commence ahead of the discharge of all pre-commencement conditions relating to the new build construction.
- 2.19 The applicant will consider a full schedule of conditions once provided by the LPA, and work with officers to minimise the number of conditions needed and avoid pre-commencement conditions where possible.

Flood Risk

- 2.20 Standard conditions regarding surface water drainage are proposed. The comments are noted from United Utilities and the applicant will in discharging conditions complete soakaways/infiltration testing and pre-development enquiry. Depending on the results of this, adjustments will be made to the strategy to use infiltration where possible. Amendments to the strategy would be detailed in documentation submitted at discharge of conditions stage. The applicant accepts the proposed conditions set out in the response. Although, there is some clarification is sought with regard to the condition wording which refers to 'No development should take place until surface water drainage works have been implemented....' The surface water drainage works will be part of the proposed development, so this condition needs to be reconsidered. The applicant suggests that it is reworded to state that no development other than demolition and site clearance shall take place until a surface water design strategy is submitted and agreed in writing. The applicant will consider a full schedule of conditions once provided by the LPA, and work with officers to minimise the number of conditions needed and avoid pre-commencement conditions where possible.

Arboricultural

- 2.21 The arboricultural officer on behalf of MCC concluded that the mitigation methods, as set out within the Arboricultural Method Statement, are sufficient for the granting of planning permission for the proposal ensuring that these methods are strictly adhered to assure that no harm is caused to off-site trees.
- 2.22 Standard conditions and expectations are put forward consisting of predominantly protective fencing and arboricultural site management. These will be incorporated in the full list of conditions as issued by the LPA to be reviewed by applicant.

Pre-commencement Conditions

- 2.23 The applicant will likely wish to proceed with demolition of the buildings as soon as possible. Therefore, the applicant is keen to work with officers to agree a pre-demolition management plan condition and for all other conditions to be pre-construction or similar.

Conclusions

- 2.24 Further clarification has been provided where requested to assist in fully understanding the proposal and its future relationship with its surroundings. The applicant has comprehensively demonstrated through its planning application submissions and supplementary reports that there are no material considerations which suggest any reason for deviation from a conclusion that planning permission should be granted for a proposed development that is in accordance with a development plan overall.
- 2.25 The planning application submission including the submitted supplementary reports clearly demonstrate that the proposal is in accordance with the development plan and that there are not any material considerations to indicate otherwise. Paragraph 11(c) of the Framework is engaged, and planning permission should be granted without delay.

Appendix 1: Consultation Response Table

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Carmoor Road, Manchester – Responses Received Table
Planning Reference: 135576/FO/2022

CO – Case Officer

Statutory Consultee Responses

Design

Specialism / Consultee	Comments Received	Development Team Response
Design officer comments via CO	Design officer comments were received through email correspondence with the case officer on 10 February 2023. This emailed raised some design matters that required further work from the applicant. These design matters included involved window reveals, ventilation and materiality.	The project architect has provided a Design and Access Statement Addendum. This provides a comprehensive response to the design matters raised. These design matters raised concern regarding window design, the relationship between the ventilation strategy and the external appearance, vertical and horizontal interpretation and decorative screen finishes. The project architect has prepared an addendum to the Design and Access Statement by way of a comprehensive design response to the matters raised. Clarification is provided on a number of points, including that the design incorporates already a full brick reveal to windows.

Daylight/Sunlight

Specialism / Consultee	Comments Received	Development Team Response
CO	The case officer advised via email on 25 January 2023 that a further daylight/sunlight assessment need to be undertaken to address the neighbouring WIOCC concerns regarding the development's impact on daylight sunlight at the community centre.	A supplementary daylight/sunlight assessment is submitted. The findings demonstrate that the impact of the daylight/sunlight and overshadowing on the community centre and associated outdoor space is acceptable with regard to the recognised industry standards.

Noise

Specialism / Consultee	Comments Received	Development Team Response
CO	The case officer advised via email on 25 January 2023 that a further noise assessment would need to be undertaken to address the neighbouring WIOCC concerns in terms of noise levels on the development from the community centre.	A supplementary noise assessment has been undertaken by MZA Acoustics. Further noise levels have been specifically recorded from the community centre direction over different periods of time. The findings found that on occasions the noise level exceeded acceptable levels. The report sets out solutions how to mitigate appropriately these noise levels which reach an unacceptable level. These frame, glazing and ventilation specification solutions are proposed to be incorporated into the detailed design. It is agreed that a condition is attracted stating that the development should be in accordance with the noise assessments undertaken by MZA Acoustics.

Highways

Specialism / Consultee	Comments Received	Development Team Response
CO	The case officer asked that further consideration be given to cycle provision onsite, over and above the level of provision found acceptable by the local highways authority.	In response to the case officer, further provision has been illustrated on the plan to show the future expansion of the cycle parking if demand was greater than predicted following occupation. This will be monitored as part of the approved travel plan. The zone allocated for future expansion would accommodate one further shelter providing an additional 30 spaces.

