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20th December 2021

Anthony Mitchell
Planning
Manchester City Council
Town Hall Extension
Manchester
M60 2LA

Dear Tony,

SECTION 73 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
SECTION 19 OF THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990
PLANNING PORTAL REFERENCES: PP-10470212, PP-10470216
FORMER LONDON ROAD FIRE STATION, LONDON ROAD, MANCHESTER M1 2PH

Two applications have been submitted on behalf of Allied London Fire Station Limited for:

- the variation of condition 2 attached to application ref 127817/JO/2020 which amended consent ref 125712/FO/2019 (Portal ref PP-10470212); and
- the variation of condition 2 of the associated listed building consent ref 127818/JO/2020 which amended consent ref 125714/LO/2019 (Portal ref PP-10470216).

The original full planning and listed building consent applications were granted on 17th April 2020 for the following, respectively:

Refurbishment, restoration, reconfiguration and extension of former London Road Fire Station site to create a mixed use development comprising of hotel (Use Class C1), workspace/office (Use Class B1, D1), commercial floorspace for shop and food and drink uses (Use Classes A1, A3 and A4), residential apartments (Use Class C3) and leisure (Use Class D2), together with access and highways works, servicing, rooftop plant and associated works; and

LISTED BUILDING CONSENT for internal and external works in association with refurbishment, restoration, reconfiguration and extension of former London Road Fire Station site to create a mixed use development comprising of hotel, workspace/office, commercial floorspace for shop and food and drink uses, residential apartments and leisure, together with access and highways works, servicing, rooftop plant, landscaping and associated works

These were subsequently amended by applications 127817/JO/2020 and 127818/JO/2020 which altered the consented plans but retained the same descriptions of development.

In both cases, Condition 2 requires the development to be carried out in accordance with the approved plans. This application seeks to substitute relevant plans to reflect amendments. These involve the provision of a separate access point for the workspace use to reflect the requirements of potential occupiers; and the increase in the hotel provision for viability reasons.

This submission includes the relevant plans, which are to replace consented plans ref 2002-2007 and 2015. The design approach has been progressed with the full consideration of heritage matters.

Minor material

Section 73 of the Town and Country Planning Act 1990 allows an application to be made to vary the conditions associated with a planning permission, resulting in minor material amendments. National Planning Practice Guidance confirms that there is no statutory definition of a 'minor material amendment' but that it is likely to include 'any amendment where its scale and/or nature results in a development which is not substantially different from the one which has been approved' (ref 17a-017). This is considered to be the case with the proposal, which is comprised of very small scale changes in relation to the proposal as a whole.

The changes to the building's appearance, development quantum and mix will be very minor. All proposals will retain the heritage and design based principles agreed through previous consents.

Workspace Access

The previously consented version of the scheme, in 2017, included two new openings at the base of the Drill Tower. These were excluded from the next iteration of the scheme, but it has become apparent that a dedicated entrance to the workspace uses at upper floors is required by prospective occupiers. A lift is also to be inserted for the same reason.

Whether due to concerns raised by the pandemic or simply for operational reasons, a dedicated entrance and a lift have become a requirement. These changes have viability and compliance benefits, with the lift also bringing accessibility benefits.

The submitted plans detail the new entrance. In doing so, they follow the design and heritage principles set by the hotel entrance, which has been agreed with officers.

Whilst there will be some, limited, loss of historic fabric, this is achieved through the means that were previously consented and were thereby found acceptable in heritage terms. This involves the removal of windows and lowering of the sill to form a door opening. Adjacent windows provide legibility of the original elevation. Some additional subdivision is required.

Benefits of the approach are delivered in the form of long-term viability of upper spaces. On balance, the approach is found to be acceptable in planning and heritage terms.

Hotel Rooms

The scheme which was consented in 2017 incorporated a 91-room hotel. This was reduced to 42 in the latest consented scheme with the remaining space being predominantly workspace. It is now proposed to increase the hotel use to 61 rooms.

This comprises an additional 6 rooms on the first, second and third floors. The vertical circulation space along Fairfield Street is used as a logical marker between the uses. There will be a moderate decrease in workspace. This change is being sought for viability reasons. The additional hotel rooms will result in the enhanced viability of the consented scheme.

There will be some additional subdivision and the insertion of bathrooms. In line with established conservation principles relating to the project, this will be achieved by working with the existing room divisions to create suites wherever possible and thereby minimise subdivision. Bathrooms will be placed internally within the block to retain more significant rooms as bedrooms and

living spaces. This includes the provision of generous suites which maintain the legibility of the original layout, particularly the corner rooms.

