

Our Ref: 081453-CUR-XX-XX-T-TP-00005-P02

15/07/2024

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Development Management
Citywide Support (Highways)
Growth and Neighbourhoods Directorate
Manchester City Council
Hammerstone Road Depot
M18 8EQ

By Email Only

RE: 127226/FO/2023 - Crown Street Phase 3 & 127227/FO/2023 – Plot D

Dear ██████████

Thank you for the additional consultation response in relation to the Post Application Letter (Curtins Reference: 081453-CUR-XX-XX-T-TP-00004-P02_PostApplicationLetter) for the above applications – Crown Street Phase 3 (CSP3) and Plot D, dated 17th June 2024.

Following discussions with MCC Highways with respect to these additional comments, it was noted that these were provided by Transport for Greater Manchester (TfGM). Furthermore, Curtins received further comments from MCC Highways via email on 26th June 2024 – following discussions with TfGM.

In addition, Curtins received separate comments from Active Travel England (ATE) on 19th June 2024. MCC Highways have subsequently reviewed these ATE comments and provided their response via email on 9th July 2024.

On this basis, Curtins has reviewed the comments, and this letter responds to each comment that has been raised.

For convenience, we have reproduced the comments in ***bold italics***, followed by our response underneath. For conciseness, we have only included the consultee comments where an action or response is required by Curtins.

MCC FURTHER COMMENTS - 17TH JUNE 2024

“MODELLING:

With regards to Modelling, the discussions about the modelling are noted but with any degrees of saturation above 85-90 per cent, the impact of small increases of traffic flows have a disproportionate increase in traffic delays. See below from the TfL design guide.

The modelling predicts approaches with degrees of saturation at 98 per cent. It isn't a question about the impact being 'severe' but rather that appropriate mitigation is provided to reduce the number of vehicle trips to and from the site. This is in terms of providing suitable active travel measures - discussed below:

“2.5.6.1.4 Junction Performance

It is necessary to be aware of the relationship between traffic delay and DoS in order to best optimise junction performance during proposal development. The relationship illustrated in

Figure 19 highlights that a network is generally stable below 85% DoS, however delay begins to increase exponentially above this level and can lead to unstable network performance. At junctions operating close to zero Practical Reserve Capacity (PRC), corresponding to approximately 90% DoS, small reductions in capacity can result in a significant increase in delay. For this reason, a DoS of 90% represents an upper limit of practical capacity for signalised junctions, however greater reserve capacity is necessary on strategic routes to help maintain acceptable performance, allowing for flow variation and other random events. Unsignalised junctions typically have a lower practical capacity limit than for signalised junctions, with an upper stable saturation limit in the range 80-85%. Junction capacity relationships are important to consider when designing schemes to ensure that new proposals perform well within the existing network”.

The response within the original Curtins Post-Application Letter remains valid; the junction in question is shown to operate above practical capacity, but within theoretical capacity in the Baseline and Baseline + Development scenarios. The relative impact of the proposed development shows a minor reduction in capacity, and a minor increase in queues and delay, and it is Curtins' view that these impacts cannot be considered significant or severe.

“TFGM COMMENTS IN RELATION TO WALKING AND CYCLING CONNECTIONS FROM THE SITE TO THE CITY CENTRE:

TfGM note that with reference to Walking and Cycling infrastructure, for the avoidance of doubt and clarity it is requested that a full list of all the walking and cycling infrastructure changes funded by the development should be listed.”

Silvercroft Street:

- Upgraded footways (minimum 2m, with the exception of the loading bay pinch point along the southern footway);
- Widened carriageway to 5.5m to allow for safer movement of cyclists;
- Tactile paving and dropped kerbs at all crossings.

Great Jackson Street:

- 5.5m carriageway to encourage low speeds;
- Proposed raised table to encourage low speeds and facilitate pedestrian movements across Great Jackson Street;
- Upgraded footways (minimum 2m with the exception of a 1.8m pinch point due to wind mitigation);
- Tactile paving and dropped kerbs at all crossings; and
- New signalised pedestrian crossing opposite Plot D.

Melbourne Street:

- Traffic calming measures (including a speed hump and other measures) on slip road to encourage low speeds;
- Upgraded footways (minimum 2m);
- Shared use (cyclists and pedestrians) along the southern footway;
- Tactile paving and dropped kerbs at all crossings; and
- New signalised pedestrian crossing opposite Plot D.

“TOUCAN CROSSING:

TfGM's concern is that traffic will not be travelling at 20 mph since it is coming directly from the Mancunian Way and the plan doesn't show the forward visibility, it shows the layout. Plans

showing the visibility of the crossing at different speeds - 20 mph - 30 mph should be provided. Additional traffic calming is necessary on the off slip."

