

Carolyn Parry
Development Management - City Centre Planning
Growth and Development Directorate
Manchester City Council
Level 6, Town Hall Extension
Manchester
M60 2LA

15 June 2020

Dear Carolyn

39-41 PICCADILLY PLAZA, MANCHESTER, M1 4AH – FULL PLANNING APPLICATION FOR CHANGE OF USE, NEW SHOPFRONTS AND INTERNAL SUBDIVISION

On behalf of our client, City Tower Unit Trust, please find enclosed a Full Planning Application to Manchester City Council (MCC) for the flexible change of use, internal subdivision, new shopfronts and associated works in respect of 39-41 Piccadilly Plaza, shown edged red on the accompanying Site Location Plan.

Full planning permission is proposed for the following development:

Flexible change of use from existing sui generis (casino) use to a flexible use including: Use Class A1 (Shops); A2 (Financial and Professional Services); and A3 (Restaurants and Cafes), including internal subdivision, installation of new shopfronts and associated works at 39-41 Piccadilly Plaza.

The following documents and drawings are enclosed to support the application:

- This Supporting Letter (dated 15 June 2020);
- Completed Application Forms and Certificates;
- Site Location Plan;
- Existing and Proposed Floorplans; and
- Existing and Proposed Elevations;
- Design and Access Statement incorporating:
 - Waste Management Strategy;
 - Servicing Strategy;
 - Ventilation, odour and extraction strategy.
- Crime Impact Statement (CIS);
- Acoustic Assessment;
- Transport Statement; and
- Completed Waste Proforma.

This Planning Application has been submitted electronically via the Planning Portal (Ref: **PP-08437128**). The Crime Impact Statement (CIS), Acoustic Assessment, and Transport Statement will follow by post.

The requisite planning application fee to the value of £462.00 will be paid directly by our client, City Tower Unit Trust, following submission of the application.

SITE AND SURROUNDING AREA

This application relates to the former Nobles Amusements unit at Piccadilly Plaza (Numbers 39-41). Piccadilly Plaza is located at the base of City Tower, located within Manchester City Centre, to the south of the prominent Piccadilly Gardens. The site is currently vacant. Numbers 39-41 front onto and are directly accessed from Parker Street.

City Tower is a 30-storey building dating to the 1960s, at the heart of the City Centre and a prevalent feature on Manchester's skyline. Adjacent to City Tower is Piccadilly Gardens, and bus and tram stops which act as a transport hub in the City Centre. City Tower is bordered to the north-east by Parker Street, by Portland Street to the south-east, New York Street to the south-west, and Mosley Street to the north-west.

The building is characterised by active ground floor frontages, with offices above. Establishments operating on the ground floor include Subway, Nudo Sushi Box, Flight Centre, Krispy Kreme, M&S Food, Lidl, Tesco Express, Starbucks, Freshly Chopped, Tutzy's Convenience Store, Greggs, Ladbroke's, SPAR and Paddy Power. City Tower is surrounded by buildings with similar characteristics and uses, comprised of active ground floor frontages with office space above.

The site is not within a Conservation Area and does not contain any Listed Buildings. As confirmed by the Environment Agency flood maps, the site is not located in an area at risk from flooding.

PROPOSED DEVELOPMENT

Flexible Change of Use

The proposal relates to numbers 39-41 on the ground floor of Piccadilly Plaza. The permitted use of the unit is *sui generis* (casino) having previously been occupied by Admiral (Nobles) and TJ's Hot Food. Since the relocation of Nobles in May 2019 the unit has been vacant.

Discussions have now progressed with a number of potential future occupiers; however, at the current time, no agreements for lease (AFLs) have been signed as yet. As such, this change of use is sought to provide as much flexibility as possible to enable alternative tenants to occupy the units as required. This will enable the units to be let as soon as possible bringing them back into beneficial economic use and reanimating the street. The proposed flexible change of use would allow businesses within Use Classes A1, A2, or A3 to operate from these units.

Subdivision

39-41 Piccadilly Plaza has been previously subdivided to create a unit of 56 sqm (number 39) and a unit of 400 sqm (numbers 40-41) (456 sqm in total). This application now seeks consent for the subdivision of units 40-41 to create two smaller units, with the proposed change of use to apply across all three units.

