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01 May 2025

FAO Michael Pearson
Manchester City Council
PO Box 532
Town Hall
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Dear Michael,

Application for Partial Change of Use of Floor 4, St James Building, Manchester, from office (Use Class E) to educational (Use Class F1a) and / or office space (Use Class E).

This Covering Letter is submitted in support of an application for a partial change of use at Floor 4 of St James Buildings, for use of blocks A, AE, B and BE as educational space, to provide additional floorspace to a current occupier at the building (the 'Proposed Development'). No external or internal physical changes are proposed to the building that would require planning permission or listed building consent.

The applicant is Bruntwood Aviva 2 Ltd (the 'Applicant').

The Application Site ('the Site') comprises part of the fourth floor of St James Building as set out on the Location Plan ref. (*Location Plan).* St James Building is a Grade II listed building providing a range of uses and is located on Oxford Road, within Manchester City Centre.

For the purposes of leasing, and aligning with the layout of the building, the floorplates in St James are split into 'blocks' (A, B, C, D and E). Occupiers of the building generally lease an L-shaped floorplate area, made up of blocks A - D and then a section of block E. This application relates to blocks A, B, AE and BE only. Please refer to the submitted L4 Demise Plan for reference.

Proposed Development

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An established education provider currently operating on the eighth floor of St James Building proposes to use part of the fourth floor, to expand their offer. To enable the tenant to occupy this part of the building, there is a need to secure planning permission for the Change of Use of part of the fourth floor (Blocks A, AE, B and BE only) to expand the range of permitted uses to include education use (Use Class F1a), as shown in the Demise Plan *(Demise Plan - Fourth Floor St James)* (Figure).

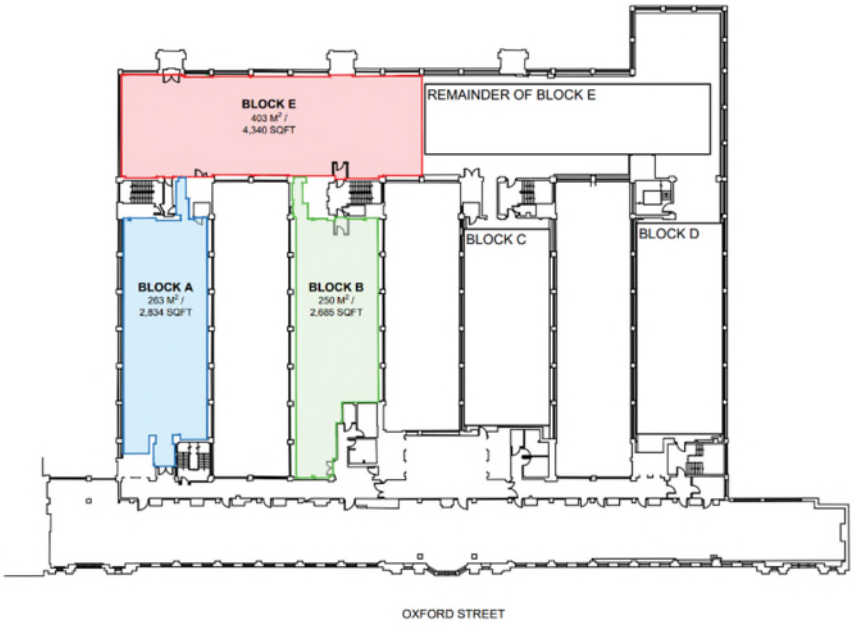


Figure 1- Proposed Development on fourth floor

The Occupier - QAHE

The proposed occupier is education provider QA Higher Education Limited ('QAHE'). QAHE has been an occupier at St James Building for eight years and is now looking to expand within the building. They currently occupy space on the eighth floor.

QAHE works in partnership with UK universities to recruit and deliver more than 100 foundation, undergraduate and post-graduate degree programmes for in-demand skills subjects. They are a successful and growing education provider, with 10,000 students studying with them and at their university partners at present. Currently QAHE enrols 850 students on a yearly basis at St James Building. This would increase to 1200-1400 students following the Proposed Development.

