

MADDOX PLANNING

PLANNING STATEMENT

LONDON & MANCHESTER

0845 121 1706

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29/07/2022

DESCRIPTION OF DEVELOPMENT

Demolition of existing buildings and residential redevelopment including creation of a new vehicular access from Francis Road, parking provision, landscaping and associated works.

TYPE OF APPLICATION

Full planning permission

APPLICANT

Southway Housing Trust (Southway Housing Trust (Manchester) Limited)

Southway Housing Trust is a committed and forward thinking, not-for-profit, local housing company based in South Manchester. Southway is passionate about providing excellent homes and outstanding customer care. It was established in 2007 in South Manchester where it owns 5,880 properties. All Southway homes exceed Decent Homes Standard, and its core landlord services excel in performance and tenant satisfaction ratings. Southway annually spends up to £25m to invest in its local communities.

Southway has an experienced Development Team with a track record in delivering new social investment, including employment and training initiatives. It also has a dedicated Age Friendly team to meet the diverse needs of its local communities. Southway has a strong financial standing, with an excellent governance and viability rating, with new loan facilities secured for the future. Southway plays a key role in its communities and already reaches out to local groups working with local stakeholders and community groups. Southway is proud of all the work it does in its neighbourhoods.

LIST OF SUPPORTING DOCUMENTS

1. Planning statement (this document), Maddox Planning
 2. Full drawing package, Southgate & Sarabia Architects
 3. Design and access statement, Southgate & Sarabia Architects
 4. Landscape masterplan and planting strategy, Square Yard
 5. Statement of Community Involvement, Maddox Planning
 6. Crime impact statement, Secure by Design at Greater Manchester Police
 7. Transport statement (including framework service management plan and framework travel plan), SK Transport Ltd
 8. Ground conditions Phase 1 preliminary assessment, LK Group
 9. Sustainable drainage strategy, Hydrock
 10. Building Regulations Part L Volume 1 -SAP, Seven
 11. Bat survey report, 3EP
 12. Arboricultural assessment, 3EP
 13. Acoustic assessment, PDA
 14. Framework construction management plan, Aedi Construction
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DEVELOPMENT PLAN

The adopted development plan comprises:

1. Core Strategy 2012-2027 (adopted 2012)
2. Interactive Proposals Map (adopted 2012)
3. Unitary Development Plan – saved policies (adopted 1995)
4. Greater Manchester Joint Waste DPD (adopted 2012)
5. Greater Manchester Joint Minerals DPD (adopted 2013).

The emerging development plan comprises:

1. Manchester Local Plan (issues and options February to April 2020)
2. Places for Everyone Joint Development Plan Document, published August 2021 (submitted to the Secretary of State for examination on 14 February 2022)

POLICIES MAP

The following designations on the policies map are particularly relevant:

1. South Manchester sub-area, where policies EC9 and H6 apply.
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PLANNING POLICIES

The following adopted and emerging planning policies are particularly relevant:

Document	Policy number	Policy title
Core Strategy	SP1	Spatial Principles
Core Strategy	EC1	Employment and Economic Growth in Manchester
Core Strategy	EC2	Existing Employment Space
Core Strategy	EC9	South Manchester
Core Strategy	H1	Overall Housing Provision
Core Strategy	H6	South Manchester
Core Strategy	H8	Affordable Housing
Core Strategy	EN1	Design Principles and Strategic Character Areas
Core Strategy	EN4	Reducing CO2 Emissions by Enabling Low and Zero Carbon Development
Core Strategy	EN6	Target Framework for CO2 Reductions from Low or Zero Carbon Energy Supplies
Core Strategy	EN8	Adaption to Climate Change
Core Strategy	EN9	Green Infrastructure
Core Strategy	EN14	Flood Risk
Core Strategy	EN15	Biodiversity and Geological Conservation

Core Strategy	EN17	Water Quality
Core Strategy	EN18	Contaminated Land and Ground Stability
Core Strategy	EN19	Waste
Core Strategy	PA1	Developer Contributions
Core Strategy	T1	Sustainable Transport
Core Strategy	T2	Accessible Areas of Opportunity and Need
Core Strategy	DM1	Development Management
UDP	DC26	Development and Noise

OTHER MATERIAL CONSIDERATIONS

Other material considerations (such as national planning policy and supplementary planning documents, area action plans and design briefs) include:

1. National Planning Policy Framework (2021) – the Framework
 2. National Planning Practice Guidance (various dates) – the Practice Guidance
 3. Guide to Development in Manchester SPD (adopted 2007)
 4. Providing for Housing Choice SPD (adopted 2008)
 5. South Manchester Regeneration Framework
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RELEVANT PLANNING DECISIONS

