



Pall Mall Court, Manchester City Centre

Statement of Consultation

May 2022

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1. Introduction

This Statement of Consultation accompanies an application for Full Planning Permission and Listed Building Consent, submitted to Manchester City Council ('MCC') by Bruntwood Pall Mall Ltd (the 'Applicant' or 'Bruntwood').

- 1.1. The applications are for the refurbishment of the Grade II listed Pall Mall Court (the Site) to facilitate its continued long-term use as office accommodation and complementary interventions to ensure a viable future for the building. The proposal includes creation of a new entrance off the piazza along with associated piazza improvements; repurposing of part of the ground floor for retail use; renewal and alteration of the curtain walling system; repurposing of the former King Street entrance; rooftop extensions to the King Street and Marsden Street blocks; and the introduction of basement amenities.
- 1.2. This Statement sets out in detail the pre-application consultation that has been undertaken, the feedback received and how that has been considered and addressed within the final proposals, where appropriate. This Statement should be read in conjunction with the Planning Statement and Design and Access Statement submitted with the applications.

The Site

- 1.3. The Site extends to 0.23ha and is bounded by Marsden Street to the North, the Pinnacle building (former Norwich Union offices) to the East, King Street to the South and the now pedestrianised former Pall Mall (and piazza) to the West.

The Proposals

- 1.4. These applications are driven by the need to bring Pall Mall Court back into viable use appropriate to its location in the Central Business District whilst remaining sympathetic to the asset's historic and architectural significance and the role it plays within the Upper King Conservation Area. In brief, the proposed interventions comprise:
 - High-quality refurbishment of Pall Mall Court to create an environmentally conscious building, that responds to the needs of occupiers.
 - Renewal of the façade in order to improve environmental efficiencies, the lifespan of the building and contribute to NZC targets.
 - Reactivation of the piazza and entrances through a reorientation of the building entrance to facilitate the arrival space occupiers want.
 - Reconfiguration of the floorplates and improvements to amenity provision (such as new WCs) on each floor to create attractive spaces for occupiers.
 - Retail /F&B use to be implemented at ground floor to further enhance activation. This will involve infilling the ginnel on the Marsden block with new bay windows, helping to bring more light into the ground floor retail use.
 - Minor alterations to the exterior planter to facilitate new elements of mechanical plant.

- The construction of a 1 storey roof-top extension of office floorspace on Marsden Street, and associated roof-top plant; re-purposing of the existing and now defunct plant room on King Street to facilitate a private roof-top terrace bar and new roof-top plant. All new plant will be screened.
- Repurposing of large parts of the basement to create a new tenant gym and wellness suite, and new secure cycle storage.

1.5. The formal description of development on the planning application is:

'Refurbishment of Pall Mall Court comprising of external alterations to form a new primary entrance off the Piazza and infilling of the arcades with new window-bays; alterations to existing King Street entrance to facilitate use as a retail (Use Class E) unit; the construction of a 1 storey roof-top extension of office floorspace on Marsden Street, the installation of new rooftop plant on Brown Street and King Street and associated plant screening; the installation of new balustrade on King Street to facilitate an ancillary roof terrace; the renewal of the external façade including a wholesale like-for-like replacement of the curtain walling system; and other associated works.

1.6. The formal description of development on the listed building consent application is:

'Refurbishment of Pall Mall Court comprising of external alterations to form a new primary entrance off the Piazza and infilling of the arcades with new window-bays; alterations to existing King Street entrance to facilitate use as a retail (Use Class E) unit; the construction of a 1 storey roof-top extension of office floorspace on Marsden Street, the installation of new rooftop plant on Brown Street and King Street and associated plant screening; the installation of new balustrade on King Street to facilitate an ancillary roof terrace; the renewal of the external façade including a wholesale like-for-like replacement of the curtain walling system; internal refurbishment and other associated works.