There is no evidence to suggest that vehicles travel above 20mph, particularly now that the Mancunian Way is limited to 30mph. Moreover, an array of traffic calming measures to further encourage low speeds are proposed on the section of the slip road within MCC's control, as follows:

- Narrowing of the slip road by provision of an overrun area (provided with a different material) for HGVs;
- Additional vertical signage;
- Speed hump before the crossing;
- Zig-Zag markings as part of the signalised crossing; and
- Speed roundel.

The following image demonstrates that visibility for the posted 20mph speed limit is achievable:



Further to this, Curtins visited the site on the 19th of June 2024 and took pictures from the existing uncontrolled crossing, which will be replaced by the proposed signalised crossing at the same location. The following two pictures provide a view from the tactile paving on both sides of Melbourne Street, demonstrating good visibility from oncoming vehicles:





“ZEBRA CROSSINGS SHOULD BE PROPOSED WITHIN THE SITE:

TfGM state that whilst it might be used primarily by pedestrians and cyclists, firstly it is still a road and there will be vehicles that have a potential conflict with pedestrians and cycles, and secondly, cycles will need to give way to pedestrians. TfGM therefore maintain the requirement for formal crossings at key conflict points between vehicles and pedestrians.”

All crossings at junctions are proposed as uncontrolled crossings, which is the typical approach for low flow, low speed streets within the city centre. The crossings at Melbourne Street and Great Jackson Street opposite Plot D are proposed as signal-controlled crossings. The two pedestrian crossings proposed along Great Jackson Street between the Phase 3 towers are located within the proposed raised table.

Based on the above, it is Curtins view that all proposed pedestrian crossings are safe, consistent, and appropriate for their local setting, and that zebra crossings are not required.

MCC ADDITIONAL COMMENTS (VIA EMAIL) - 27TH JUNE 2024

“...TfGM have confirmed that they would not expect to see any further modelling.”

Noted.

“In terms of the other comments in relation to active travel, mitigation and highway safety concerns, TfGM will want a response. It is also worth noting that in our initial response we did request a Stage 1 RSA, which I believe we have not seen yet.”

A response with respect to active travel, mitigation and highway safety concerns has been provided earlier within this letter.

With respect to a Stage 1 Road Safety Audit (RSA), it is considered that this can be conditioned – and a combined Stage 1/2 RSA can be undertaken at the detailed design/Section 278 stage. This is a standard approach – and due to the timescales and that the design process has been undertaken with extensive liaison with MCC Highways, it is considered that any minor amendments that may be required following a Stage 1/2 RSA can be undertaken during the S278 process.

Key ATE COMMENTS - 19TH JUNE 2024

“ATE notes that 3.4.8 of the TA describes shared cycle and pedestrian footways. These are only considered appropriate by LTN1/20 in a very limited set of circumstances. While the applicant refers to a '3m requirement for shared cycle and pedestrian footways where cycle flows are below 300 per hour', it does not justify why a shared path is considered appropriate in this location. ATE would highlight that the requirements of LTN 1/20 have been somewhat misinterpreted here and the applicant may therefore wish to clarify its position in light of this. LTN 1/20 paragraph 6.5.6 states that shared use may be appropriate in some situations and goes on to set out the situations eg places where there are few pedestrians, at and around junctions where cyclists will be moving at a slow speed. Table 6-3 sets out recommended widths for cycle flows of up to 300 but this table is only appropriate to apply for situations previously described at 6.5.6. The applicant should therefore provide justification where shared use paths are provided as to how they meet the requirements set out in this section of LTN 1/20.

Before it is able to recommend approval of this application, ATE considers issues of particular importance to be ensuring that surrounding infrastructure is sufficiently safe and attractive in order to enable future residents to make the choice to use active travel modes. This is considered particularly important in light of the significant numbers of future residents this development will yield (over 5000).”

Curtins commissioned a week-long Automated Traffic Count along Great Jackson Street, starting on the 14th of November 2022. The observed 5-day daily average flow for cycles and motorcycles is 254. The maximum number of cyclists observed at any given hour of the 7-day survey was 39.

The modal split for cycling in Manchester is 5% according to Greater Manchester Travel Diary Survey (TRADS) in 2022. This split has been steady over the years since the data started to be gathered in 2016. If we consider a worst-case scenario where 5,000 new residents travel through Great Jackson Street (as suggested by ATE), this would equate to an additional 250 cyclists in a day. Even if all 250 cyclists decide to travel at the same time during the observed busiest period, this would not surpass the 300 cyclists per hour threshold (293).