Reference/address	Description	Status/decision date	Referred to in paragraph number of this statement
024742 premises at Francis Road (Onsite)	Extension at first floor level to form offices and storage space	Approved 4/09/1985	
020905 premises at Francis Road (Onsite)	2-storey extension to existing printing works to form additional factory space with ancillary offices	Approved 24/01/1984	
F00746 Cotton Lane/Francis Road (Onsite)	Use of premises (previously used for the manufacture and mixing of ink), for warehousing and office purposes.	Not proceeded with 19/03/1975	

074755/FO/2005/S2 Former Laundry Site, Francis Road (Onsite)	Erection of a three storey block to form 20 No. X 2 bed apartments and 10 No. X 1 bed apartments with associated 30 space car park and access from Francis Road	Withdrawn 4/05/2005	
077190/FO/2005/S2 Former Laundry Site, Francis Road (Onsite)	Erection of a part 2, part 3 storey building to form 3 x three bedroom townhouses, 12 x two bedroomed apartments and 1 x three bedroomed apartment with accommodation in the roof space, 16 parking spaces, landscaping and boundary treatments following demolition of existing laundry and adjoining offices	Refused 21/03/2006	
081492/FO/2006/S2 Former Laundry Site, Francis Road (Onsite)	Erection of five 3 storey terrace houses following demolition of laundry building	Approved 28/03/2007	
047084/VO/SOUTH1/95 Kingslea House, Southdown Business Centre, Francis Road (Adjacent to the southwest of the site)	City Council Development change of use from office accommodation to mixed use comprising offices, residential (for people in need of emergency care) and day centre	Approved 30/03/1995	

CONTENTS OF THIS STATEMENT

1. Site and area description
2. Pre-application consultation and engagement
3. Proposed development
4. Considerations
5. Conclusions

1.0 SITE AND AREA DESCRIPTION

- 1.1 The site extends to 0.1560 ha and its address is Pellowe House, Francis Road, Withington, M20 4XP. The footprint of the existing building on site is approximately 929 sq. m. The building has a long history of employment use and it was last occupied by ISS Group Limited, an electron optics business which relocated to Middleton (Manchester) in 2020. The building is predominately one storey but extends to two storeys at the southwest end of the site. The building is designed in such a way that a row of gable ends front onto Francis Road.
- 1.2 Pedestrian and vehicular access to the site is via Francis Road; there are a number of demarcated parking spaces located at the front of the building. Pedestrian and vehicular access can also be gained off Cotton Lane. There is a right of access to a parking area at Kingslea House via Cotton Lane.
- 1.3 The site is located in a residential area and its continued employment use was an anomaly given the local context. The only other commercial uses locally are Kingslea House (currently occupied by Greater Manchester Mental Health NHS Foundation Trust's North Mersey Community Mental Health Team who care for individuals with severe and enduring mental health problems) and a number of retail businesses located at the crossroad junction of Francis Road, Cotton Lane, and Heathside Road. The past industrial use is considered incongruous in this south Manchester suburban location.
- 1.4 The Manchester City Council (MCC) composite Proposals Map identifies the site being part of the South Manchester sub-area, within which policies EC9 and H6 apply.
- 1.5 The site is not located in, or in close proximity to a statutorily listed building, or in a conservation area.
- 1.6 The site is not located in an air quality management area.
- 1.7 The site is located in flood zone 1 (the lowest probability of flooding).
- 1.8 There are no tree preservation orders at, or adjacent to the site.
- 1.9 From the interactive GM Mapping Tool, the site has a very good accessibility level rating at 6/7 (8 being the best accessibility). There are a number of bus stops close by. These are located on Parrs Wood Road to the east of the site with the closest being situated 0.5 km away at Parr Wood Road/Heyscroft Road stop; and also Wilmslow Road to the west of the site with the closest being situated 0.5 km away at Oak Road stop. These have regular services to Stockport, East Didsbury and Piccadilly Gardens. The site located approximately 1.1 km to the northwest of Burnage train station and 1.4 km to the southwest of Mauldeth Road train station. The site is located approximately 1.6 km from the closest tram stop; Burton Road, West Didsbury and Didsbury Village are all approximately the same distance way from the site.