		With the expansion the development would provide the following cycle parking provision: – Secure resident's cycle spaces: 90 spaces – Secure cycle hire spaces: 10 spaces – Visitor cycle spaces: 4 spaces This increases the potential cycle parking provision significantly, providing for plentiful parking spaces for residents' and visitors' bicycles. This cycle hire scheme ensures that 100% of residents have access to a bicycle
Manchester City Council highways team	Trip Generation and Junction Capacity: The development proposal is for a car-free development, this is acceptable in principle given the sustainable location and type of development. It is anticipated that the proposals are unlikely to generate a significant increase in the level of vehicular trips therefore they do not raise any network capacity concerns. Resident Management Strategy: It is suggested that all students will receive a letter prior to arrival advising of the Move In/Move Out Strategy and that there is no facility for onsite parking and advising them of the temporary use of the proposed layby on Carmoor for drop-off/pick-up. The proposed strategy should be conditioned. Road Safety Assessment: The TfGM accident database has been reviewed for the most recent five-year period. The database indicates that there have been no recorded accidents on Carmoor Road (within proximity of the site), or at Carmoor Road / Hathersage Road priority junction and A34 / Autumn Street junction.	Comments on acceptability are noted, particularly with regard to parking provision. It is noted that the highway authority is in support of the disabled parking provision and this supports the approach adopted which reflects accepted levels of provision provided elsewhere in the city. Tiger Developments intend not to adopt the paving between footway and proposed layby. The applicant is in agreement in principle that matters can be dealt with by way of condition. The applicant looks forward to receipt of a draft schedule of conditions and will work with officers to limit the number of conditions necessary and minimise pre-commencement conditions. The applicant wishes to agree two separate construction management conditions, requiring a demolition management plan and a construction management plan, such that demolition of the existing buildings on site might commence ahead of the discharge of all pre-commencement conditions relating to the new build construction.

	A total of 6 incidents were recorded within the vicinity of the Upper Brook Street / Hathersage Road signalised junction. All were classed as slight. Based on this assessment Highways have no concerns about highway safety issues within the vicinity of the site. Site Accessibility: The site is well accessed by sustainable modes. Regular bus services are routed along Upper Brook Street and provide connections to The Lowry, East Didsbury, Media City, Sale, Middleton and Cheetham Hill. Further bus stops are in place along Plymouth Grove and provide connections to Manchester City Centre. Parking and Access: The development will be car free and given the nature of this development, low levels of vehicle ownership are anticipated and given its accessible location, this is deemed to be acceptable to Highways. The development will provide two disabled parking spaces. Due to constraints on-site these will be located on-street at the site frontage to the south of the proposed service lay- by. Highways are satisfied with this arrangement. Currently, in this location an access protection line is in place and this will no longer be required as part of the proposals. The TRO and bays detailed design is subject to a S278 agreement with MCC Highways and all costs are attributable to the Developer. The applicant has confirmed that students will not be permitted to apply for a parking permit and will be reflected within tenancy agreements. This is acceptable to Highways. A new service layby will be Installed along Carmoor Road and will have a length of 18m and width of 2.7m. The applicant has confirmed that	
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	two-way traffic flow and pedestrian movements will not be impacted. It should be ensured that a 2m footway is in place for pedestrians. The layby will require a TRO to discourage long stay parking. The TRO and layby detailed design is subject to a S278 agreement with MCC Highways and all costs are attributable to the Developer. The plans suggest that an area of footway will be in place between the edge of the property and the lay-by. It should be confirmed whether this falls within the developer's land and if so that they will maintain it or if they are offering this up for adoption. If adoption is required the highway will need to be carried out under a S38 Agreement (Highways Act 1980). to ensure that all elements of new highway infrastructure are constructed to acceptable and adoptable standards. This includes; layout, drainage, street-lighting, surfacing, stats etc. Pedestrian access to the site will be via Carmoor Road and Autumn Street. It is understood that there will be no access upgrades on the adopted highway. Any updates on the adopted highway will be subject to a Section 278 agreement. The existing vehicle access to the garage workshop on Carmoor Road will be removed and replaced with footway. If a dropped kerb is installed in this location it will need to be reinstated via a Section 278 agreement at the expense of the applicant. On-Street Parking: The Transport Statement provides a summary on the existing on-street car parking surrounding the site. An on-street car parking survey was undertaken on Wednesday the 28 September and Saturday 1 October 2022 on Carmoor Road understand Carmoor Road parking occupancy levels. The whole of Carmoor Road was accessed and split into 4 zones (zone 1 includes the frontage of the site). The survey found that Zone 1 reached close to capacity 14:00 - 15:00 on the weekday and 18:00 - 19:00 on the Saturday, with only one	
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	space remaining. However, the average occupancy throughout the day was noted as 66% on the weekday and 64% on the Saturday. Zone 2 reach 85% maximum capacity on the weekday and 80% on the Saturday. Zone 3 and 4 are noted to have space capacity. Therefore, Highways recognise that whilst there is some spare capacity, although on- street parking is common and parking close to capacity at times along Carmoor Road. Cycle Parking: The development will provide 60 cycle parking spaces, equating to 35% provision. This is acceptable to Highways. The spaces will be in the form of covered to tiered cycle stores with a fob access. This is acceptable to Highways. The proposals also include a separate on-site cycle hire provision comprising of 10 spaces. This is welcomed by Highways. It is requested that the cycle parking usage be monitored as part of the Travel Plan and further provision provided if required. It is noted that the applicant is in discussion with TfGM in regard to cycle parking spaces being allocated to the Manchester Bee Bike Scheme. Boundary Treatments: It is recommended that all fencing / railings adjacent to the adopted highway are visually permeable from a distance of 600mm upwards to ensure adequate visual permeability for child pedestrians. The applicant should be advised that all gated accesses will need to provide inward opening gates to ensure they do not impact on the adopted footway or highway. Refuse and Servicing:	
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	A bin store is located internally within the site. On collection day on-site management will take the bins from the refuse store to the site frontage. It should be ensured that the bins are taken back to the bin store immediately after collection to ensure they do not impinge on pedestrian movements. The proposals are for the refuse vehicle to access the site via the proposed serviced lay- by off Carmoor Road. Swept Path Analysis has been undertaken and Drawing "VN201675- D10" demonstrates that a 11.5m refuse vehicle can safely enter and exit the loading bay. A Waste Management Strategy has been produced for the site. This is welcomed by Highways. It is recommended that the above is conditioned and attached to any planning permission that may be granted. Highways consider this to be acceptable in order to prevent any obstruction to passing pedestrians on the adjacent footway. Framework Travel Plan: A Framework Travel Plan (FTP) has been produced with the intention that a full Travel Plan (TP) will be prepared by before occupation of the site. The FTP confirms that the TPC will be responsible for the ongoing monitoring and will review the success and identify the potentially for future refinement. The TPC will do this via an annual review of the TP. The FTP provides measures, management, aims and objectives, targets, action plan and marketing strategy. The development, submission, implementation, and monitoring of a full Travel Plan should be included in the conditions of any planning consent. Construction Management:	
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	A Framework Construction Management Plan has been submitted that provides details of what it to be included in a full CMP for the demolition phase and the main Construction Phase. For the avoidance of doubt a Construction Management Plan should be provided by the applicant prior to any construction works beginning. The Construction Management Plan should detail the phasing and quantification / classification of vehicular activity associated with planned construction. This should include commentary on types and frequency of vehicular demands together with evidence (including appropriate swept-path assessment) of satisfactory routeing both within the site and on the adjacent highway. The document should also consider ongoing construction works and contractor parking in the locality. It is also requested the applicant provides a dilapidation survey as part of the Construction Management Plan document. The survey should include photographs and commentary on the condition of carriageway / footways on construction vehicle routes surrounding the site. It is recommended that the above is conditioned and attached to any planning permission that may be granted. Suggested Conditions: Off-Site Highways Works, Resident Management Strategy, Travel Plan, Waste Management, Strategy CMP.	
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Ecology