Pre-Application Consultation

1.7. A process of pre-application engagement has been implemented by the project team to ensure that the approach to the scheme's design development has been properly communicated and discussed and, where possible, points raised during these discussions have been taken into account.

Statutory Consultee Engagement

- 1.8. Pre-application consultation with Statutory Consultees has been focused upon providing an explanation of the Proposed Development, including the way in which the detailed design of the proposals have responded to the site conditions, surrounding area, relevant frameworks and the Site's economic, planning and regeneration context.
- 1.9. This process has sought to address specific site considerations, questions and comments that have been raised during the consultation process.
- 1.10. Full details of all pre-application engagement with statutory and non-statutory consultees and the response provided by the submission is provided in Section 3 of this Statement.

Report Structure

- 1.11. This Statement of Consultation explains in detail the programme of consultation that the scheme has been through in order to ensure that issues could be considered and addressed as the proposals came forward.
- 1.12. The remainder of this Statement is structured as follows:
- Section 2 – sets out the relevant planning policy and requirements.

- Section 3 – provides details of the consultation undertaken, summarises the feedback received and provides a response where relevant.
- Section 4 – presents the summary and conclusions.

2. Policy Context

Guidance and policy requirements with regard to consultation and pre-application engagement is set out at both the national and local level in this section.

National

Localism Act

- 2.1. The Localism Bill was introduced to Parliament on 13 December 2010, and was given Royal Assent on 15 November 2011, becoming an Act (“the Act”).
- 2.2. The main aim of the Act is to shift power from Central Government back into the hands of individuals, communities and Councils. It includes five key measures as follows:
 - Community rights.
 - Neighbourhood planning.
 - Housing.
 - General power of competence.
 - Empowering cities and other local areas.
- 2.3. Part 6 of the Act specifically deals with planning and Chapter 4 sets out requirements in relation to consultation before applying for Planning Permission.
- 2.4. Section 122 of the Act amends the Town and Country Planning Act 1990 to include a new section 61W that sets out a requirement to carry out pre-application consultation as follows:
 - 1 **Where—**
 - a) **a person proposes to make an application for planning permission for the development of any land in England, and**
 - b) **the proposed development is of a description specified in a development order, the person must carry out consultation on the proposed application in accordance with subsections (2) and (3).**
- 2.5. Subsections (2) and (3) state:
 - 2 **The person must publicise the proposed application in such manner as the person reasonably considers is likely to bring the proposed application to the attention of a majority of the persons who live at, or otherwise occupy, premises in the vicinity of the land.**
 - 3 **The person must consult each specified person about the proposed application.**
- 2.6. Subsection (4) outlines the requirements in regard to publicity of applications:
 - 4 **Publicity under subsection (2) must—**
 - a) **set out how the person (“P”) may be contacted by persons wishing to comment on, or collaborate with P on the design of, the proposed development, and**

- b) **give such information about the proposed timetable for the consultation as is sufficient to ensure that persons wishing to comment on the proposed development may do so in good time.**

- 2.7. The Act also sets out a duty to take account of the responses to consultation. Section 61X requires a developer to have regard to any comments or responses generated by the consultation undertaken in accordance with section 61W, when deciding whether to make any changes to proposals before submitting a planning application.
- 2.8. Section 61Y enables the Secretary of State to set out further provisions as to how the consultation required under new section 61W should be undertaken in practice.

National Planning Policy Framework (2021)

- 2.9. The Department for Communities and Local Government published the amended NPPF in July 2021. The document sets out the Government's planning policies for England and how these are to be applied. It requires planning policies to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.
- 2.10. Paragraphs 39 to 46 address pre-application engagement and front-loading. Paragraph 39 observes that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. It goes on to state that good quality pre-application discussion enables better co-ordination between public and private resources and improved outcomes for the community.
- 2.11. Paragraph 40 directs local planning authorities to encourage any applicants who are not already required to do so by law to engage with the local community, where they think this would be beneficial, and, where relevant with statutory and non-statutory consultees, before submitting applications.
- 2.12. Similarly, paragraphs 124 to 129 set out how Local Planning Authorities should have regard to early, proactive and positive engagement with the local community and their views, as well as addressing any comments received from design review panels.
- 2.13. The NPPF also promotes the use of the Local Planning Authority Pre-Application Service in order to encourage a partnership approach to applications. It is considered that early engagement with the Local Planning Authority is often conducive to the best result for the application, as it highlights where further work is required.