2.0 PRE-APPLICATION CONSULTATION AND ENGAGEMENT

- 2.1 The applicant entered into formal pre-application engagement with the local planning authority (the LPA) in 2021. The applicant submitted a draft proposal to the LPA for consideration; this included a pre-application planning design document which presented the proposal and its design evolution. Meeting minutes were subsequently agreed, and it was advised by the pre-application case officer that these minutes should be used as the formal pre-application response. The scope of validation requirements was also agreed at this stage.
- 2.2 In summary, the principal points made by the case officer in the pre-application meeting are:
- Residential redevelopment would be more suitable in the predominately residential suburban setting.
 - A significant improvement over existing site conditions.
 - Proposed separation distances were a betterment than what is currently there on site.
 - Supportive of the industrial aesthetic in the design.
 - Appropriate landscaping measures should be implemented to ensure of appropriate boundary green buffers and encouragement of biodiversity habitats.
 - Highways need to be fully considered and assessed to ensure a safe access, movability through the site and minimal impact to existing on-street parking.
- 2.3 Full details of pre-application engagement are given in a separate Statement of Community Involvement which includes and details engagement with local ward councillors and local residents and businesses.

3.0 PROPOSED DEVELOPMENT

- 3.1 The proposed description of development is:

Demolition of existing buildings and residential redevelopment including creation of a new vehicular access from Francis Road, parking provision, landscaping and associated works.

COMPOSITION

- 3.2 Table 3.1 provides a summary of the existing employment and the proposed residential units.
- 3.3 The accompanying Design and Access Statement (the DAS) provides full details of the proposed residential development, units, layout appearance and materials. A brief summary is given below.

Table 3.1 - existing employment and proposed residential units

Existing			Proposed			
Unit	Type	Floorspace (sq. m)	Floor	No. Units 1b-2p (50 -53 sqm)	No. Units 2b-3p (61-75sqm)	Floorspace (sq. m)
1	MPC House (single storey)	669	Ground floor	2	4	553
2	Pellowe House (2 storey)	520	First floor	5	4	636
			Second Floor	5	4	636
Total						
		1,189		12	12	1,825

LAYOUT

- 3.4 The proposal is for 24 units across three floors within one predominately rectangular block. The block is positioned to the southeast of the site. Car parking is located to south-west side of the block. The proposed development will have a flat roof and totals 1,825 sq. m (GIA). The main entrance to the building is off Francis Road, although there is access to the building from the car park, and from the side of the building to the north.
- 3.5 The floor area for one bed apartments are between 50-53 sq. m and the floor area for two bed apartments is primarily 61 sq. m, although some units extend to 75 sq. m. All proposed dwellings are NDSS complaint.
- 3.6 In addition to the residential units, a central lift system and stairwell are included. On the ground floor, there is a plant room (28 sq. m), cycle store (8 sq. m) and a bin store (22 sq. m).

SCALE AND MASSING

- 3.7 The three storey block has a maximum height of 9.45 metres.

TENURE

- 3.8 The scheme will be 100% affordable housing.

EXTERNAL APPEARANCE

- 3.9 The elevational treatment proposed is brick to reflect the local context. The fenestration proposes an industrial aesthetic. The submitted DAS provides full details.

LANDSCAPING

- 3.10 Hard and soft landscaping is proposed where possible throughout the site. Comprehensive planting is proposed on the boundary adjoining Francis Road. The submitted landscaping plans provide full details.

AMENITY SPACE

- 3.11 Some external amenity space will be provided on site. The scheme proposes secure private gardens to ground floor units on Francis Road. Juliet balconies are proposed on the upper floors. External timber bench seating and sensory planting provide focal points within the communal external space on the south-west side of the building, near the cycle store. The site is within close proximity to Fog Lane Park to the south and Ladybarn Park to the north for future residents to also enjoy.

ACCESS AND PARKING

- 3.12 Vehicular access and egress to the site will be via an under-croft new entrance off Francis Road. The existing off street parking onsite from Francis Road will be removed. Pedestrian access to the building is both via Francis Road, and from the car park to the rear to the northwest. 15 car parking spaces are provided, four of which are to be electric vehicle (EV) standard and two designated for disabled permits. There is also an external bike store proposed.

ACCESSIBILITY

- 3.13 The properties are designed with level access throughout to Part M compliance.

REFUSE AND SERVICING

- 3.14 The bin store is located in the building to the northeast within a designated area, which has direct access onto Francis Road. It is proposed that collections will be from Francis Road by the local service provider. Full details are in the servicing plan, prepared by SK Transport, and the DAS, prepared by Southgate & Sarabia Architects.

4.0 CONSIDERATIONS

- 4.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material consideration indicates otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Section 1 of this statement. The main planning considerations are considered to be: principle of residential development; loss of employment land; design; highways; and sustainability.

