

10th December 2024

Jennifer Atkinson
Planning
Manchester City Council
Town Hall Extension
Manchester
M60 2LA

Dear Jennifer,

**SECTION 73 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
SECTION 19 OF THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990
VARIATION OF CONDITION 2 ATTACHED TO APPLICATION REFS 132633/JO/2022 (FULL) AND
132634/JO/2022 (LBC)
PLANNING PORTAL REFERENCES: PP-13625164, PP-13625206
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 132633/JO/2022 (full application) (Portal ref PP-13625164); and
- the variation of condition 2 of the associated listed building consent ref 132634/JO/2022 (listed building consent) (Portal ref PP-13625206).

Both the full planning and listed building consent applications were granted on 20th April 2022 for the following, respectively:

Application to vary Condition 2 (Specified Plans) to previously approved application 127817/JO/2020 and

Application to vary Condition 2 (Specified Plans) to previously approved application 127818/JO/2020.

These amended the following 'parent' permissions:

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

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 design amendments which have arisen as the detailed design work has progressed. It also reflects the involvement of a new hotel operator with different requirements.

This submission includes the following, prepared by the scheme architect and heritage advisor, Purcell:

- Revised plans
- A set of annotated consented plans which identify the proposed changes.
- Dry riser detail plans
- Detail plans relating to the external courtyard stair
- A Design and Access Statement and Heritage Significance Assessment (in a single document)

Please note, additional, separate submissions have also been made in relation to the discharge of the following conditions.

- **Drainage**
 - Condition 14 of application ref 132633/JO/2022 (ref PP-13625506)
- **Courtyard paving**
 - Conditions 3 and 36 of 132633/JO/2022 (PP-13625575)
 - Conditions 3 and 11 132634/JO/2022 (ref PP-13625636)
- **Pavement lights**
 - Condition 9 of 132633/JO/2022 (ref PP-13625667)
- **Substation gates**
 - Condition 31 of 132633/JO/2022 (ref PP-13625708)
 - Condition 6 of 132634/JO/2022 (ref PP-13625750)

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 will be minor. The development quantum and mix of uses remain unaffected.

Changes

This section should be read alongside the clean and marked-up plans which form part of the submission, and Section 3.0 of the Design, Access and Heritage Statement which provides a breakdown of all changes alongside comparator plans.

Reduced interventions

The involvement of a new hotel operator results in the need for less cellular spaces, particularly to basement and ground floors. As such, less partitions are required. There is a particular benefit in relation to the former cells which can be retained in their existing format.

Similarly, the introduction of two external doors to the first floor workspaces to Whitworth Street means that existing fabric on stairways can be retained. It has been determined that one of the proposed goods lifts is no longer required. To London Road, lifts have been simplified removing the need for stairs and WC in this location.

To the first and second floors, the WCs located on the corner of Fairfield Street and Minshull Street South have been reworked so as to maximise retention of historic fabric. Several proposed partitions are to be omitted along the Fairfield Street side at first floor.

Overall, there is less intervention and a greater degree of retention of historic fabric.

Vertical risers

A vertical riser solution has been incorporated instead of the previous strategy of horizontal services distribution. This has the benefit of resulting in far less service penetrations into the historic fabric, including the roof. There is a particular benefit to the Fairfield Street courtyard elevation which no longer requires the large vent positions which were previously incorporated.

Courtyard

On reflection, it is considered that a full canopy around the perimeter of the courtyard is not required. The glass canopy to the courtyard has therefore been removed. A canopy will be retained to the entrance for convenience and wayfinding. Overall, this is viewed as a positive as it allows the courtyard to be closer in character to its original form.

The existing external stair to the courtyard will be repaired and retained in situ. It was intended that this stair would be used as part of the circulation / fire strategy. However, it has proved extremely difficult to make the stair safe for use due to inherent structural issues. As such, it is to be retained in situ and fixed metal decorative panels will be attached to it which prevent its use. The circulation and fire strategies have been updated in response. Retention of the stair will constitute a moderate benefit.