Specialism / Consultee	Comments Received	Development Team Response
Greater Manchester	The Preliminary Ecological Appraisal states that further bat surveys are required. If the development is likely to disturb a potential bat roost,	The Preliminary Ecological Appraisal (Revision C, September 2022) sets out that:

Ecology Unit	then a full bat survey should be carried out before the application is determined. If bats are found on site under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, a licence is required from the Natural England to derogate the terms of this legislation. Before a licence can be granted three tests must be satisfied. These are: i. That the development is “in the interest of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequence of primary importance for the environment”; ii. That there is “no satisfactory alternative”; iii. That the derogation is “not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range”. Defra Circular 01/2005 gives guidance to local authorities on how these issues should be considered, including that surveys for protected species should not be left to conditions. The application should therefore not be determined until all necessary bat surveys have been submitted.	<i>Given the time lapse since the evening bat survey work was undertaken, a precautionary evening emergence survey in May – July 2023 is proposed to ensure that the use of the nursery by bats has not altered, that is, that the building does not support a bat roost.</i> The proposed development is not likely to disturb a potential bat roost, given the findings of surveys undertaken; that is, that the building does not support a bat roost. The further evening emergence survey is proposed as a precautionary measure.
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Construction Management

Specialism / Consultee	Comments Received	Development Team Response
Manchester City Council environmental health team	Demolition/Construction Management Plan: <i>Prior to the commencement of development, a demolition / construction (delete as appropriate) management plan outlining working practices shall be submitted to and approved in writing by the City Council as Local Planning authority, which for the avoidance of doubt shall include as a minimum:</i> – Measures to control noise and vibration; – Dust suppression measures; – Compound locations where relevant; – Details of an emergency contact telephone number; – A community consultation plan and; – Sheeting of construction vehicles. <i>The development shall only be carried out in accordance with the approved management plan.</i> <i>Reason - To safeguard the amenities of nearby residents pursuant to policies SP1, EN19 and DM1 of the Manchester Core Strategy.</i> <i>*The applicant should refer to our noise from building sites webpage for further information/guidance and also IAQM/EPUK Construction Guidance.</i> Demolition/Construction Hours:	The applicant is in agreement with the conditions in principle, although detailed consideration of condition wording/whether they are necessary will take place when schedule of conditions is provided. The applicant wishes to agree two separate construction management conditions, requiring a demolition management plan and a construction management plan, such that demolition of the existing buildings on site might commence ahead of the discharge of all pre-commencement conditions relating to the new build construction. NSE1 (ground floor gym) The proposed condition relating to the planned on-site gym is considered to be overly onerous. This might be justified were a larger scale commercial gym proposed. The gym proposed is small scale, ancillary to the primary function of the site as a PBSA development and only available for use by residents of the development. It is not a commercial gym operation. The suggestion that acoustic insulation needs to be considered for a small-scale, ancillary gym use goes above and beyond what could be reasonably said to be in accordance with the six tests for planning conditions (Framework paragraph 55). NSE4(b): Residential sound insulation and overheating The planning application submission included a robust noise impact assessment and a consideration of overheating. Given this, the condition needs to be reworded to reflect the findings of the technical work already undertaken and its conclusions on the need or otherwise for acoustic insulation having regard to the ventilation strategy which itself is informed by an analysis of overheating. It is