Heritage Impact

The proposals are consistent with the requirements of the NPPF and Historic England guidance. The alterations align with the principles which have been established throughout the project to date. They constitute minimal changes; minimise the loss of fabric; and uphold the significance of the asset.

Overall, the proposed alterations will not change the cumulative impact assessment undertaken in the 2019 SLHA Heritage Statement that there will be a positive heritage impact on the London Road Fire Station. As such, the works are appropriate in heritage terms, and comply with the necessary legislation and policy.

Replacement Plans

The table below shows the consented plans and their replacements. This is to be achieved through the rewording of condition 2. The same changes apply to the documents listed at condition 2 of both consented applications (refs 127817/JO/2020 and 127818/JO/2020).

Consented plans to be removed	**Replacement plans**
LRFS-PUR-01-B1-DR-A-1053 Rev 9 Basement Plan Downtakings & Alterations	LRFS-PUR-01-B1-DR-A-1053 Rev 21 Basement Plan Downtakings & Alterations
LRFS-PUR-01-00-DR-A-1054 Rev 9 - Ground Floor Plan Downtakings & Alterations	LRFS-PUR-01-00-DR-A-1054 Rev 21 - Ground Floor Plan Downtakings & Alterations
LRFS-PUR-01-01-DR-A-1055 Rev 9 - First Floor Plan Downtakings & Alterations	LRFS-PUR-01-01-DR-A-1055 Rev 22 - First Floor Plan Downtakings & Alterations
LRFS-PUR-01-02-DR-A-1056 Rev 9 - Second Floor Plan Downtakings & Alterations	LRFS-PUR-01-02-DR-A-1056 Rev 21 - Second Floor Plan Downtakings & Alterations
LRFS-PUR-01-03-DR-A-1057 Rev 9 - Third Floor Plan Downtakings & Alterations	LRFS-PUR-01-03-DR-A-1057 Rev 21 - Third Floor Plan Downtakings & Alterations
LRFS-PUR-01-ZZ-DR-A-1067 Rev 11 Minshull St Courtyard Downtakings and Alterations	LRFS-PUR-01-ZZ-DR-A-1067 Rev 14 – Minshull St Courtyard Downtakings and Alterations
LRFS-PUR-01-00-DR-A-2003 Rev 9 - Proposed Ground Floor Plan	LRFS-PUR-01-00-DR-A-2003 Rev 20 - Proposed Ground Floor Plan
LRFS-PUR-01-01-DR-A-2004 Rev 11 - Proposed First Floor Plan	LRFS-PUR-01-01-DR-A-2004 Rev 25 - Proposed First Floor Plan
LRFS-PUR-01-02-DR-A-2005 Rev 11 - Proposed Second Floor Plan	LRFS-PUR-01-02-DR-A-2005 Rev 23 - Proposed Second Floor Plan
LRFS-PUR-01-03-DR-A-2006 Rev 11 - Proposed Third Floor Plan	LRFS-PUR-01-03-DR-A-2006 Rev 22 - Proposed Third Floor Plan

LRFS-PUR-01-B1-DR-A-2002 Rev 12 - Proposed Basement Plan	LRFS-PUR-01-B1-DR-A-2002 Rev 22 - Proposed Basement Plan
LRFS-PUR-01-RF-DR-A-2007 Rev 8 - Proposed Roof Plan	LRFS-PUR-01-RF-DR-A-2007 Rev 17 - Proposed Roof Plan
LRFS-PUR-01-ZZ-DR-A-2015 Rev 11- Proposed Minshull Street Courtyard Elevation	LRFS-PUR-01-ZZ-DR-A-2015 Rev 14 – Proposed Minshull Street Courtyard Elevation –

A Design and Access Statement produced by Purcell Architects is submitted as part of this application.

The proposed changes are limited and are minor in nature. Works follow the principles of design and heritage established through the previous grants of consent and discharge of conditions. The amendments have arisen from a review of the practicalities of the consented approach.

The amended scheme will maximise use of the London Road Fire Station whilst securing its optimum viable use for the future. Works are found to be appropriate from a heritage standpoint. The amendments uphold the high quality and conservation-led principles of the consented scheme, which was recognised as delivering transformative regeneration to this part of Manchester, and securing the future of an important Grade II* listed building. This remains a sustainable form of development that complies with the relevant national and local policies.

I trust the submitted application is satisfactory and I look forward to acknowledgement of its receipt. Should you wish to discuss the proposals or have any queries please do not hesitate to contact me.

I look forward to hearing from you in due course.

Yours sincerely,



Deborah Baker Barnett
Associate