National Planning Practice Guidance

- 2.14. In March 2014, the Government issued the National Planning Practice Guidance as an on-line resource, which is designed to bring together planning practice guidance for England in an accessible and usable way. The Guidance was amended in March 2019 following updates to the NPPF.
- 2.15. The Guidance provides further detail to assist in the understanding of planning policies set out within the NPPF, including requirements for pre-application engagement.
- 2.16. The 'Consultation and pre-decision matters' identifies that:
- In line with the policies of the NPPF, statutory consultees have an important role to play in the pre-application stage and should be engaged early; and
 - Pre-application consultation with the local community is encouraged where it adds value to process and outcome.

Local

Manchester City Council Statement of Community Involvement

- 2.17. MCC adopted a refreshed Statement of Community Involvement (SCI) in June 2018. The SCI sets out how and when MCC will involve the community in relation to the preparation and revision of the Local Development Documents and in the process of making decisions on planning applications.
- 2.18. Appendix 1 of the SCI provides guidance on developer-led early engagement.
- 2.19. The SCI states that early engagement has significant benefits by improving the efficiency and effectiveness of the planning system for all parties. Therefore, developers are encouraged to consult before submitting a planning application.
- 2.20. The SCI encourages developers to consult with the public and various parties, which could include equalities groups, as well as with specific infrastructure and service providers who can advise developers on any need for increased provision of services.
- 2.21. Consultations should be inclusive, transparent, clear and understandable. Additionally, developers are encouraged to submit a record of the consultation that took place with their planning submission, which is detailed within Section 3 of this Statement.

Summary

- 2.22. This section has set out the relevant elements of Planning Policy that relate to the formulation of development proposals during the pre-application stage.
- 2.23. The following section of this report sets out, in detail, the extensive amount of pre-application and engagement that has taken place with the local community, statutory and non-statutory consultees in line with the guidance and requirements set out above.

3. Consultation Strategy and Responses

This section describes the consultation that has been undertaken by the Applicant and the project team. It includes an outline of the consultation strategy and the outcome of the consultation process.

Proposed Development Consultation Strategy

- 3.1. Pre-application consultation has been focused upon providing an explanation of the Proposed Development, including the way in which the detailed design of the proposals has responded to the constraints of the existing Pall Mall Court building, the heritage significance of the building, and the strategic and economic context.
- 3.2. This process has sought to address specific site considerations, questions and comments that have been raised during the consultation process, which in summary comprised:
 - Regular meetings throughout the design development process with Manchester City Council's Planning Officers and Conservation Officer.
 - Extensive dialogue with Historic England, Twentieth Century Society and the Manchester Modernists.
 - Engagement with Local Landowners neighbouring development site contractors; and
 - Engagement with Greater Manchester Police.
- 3.3. The sections set out in subheadings below further describe the consultation activity undertaken in preparation of this Application, provide a summary of the feedback received and how this has been addressed within the Proposed Development.

Pre-application Consultation

- 3.4. As part of the options appraisal, extensive pre-application discussions were undertaken to understand the various stakeholder priorities. The pre-application consultation has been focused upon providing an explanation of the proposed refurbishment to Pall Mall Court. As part of the consultation process, the way in which the detailed design of the proposals has responded to the Site's economic, planning, historic and regeneration context has been explained. The consultation also provided background relating to the key market drivers to the proposed project programme.