This is shown on the accompanying plans, and described within the Design and Access Statement which accompanies this application.

The proposed subdivision would facilitate three new tenants to occupy the former now vacant units, with three new units comprising the following:

- 39 Piccadilly Plaza – 56 sqm;
- 40 Piccadilly Plaza– 300 sqm; and
- 41 Piccadilly Plaza– 100 sqm.

All three units are accessed from Parker Street to the front, as are the other commercial units on this frontage. The central unit (number 40) is the largest of the three and also benefits from two back of house entrances/exits for staff. Number 41 also has one back of house entrance/exit for staff to the rear.

Shopfronts

Following the internal subdivision of the two existing units to create three new units across 39-41 Piccadilly Plaza, three new shopfronts would be installed. The proposed design is of a high quality and would full height frameless glazing with the signage behind the glass, in line with the other shopfronts along the same frontage. Further details are contained within the Design and Access Statement and the existing and proposed elevations which accompany this application.

This application does not include advertisement consent and any future tenants would be required to submit separate signage applications. However, a signage zone is identified within each of the shopfronts to provide guidance as to what would be acceptable and in keeping with the rest of the frontage. This is shown on the accompanying drawings.

Operational Arrangements

It is proposed that any future occupier would operate between the hours of 7:00am and 10:00pm Monday to Saturday, and 8:00am to 7:00pm on Sundays.

As the tenants are not currently confirmed at this stage, we would welcome a condition requiring a full Operating Schedule for the premises to be provided once occupiers are known. This would include: a dispersal procedure, details for the prevention of crime and disorder, prevention of public nuisance, details of a strategy for managing smokers, including noise from smokers.

This application includes an A3 use within the flexible uses and therefore if there are any A3 tenants coming forward, they would be expected to complete their own licensing arrangements separate from planning.

Servicing and Waste Management Strategy

Deliveries and servicing would be undertaken as per the existing arrangements, with Loading Bay 1 to the rear of the property utilised and deliveries carried around to the units fronting Parker Street where necessary.

Similarly, waste management will be undertaken as per existing arrangements. A completed waste proforma accompanies this application as per MCC requirements.

PLANNING HISTORY

The table below outlines the planning history of relevance for the site:

LOCATION	REFERENCE	DESCRIPTION	DECISION & DATE
39 Parker Street Manchester M1 4AJ	094392/AO/2010/C2	Installation of one internally illuminated sign behind the glazing	Approved Mon 06 Dec 2010
39 Parker Street Manchester M1 4AJ	094148/FO/2010/C2	Installation of a new shop front	Approved Mon 06 Dec 2010
39-41 Parker Street	064814/FU/CITY2/02	Change of use from Amusement Arcade to a Casino	Approved Tue 11 Jun 2002
39/41, Parker Street, (Unit B Piccadilly Plaza), Piccadilly, City	059700/AO/CITY2/00	Internally illuminated static fascia name and projecting sign	Approved Wed 09 Aug 2000
39/41, Parker Street, Piccadilly, City	059716/FO/CITY2/00	Installation of a new shop front	Approved Wed 02 Aug 2000

PLANNING ASSESSMENT

Local Planning Policy

The statutory Development Plan for the site comprises the Manchester Core Strategy (2012). The Core Strategy was adopted in July 2012 and covers a twenty-year period. The accompanying Proposals Map confirms that the application site is located within the City Centre policy area and the 'Primary Shopping Area' (PSA). The Guide to Development in Manchester SPD (2007) is also of relevance and is a material consideration.

Manchester Core Strategy (2012)

From a review of the Development Plan, we consider the following planning policies are most pertinent to the site and proposed development.

Core Strategy CC1 (Primary Economic Development Focus: City Centre and Fringe) advises that the City Centre should be the focus of employment growth in the City and City Region, with the City Centre expected to accommodate 33 ha of employment development. Developments which lead to the more intensive use of employment land will be supported. Further to this, **Policy CC6 (City Centre**

High Density Development) states that City Centre development should be high density, and land should be used to maximise its efficiency. The site is currently vacant, and this proposal will facilitate the reuse of these important units, thereby increasing employment. In addition, the subdivision will result in a more intensive use of 39-40 Piccadilly Plaza, enabling a further business to operate within this location. As such, the proposal is considered to be in compliance with policies CC1 and CC6.