As such, the Applicant want to support their growth within the building, by offering additional floorspace on the fourth floor. At present, the floorspace is used by the General Medical Council, but they no longer require the space, albeit they will retain some occupation of the fourth floor.

Providing additional floorspace for QAHE to grow will provide the opportunity to expand the offer in Manchester, and to build further synergistic links with the local business community, creating training and employment pathways for students, whilst also helping to address the skills demand within the local economy. QAHE is part of the QA group, specialising in delivering corporate apprentices and degree apprenticeships nationally. The courses will be available for local people and international students.

QAHE partner with the Solent University, Ulster University and London Metropolitan University and current courses include:

- Ulster - MBA
- Ulster - MSc International Business
- Ulster - MSc International Business with Data Analytics
- Ulster - MSc International Business with HRM
- Ulster - MSc Computer Science and Technology
- Ulster - MSc Computer Science and Technology with Business
- Ulster - Graduate Certificate (Extended)
- Solent - BA Business Management
- Solent - BA Business Management Foundation
- Solent - BSc Computer Science
- Solent - BSc Computer Science Foundation
- Solent - BSc Cyber Security Foundation
- Solent - BSc Psychology Foundation
- LMET - BA Business Management
- LMET - BA Business Management Foundation
- LMET - BSc Health & Social Care
- LMET - BSc Health & Social Care Foundation

While, the Ulster University partnership has already been established with QAHE in London and Birmingham, the expansion at St James building would enable QAHE to introduce their partnership with Ulster University in Manchester as well. This will enable QAHE to offer the following courses in partnership with Ulster University in Manchester:

- Ulster - MBA
- Ulster - MSc International Business
- Ulster - MSc International Business with Data Analytics
- Ulster - MSc International Business with HRM
- Ulster - MSc Computer Science and Technology
- Ulster - MSc Computer Science and Technology with Business
- Ulster - Graduate Certificate (Extended)

The new lease will be for a term of 10 years, demonstrating the strong commitment of QAHE to provision of their educational offer in Manchester. The occupier will positively contribute towards the diversification of the graduate stream within Manchester and further enhance the Oxford Road Corridor as the strategic centre for Greater Manchester's knowledge economy.

Description of Development

The description of development as stated on the Application Form for Change of Use is:

"Partial Change of Use of the fourth floor of St James Building from office use (Use Class E) to education use (Use Class F1a) and / or office use (Use Class E)."

Site Description

The Site occupies part of the St James Building, a strategically important location within Manchester's Oxford Road Corridor. Oxford Road borders the building to the west, while commercial buildings surround it on the remaining sides. The St James Building houses a mix of uses, including office, educational, retail, and storage spaces.

As outlined within the site photograph pack, the fourth-floor interior fit-out is relatively dated due to consistent use of the space by a sole occupier over the past 10 years.

However, this presents a unique opportunity for transformation. The St James Building sits in the heart of Manchester's Knowledge Quarter, offering exceptional access to major educational institutions and established business centres. This prime location makes it ideal for integration into the vibrant Oxford Road Corridor innovation district.

Planning History

Planning permission was previously granted in 2008 for the use of Block A-only on the fourth floor to be used for educational purposes (previous Use Class D1c) and / or office use, under

planning application ref. 085732/FO/2008/C3. We understand that educational use has not since been established at the Site and therefore, is deemed as not implemented. As such, Block A has been included within the red line boundary.

It is also relevant to note that planning permission was granted in December 2023 for the change of use of part of the fifth floor from Office Space (Use Class E) to Flexible Office Space (Use Class E) / Educational College (Use Class F1a) for a 10-year period – under application ref. 138217/FU/2023, however this has not yet been implemented.

Site Access

The main entrance into the Site is from Oxford Road, leading to a lobby which includes an accessible lift. The building can also be accessed via 'Flexi steps' in the North Lodge on Oxford Road.

The Site is situated on Oxford Road, a primary route into Manchester City Centre. It has excellent pedestrian access and benefits from the wide array of services and amenities the city centre offers.

Oxford Road Bus Corridor is one of the most heavily used bus routes in Europe and accommodates routes across Greater Manchester. Additionally, the Site is located within the local vicinity of Oxford Road Train Station and St Peters Square Metrolink, both of which are key local transport hubs within Greater Manchester and nationally.