Manchester City Council

- 3.5. The proposals have been worked up in close consultation and collaboration with the Local Planning Authority, with meetings held on 25 November 2021, 9 December 2021, and then on a c. bi-weekly basis from 27 January 2022. The feedback received has been positive and constructive in principle. The discussions have focussed on:

- The need to bring Pall Mall Court back into use and contribute to the CBD and delivery of much needed City Centre office space, as a long-underutilised building.
- The potential for Pall Mall Court to act as a catalyst for other regeneration in the area, as well as the opportunity for a key secondary route across the city.
- The need for a viable development both in operation and construction, with special consideration for the significance of the building.
- The extensive consideration by the team to successfully renew the façade. The discussions around the façade renewal have been detailed and have included the following:
 - The options matrix and detailed reports that have underpinned this process.
 - The discussion of a window bay removal in order to intricately examine the mechanism to ensure the most like-for-like replacement is created.
 - The discussion of a glazing removal in order to intricately examine and ensure the provisioned double-glazing matches the original aesthetic of the historic single glazing.
 - The provision of a report on colour testing for the framing, as well as testing for the mosaics, in order to retain the intended aesthetics of the historic façade.
 - A detailed analysis and preparation of detailed drawings of the existing façade frame details. Further to this, the team prepared 3D models of the component parts of the frame and created sections of the frame. The 3D model was very useful in demonstrating how the fixtures and jointing would appear. This meant MCC had a good understanding of the proposed system and on the like-for-like framing for the façade renewal. This discussion extended to multiple site visits between the team and MCC.
- The opportunity to reactive the piazza, that has never truly worked as intended, and by that addressing the anti-social behaviour associated with the building. This has included discussions surrounding the provision of F&B units facing the piazza, as well as future phases of the proposals that will enable further activation into the piazza.
- Taking a holistic approach to ensure the proposals address issues which currently deter occupiers.
- The repurposing of the existing King Street entrance to a retail unit, contributing the active frontages along King Street.
- Design and massing of the roof-top extensions on Marsden Street and King Street.

Historic England

- 3.6. In high level terms, Historic England (HE) have a statutory remit in the decision making process if a building is Grade I; Grade II*; more than 1,000 sq. m in a conservation area; and if the works proposed to it involved significant demolition of principle elements of the interior or exterior of the listed building. However, HE can also be consulted on other applications which may be of interest, for example setting of listed buildings or less substantial demolition. The consultation can take place at pre-application stage and is at the discretion of the Applicant and HE.
- 3.7. Pall Mall Court is located within a conservation area however the proposed new floor space is just c.250 sqm. However, due to the wholesale replacement of the façade it was considered this could be considered significant demolition to the building. Therefore, the Applicant engaged with HE at the pre-application stage.
- 3.8. Meetings with HE were held on 20 January 2022 and 15 March 2022. Two letters were received by HE and provided the following feedback.

- Welcomed the sequential methodological approach to the façade renewal works that included a number of phases and considered economic, social, environmental and heritage factors in order to reach a viable solution.
- Welcomed the extensive justification for the works, especially with regards to the façade, in order to secure the building's long term viable use. The provision of a number of reports, including the glazing methodology and technical report on the condition of the curtain walling, carbon study technical note and costs memo.
- Noted that no more involvement would be required at pre-application stage regarding the works within the piazza and the proposed rooftop extension., HE was satisfied that these elements had been considered in depth by the team.
- HE noted that they were satisfied with the information provided to date and would defer to MCC for consideration. HE will review the applications once submitted and take a formal view at this stage.