PRINCIPLE OF RESIDENTIAL DEVELOPMENT

- 4.2 The application site is not allocated for a specific use in the local development plan. The site is within a primarily residential area and therefore the proposed use is entirely appropriate and in accordance with the prevailing land use locally. The site is not subject to any special protection in the context of either the natural or historic environment.
- 4.3 The proposal is for 24 units, each providing one or two bedrooms. A key objective of Southway Housing Trust is to increase the supply of housing in areas that are in or close to South Manchester, improving the range and choice of housing available for those who currently have limited or no access to a decent, safe and secure home.
- 4.4 The proposal will positively contribute to the necessary supply of housing in Manchester, consistent with the broad objectives of Policy H1. Policy H1 advises that the type, size and tenure of the housing mix will be assessed on a site by site basis and be influenced by local housing need and economic viability. Whilst the MCC *Development in the City 2018-20* Annual Monitoring Report (March 2020) advises that its housing requirement became out of date in 2017, and that there is an absence of an up-to-date adopted local plan housing requirement, there is no doubt that there is a need for significant additional new housing in suburban Manchester.
- 4.5 The MCC Five Year Housing Land Supply Statement (April 2019) advises that the housing supply to be at least 6.25 years at that time. There is no more recent update. The submitted publication of *Places for Everyone* (August 2021) proposes a redistribution of housing provision across the nine boroughs preparing the joint plan. Places for Everyone advises that the highest levels of population growth across Greater Manchester are projected to be in Manchester at an increase of 32,700 residents over the plan period up to 2037. In order to help address these issues, higher levels of housing growth will be focused in the central districts of Greater Manchester, which includes the City of Manchester. The City of Manchester including its suburban areas will continue to be an appropriate location for the highest levels of new housing.
- 4.6 Policy H6 *South Manchester* states “*South Manchester will accommodate around 5% of new residential development over the lifetime of the Core Strategy (Delivery of around 3,240 residential units)... Outside the district centres priorities will be for housing which meets identified shortfalls, including family housing and provision that meets the needs of elderly people, with schemes adding to the stock of affordable housing.*” The proposal is in line with Policy H6 objectives by proposing to add to the affordable housing provision in South Manchester.
- 4.7 Southway Housing Trust is behind a similar scheme at Minehead Avenue, Withington, which has helped inform this proposal in terms of mix and tenure. There is an assessed equal demand one and two beds, which had informed the 50/50 dwelling mix. The development plan policy requirement on dwelling mix is considered to be out-of-date given the evidence of market demand locally. This proposal has to be read in the context of this known market demand, which is a significant material consideration. The dwelling mix

proposed and the 100% affordable housing provision is a response to local demand; informed by the Southway Housing Trust Minehead Avenue development.

- 4.8 Having regard to the development plan and material considerations including national planning policy and guidance, it is demonstrated that redevelopment of the site for residential use is acceptable in principle.
- 4.9 Policy H8 provides advice for affordable housing or an equivalent financial contribution, which currently applies to all residential developments on sites of 0.3 hectares and above or where 15 or more units are proposed. It includes a target for 20% affordable housing on relevant sites and for the proportion to reflect the type and size of development as a whole. Alternative Affordable Housing provision can be considered where viability is undermined, or other material considerations indicate otherwise including:
- High level of Affordable Housing already present in the area
 - House prices or rented accommodation levels in the area
 - Prejudice to the diversification of the existing housing mix
 - Undermine the achievement of other planning/ regeneration objectives in the area / SRF
- 4.10 The proposed provision of 100% affordable housing satisfies, and goes beyond, meeting the affordable housing requirement set out in policy H8.