There are also a number of dedicated cycleways along Oxford Road for cyclists, forming a strategic cycle link from south Manchester, into Manchester City Centre. Cycle stores in St James Building are for customer use only.

Proposed Use and Quantum

The Proposed Development comprises the Change of Use of part of the fourth floor (blocks A, AE, B and BE only) from office (Use Class E) to education use (Use Class F1a) and / or office use (Use Class E)

The proposed educational / flexible office floorspace comprises c. 924 sq metres. Given the overall building's floorspace of 26,786 sq metres, this constitutes a change of only 3.5% of the floorspace from office use to educational / flexible office use at St James Building.

Please see breakdown of floorspace at the fourth floor, pre and post-QAHE expansion, outlined within the below table. This outlines that there will be a minimal change in use class ratio overall.

Building Use	Pre-QAHE Fourth Floor Expansion (%)	Post-QAHE Fourth Floor Expansion (%)
Office	46.52	43.10
Dual	14.45	17.7
Educational	27.60	27.60
Retail	9.58	9.58
Storage	1.85	1.85

Although there will be a minor change in office space provision in this location of the City Centre, due to an existing occupier expansion in the building, the flexibility provided within the Proposed Development would allow for use as office space in the future.

The current space is of relatively low quality and has not been refurbished for 12 years. The Applicant currently is significantly investing in the provision of modern, high quality, office space in the Portland Street and Oxford Road Corridor area of the City Centre. Therefore, it is envisaged that any future demand for office space will be better-provided and suited to more modern office developments within the Applicant's City Centre portfolio.

Planning Policy and Material Considerations

This section includes a summary of the Development Plan documents and relevant material considerations to the determination of the application. The Local Development Plan comprises of the Manchester Core Strategy and Places for Everyone Plan.

Local Development Plan

Manchester Core Strategy (2012)

The Manchester Core Strategy is the key planning document in Manchester and outlines the Council's vision for Manchester in the future along with planning policies which will be used to deliver that vision.

The relevant policies are listed below:

- Core Strategy Objective SO2 – Economy – This policy outlines Regional Centre as being a focus for higher education.

- Core Strategy Policy EC1 – Employment and Economic Growth outlines the focus of employment land development within the Manchester City Centre (33ha). The policy outlines that in addition to providing employment land specifically, the Council will also support other significant contributors to economic growth and productivity, including education in the City Centre.

- Core Strategy Policies CC1 (Primary Economic Development Focus) and EC3 (The Regional Centre) - outlines that the City Centre will be the focus for economic and commercial development, retail, leisure and cultural activity.

- Policy EC2 (Existing Employment Space) states that the Council will seek to retain and enhance existing employment space and sites. Alternative uses will only be supported on sites allocated accordingly, or if it can be demonstrated that:
    - The existing use is un-viable in terms of business operations, building age and format;
    - The existing use is incompatible with adjacent uses;
    - The existing use is unsuitable for employment having had regard to the Manchester-Salford - Trafford SFRA; or
    - On balance, proposals are able to offer greater benefits in terms of the Core Strategy's vision and spatial objectives than the existing use.

- Core Strategy Policy EC 8 (Central Manchester) states that Central Manchester is expected to provide approximately 14ha of employment land. The Oxford Road Corridor specifically is suitable for office, research and development, light industrial, general industrial, education and health.

- Core Strategy Policy CC8 (Change and Renewal) outlines 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. The Council will also provide appropriate support, including site assembly, for schemes which are likely to contribute to the promotion or improvement of the social, economic or environmental well-being of Manchester.

- Core Strategy Policy CC10 (A Place for Everyone) states the City Centre will develop as a location which appeals to a wide range of residents and visitors. Development which promotes this objective will be supported, particularly through:

- Uses which increase the diversity of activity in the City Centre, with an emphasis on family-oriented activity; and
- High standards of accessibility to buildings and across spaces in the City Centre.