Other changes

Changes have arisen for various reasons, for example changes to the hotel layout due to steelwork positions.

To basement, the amended fire strategy has resulted in the introduction of small lobbies and a stair. The lobby at the base of Stair EX02 means that there is no need for intervention at the courtyard level. Slopes are introduced to Unit A and associated back of house (ie the basement to Fairfield Street) to respond to changes in floor level.

Stair S11 is removed as the roof terrace is to be removed from the scheme, meaning that access to the roof for the general public is no longer required. The consented glass balustrading to roof level is to be replaced with a simple metal balustrade.

Heritage Assessment

The application is accompanied by a Heritage Statement carried out by Purcell. It provides a clear methodology for the appraisal and assessment of the works, and is consistent with the requirements of the NPPF and Historic England guidance. It provides a comprehensive assessment of significance.

The report sets out the site's recent history and the proposed alterations to the consented works. It characterises the overall strategy as one of reduction, both in terms of changes to existing fabric, and in relation to the building services strategy.

It summarises the impact of the proposed changes as follows. The impact of the changes to plan layout reduces the amount of fabric removal from the building interiors whilst upholding the restoration of high significance spaces such as the former Coroner's Court. Circulation patterns are maintained and enhanced ensuring access for all. The direct heritage impact is considered to be minor adverse as this would result in minor physical change to areas of lower significance.

Regarding the roof, the removal of the terrace and the amended MEP strategy significantly reduces the number of penetrations through the pitched roof areas and allows these to be situated in either new build elements or flat roof areas. This is considered to be major beneficial in heritage terms as these amendments preserve more of the building fabric and the character of the roofscape, particularly on the Fairfield Street and Whitworth Street elevations.

In line with the fire strategy, minor new openings are required to facilitate the revised plans. For example, to retain the historic stairs to the former police staff accommodation. Such interventions have been minimised and where required, they are located in areas of lower significance. The direct heritage impact is considered to be minor adverse as this would result in minor physical change to the elevations. This is also balanced by the retention of the existing glazed screens to each level of stair 7 and the omission of the glazed canopy to the perimeter of the building. The proposed alterations would not diminish the character of the courtyard or the aesthetic of the elevations, particularly when screened by the sections of repaired balustrade.

Overall, the proposed alterations continue to demonstrate a viable use for the former Fire Station, particularly now informed by key stakeholders who are proposed to occupy the property. These proposals are a reduction in intervention from that proposed previously. Taken in balance with the restoration works already carried out to the building fabric, the minor physical impact of the alterations would be more than outweighed by the benefits of securing a viable new use. The proposed minor physical impact of the proposed amendments is offset by the reduced scope of the proposed interventions and when set in balance against the restoration of the high significance spaces, courtyard, external stair and balustrades offer a major beneficial impact 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.

As such, the works are appropriate in heritage terms, and comply with the necessary legislation and policy, specifically Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Replacement Plans

The table below shows the consented plans and their replacements. This is to be achieved through the rewording of condition 2. Any plans not referenced are to remain as consented documents. The same changes apply to the documents listed at condition 2 of both consented applications.