LOSS OF EMPLOYMENT LAND

- 4.11 *Policy EC 2 Existing Employment Space advises that the Council will seek to retain and enhance existing employment space and sites. Alternative uses will only be supported on sites allocated accordingly, or if it can be demonstrated that:*
- *The existing use is un-viable in terms of business operations, building age and format;*
 - *The existing use is incompatible with adjacent uses;*
 - *The existing use is unsuitable for employment having had regard to the Manchester-Salford - Trafford SFRA; or*
 - *On balance, proposals are able to offer greater benefits in terms of the Core Strategy's vision and spatial objectives than the existing use.*
- 4.12 The proposal will result in the loss of the existing employment land at the site. The previous tenant relocated in 2020 and the building is currently vacant. The buildings, which have been constructed in a piecemeal approach, are considered not suitable for modern industrial or other employment use. The configuration, layout and location are not attractive to end users, hence the prolonged period of vacancy. There are other strategic sites and locations, in south Manchester and beyond, that would better cater for modern industrial employment operations. These sites generally have purpose built, modern industrial units which are better able to fully meet the requirements of business and well as having appropriate access to the strategic highway network and on-site parking for vehicles and HGV deliveries.
- 4.13 It was agreed at pre-application stage that the employment site is incongruous in its suburban residential context. Due to the site being located in close proximity to residential units, employment use is considered incompatible and may give rise to adverse impact associated with commercial vehicle movements, noise and air quality.
- 4.14 This site contributes a minimal amount to the existing employment land supply across the Manchester area. In reality, when considering market indicators for the area, site characteristics and that the floorspace is no longer in active employment use, the site is demonstrably more appropriate in residential use. The existing employment land at Francis Road is considered unsuitable for modern day employment and therefore the proposed development is considered to be in accordance with Policy EC 2 *Existing Employment Space*.

- 4.15 In respect of employment Policy EC9 *South Manchester* advises that *South Manchester is not expected to make a significant contribution to employment provision within the City... Development proposals and planning applications should have regard to ensuring efficient use of existing employment space and improving public transport*. This indicates that sustaining employment land supply in South Manchester is not a development plan policy objective, except for areas which are explicitly stated in the Core Strategy. The Francis Road site is not included as part of this.

DESIGN

- 4.16 Policy EN 1 Design Principles and Strategic Character Areas sets out that all development in Manchester should follow seven principles of urban design (taken from national policy at the time of Core Strategy adoption). Policy EN 1 describes Southern Manchester as:

“There is a notable presence of older development (1750-early 1900) at key junctions and along historic radial routes such as Oxford Road/Wilmslow Road, often but not exclusively associated with District Centres. The largely flat terrain has enabled the subsequent infilling of land between these routes with a more regular layout of predominantly residential development up to the 1960s. Much of this subsequent development was associated with the purpose built radial parkways, serving the City Centre. Princess Parkway now forms the principal road link between the City Centre and the Airport. The area contains pockets of formal open space including some significant historic parks.

- *New development needs to retain the identity and focus of activity associated with the historic District Centres.*
 - *Where appropriate development along the radial routes such as Princess Parkway should be commensurate in scale with the prominence of its location.”*
- 4.17 The policy provides direction on the type of development suitable for this area. When considering proposed development against the policy, the site is located within predominantly residential area and is rightly considered as a residential infill site. The proposed development would be in accordance with Policy EN 1 Design Principles and Strategic Character Areas.
- 4.18 The DAS provides full justification for the layout, unit sizing, orientation, scale and massing of the proposed development; all of which are considered to be entirely appropriate in a site context.
- 4.19 The design of the building itself has been primarily based on its functional requirements, which were set out by Southway Housing Trust. The new development will consist of 24, one and two bedroom units, designed to meet or exceed nationally described space standards (NDSS). The proposals will adopt the recommendations for good design principles set out in national guidance including ‘Building for Life 12’, ‘National Design Guide’ and ‘HAPPI’. The proposed development is designed to be fully inclusive and accessible, fully according with NDSS and Part M requirements.
- 4.20 The layout (both internal and external) and design of the proposed development also seeks to ensure the maintenance of the privacy enjoyed by residents of existing properties that adjoin the site. The separation distances achieved are detailed in the Design and Access Statement.
- 4.21 In terms of scale and massing, the proposed development is considerate of the local context and existing site conditions. The proposal is a three storey development which would be of a similar, yet lower, height to the three storey residential building located at the corner of Francis Road and Cotton Lane. The proposed footprint represents a reduction over the existing on-site, to allow for appropriate parking provision, amenity space and landscaping. Both scale and massing of the proposed development are considered acceptable, particularly given the context of the character location and existing site conditions.

- 4.22 The pre-application advice received, in terms of design, provides support for the materiality. The pre-application case officer advised that the design gives an industrial aesthetic which, given the existing use of the site, is appropriate. The case officer also noted the betterment, in terms of separation distances, when compared with the existing building. Appropriate assessments including daylight/sunlight analysis have been undertaken to ensure the proposed development would not have an adverse impact on the properties.
- 4.23 In terms of the management of demolition and erection of the building, the submitted Construction Management Plan, prepared by AEDI Construction, provides full details.

DESIGNING OUT CRIME

- 4.24 A Crime Impact Statement (CIS) prepared by Greater Manchester Police (GMP) gives due consideration to the development for which planning permission is now sought. The measures recommend are included where possible to ensure of safety throughout the site. Where it is not possible or feasible to address points raised, the DAS seeks to provide justification on why addressing the recommendations is not considered feasible, and/or advises of an alternative solution considered and incorporated.

