

APPENDIX 9.1

PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF)

- 1.1 The National Planning Policy Framework 2019 (NPPF) sets out the overall economic, social and environmental objectives that the planning system should follow to achieve sustainable development. At the heart of the NPPF is a *'presumption in favour of sustainable development'* (Para. 11).
- 1.2 The NPPF stresses the concept of good design as a key aspect of sustainable development. It *'creates better places in which to live and work and helps make development acceptable to communities'* (Para. 124). Furthermore, the policy states that development has to (Par. 127):
- be *'visually attractive as a result of good architecture, layout and appropriate and effective landscaping'*;
 - be *'sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)'*; and
 - *'establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit'*.
- 1.3 Therefore, design quality and appropriateness to surroundings are important parts of the evaluation of planning proposals. *'In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings'* (Para. 131).
- 1.4 Conservation and enhancement of the natural environment are also at the heart of the NPPF's objectives. Planning decisions should contribute by *'protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)'* (Para. 170).
- 1.5 Valued landscapes might also be found within an urban context; however, it is noted that the NPPF does not clearly define what constitutes a 'valued landscape'. Useful in the NPPF 2019 revision is the update to Para. 11 which provides some additional guidance through footnote 6. This defines, more thoroughly than before, *'areas or assets of particular importance'* as: *'habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.'* However, for the purposes of this TVIA, it is believed that the *'Stroud DC v Gladman High Court judgement (reference CO/4082/2014)* is still relevant to identify what is a 'valued landscape'; therefore, to be valued in terms of the NPPF the landscape is required to show *'some demonstrable physical attribute rather than just popularity,'* ie. it has to be 'out of the ordinary.'

Local Planning Policy

- 1.6 The planning context within which the Proposed Development is considered consists of the Manchester Local Plan and Supplementary Planning Documents (SPDs). The policies and guidance relevant to the assessment of the Site and the Proposed Development are considered as follows.

1.7 The Core Strategy introduction provides an overview of Manchester and its evolution. The City of Manchester is located at the centre of Great Manchester and of the City Region. The latter is an *'agglomeration, built-up area with unique and connected neighbourhoods and employment centres.'* However, the density of people, firms and employment is not even. The highest concentration exists within the City Centre of Manchester.

1.8 The historic character of Manchester is linked to its medieval origins and the legacy of the industrial revolution of the 18th century. The City and its population rose and fell following the course of industrialisation. However, since 1990, *'Manchester has undergone a remarkable transformation. High quality new buildings and strong urban design have helped create a distinctive and contemporary City Centre.'*

1.9 For the purpose of the TVIA, the following policies are considered relevant to the understanding of the baseline condition and possible development impacts.

- Policy SP 1 - Spatial Principles

This policy is associated with the first Spatial Objective of the Core Strategy, which aims to guide the sustainable development of Manchester City in order to halt climate change. The key principles set by the policy applies to all type of development and throughout the City.

According to the policy development should *'make a positive contribution to neighbourhoods of choice including:*

- *creating well designed places that enhance or create character.*
- *making a positive contribution to the health, safety and wellbeing of residents*
- ...
- *protect and enhance the built and natural environment.'*

The policy also highlights the importance of the three river valleys that, complemented by other parks and green spaces, are *'assets which will be protected and enhanced because they are the backbone of the City's Green Infrastructure and provide an important contrast with the abiding urban landscape and make a contribution to creating an attractive and healthy City.'*

- Policy CC6 – City Centre High Density Development

This policy promotes the appropriateness of high-density development within the City Centre.

The policy states: *'City Centre development will generally be high-density. It is a location where land should be used to maximise its efficiency. The appropriate scale, massing and height of development in the City Centre will significantly exceed what is appropriate elsewhere in the City.'* Never the less, the policy also requires development to comply with the Council's approach to tall buildings (Policy EN2).

- CC9 – Design and Heritage

This policy ought to protect the value of the heritage assets within the City Centre. It advocates for *'high standard design in terms of appearance and function'* to ensure developments are appropriate to the City Centre context and character.

The explanatory text states: *'The City Centre has 14 Conservation Areas and numerous Listed Buildings. These are essential ingredients to the City's sense of place, providing aesthetic quality and strong references to the City's past, which will*

always be a central part of Manchester's character. Development which fails to respond to the opportunities that this context affords should not be supported.'