Consented plans to be removed	Replacement plans
LRFS-PUR-01-00-DR-A-2003 REV 20 - Proposed Ground Floor Plan	LRFS-PUR-00-00-DR-A-0200-Proposed Ground Floor Plan
LRFS-PUR-01-01-DR-A-2004 REV 25 - Proposed First Floor Plan	LRFS-PUR-00-01-DR-A-0201-Proposed First Floor Plan
LRFS-PUR-01-02-DR-A-2005 REV 23 - Proposed Second Floor Plan	LRFS-PUR-00-02-DR-A-0202-Proposed Second Floor Plan
LRFS-PUR-01-03-DR-A-2006 REV 22- Proposed Third Floor Plan	LRFS-PUR-00-03-DR-A-0203-Proposed Third Floor Plan
LRFS-PUR-01-B1-DR-A-2002 REV 22 - Proposed Basement Plan	LRFS-PUR-00-B1-DR-A-0199-Proposed Basement Plan
LRFS-PUR-01-RF-DR-A-2007 REV 17 - Proposed Roof Plan	LRFS-PUR-00-RF-DR-A-0204-Proposed Roof Plan
LRFS-PUR-01-ZZ-DR-A-2008 REV 2 - Whitworth Street Elevation	LRFS-PUR-00-ZZ-DR-A-0211-Proposed Whitworth St Elevation
LRFS-PUR-01-ZZ-DR-A-2009 REV 1 - London Road Elevation	LRFS-PUR-00-ZZ-DR-A-0212-Proposed London Rd Elevation
LRFS-PUR-01-ZZ-DR-A-2010 REV 1 - Fairfield Street Elevation	LRFS-PUR-00-ZZ-DR-A-0213-Proposed Fairfield St Elevation
LRFS-PUR-01-ZZ-DR-A-3105 Rev 06 - Proposed Minshull St- South Detail Elevations 1 LRFS-PUR-01-ZZ-DR-A-3106 Rev 07 - Proposed Minshull St- South Detail Elevations 2 LRFS-PUR-01-ZZ-DR-A-3107 Rev 07 - Proposed Minshull St- South Detail Elevations 3 LRFS-PUR-01-ZZ-DR-A-3108 Rev 06 - Proposed Minshull St- South Detail Elevations 4 LRFS-PUR-01-ZZ-DR-A-3109 Rev 06 - Proposed Minshull St- South Detail Elevations 5	LRFS-PUR-00-ZZ-DR-A-0214-Proposed Minshull St Elevation
LRFS-PUR-01-ZZ-DR-A-2013 - Proposed London Road Courtyard Elevation	LRFS-PUR-00-ZZ-DR-A-0216-Proposed London Road Courtyard Elevation
LRFS-PUR-01-ZZ-DR-A-2015 Rev 14 - Proposed Minshull Street Courtyard Elevation	LRFS-PUR-00-ZZ-DR-A-0218-Proposed Minshull Street Courtyard Elevation
240242-PUR-FS-A-2020 REV 2 - Basement Waste Access & Servicing Strategy	LRFS-PUR-00-B1-DR-A-2020-Basement Waste, Access and Servicing Strategy
240242-PUR-FS-A-2021 REV 3 - Ground Floor Waste Access & Servicing Strategy	LRFS-PUR-00-00-DR-A-2021-Ground Floor Waste, Access and Servicing Strategy
240242-PUR-FS-A-2022 REV 3 - First Floor Waste Access & Servicing Strategy	LRFS-PUR-00-01-DR-A-2022-First Floor Waste, Access and Servicing Strategy
240242-PUR-FS-A-2023 REV 3 - Second Floor Waste Access & Servicing Strategy	LRFS-PUR-00-02-DR-A-2023-Second Floor Waste, Access and Servicing Strategy
240242-PUR-FS-A-2024 REV 3 - Third Floor Waste Access & Servicing Strategy	LRFS-PUR-00-03-DR-A-2024-Third Floor Waste, Access and Servicing Strategy