LANDSCAPING

- 4.25 Policy EN9 *Green Infrastructure* states “new development will be expected to maintain existing green infrastructure in terms of its quantity, quality and multiple function”.
- 4.26 Policy EN15 *Biodiversity and Geological Conservation* clarifies that developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity.
- 4.27 A landscape masterplan and planting strategy, prepared by Squareyard is submitted as part of the application. The landscape masterplan and planting strategy includes appropriate soft and hard landscaping features which complement the architectural built form, proposed use and local character. The landscaping improvements proposed include shrubbery and tree planting facing onto Francis Road and a bench and some sensory planting to the northeast of bike store.
- 4.28 Overall, the landscaping strategy responds positively to the site context and to local development plan policy and material considerations including national planning guidance on landscaping.

AMENITY SPACE

- 4.29 Residents will have access to some external communal amenity space. The design is a response to the specific function requirements set out by Southway Housing Trust. The level of amenity space proposed is consistent with that delivered on other Southway Housing Trust schemes elsewhere and is considered appropriate for the likely resident demographic. The units on ground floor facing onto Francis Road have private garden amenity and the upper floors all have Juliet balconies. The units on the ground floor facing the car park do not have private outdoor amenity, but they, like other residents, can utilise communal space outside which offers seating and some soft landscaping features.
- 4.30 Beyond the site, Fog Lane Park and Ladybarn Park both offer well maintained, diverse green space which is already well used by the local community. These parks are considered to be an attractive feature for future residents who would be able to make use of these local parks. Fog Lane Park is located 320 metres away to the south of the site. MCC website advises that the park is open from dawn to dusk and offers a children's play areas, football pitches, multi-use sports area (MUGA), tennis courts, bowling green, veterans pavilion, pond, park office, visitors centre, cafe, changing rooms and toilets. Ladybarn Park is located 800 metres away to the north of the site. MCC website advises that the park is open from dawn to dusk and offers a children's play area, multi-use sports area (MUGA), standalone basketball court, outdoor gym, bowling green, tennis courts and skateboard park.

- 4.31 The closest, Fog Lane Park is an eight minute walk from the site. *MCC Open Space and Recreational Needs Assessment* (August 2009) advises at paragraph 6.23 that parks and gardens often provide a similar function to amenity green space, providing people with access to informal open space and a place to meet friends. Public amenity green spaces are also considered to positively contribute to residential areas. Some existing public amenity green space is located to the west on Parrs Wood Road which is similarly an eight minute walk from the site. The assessment sets accessibility standards to parks and other public amenity green spaces. For local parks and amenity green spaces, the threshold is up to 10 minute walk time being acceptable. Considering the eight minute walk time to the closest local park, the proposal is considered to meet the accessibility standards regarding the availability of greenspace to future residents.

HIGHWAYS

- 4.32 Core Strategy policy *T1 Sustainable Transport* sets out a policy basis for delivery of a sustainable, high quality, integrated transport system which prioritises to public transport, cycling and walking, to support the needs of residents and businesses and to prepare for carbon free modes of transport.
- 4.33 Core Strategy policy *T2 Accessible Areas of Opportunity and Need* sets out principles for managing the pattern of development in terms of potential impact on highways. The policy advises that car parking standards are maximums.
- 4.34 A transport statement prepared by SK Transport is submitted alongside this application. It sets out in detail how the development is considered to achieve compliance with the transportation and highways policies of the development plan and specifically policies T1 and T2 of the Core Strategy.
- 4.35 The proposed vehicular access to the site will be off Francis Road. The proposal will provide 15 car parking spaces, including disabled and EV parking. A parking assessment within the transport statement shows that a development of this type and scale requires between 10 and 13 parking spaces. The proposal includes 15 parking spaces which should comfortably accommodate resident and visitor demand.
- 4.36 An external cycle store is also provided. The operation of the development will be underpinned by a Travel Plan. Pedestrian access into the development is via Francis Road. Whilst there is existing access to the site from Francis Road, the proposed development result in a vehicular access focused to the northern part of the site and the main pedestrian access through the building. Parking onsite fronting Francis Road will be removed. There will be no change to the current access arrangements via the private lane off Cotton Lane.
- 4.37 The accessibility analysis within the transport statement shows that the site is well located to allow residents to easily access local amenities and services within a 15-minute walk or cycle. Public transport accessibility is good with opportunities available to access bus, train, and tram services. The site has a GMAL rating of between 6 and 7, which is a very good level of accessibility for a suburban area.
- 4.38 The transport statement reports no recorded accidents in the past five years at the site access junction. The trip generation forecasts for both, the historic and proposed uses at the site shows that the proposal will not increase the traffic activity and will provide improved access and circulation to the site. Kingslea House will continue to be served by the existing access.
- 4.39 The transport statement includes details of servicing. In terms of waste collection, this will be facilitated via Francis Road. It is considered that servicing including refuse collection activity can be undertaken with minimal impact on the surrounding highway network. It is anticipated that the service management plan will be subject to a pre-occupation condition.