- Policy EN1 – Design Principles and Strategic Character Areas

This policy encourages proposed development to follow a set of urban design principles aimed to achieved good design while enhancing the overall image of the City. The introductory text sets seven design principles in accords with PPS1 and its companion guide:

- *'Character: a place with its own identity.'*
- *'Continuity and enclosure: a place where public and private places are clearly distinguished.'*
- *'Quality of the public realm: a place with attractive, and successful outdoor areas.'*
- *'Ease of movement: a place that is easy to get to and move through.'*
- *'Legibility: a place that has a clear image and is easy to understand.'*
- *'Adaptability: a place that can change easily.'*
- *'Diversity: a place with variety and choice.'*

In order to achieve the above principles, the policy recognises that *'protection and enhancement of the local environmental quality involve understanding and respecting the character and distinctiveness of place and landscape.'* It therefore references Manchester's Character Study and its eleven character areas, requiring development to *'take into consideration its location within the specific character areas and reinforce the sense of place and local distinctiveness of the City. This is considered an important element in increasing the sense of local ownership of and respect for a neighbourhood.'*

The Site is located within the City Centre Character Area. According to the policy, this area *'contains a rich legacy which reflects its urban evolution to the current day and includes listed buildings, conservation areas, archaeological remains and an historic street pattern.'* The urban fabric is particularly dense and diverse in use. Green spaces are lacking and limited to *'a range of civic uses and less formal green spaces and waterways.'*

The policy includes the following guidance for proposed development:

- *'Developers will be expected to consider the City's heritage and continue the rich pattern of activity in the core area.'*
- *'While there will be opportunities to create landmark buildings, developments should also contribute positively to the experience of all at street level.'*
- *'Wherever possible the opportunity should be realised to enhance existing and provide new areas of meaningful open space, and the maintenance and improvement of the City's permeability should be considered in all proposals.'*

- Policy EN2 – Tall Buildings

The policy provides clearance on the definition of what is considered a tall building and subsequent guidance for appropriate development.

The policy states that *'tall buildings are defined as buildings which are substantially taller than their neighbourhoods and/or which significantly change the skyline.'*

Proposals for tall buildings are supported if they demonstrate that they:

- *'Are of excellent design quality,*
- *Are appropriately located,*
- *Contribute positively to sustainability,*
- *Contribute positively to place making, for example as a landmark, by terminating a view, or by signposting a facility of significance, and*
- *Will bring significant regeneration benefits.'*

Other key considerations included in the policy are:

- *Proposed tall buildings should 'complement the City's key existing building assets and make a positive contribution to the evolution of a unique, attractive and distinctive Manchester, including to its skyline and approach views.'*
- *'Suitable locations will include sites within and immediately adjacent to the City Centre with particular encouragement given to non-conservation areas and sites which can easily be served by public transport nodes.'*

- Policy EN3 – Heritage

Much of the architectural and heritage character of Manchester derives from its industrial history and physical legacy of Victorian innovation. With the historic environment so central to the cultural heritage of the City, this policy protects such distinctive urban character while supporting development that complements Manchester's heritage assets and features.

The policy states: *'New developments must be designed so as to support the Council in preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance, including scheduled ancient monuments, listed buildings, registered parks and gardens, conservation areas and archaeological remains.'*

Guide to Development in Manchester Supplementary Planning Guidance (Adopted April 2007)

- 1.10 This SPD acknowledges the unique and distinctive character of Manchester's townscape and its contribution to the make of a *'welcoming, inclusive, neighbourly, interesting and attractive'* City. It notes that many factors contribute to the *'sense of place'* including the appearance of buildings or presence of parks. Therefore the SPD provides guidance to ensure that proposed developments are visually attractive, unique and contribute positively to the sense of place. The following advice included in the SPD is considered relevant to the assessment of the impact of the Proposed Development.
- 1.11 Part 1 of the SPD provides instructions on the definition of high-standard design. This is principally inspired by the seven principles defined by CABE (Commission for Architecture & the Built Environment). The key points that would inform the assessment of the impact of the Proposed Development are:
- *'Design should respect and be informed by location'*. The SPD highlights the individual characters of different districts, neighbourhoods or street as *'a product of the design of their buildings, the nature of the streets, the quality of the landscape or the nature of their activities'*. Consequentially the Proposed Development needs to demonstrate its appropriateness to its context and the character of the area.
 - *'Quality is much more than aesthetic'*. The SPD's interpretation of the relationship between function and form is evident as it doesn't accept conflict between good design and function of the buildings advocating for a joint approach. Consequentially, providing a functional building is not enough to achieve high-standard design.