The Twentieth Century Society

- 3.9. The Twentieth Century Society has to be consulted by the Local Planning Authority about any application for listed building consent for works for the alteration of a listed building which comprise or include the demolition of any part of that building¹. The proposed façade is a form of demolition and therefore it was decided that pre-application discussions with the Twentieth Century Society would be beneficial.
- 3.10. Meetings with the Twentieth Century Society were held on 17 February 2022 and a site visit on 6 April 2022, a letter response was received by C20 and provides the following feedback:
- Support the principle of bringing the vacant building back into use and appreciate the need to upgrade it to meet modern standards.
 - Supported the principle of moving the main entrance to the piazza elevation, noting it would help to re-activate the space and provide level access.
 - Concerns around the removal of the bays in the arcade, alongside the appearance of the new infilled elements. The concerns related to the loss of original fabric and changes to the building's original appearance.
 - The Society was sympathetic to the need to improve the building's environmental performance. They set out that they appreciate the Applicant's efforts to arrive at a scheme which will allow these upgrades to be made while conserving the building's special interest.
 - The Society took the view that the proposals to replace the original glazing would cause heritage harm as a result of the loss of original fabric. However, the Society agreed that secondary glazing would not be appropriate and impact the appearance of the building. As such the Society accepted that some aspect of replacement will be necessary to improve the environmental performance. They emphasized that it is essential that matters of detail around any replacement or renewal are very carefully considered.
 - The committee supports proposals to repair and reveal the original mosaics and other original exterior and interior finishes.
 - Concerned around the roof-top extensions and the change in the appearance of the building.

¹ As set out in "Arrangements For Handling Heritage Applications – Notification To Historic England And National Amenity Societies And The Secretary Of State (England) Direction 2021" ([Handling heritage applications Direction 2021 \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/106444/handling-heritage-applications-direction-2021.pdf), Accessed May 2022)

- 3.11. The Applicant has considered the Society's comments and addressed these within Section 4 of the Design and Access Statement. The Applicant also provided a written response to the Society on 3 May 2022 which provided more technical details on the façade and the heritage viewpoint analysis images.
- 3.12. Overall, the Applicant considers that the proposals and the interventions are needed and take a holistic approach to resolving the issues associated with the building. Through these interventions Pall Mall Court will become a vibrant office building with a well used piazza. As such the proposals will realise the original architectural vision for the area and ensure the building has a long-term, sustainable future.

Non-Statutory Consultees

The Modernist Society

- 3.13. The Applicant met with a member of the Manchester Modernist Society on 25 April 2022. The member noted that they did not formally represent the Society, but agreed that they would be able to communicate with the wider Society about the proposals should questions and queries be raised.
- 3.14. The meeting was positive with the member understanding the challenges with the existing building and the benefit of the interventions. They welcomed that a like-for-like replacement had been found for the curtain walling and the repairs to the mosaics.
- 3.15. They had no concerns with the proposed roof-top extensions and considered these unobtrusive and with minimal visibility from street level. In respect of King Street, it was noted that the existing entrance does not work as well as intended and leads to a poor environment. The proposals to re-purpose the entrance to retail use and bring new animation to the façade was welcomed. However, the member did go on to add that they would like to see more animation on King Street through future interventions.
- 3.16. They praised the proposals to activate the piazza through the infilling of the arcades and the new entrance. They noted that the creation of the main entrance to the piazza means that more people will see more of the building, rather than just viewing the King Street façade. As such the new entrance is encouraging the appreciation of Pall Mall.
- 3.17. They concluded that they have full trust in Bruntwood to deliver a successful and sustainable development based off the highly successful track record of Bruntwood.

Greater Manchester Police

- 3.18. A meeting was held on 8 February 2022 with a Case Officer at Greater Manchester Police ('GMP'). A subsequent site visit was held on 5 April 2022 in order to further investigate the anti-social issues around the building. GMP were aware of the high levels of anti-social behaviour the piazza attracts specifically regarding rough sleepers, urine and drug use. This anti-social behaviour was seen to be a particular issue in the sunken arcade areas and the fire escape on Marsden Street.
- 3.19. GMP were supportive of the proposals and suggested that the development should not result in new sheltered open spaces which might attract anti-social behaviour. GMP also noted that the infilling of existing crevices may be difficult considering the listing of the building however this would be preferential when deterring rough sleeping. GMP also noted the need for continued security surrounding Pall Mall Court in order to support the deterring of anti-social behaviour.