	<i>Construction/demolition works shall be confined to the following hours unless otherwise agreed in writing by the City Council as local planning authority:</i> <i>Monday-- Friday: 7.30am-- 6pm</i> <i>Saturday: 8.30am-- 2pm</i> <i>Sunday / Bank holidays: No work</i> <i>Reason - To safeguard the amenities of nearby residents pursuant to policies SP1, EN19 and DM1 of the Manchester Core Strategy.</i> NSE1 (ground floor gym): i. <i>The premises shall be acoustically insulated and treated to limit the break out of noise in accordance with a noise study of the premises and a scheme of acoustic treatment that has been submitted to and approved in writing by the City Council as local planning authority. The scheme shall be implemented in full before the use commences or as otherwise agreed in writing by the City Council as local planning authority. Where entertainment noise is proposed the LAeq (entertainment noise) shall be controlled to 5dB below the LA90 (without entertainment noise) in each octave band at the facade of the nearest noise sensitive location and internal noise levels at structurally adjoined residential properties in the 63Hz and 125Hz octave frequency bands shall be controlled so as not to exceed (in habitable rooms) 47dB and 41dB (Leq,5min), respectively.</i> ii. <i>Prior to occupation of the development a verification report will be required to validate that the work</i>	agreed that a condition is attracted stating that the development should be in accordance with the noise assessments undertaken by MZA acoustics. Waste Management In line with highways comments, it is agreed that a condition is attracted stating that the development should be in accordance with approved waste management strategy.
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	<i>undertaken throughout the development conforms to the recommendations and requirements in the approved acoustic consultant's report. The report shall also undertake post completion testing to confirm that acceptable criteria have been met. Any instances of non-conformity with the recommendations in the report shall be detailed along with any measures required to ensure compliance with the agreed noise criteria.</i> <i>Reason - To safeguard the amenities of the occupiers of the building and occupiers of nearby properties.</i> NSE4(b): Residential sound insulation and overheating <i>i. Before the development commences a scheme for acoustically insulating the proposed residential accommodation against noise from [Main Street] and [Busy Road] shall be submitted to and approved in writing by the City Council as local planning authority. There may be other actual or potential sources of noise which require consideration on or near the site, including any local commercial/industrial premises.</i> <i>The potential for overheating shall also be assessed and the noise insulation scheme shall take this into account. The approved noise insulation and ventilation scheme shall be completed before any of the dwelling units are occupied. Noise survey data shall include measurements</i>	
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	<i>taken during a rush-hour period and night time to determine the appropriate sound insulation measures necessary. The following noise criteria shall be required to be achieved:</i> <i>– Bedrooms (night time - 23.00 - 07.00) 30 dB LAeq (individual noise events shall not exceed 45 dB LAmax,F by more than 15 times)</i> <i>– Living Rooms (daytime - 07.00 - 23.00) 35 dB LAeq Gardens and terraces (daytime) 55 dB LAeq</i> <i>– Additionally, where entertainment noise is a factor in the noise climate the sound insulation scheme shall be designed to achieve internal noise levels in the 63Hz and 125Hz octave centre frequency bands so as not to exceed (in habitable rooms) 47dB and 41dB (Leq,5min), respectively.</i> <i>ii. Prior to first occupation of the residential units, a verification report shall be required to validate that the work undertaken throughout the development conforms to the recommendations and requirements in the approved acoustic consultant's report. The report shall also undertake post completion testing to confirm that the internal noise criteria have been met. Any instances of non-conformity with the recommendations in the report shall be detailed along with any measures required to ensure compliance with the internal noise criteria.</i>	
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Reason: To secure a reduction in noise from traffic or other sources in order to protect future residents from noise disturbance and to reduce the potential for overheating.

The applicant must ensure that the criteria set out in the acoustic report submitted is not exceeded and the mitigation measures set out in the report must be implemented in full at the development.

NSE6

External plant/equipment/servicing

- I. Externally mounted ancillary plant, equipment and servicing shall be selected and/or acoustically treated in accordance with a scheme designed so as to achieve a rating level of 5dB (LAeq) below the typical background (LA90) level at the nearest noise sensitive location. Prior to commencement of the use hereby approved the scheme shall be submitted to and approved in writing by the City Council as local planning authority in order to secure a reduction in the level of noise emanating from the site. The scheme shall be implemented in full before the use commences or as otherwise agreed in writing by the City Council as local planning authority.*
 - II. Prior to the operation of the scheme a verification report shall be submitted to and approved in writing by the City Council as local planning authority to validate that the work undertaken throughout the development conforms to the recommendations and requirements in the approved acoustic report. The report shall also undertake post completion testing to confirm that the noise criteria have been met. Any*
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	<i>instances of non- conformity with the recommendations in the report shall be detailed along with any measures required to ensure compliance with the agreed noise criteria.</i> <i>Reason - To minimise the impact of the development and to prevent a general increase in pre-existing background noise levels around the site.</i> <i>The applicant must implement the mitigation measures set out within the submitted acoustic report.</i> <i>The applicant must also submit a scheme for the testing of the emergency generator.</i> REF*: <i>i. Before the development commences a scheme for the storage and disposal of refuse shall be submitted to and approved in writing by the City Council as local planning authority. New developments shall have refuse storage space for segregated waste collection and recycling. Internal and external storage areas are required.</i> <i>ii. The details of the approved scheme shall be implemented as part of the development and shall remain in situ whilst the use or development is in operation.</i> <i>Reason - In the interests of amenity and public health.</i> <i>*The proforma/ Waste Management Strategy must include the following information:</i>	
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	– Estimated volumes and types of waste produced by the development; – Details of internal and external stores for both waste and recycling, including any plans and designs; – Location of the proposed collection point and details of the route the collection vehicle will take; – Details of how waste will be transferred between stores and to the collection location; and Details of number and capacity of bins proposed and collection frequency. Other details as per 'Waste Proforma-v1.0' - refer to guidance at: http://www.manchester.gov.uk/downloads/download/6048/waste_management_strategy 10 units or below = low rise 11 or above = high rise <i>The Waste Management Strategy submitted with the application is acceptable.</i>	
Manchester City Council environmental health team	The contaminated land section has reviewed information in order to assess the following points: 1. The adequacy of the desk study information available for this site. 2. The adequacy of the site investigation. 3. The adequacy of the final risk assessment. 4. The acceptability of the proposed remediation strategy.	The applicant acknowledges the comments. The proposed development fully intends to follow the recommendations.