Core Strategy Policy CC2 (Retail) supports the growth and improvement of retail provision in the City Centre. The unit was previously in *sui generis* use as a casino, and therefore this proposal has potential to increase the existing retail provision should an A1 occupier come forward. Furthermore, ancillary commercial and leisure services (such as those falling within A2 and A3 Use Class) are also acceptable within the PSA, providing retail remains the predominant use. In summary, Policy CC2 allows all three uses proposed under this application in this location. It is therefore considered that the change of use proposed is entirely appropriate in this location and is in line with Policy CC2.

Core Strategy Policy CC7 (Mixed Use Development) encourages active ground floor uses (shops, food and drink and leisure) and states that these will be appropriate in locations which have an established public function, or as part of a development which will create such an environment. Under the proposals an A1/A2/A3 occupier would provide an active and complimentary use to those within the building and surrounding area.

Core Strategy Policy CC8 (Change and Renewal) advises that developments which make significant contributions to the City Centre's role in terms of employment and retail growth or which improve the accessibility and legibility of the Centre will be supported, subject to the proposal's impact on key aspects of the City's heritage and character. This policy goes on to advise that the Council will also support schemes which are likely to contribute to the promotion or improvement of the social, economic or environmental well-being of Manchester. The proposal would enable three new occupiers to grow their operations in Manchester, increasing employment and business turnover, thus adding to the commercial and employment offer of City Tower and Manchester. Therefore the proposal satisfies Policy CC8, with consent enabling economic growth.

Material Considerations

The Guide to Development in Manchester SPD (2007) provides context to design criteria for the City Centre outlined within the Core Strategy, and is a material consideration in the determination of planning applications.

At paragraph 2.3, the Council set out how development should be designed with full regard to context and the character of the area. At paragraph 12.5, the Council advise that development will be expected to contribute positively to the identity and quality of the City Centre and designed for place not simply for purpose.

In relation to Design and Function, paragraph 2.5 states that there should be no conflict between good design and buildings that function well and meet the needs of the occupants.

National Planning Policy

National policy is contained within the revised National Planning Policy Framework (NPPF) (February 2019). The NPPF sets out the Government's planning policies for England and must be taken into

account as a material consideration in the determination of planning applications, in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004 ("The Act").

At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). For decision taking, this means approving development proposals that accord with the Development Plan "without delay" (paragraph 11). It is our view that the proposed uses are in line with the site's designation and associated local policy. The uses proposed are appropriate in this location and in keeping with surrounding uses and would guarantee flexibility to ensure that the units can be let and thus drive economic growth.

Furthermore, at Chapter 6, the NPPF sets out that the Government is committed to building a strong and competitive economy and encourage sustainable economic growth in order to create jobs and prosperity. Paragraph 81 of the NPPF states that planning policies within the Development Plan should "*be flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstances*". Allowing the units to be occupied by businesses within Use Class A1, A2, or A3 would create flexibility to respond to local demand and would ensure that the units are no longer left vacant, thereby securing the long-term sustainability, viability and vitality of the area.

In this context, we consider that the proposed subdivision and change of use of the units to facilitate three new tenants is appropriate in this location, allowing three new businesses to locate in this area. Consequently, the application will provide additional employment and contribute to sustainable economic growth.

SUMMARY

Taking the above into consideration, we consider that the proposals are consistent with, and supportive of, both local and national planning policy. The proposed development accords with Policies CC2 and CC8 of the adopted Core Strategy through the use of the land for employment purposes, with A1, A2, and A3 uses considered acceptable in Primary Shopping Area. Furthermore, the proposals accord with national policy contained within the NPPF, providing a sustainable economic use which generates employment and supports the local economy.

We trust that the above information is sufficient for you to consider this application and look forward to receiving formal confirmation of the application's validation in due course. In the meantime, if you have any questions or comments, or require additional information in relation to this application, please feel free to contact us.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'A May' or 'Alice May', enclosed within a circular scribble.

ALICE MAY
PLANNING & DEVELOPMENT - CBRE LIMITED