- 3.20. GMP has produced a Crime Impact Statement for the proposals, which is included as part of this application. Commentary on the recommendations provided by GMP is within the Design and Access Statement.

Neighbouring Landowners

- 3.21. There has been ongoing dialogue between Bruntwood and the owners of 55 King Street and The Pinnacle building. The conversations have been positive and welcoming of the revitalisation of Pall Mall Court.
- 3.22. Information letters were sent via a letter drop on 27 April 2022 to surrounding neighbours. No responses or requests for further information have been received.

Summary

- 3.23. Overall, there is support for the residential use proposed on site, in order to secure the long-term use of a prime location at the edge of Manchester City Centre.
- 3.24. Whilst justification has been provided within the Planning Statement and Design and Access Statement, this Statement has also set out a direct response to points made by members of the local community, as well as Statutory and Non-Statutory Consultees.
- 3.25. The Client is also committed to ensuring the consultation process will continue as part of the formal statutory planning procedure managed by the Local Planning Authority and beyond. During this process, the Applicant and the project team will continue to listen and engage with local stakeholders and, wherever possible, accommodate their ideas and aspirations.

4. Summary and Conclusions

- 4.1. Consultation has been undertaken in accordance with the requirements of national policy (the Localism Act and the NPPF).
- 4.2. The application proposals have been the subject of pre-application consultation with organisations and the public. This has involved the use of a number of consultation methods to engage effectively with the Local Planning Authority, Historic England, amenity societies and consider relevant issues prior to the submission of the application for planning permission.
- 4.3. Responses show that there is general support for the proposals. Areas that the applicant team have been able to address within the Proposed Development have been implemented.
- 4.4. The Proposed Development capitalises on the opportunity presented to meet the ambitions of the city and the scheme will bring about the following public benefits:
 - Supporting the economic growth of the Greater Manchester Region through supporting the delivery of much sought after Grade A office space.
 - The viable refurbishment of Pall Mall Court, recognising that the current state of Pall Mall Court does not represent a viable future for the building. The existing entranceways and floorplates would be reconfigured to ensure it is of a scale that will meet identified demand, and the façade renewal will ensure long-term viability of the building. Retail will also be created on a key active frontage along King Street, Marsden Street and the Piazza. These interventions have many sustainability benefits such as reducing the demand on energy for thermal regulation and ensuring the long-term use of a heritage asset. The internal works will also improve accessibility of the building in line with the Equality Act.
 - The provision on new retail and leisure units at ground floor level to provide the opportunity for new retailers to enter into the Manchester City Centre market or for existing retailers to move to a more prominent location within the CBD.
 - The delivery of a significant amount of Grade A office floorspace and associated job creation through construction and occupation of the buildings. The type of floorspace on offer will appeal to a wide range of companies, including start-ups and SMEs.
 - The beneficial, long-term, sensitive re-use of Pall Mall Court. The historical interventions are proposed to be kept to a minimum (and represent the least intrusive, viable use option) and the building will undergo much needed repair, following years of neglect.
 - Specific heritage benefits which include restoring and refurbishing areas of high significance such as the mosaics allows for the appreciation of heritage – this is a distinct and recognised heritage benefit.
 - Significant carbon reduction; helping the City reach its zero carbon goals and cater to the growing NZC ambitions of companies.
 - The renewed use and vitality it will bring will improve the general ambience of the area and contribute to the regeneration of other buildings within the Upper King Street Conservation Area. The newfound activity to the area will increase passive surveillance and reduce user's perception of crime in the area, a social benefit.

- The provision of wellness spaces and secure cycling in order to support the health and wellbeing of occupiers – a key element of the Pioneer model.

4.5. Moving forward with the project, the Client is committed to ensuring the consultation process will also continue as part of the formal statutory planning procedure managed by the Local Planning Authority and beyond. During the determination process, the Applicant and the project team will continue to listen and engage with local stakeholders and, wherever possible, accommodate their ideas and aspirations for the Site.



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