	5. Whether the information submitted is sufficient to discharge the relevant contamination and/or gas condition from the planning approval. 1. The adequacy of the desk study information available for this site The report includes a description of the site including its past historical uses. An appraisal of the site environmental setting is presented including its geology, hydrogeology and hydrological regime, mining activities, waste management issues, and identification of additional environmental sources, pathways and receptors. This information has been used to compile a clear site conceptual model, which identifies potential sources, pathways and receptors and likely pollution linkages. The desk study information was found to be adequate. 2. The adequacy of the site investigation Not submitted 3. The adequacy of the final risk assessment Not submitted 4. The acceptability of the proposed remediation strategy Not submitted 5. Whether the information submitted is sufficient to discharge the relevant site investigation and/or gas condition of the planning approval Before this Section can recommend discharge of the contaminated land condition from this application, the following information needs to be submitted to the Council for approval:	
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	i. Submission of Site Investigation Proposals ii. Submission of a Site Investigation and Risk Assessment Report iii. Submission of a Remediation Strategy iv. After completion of site works, a verification report to validation that the work undertaken conforms to the remediation proposals received and agreed by this section.	

Flood Risk and Drainage

Specialism / Consultee	Comments Received	Development Team Response
Manchester City Council flood risk management team	Condition 1 <i>No development shall take place until surface water drainage works have been implemented in accordance with Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacements national standards and details that have been submitted to and approved in writing by the Local Planning Authority.</i> <i>In order to avoid/discharge the above drainage condition the following additional information has to be provided:</i> – <i>A finalised drainage layout showing all components, outfalls, levels and connectivity;</i> – <i>Maximised integration of green SuDS components (utilising infiltration or attenuation) if practicable;</i>	The applicant is in agreement with the conditions proposed. Although, there is some clarification is sought with regard to the condition wording which refers to ‘<i>No development should take place until surface water drainage works have been implemented....</i>’ The surface water drainage works will be part of the proposed development, so this condition needs to be reconsidered. The applicant suggests that it is reworded to state that no development other than demolition and site clearance shall take place until a surface water design strategy is submitted and agreed in writing.

	– <i>Details of surface water attenuation that offers a reduction in surface water runoff rate in line with the Manchester Trafford and Salford Strategic Flood Risk Assessment, i.e. at least a 50% reduction in runoff rate compared to the existing rates with the aim of reducing to the Greenfield runoff rates, as the site is located within Conurbation Core Critical Drainage Area;</i> – <i>An existing and proposed impermeable areas drawing to accompany all discharge rate calculations.</i> – <i>A blockage risk assessment is undertaken as part of the drainage strategy to support proposed flows less than 5 l/s. If the risk cannot be adequately managed, a higher minimum discharge rate should be considered / agreed with relevant parties.</i> – <i>Runoff volume in the 1 in 100 year, 6 hours rainfall shall be constrained to a value as close as is reasonable practicable to the greenfield runoff volume for the same event, but never to exceed the runoff volume from the development site prior to redevelopment;</i> – <i>Evidence that the drainage system has been designed (unless an area is designated to hold and/or convey water as part of the design) so that flooding does not occur during a 1 in 100 year rainfall event with allowance for 45% climate change;</i> – <i>Assessment of overland flow routes for extreme events. Overland flow routes need to be designed to</i>	
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	convey the flood water in a safe manner in the event of a blockage or exceedance of the proposed drainage system capacity including inlet structures. A layout with overland flow routes needs to be presented with appreciation of these overland flow routes with regards to the properties on site and adjacent properties off site. – Where surface water is connected to the public sewer, agreement in principle from United Utilities is required that there is adequate spare capacity in the existing system taking future development requirements into account. An email of acceptance of proposed flows and/or new connection will suffice. – Hydraulic calculation of the proposed drainage system; – Construction details of flow control and SuDS elements. Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution. This condition is imposed in light of national policies within the NPPF and NPPG and local policies EN08 and EN14. Condition 2 No development hereby permitted shall be occupied until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details. Those details shall include:	
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	– Verification report providing photographic evidence of construction as per design drawings; – As built construction drawings if different from design construction drawings; – Management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. <i>Reason: To manage flooding and pollution and to ensure that a managing body is in place for the sustainable drainage system and there is funding and maintenance mechanism for the lifetime of the development.</i>	
United Utilities	Following our review of the submitted drainage documents; Drainage Strategy Ref: P451205- WW-XX-XX-RP-C-0002, Dated 18.11.22, the plans are not acceptable to United Utilities. This is because we have not seen robust evidence that that the drainage hierarchy has been thoroughly investigated and the proposals are not in line with the Non-Statutory Technical Standards for Sustainable Drainage Systems. It appears that there may be space outside of the 5m standoff distance from proposed buildings for infiltration to ground to be considered. Therefore, if so, we would request ground investigation logs or infiltration testing in accordance with BRE 365 be provided for further assessment. Also, it is requested a detailed drainage plan be submitted with levels for further assessment.	The comments are noted. The applicant will as part of discharging conditions attached to any planning permission granted complete soakaways/infiltration testing and a pre-development enquiry. Depending on the results of this, adjustment to the strategy to use infiltration where possible make form part of discharging pre-construction conditions. The requested amendments can form part of the documentation submitted at discharge of condition stage. The applicant accepts the proposed conditions set out in the response.