Places for Everyone (2024)

Places for Everyone Joint Development Plan Document (PfE) is a long-term plan of nine Greater Manchester districts (Stockport opted out of the Plan in 2020) for new homes, jobs and sustainable growth, covering the period from 2022 to 2039. The regional planning policy document was adopted on 21 March 2024.

The relevant policies are listed below:

- Places for Everyone Policy JP-Strat 1 (Core Growth Area) outlines economic role of City Centre will be protected and enhanced with focus on job provision and creation of jobs for local communities. The policy outlines that infrastructure provision will support the growth and continued capacity of the Core Growth Area.

- Places for Everyone Policy JP-Strat 2 (City Centre) outlines that the role of the City Centre as the most significant economic location in the country outside London will be strengthened considerably. The City Centre will continue to provide the primary focus for business, retail, leisure, culture and tourism activity in Greater Manchester, but the increasingly important residential role of the City Centre will be expanded. Development will generally be high density. It will enable people to take advantage of the access to education and training and the extensive public transport offer, reducing the need to travel to work whilst supporting economic growth and reducing levels of poverty.

- Policy JP-P1 (Sustainable Places) supports improvements in education and research facilities. It also outlines that sustainable places should also be well served by education facilities.

- Policy JP-P5 (Education, Skills and Knowledge) sets out a number of ways in which significant enhancements in the education, skills and knowledge will be promoted, including through enabling the delivery of new and improved accessible facilities for education to ensure the City's workforce is ready to benefit from new employment opportunities. The plan recognises educational activity as one of the City's greatest strengths, with the largest concentration of research activity is located with Corridor Manchester. The Plan outlines

that the educational institutions are a vital component of developing Greater Manchester as a globally important city region.

Material Considerations

National Planning Policy Framework (2024)

The revised National Planning Policy Framework (NPPF) was published in July 2018 and most recently updated in December 2024. The NPPF sets out the government's planning policies for all of England and how these are expected to be applied and is a material consideration in the determination of all planning applications.

Paragraph 100 of the NPPF states that local planning authorities should take a proactive and positive approach to development that will widen choice in education:

"It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and

b) work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted."

Corridor Vision and framework

The Site is within the 'Oxford Road Corridor Manchester', which is a 243-hectare area stretching from St Peter's Square to Whitworth Park. It is a significant hub for knowledge-intensive organisations and businesses, home to a substantial 77,000 students and a workforce exceeding 72,000. The Oxford Road Corridor benefits from a powerful combination of public and private sector partners invested in advancing academic excellence, research, and commercialisation. This collaboration drives high-value economic growth in the knowledge economy, generating an estimated £3 billion GVA annually and solidifying the corridor's contribution to Manchester's economic output.

Key institutions like Manchester Metropolitan University, the University of Manchester, Manchester University NHS Foundation Trust (MFT), the Royal Northern College of Music

(RNCM), and Manchester Science Partnerships (MSP) have established the area as a hub of knowledge and innovation. Their presence, alongside substantial investment programmes focused on research, incubation, science park facilities, civic buildings, public spaces, and cultural facilities, distinguishes the Oxford Road Corridor as a unique and thriving environment.

Corridor Manchester's strategic vision for 2025 sets out strong ambitions to be: 'Manchester's cosmopolitan hub and world-class innovation district, where talented people from the city and across the world learn, create, work, socialise, live and do business; contributing to the economic and social dynamism of one of Europe's leading cities'.

The strategic vision sets out seven strategic themes to guide development undertaken along the corridor up to 2025. These are as follows:

- Supporting the Growth of World Class Institutions;
- Accelerating Innovation, Commercialisation and Company Growth;
- Championing Transformational Investment;
- Creating a Special Place for People;
- Culture at the Heart of Corridor Manchester;
- Developing Smart City Infrastructure & Services; and
- Raising the Bar: Increasing Corridor Manchester's Contribution to Economic and Social Infrastructure.

The 2018 Strategic Spatial Framework (SSF) sets a clear vision for the redevelopment and future development within the Corridor and outlines key principles for achieving this. These include showcasing the world-leading work and activities within the corridor, maximising public realm, and optimising connectivity through well-planned streetscapes. The framework also emphasises creating vibrant "anchor destinations" that encourage a blend of work, study, and leisure within a higher-density, campus-like environment.