- 4.40 SK Transport has reviewed the sustainable transport mode options available for future occupiers. The site is located in a very sustainable and accessible area of south Manchester and this has been fully considered when developing the transport strategy for the proposed development.

ECOLOGY

- 4.41 Policy EN 15 *Biodiversity and Geological Conservation* seeks to maintain or enhance sites of biodiversity and geological value throughout the city. The policy notes that developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to linkages between valuable or potentially valuable habitat areas where appropriate.
- 4.42 In this regard, a bat survey report is submitted with the planning application. The appraisal identified low bat roosting potential in the building. A single emergence survey was undertaken due to the series of potential roosting features located on the exterior of the building, which could support crevice dwelling bat species on an occasional basis. No bats were recorded emerging from the building during the nocturnal bat survey. The results found low numbers of common pipistrelle and soprano pipistrelle across the site, with high levels of activity recorded.
- 4.43 The report concludes that no further surveys are required, and that a Natural England Bat Licence is not required for demolition of the buildings to proceed. The report makes recommendations over standard provisions for circumstances where birds and bats are found whilst demolition of the buildings or removal of trees are taking place. No other or additional ecological constraints were identified at the site.
- 4.44 Considering the findings and recommendations set out in the reports, the proposed development is considered to be in accordance with Core Strategy Policy EN 15.

TREES

- 4.45 Policy EN 15 *Biodiversity and Geological Conservation* outlines the Council objective to protect and conserve the existing trees and woodlands in the City and the aim for a net increase in trees across the City. Policy EN 8 *Adaption to Climate Change* supports increased tree cover in development to reduce in impacts of climate change.
- 4.46 None of the trees are on the site subject to a TPO. An arboricultural impact assessment (AIA), prepared by EP3 is submitted as part of the planning application and confirms the health of trees. The report identifies a total of 28 individual trees and three groups of trees on and adjacent to the site. These include nine individual trees graded Category B (of moderate value), and 17 individual trees and three groups of trees graded Category C (of low arboricultural value). Two individual trees have been categorised as unsuitable for retention regardless of the site proposals (i.e. 'U' category). The proposal includes no tree removals.
- 4.47 Some of the works encroach within existing trees root protection areas. The report sets out appropriate mitigation measures to protect the trees through the construction process and when the proposed development is fully operational. EP3 has also prepared an Arboricultural Method Statement (AMS) which provides guidance on the process and works to protect the trees.
- 4.48 The conclusions and mitigation measures set out in both the AIA and AMS seek to ensure that the proposed development is in accordance with the principle of Policy EN 15 *Biodiversity and Geological Conservation* and Policy EN 8 *Adaption to Climate Change*.

NOISE

- 4.49 Policy DM1 *Development Management* of the Core Strategy sets out that all development should have regard to specific issues which include the effects of noise and development where a new use might be sensitive to existing noise conditions. Policy CD26 *Development and Noise* of the UDP broadly reflects this and seeks to ensure that there is not any adverse impact from noise pollution.
- 4.50 An acoustic assessment report is submitted to inform the determination of the planning application. Having regard to local development plan policy, the noise assessment undertaken concludes that there will be no adverse impact on the amenity of existing residential properties locally or the new units proposed, as long as construction methods and mitigation measures used reflect the commentary as set out in the report.

DRAINAGE

- 4.51 Policy EN 14 *Flood Risk* advises that *all new development should minimise surface water run-off, including through Sustainable Drainage Systems (SUDS) and the appropriate use of Green Infrastructure.*
- 4.52 Policy EN 17 *Water Quality* sets out that *development should avoid any adverse impact on water quality, minimise surface water run-off and maximise the use of appropriate sustainable drainage systems, to minimize groundwater contamination, and to avoid pollutants reaching watercourses.*
- 4.53 A drainage strategy prepared by Hydrock is submitted and shows the drainage measures proposed to be incorporated throughout the proposed development. The strategy sets out how drainage will be in separate surface water and foul networks, which would then combine in a manhole to the rear of the development, before utilising an existing connection to a United Utilities public sewer located within Cotton Lane. Below ground attenuation will be provided to ensure that the proposed discharge rates provide a minimum 50% betterment to existing brownfield runoff rates.
- 4.54 Implementation of a detailed drainage strategy is expected to be the subject of a condition attached to any planning permission granted. The drainage strategy demonstrates the proposal is in accordance with the principles set out in Policy EN 17 *Water Quality*.