	Should planning permission be granted we request the following condition is attached to any subsequent Decision Notice: Condition <i>Prior to the commencement of development, details of a sustainable surface water drainage scheme and a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The drainage schemes must include:</i> <i>i. An investigation of the hierarchy of drainage options in the National Planning Practice Guidance (or any subsequent amendment thereof). This investigation shall include evidence of an assessment of ground conditions and the potential for infiltration of surface water in accordance with BRE365;</i> <i>ii. A restricted rate of discharge of surface water agreed with the local planning authority (if it is agreed that infiltration is discounted by the investigations);</i> <i>iii. Levels of the proposed drainage systems including proposed ground and finished floor levels in AOD;</i> <i>iv. Incorporate mitigation measures to manage the risk of sewer surcharge where applicable; and</i> <i>v. Foul and surface water shall drain on separate systems.</i> <i>The approved schemes shall also be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards.</i>	
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	<i>Prior to occupation of the proposed development, the drainage schemes shall be completed in accordance with the approved details and retained thereafter for the lifetime of the development.</i> <i>Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution.</i>	
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Arboricultural

Specialism / Consultee	Comments Received	Development Team Response
Manchester City Council Arboricultural Neighbourhood Officer	There is potential for the proposed development to have a negative impact on the 9 off-site Cat C trees on the adjacent site. We would request that should this application be granted approval; the applicant must strictly adhere to the arboricultural method statement to ensure they do not damage the off-site trees. We are happy with the planting proposals for the site.	The applicant acknowledges the comments. The proposed development fully intends to follow the report recommendations.

Third Party Responses

Specialism / Consultee	Comments	Actions / Consultant Response
WIOCC	Background The application proposals would introduce a significant number of new neighbours adjacent to the ACFCA Community Centre building on Carmoor Road and this must be properly evaluated before the planning application can be determined. ACFCA operates to promote and develop the social, cultural, and economic wellbeing of the Afro Caribbean people of all ages across Greater Manchester but with an emphasis on working with the under privileged young. ACFCA is a self-	Point 1: There is no dispute regarding the facts that the community centre has a premises license for the sale of alcohol Monday – Saturdays 09:00-03:00, Sundays 09:00-02:00 and that the premises licence permits events with live and recorded music and dance to be held at the centre Monday – Saturday 09:00 – 03:30 and Sundays 09:00 – 02:30. However the specific wording of conditions attached to the licence (as repeated in the submitted noise impact assessment) prevent unacceptable noise generation, with a stipulation that enforcement action would