LRFS-PUR-01-ZZ-DR-A-1053 REV 21 - Basement Plan Downtakings & Alteration	LRFS-PUR-00-B1-DR-A-1053 REV C.09 - Basement Plan Downtakings & Alteration
LRFS-PUR-01-00-DR-A-1054 REV 21 - Ground Floor Plan Downtakings & Alterations	LRFS-PUR-00-00-DR-A-1054 Rev C.10 - Ground Floor Plan Downtakings & Alterations
LRFS-PUR-01-01-DR-A-1055 REV 22- First Floor Plan Downtakings & Alterations	LRFS-PUR-00-01-DR-A-1055 Rev C.12 First Floor Plan Downtakings & Alterations
LRFS-PUR-01-02-DR-A-1056 REV 21- Second Floor Plan Downtakings & Alterations	LRFS-PUR-00-02-DR-A-1056-Second Floor Plan Downtakings & Alterations
LRFS-PUR-01-03-DR-A-1057 REV 21 - Third Floor Plan Downtakings & Alterations	LRFS-PUR-00-03-DR-A-1057 REV C.11 - Third Floor Plan Downtakings & Alterations
240242-PUR-FS-A-1063 REV 2 - Minshull Street Downtakings and Alteration	LRFS-PUR-00-ZZ-DR-A-1063 REV C.01 - Minshull Street Downtakings and Alteration
LRFS-PUR-01-ZZ-DR-A-1064 - Whitworth St Courtyard Downtakings and Alterations	LRFS-PUR-00-ZZ-DR-A-1064 Rev C.01 - Whitworth Street Courtyard Downtakings and Alterations
LRFS-PUR-01-ZZ-DR-A-1065 - London Rd Courtyard Downtakings and Alterations	LRFS-PUR-00-ZZ-DR-A-1065 Rev C.01 - London Rd Courtyard Downtakings and Alterations
LRFS-PUR-01-ZZ-DR-A-1066 - Fairfield St Courtyard Downtakings and Alterations	LRFS-PUR-00-ZZ-DR-A-1066 Rev C.01 - Fairfield St Courtyard Downtakings and Alterations
LRFS-PUR-01-ZZ-DR-A-1067 REV 14 - Minshull St Courtyard Downtakings and Alterations	LRFS-PUR-00-ZZ-DR-A-1067 Rev C.01 - Minshull St Courtyard Downtakings and Alterations
LRFS-PUR-01-ZZ-DR-A-1060 REV 2 - Whitworth Street Downtakings and Alteration	LRFS-PUR-00-ZZ-DR-A-1060 Rev C.01 - Whitworth St Downtakings and Alterations
240242-PUR-FS-A-1061 REV 2 - Downtakings and Alteration	LRFS-PUR-00-ZZ-DR-A-1061 Rev C.01 London Road Downtakings and Alterations
240242-PUR-FS-A-1062 REV 1 - Fairfield Street Downtakings and Alteration	LRFS-PUR-00-ZZ-DR-A-1062 Rev C.01 - Fairfield St Downtakings and Alterations
LRFS-PUR-01-ZZ-DR-A-1063 REV 2 - Minshull Street Downtakings and Alteration	Duplicated on decision notice
2320-LRFS-PUR-01-00-DR-A-2320 - Hotel Entrance - Proposed Plan	No replacement plan
2321-LRFS-PUR-01-ZZ-DR-A-2321 - Hotel Entrance - Existing Elevation	No replacement plan
2322-LRFS-PUR-01-ZZ-DR-A-2322 - Hotel Entrance - Proposed Elevation	No replacement plan
2323-LRFS-PUR-01-ZZ-DR-A-2323 - Hotel Entrance - Proposed Section	No replacement plan

Additional plans are submitted as follows:

- LRFS-PUR-00-ZZ-DR-A-0215-Proposed Whitworth Street Courtyard Elevation
- LRFS-PUR-00-ZZ-DR-A-0217-Proposed Fairfield Street Courtyard Elevation
- LRFS-PUR-00-ZZ-DR-A-0215-Proposed Whitworth Street Courtyard Elevation
- LRFS-PUR-00-ZZ-DR-A-0217-Proposed Fairfield Street Courtyard Elevation
- LRFS-PUR-00-ZZ-DR-A-3400-Proposed Staircase S02 Plan
- LRFS-PUR-00-ZZ-DR-A-3401-Proposed Staircase S02 Section
- LRFS-PUR-00-ZZ-DR-A-3402-Proposed Staircase S01
- LRFS-PUR-00-ZZ-DR-A-3407-Proposed Staircase S07 Plan
- LRFS-PUR-00-XX-DR-A-3433-Existing External Stair EX03

The proposed changes are minor in nature and represent a reduction in intervention from that proposed previously. Taken in balance with the restoration works already carried out to the building fabric, the minor physical impact of the alterations would be more than outweighed by the benefits of securing a viable new use. Works have been demonstrated 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 applications are satisfactory and I look forward to acknowledgement of their receipt. Should you wish to discuss the proposals or have any queries please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read "DBB", with a stylized flourish extending from the end.

Deborah Baker Barnett
Associate Director