Compliance with Planning Policy and Material Considerations

The Proposed Development aligns with planning policy and material considerations by balancing the need for educational space with the continued provision of employment opportunities. The change of use complies with Core Strategy objective SO2 and policy EC1 by expanding educational provision within the Regional Centre, specifically within the Oxford Road Corridor, a focus for higher education. The proposals will transform part of the St James Building into educational/flexible office space, which aligns with 'Corridor Manchester's' Vision of a 'world class innovation district', and will contribute to fostering collaboration between Manchester's educational institutions and knowledge-based industries. The development's contribution to the

educational sector indirectly supports the local economy. As demonstrated by the Oxford Road Corridor's £3 billion GVA, educational institutions attract students, researchers, and businesses, boosting economic activity.

The Proposed Development will allow the creation new, accessible educational facilities and contribute to a skilled workforce, directly complying with PfE policy JP-P5. While some policies, such as Core Strategy Policies CC1, EC3, and EC8, along with PfE policies JP-Strat 1 & 2 and Policy CC8, emphasise employment and economic growth within the city centre, PfE policies JP-P5, JP-P1 and Core strategy objective SO2 and policy EC1 emphasise the importance of the education sector for regional economic growth and workforce development.
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Repurposing part of the fourth floor in St James building for flexible educational use aligns with principles of sustainability and resource efficiency, maximising the use of existing buildings. Furthermore, the applicant's significant investment in new office developments on Portland Street and Oxford Road Corridor ensures a continued contribution to the city centre's employment land provision in locations and accommodation better suited to contemporary business needs. This proactive approach ensures there is a continued office supply to meet specific demand in this location.

The Proposed Development's strong alignment with educational policies (specifically EC1, JP-P5, Corridor Manchester Vision, and NPPF Paragraph 100), combined with the building's suitability for educational purposes and the applicant's commitment to providing modern office space elsewhere, supports the change of use. This Proposed Development supports a vibrant, knowledge-based city centre, making the best use of existing resources.

In addition the proposed flexible change of use allows future office use of the space should demand require.

Application Documentation

In addition to this Covering Letter, the Application is supported by the following documents, as prepared in accordance with Manchester City Council's Validation Checklist.

- Application Form – prepared by Deloitte LLP;
- Location Plan *(Doc Ref: Location Plan)* - prepared by Bruntwood Sci-Tech;
- Demise Plan *(Demise Plan - Fourth Floor St James)* - prepared by Bruntwood Sci-Tech;
- Site Photographs; and
- Waste Management Details - prepared by Bruntwood Sci-Tech;.

- Ground floor plan showing location of bin store *(Doc ref: Ground Floor Plan as Proposed)*- prepared by Bruntwood Sci-Tech;
- Covering Letter (also providing information on Design and Access)

Summary

The proposed Change of Use to education / flexible office space has no adverse impacts. The proposal will allow for the expansion of a key, long-standing educational provider, strengthening the city centre's role as a hub for knowledge and skills development. This expansion will attract new students, researchers, and associated businesses, contributing to the local economy and fostering a vibrant academic community. The lease is provided on a 10-year basis and therefore, this expansion will help ensure a key listed building within the City Centre remains in full occupation. This long-term commitment demonstrates confidence in the viability and sustainability of the proposed educational use, contributing to the vibrancy and economic resilience of the area.

Therefore, the proposals are considered to be in accordance with national and local planning policy and the Town and Country Planning Act 1990 (as amended) and we respectfully request that Manchester City Council approve this Application.

Application fee

Payment of the planning application fee in the sum of £673 (including £85 service charge) has been made via the Planning Portal (ref: PP-13968672I would be grateful if you could please confirm receipt of this fee. I would be grateful for written confirmation of receipt and registration of this application. If there are any points of clarification required, please do not hesitate to contact me or my colleagues Katie Wray (0161 455 6350/ kawray@deloitte.co.uk) or Eleanor Scrafton (0161 455 8598/ escrafton@deloitte.co.uk).

Yours sincerely

Deloitte LLP

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