	funded charitable organisation run by volunteers that relies on income derived from the long-established Community Centre building on Carmoor Road. The building is used throughout the week both during the daytime and on evenings to host events held by community organisations, members and friends, this use includes the hire of the hall and ancillary facilities for social gatherings and celebrations. A Premises Licence allows the sale of alcohol at the Community Centre building between 9am and 3am Monday to Saturday and from 9am and 2am on Sundays. It also permits events with live and recorded music and dance between to be held at the Community Centre between 9am and 3.30am Monday to Saturday and between 9am and 2.30am on Sundays. Thus, in accord with the terms and requirements of the license, events can take place beyond midnight and well into the early hours of the morning throughout the week. The Covid pandemic has impacted significantly on the third sector and the ACFCA's operations have also suffered. Nonetheless, ACFCA has taken stock and has developed a business plan which is intended both to ensure optimal use of the building and to deliver a diverse range of community activities. These planned initiatives include, amongst others, an upgraded Community Garden utilising the land around the building for organic gardening to benefit members, friends, visitors – including those referred as part of the NHS prescribing process. The revamped garden will be an organic, bio-diverse, carbon capturing environment designed to be drought tolerant, self-fertilising and therefore highly sustainable. The Community Garden will be a focal point for ACFC members, friends, and visitors. It will allow them to hold social events and to host organic horticultural classes to demonstrate, encourage and support members of the community to grow their own food, as well as learning the importance of biodiversity, climate control, and food recycling for use as garden nutrients. This	be taken against the licence holder should MCC investigations breach of the conditions of the licence. These conditions are including to protect the amenity existing and future residents living nearby, including students who would occupy the PBSA proposals, from unacceptable noise generation. Point 2: The objection states that that the submitted noise impact assessment incorrectly references the permitted operating hours for the venue. Section 5.1.1 of the noise impact assessment details correctly the permitted operating hours. The noise impact assessment highlights conditions attached to the licence included to protect the amenity for existing and future residents living nearby. In terms of noise the WIOCC is bound to comply to the below conditions: Annex 3 – Conditions attached after hearing by the licensing authority: 2/ No regulated entertainment in the form of live or recorded music shall be played at the premises until noise limiter set at a level agreed with Environmental Health. 4/ All windows and doors shall be closed, save for access and egress, whilst live or recorded music is being played. 5/ No external speakers shall be allowed. 8/ A comprehensive plan shall be in place for the quiet, rapid dispersal of customers throughout the evening. 10/ Fit prominent signs shall be displayed near the exists requesting that customers respect local residents and leave quietly. 12/ Staff shall ensure that customers do not congregate outside the premises. The assessment assumes that all the key conditions are in place and as such nearby residents (existing and future) would only expect to experience minimal impact during licensed events. Where this is not the case, noise complaints to the LPA would result in investigation by the Licensing Office and/or Environmental Health Professionals. The current application by Tiger Developments does not
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will serve as an exemplar project to inform best practice in gardens and community areas across Manchester. The benefits of gardening for mental health and general well-being of living in nature are well documented. The garden will be an important local hub for all the above purposes. Understandably ACFCA need to ensure that the Community Garden will not be adversely affected because of any reduction in natural daylight that might reasonably be expected to arise from development of the application proposals. Plants have been purchased, and those that have been chosen, have been selected specifically for their suitability and tolerance to current light levels and environment throughout the year. Without sufficient daylight plants may fail and become less healthy and nutritious and will be more prone to disease – all of which would deter people from attending the garden and organic growing classes. ACFCA is concerned that Tiger Development Limited’s planning application proposals have not been informed by informed and objective assessment of its present and proposed operation of the Community Centre building. Consequently, there is a significant risk that in the absence of such assessment development of the scheme proposals and introduction of a significant student accommodation adjacent to the Community Centre building could impact adversely upon its vital and continued function as a valued community facility in the city. The Application Proposals – Identified Shortcomings Having reviewed Tiger Development Limited’s planning application proposals, ACFCa is concerned that the scheme proposals do not appear to have taken proper account of the present and future operation of the Community Centre building to ensure that the	change this existing onus on the WIOCC to not operate in such a way as to cause disturbance to nearby sensitive receptors (of which there are already residents nearby). Point 3: The objection states that the noise survey undertaken was not representative of <i>‘the potential noise that might reasonably be expected to arise from a venue with such extensive hours of operation available both to host events and to permit the sale of alcohol.’</i> This statement is at odds with the process of premises licencing and the inclusion of conditions on any licence, in the interests of protecting the amenity of existing and future residents living nearby. A noise impact assessment is rightly undertaken in context with the facts of any restrictions that are in place, as imposed by conditions attached to a premises licence. The conditions of the license are clear in respect of the need to control noise such that there is no unacceptable noise generated. Where the application introduces a sensitive façade in closer proximity to that already existing, the noise impact assessment recommends that good practice design measures are incorporated into the scheme; - Increased acoustic specification requirements for external building envelope on elevations face towards the WIOCC - Ventilation systems for facades overlooking the WIOCC and entrance be designed such that windows can remain closed for normal ventilation and comply with the overheating requirements of Approved Document O without the need to open windows. Point 4: The objection states that <i>‘It is inadequate to suggest without explanation that events have been limited at the Community Centre in recent years. This is extremely insensitive since it ignores the impact of covid lockdowns on the community and the fact that Black and Minority groups were amongst those adversely affected by the pandemic.’</i>
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	proposed development can be accommodated without detriment to ACFCA's vital and continued community function. Manchester's Core Strategy policies DM1 and SP1 both require application proposals to be properly evaluated and justified to ensure that proposed developments can be accommodated without unacceptable environmental impacts. Unfortunately, the planning application submission has neither been informed by prior visit to ACFCA's Community Centre building nor by detailed assessment of potential environmental impacts that the proposed development might have on its immediate neighbour. Noise ACFCA's Community Centre building has a Premises Licence that allows events to be held throughout the week from 9am into the early hours of the morning on each day of the week (Monday through to Sunday). The Community Centre is used to host a range of events including, amongst others, weddings, funerals and other family and social functions, education sessions for adults and children, community markets, awareness campaigns and religious services. The submitted Noise Impact Assessment Report has misrepresented the terms of the Premises Licence by under reporting the permitted hours for events at the Community Centre. In addition, the noise report was informed by a survey undertaken for just over 24 hours between 9.53am on Monday 10th October 2021 through to 11.04am on Tuesday	In fact, the noise assessment clearly acknowledges the fact that use of the centre will have been affected by Covid, however factually states that research into regular events was undertaken via Facebook and other relevant websites which indicated that no regular events were advertised as ongoing at the centre, which would be necessary in order for scheduled monitoring to capture such an event. Suitable mitigation is recommended as above. Point 5: <i>It is correct that 'noise generation from the Community Centre is clearly germane to the Council's consideration of the planning application...'</i> The noise consultant for the applicant (MZA) has taken all reasonable steps to measure the prevailing noise climate of the area relevant to a proposed PBSA development. As the objection cites noise from the community centre being excessive and occurring late at night with regularity, MZA has undertaken a further attended noise measurement survey(s) over a number of weekends and a broad spectrum of hours. The noise assessment considers amplified music and sound, people generated noise and in particular low frequency noise impact. The findings of this survey are set out in a supplementary noise impact assessment submitted with this supplementary submission. This demonstrates that whilst there are incidences of noise exceeding acceptable levels, which may well be at odds with the conditions of the Premises Licence enjoyed, these incidences can be effectively mitigated through design.
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	11th October 2021. This limited weekday survey was clearly not representative given the potential noise that might reasonably be expected to arise from a venue with such extensive hours of operation available both to host events and to permit the sale of alcohol. It is inadequate for the applicant's consultant to suggest without explanation that events have been limited at the Community Centre in recent years. This is extremely insensitive since it ignores the impact of Covid lockdowns on the community and the fact that Black and Minority groups were amongst those most adversely affected by the pandemic. Proper consideration of the potential for noise generation from the Community Centre is clearly germane to the Council's consideration of the planning application since its findings should inform the applicant's design proposals and requisite acoustic treatment of the proposed development to ensure acceptable levels of amenity for future student residents. Despite this context, the noise consultant's report acknowledged that its limited assessment of noise from the Community Centre building had, 'not been informed by measurement of noise levels at an event.' This is a serious oversight, and we respectfully request that the applicant be required by the Council to carry out appropriate noise surveys of a representative night-time event and a Sunday morning religious service at the Community Centre building. Daylight and Sunlight The proposed development is far greater in scale, mass, and height than the ACFCA Community Centre building and, consequently, fair consideration of resultant daylight and sunlight impacts on neighbouring development is appropriate. However, the applicant's	
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	Daylight and Sunlight Report is confined solely to assessment of impacts on neighbouring residential properties and hence avoids any evaluation of the physical impact that the proposed development will have on the ACFCA Community Centre building and its immediate curtilage. Again, this is a serious oversight and once more, the Council should require the applicant to extend their daylight and sunlight survey to include proper assessment of the impact that the proposed development of multi-storey flatted development in this location would have upon the Community Centre and its environs. An obvious and fair concern will be to ensure that the proposed development would not impact unacceptably on ACFCA's premises and activities, including its Community Garden. Conclusion Until these shortcomings have been addressed neither ACFCA nor indeed the local planning authority, can be assured that the application proposals will not impact adversely upon ACFCA's continued and planned operation of the Community Centre building. In the absence of robust technical assessment, the application proposals as presently submitted are contrary to the requirements of local planning policies and are also in conflict with national planning policy contained in the National Planning Policy Framework.	
129 other representations received from individuals (headlines of responses received as summarised by the planning	- Insufficient Daylight or Sunlight Assessment impact. It is not considered that the application explicitly addresses the impact of daylight and sunlight on the West Indian Centre. It has addressed the impact of daylight and sunlight on properties on Hathersage Road, which are located further away, but not on the centre. any lost daylight means using more electricity in the building, especially for daytime activities at the Centre	The assessment of impact on daylight and sunlight supply focusses on habitable rooms near to the proposed development site. There are no habitable rooms in the adjoining community centre and no pre-requisite for a planning application to consider impact on a commercial building. In light of the third party comments raised, the project team daylight/sunlight consultant has given further consideration to the community centre. Its findings are set out in a supplementary submission.