- Good design must respect the heritage legacy of Manchester; it should preserve and enhance buildings and areas of historical and architectural importance.
- *'Buildings should front onto street'*. High standard design includes an adequate level of enclosure which provides a sense of place as well as social benefits. More specifically the SPD requires buildings to present their main face and pedestrian entrance to the main street, to provide informal surveillance through thoughtful windows layout, to place large car park at the rear or beneath buildings and to provide clear and safe access to the main door.
- *'Buildings should relate well to each other.'* The SPD requires that the *'scale, position and external appearance of new buildings should respect their setting and relationship to adjacent buildings, enhance the street scene and consider their impact on the roof line and skyline.'*
- *'Building height should be carefully considered'*. The SPD advocates for a careful consideration of appropriate height based on the context. As such higher structures are more appropriate in and around the City Centre. Never the less, *'extremes should be avoided unless they provide landmarks of the highest quality and are in appropriate locations'*.
- *'Developments should enhance existing vistas and create new ones'*. According to the SPD vistas facilitate people's orientation within neighbourhoods, therefore *'views to important buildings, spaces and landmarks, should be promoted in new developments and enhanced by alterations to existing buildings where the opportunity arises. Gaps between buildings should not distract from the major view along a street.'*
- *'Strong corners are important landmarks'*.
- The street network is considered *'a significant element which helps to define the character of different neighbourhoods and should be respected.'*

1.12 Part 2 of the SPD provides information on the townscape character of Manchester and is therefore considered in Townscape Baseline of this TVIA.

Supporting Planning Documents

1.13 The MCC planning framework includes evidence documents that aim to guide and inform development beyond national and local policy requirements. They set a vision for the evolution of the City while providing a useful reference to understand the existing townscape baseline. The following document provides relevant information for the purpose of this TVIA.

Great Jackson Street Development Framework (2018)

1.14 This document is part of the Strategic Regeneration Framework in Manchester initiative, which leads and coordinate the Council's input into the delivery of regeneration frameworks and major projects. The Site is located in the area identified by the Great Jackson Street Development Framework (see Appendix 9.3). The following key considerations and advice will inform the assessment of the Development Proposal impact:

- *'The Framework is strategically located at a main point of entry into the City Centre from the south.'*
- The redevelopment of the Site provides great opportunity to convert the currently undescriptive car park into a landmark contributing to the neighbourhood function and character.

- The constraints plan produced for the Framework area identifies the '*lack of attractive frontages*', '*little definition to the edge of site*', and the presences of '*light industrial buildings*'.
- The Development Framework includes a tall building study which identifies opportunities for tall buildings based on key views (see Height at Strategic Points figure in Appendix 3). '*Sites were identified around the perimeter of the Framework area addressing the key views. Building heights then step down within the centre of the Framework area and towards Bridgewater House.*' According to this study, the Site affords potential for a tall, landmark building. Notably, the suggestion is to vary the building heights throughout the Framework area to create a varied and stimulating townscape.
- '*The site's prominent gateway location and the location of tall buildings demands high quality architectural solutions. Materials used must be durable with a long design life to ensure that a high quality design and finish is maintained.*' The proposed material should be coherent throughout the development in the Framework area, with sufficient diversity to create a unique sense of place and for each plot to '*stand out in its own right*'.
- '*Bridgewater House is Grade II Listed and is the only building of historical significance in the Framework area. Proposals should seek to preserve, and where possible enhance, the setting of Bridgewater House...*'
- '*The site is not within a Conservation Area, however, the Castlefield Conservation Area borders the site to the west. Applications for tall buildings will need to be supported by a Visual Impact Assessment that includes key views from the Castlefield Conservation Area.*'
- The proposed development matrix identifies an opportunity for 13 storeys development within the Site.