Further to this, given the anticipated low vehicular traffic, it is considered that cyclists can travel safely on the carriageway, with only a section of Melbourne Street to be shared between cyclists and pedestrians. The number of cyclists along Melbourne Street is expected to be lower than along Great Jackson Street, particularly in relation to the new development since the shared use stretch of footway will only provide access to the Plot D cycle store.

On this basis, it is considered that the number of cyclists along the proposed shared footway will not surpass the 300 cyclists per hour threshold in the foreseeable future; as such, the infrastructure proposed is therefore suitable.

“The applicant states that 100% cycle parking will be provided for all residents, encouraging and promoting cycling as a realistic cycle choice for commuting/leisure trips. It is not clear exactly what 100% cycle parking entails but assuming it means there will be one space per bedroom (thus ensuring 100% of residents have access to a secure, covered cycle parking space) this aspect is very much welcomed.”

Curtins can confirm that 100% relates to the number of proposed residential units, as agreed in principle with MCC Highways during pre-application consultation.

“ATE notes the changes made to the travel plan by the applicant following consultee comments. Regarding the duration of the Travel Plan, ATE would request that it is in place for five years post development at full occupation. It is expected that the final document will take into account national targets to ensure that 50% of all short trips are walked, wheeled or cycled by 2030 and that the proposed uplift targets will be reviewed accordingly.”

Any further Travel Plan updates will be conditioned.

MCC HIGHWAYS RESPONSE TO ATE COMMENTS - 9TH JULY 2024

“OFF-SITE INFRASTRUCTURE:

Active Travel England notes that 3.4.8 of the TA detailed shared cycle and pedestrian footways and has concerns of the proposals and asks for justification of these shared use cycleways / footways.

Highways notes that 3.4.8 of the TA refers to Crown Street Phase 2, which is currently under construction and has therefore been approved at planning stage and S278 detailed design stage. Therefore, the necessary assessment and appraisal work has been undertaken for these proposals.

In terms of the proposals for Plot D TfGM also noted in their comments that the shared cycle and pedestrian footways are not to the standards of LTN1/20. Curtins responded that there was a short section along Melbourne Street where due to ecological constraints the proposed shared cycle and pedestrian cycle footway does not meet the full 3m requirement. This has been noted. Highways have requested a S1 RSA to be undertaken (and are still awaiting this) to assess the overall design of the site.”

Noted.

The request for the Stage 1 RSA has been discussed earlier within this Letter. It is considered that this can be conditioned – and a combined Stage 1/2 RSA can be undertaken at the detailed

design/Section 278 stage. This is a standard approach – and due to the timescales and that the design process has been undertaken with extensive liaison with MCC Highways, it is considered that any minor amendments that may be required following a Stage 1/2 RSA can be undertaken during the S278 process

“Great Jackson Street / Chester Road Junction:

Active Travel England comments in relation to the provision of improve signage and refreshed surface treatment at the junction is noted.

As part of approved Planning Application (134694/FO/2022) the footways will be resurfaced and the current hoarding along the Great Jackson Street be removed upon completion of the construction works.

The cycle infrastructure at the Great Jackson Street / Chester Road junction was installed as part of the Active Travel Scheme Fund for the City Centre Scheme Area by MCC. It is therefore not deemed necessary for the applicant to provide improved signage of refresh the surface treatment in this location.”

Noted and agreed.

“Signalised Crossing across Great Jackson Street:

Active Travel England support for the proposals noted.”

Noted and agreed.

“TfGMs Comments in relation to the walking and cycle provision:

Active Travel England comments noted, and these link to TfGM comments.

TfGM requested that a full list of all the walking and cycling infrastructure changes funded by the development should be listed. It is understood that the applicant will be providing a response to TfGMs comments.”

The full list of infrastructure improvements is noted towards the start of this letter.

“CYCLE PARKING:

The Transport Assessment and Framework Travel Plan confirm that 100% cycle parking provision will be made available within the basement car park. The cycle parking will be covered and secure. As per Highways initial comments this is deemed acceptable.”

Noted and agreed.

“TRAVEL PLAN:

Noted. Due to the nature of the site and the car-free element it is expected that the majority of trips will be sustainable.”

Noted and agreed.

Summary

This second post-submission response has been prepared to address the highways and transport comments raised by Manchester City Council, Transport for Greater Manchester and Active Travel England. It provides supplementary information and does not alter the conclusions of the original Post Application Letter or the reports submitted as part of the planning application. We trust this is sufficient to gain Council support from a highways and transport perspective.