application case officer)	- No evidence of positive impact on Social Housing The application does not show explicitly how the new development will alleviate the social housing problem in the area. It is believed that the development will take away the few social housing space left in this which adds to the burden on Ardwick area social housing because the new flats will not be available to residents. - Insufficient evidence of positive impact of the development on local facilities the developers have not addressed the impact of the development on community space like parks, doctors surgeries, schools' dentist and pharmacies etc. - Too much student accommodation in the area and the displacement and serious loss of several of Manchester ethnic minority communities. - The expansion of student accommodation will impact on the activities of the neighbouring centre - Insufficient measures to mitigate Noise impact Assessment. The Noise Impact Assessment section does not take into consideration that noise generated by activities at centre will cause noise complaints by occupiers of the development due to the proximity. - Insufficient community involvement prior to the application being made. It is not true that the owners and users of the Centre were consulted before and after the first application was made. The developers only responded to the petitions raised by their application. No attempts have been made to engage the Centre community directly.	The proposal is for PBSA and there is no pre-requisite for such a proposal to consider impact on social housing provision. The appropriateness of the proposed development is down to a consideration of its consistency with development plan policy, having regard to material considerations. The proposed development is in accordance with development plan policy. In respect of affordable accommodation, the applicant is offering that a proportion of the bedspaces will be available in perpetuity at an affordable rent. This will be secured through either a planning condition or a legal agreement associated with any planning permission granted. There is no evidence to suggest that a PBSA development of this scale will have any detrimental impact on access to local services, and in-part the proposed development is a response to a Council desire to see a higher proportion of students living in purpose built accommodation nearer to the main university campuses rather than HMOs; so this is in effect providing different accommodation for existing student numbers. There is no evidence that the proposed development will have any direct effect on ethnic minority communities, or the activities of the neighbouring community centre. The proposed development will see the replacement of life-expired commercial premises with new build PBSA development, making efficient use of previously developed land which is available for redevelopment. Matters relating to noise generated by the community centre are addressed above. The applicant engaged in extensive and comprehensive pre-application consultation, including directly with representatives for the community centre and the local community centre. Full details of consultation activity are set out in the submitted SCI. The highway authority has confirmed that it is supportive of the applicant seeking to bring forward a largely car-free development.
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	- 172 flats, without any parking spaces, is going to have an adverse impact on parking in the area.	
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