SUSTAINABILITY

- 4.55 Policy EN 4 *Reducing CO2 Emissions by Enabling Low and Zero Carbon Development* of the Core Strategy seeks to reduce fuel poverty and decouple growth in the economy, growth in CO2 emissions, and rising fossil fuel prices. Policy EN6 *Target Framework for CO2 Reductions from Low or Zero Carbon Energy Supplies* sets out that all applications in excess of 10 units will be expected as a minimum to meet the targets set out in policy. Policy EN8 *Adaptation to Climate Change* seeks all new development will be expected to be adaptable to climate change in terms of the design, layout, siting and function.
- 4.56 The proposed development will employ sustainable development provisions throughout to meet the sustainability objectives of local and national policy and guidance, and for the benefits of future occupiers. There is a focus on reducing carbon emissions, sustainability and wellbeing throughout the scheme. Building Regulations Part L Volume 1 -SAP (ref: 22925), prepared by Seven has been submitted as part of the application. This advises how compliance with Part L Volume 1 2021 of the building regulations (via SAP 10 calculations) for the proposed new build apartments can be achieved.
- 4.57 Core Strategy Policy EN9 *Green Infrastructure* encourages new development to consider the incorporation of measures such as tree planting and other forms of tree infrastructure to allow for the adaption to climate change in heavily urbanised areas. Measures consistent with these expectations are incorporated into the scheme alongside a detailed landscaping scheme to maximise its potential contribution to sustainability.

CONTAMINATION

- 4.58 Policy EN 18 *Contaminated Land and Ground Stability* of the Core Strategy seeks priority for the remediation of contaminated land to strategic locations. All new development within former mining areas shall undertake an assessment of any associated risk to the proposed development and, if necessary, incorporate appropriate mitigation measures to address them. Policy DM1 is also relevant.
- 4.59 In response to policy requirements, LK Group has prepared a preliminary risk assessment (phase 1), submitted with the planning application. The preliminary contamination conceptual models identifies a number of pollutants which have been assessed. The findings conclude that the pollutants on site are low, low/moderate, or moderate risk. The recommendations include an invasive phase II ground investigation to be carried out. The report advises that there is sufficient information on the potential contaminative status of the site to allow conditional approval of a planning application, based on the proposed end use.
- 4.60 A phase II will be undertaken before the commencement of invasive development work onsite. It is anticipated that any recommendations, alongside the need for Phase II works to be completed post-demolition of existing structures on the site, will be subject of conditions attached to any planning permission granted. It is also expected that the verification of any remediation measures will similarly be the subject of conditions attached to any planning permission granted.
- 4.61 Following the recommendations set out in the preliminary risk assessment, this proposal is considered to be in accordance with Policy EN 18 *Contaminated Land and Ground Stability*.

5.0 CONCLUSIONS

- 5.1 This statement demonstrates that the proposed development is in accordance with material up-to-date policies in the development plan and the development plan overall. An alternative housing mix is proposed to that set out in policy and this is justified by the current market signals and known demand for housing on schemes nearby, which are a significant material consideration. In assessing the planning balance, the benefits delivered as part of the proposed development are considered to outweigh loss of an existing employment site which is incongruous and does not appeal to potential employment tenants.

BENEFITS OF THE PROPOSAL

- 5.2 Key regeneration benefits of the proposal are:
- Residential use consistent and compatible with primarily residential uses in the suburban South Manchester area.
 - Positively contributing to housing supply.
 - Providing 100% affordable housing in a South Manchester location.
 - The design meets the function requirements set out by Southway Housing Trust.
 - Opportunity to redevelop an incongruous industrial site.
 - Use of materials palette that reflects the local context.
 - A significant improvement over existing site conditions.
 - Proposed separation distances are betterment when compared with current on-site conditions.
 - Appropriate landscaping measures to be implemented to ensure of appropriate treatment across the site.
- 5.3 The presumption in favour of sustainable development (Framework paragraph 11(c)) is engaged.
- 5.4 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material consideration indicates otherwise.