

23 October 2024

Delivered by email

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Dear Angela

**SUPPLEMENTARY INFORMATION RELATING TO PLANNING APPLICATION REF. 138805/FO/2023
REDEVELOPMENT OF THE FORMER HOTSPUR PRESS, MANCHESTER**

As you are aware, a planning application for the redevelopment of the former Hotspur Press site ('the Site') located on Cambridge Street in Manchester City Centre was submitted by Turley on behalf of Manner ('the Applicant') and subsequently validated by Manchester City Council ('MCC') on 13 December 2023 (ref. 138805/FO/2023).

Following discussions with MCC and as a direct result of the design evolution of the proposed development, a number of amendments were made to the scheme¹ and a resubmission was made in April 2024, with the following description of development:

Partial demolition of the former Hotspur Press Complex (Medlock Mill) and redevelopment of the site to provide Purpose Built Student Accommodation (Sui Generis Use Class) above ground floor commercial or community uses (Use Classes F(e), F2(a)(b) and E(b)), within a part 4/5-storey and part 37-storey building plus roof parapet level above basement level, associated ancillary internal and external amenity space, public realm (including a new public square), hard and soft landscaping and associated highway works.

The planning application was subsequently presented to the MCC Planning and Highways Committee on 30 May 2024 with a recommendation from Officers for planning permission to be granted. The Committee reached a 'minded to approve' resolution in relation to the application subject to the signing of the Section 106 Agreement and the removal of the objection from the Environment Agency to ensure that the proposed development meets the requirements of paragraph 171 (b) of the National Planning Policy Framework ('NPPF') relating to the exception test.

This covering letter relates to the supplementary submission of amended information to overcome the objection from the Environment Agency and is accompanied by amended plans prepared by Hodder and Partners (referenced later in this letter) and a revised Flood Risk Assessment (ref. 1006-01-CIV-XX-XX-R-C-1001 P07) and Flood Risk and Drainage Environmental Statement chapter (14) prepared by Civic Engineers.

¹ As detailed in Section 3 of the submitted Planning Statement and Environmental Statement Addendum (April 2024).

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Response to Environment Agency Objection

The Applicant has continued liaising with the Environment Agency since the Planning and Highways Committee, and productive discussions have occurred in an effort to overcome their objection and concerns regarding the requirements of the Flood Risk Exception Test and that the development will be safe for the lifetime of the development (paragraphs 170(b) and 171 of the NPPF).

The Flood Risk Assessment ('FRA') prepared by Civic Engineers has been updated and demonstrates that the development satisfies the Exception Test (as per Paragraph 031 of the Planning Practice Guidance (ref ID: 7-031-20220725)), as follows:

(a) Wider sustainability benefits:

- The proposed development represents a significant investment into Manchester city centre. It will deliver high-quality Purpose-Built Student Accommodation that will meet identified needs, support growth objectives, and deliver an integrated and cohesive community.
- It will make a substantial contribution to the ongoing regeneration and transformation of Corridor Manchester and the wider First Street SRF area, including through improving public realm and retaining a building of local cultural significance.
- The provision of SuDS in the form of tree pits in combination with other green infrastructure provides a significant improvement on amenity and biodiversity in the local area. This has secondary benefits to air quality, overall wellbeing, and provides precedent for future nature-based improvements in the area.

These benefits can only be realised through the development of this site i.e., they are unique to its location.

(b) Lifetime Flood Risk

- All sleeping accommodation is located at a floor level of 36.3mAOD, which is 5.32m above the interpolated 1 in 100 year + climate change flood event plus a freeboard of 600mm.
- The river wall and external wall of the building act as flood defence to the basement. Works proposed as part of the scheme will assess and remediate, as necessary, the existing building structure such that it is capable of withstanding future loading including loads from water pressure during flood events. A method for reinforcing the existing façade is indicated in Appendix H of the FRA.
- Any window openings within the external envelope along the Medlock elevation will be bricked up. Retrofit materials to be selected in line with "Extra flood resistance and resilience measures" Environment Agency guidance.
- The provision of a Sustainable Drainage scheme (included within the following sections) which provides storm water attenuation for storms up to the 1:100 year event plus an allowance for climate change. The discharge rate is also proposed to be a 50% reduction of the existing surface water runoff, which will reduce the risk of flooding in the future.
- The proposed development includes green / blue roofs, trees and planting within the proposed public realm which is an improvement on the existing fully impermeable site.
- The EA flood modelling does not take into account any flood storage within the building basement as this is based on the topography of the ground. Therefore, resisting flood water from entering the building will not have an impact on the wider flood risk.

Overall, the Site is deemed to have a medium overall flood risk, which is to be mitigated as part of proposals. Furthermore, the development is not expected to have a detrimental impact on wider flood risk in the area and is anticipated to reduce flood risk within the immediate vicinity owing to the betterment on existing discharge rates targeted by the proposals.

With regards to the Environmental Statement ('ES'), the updated FRA supersedes the version previously appended to Chapter 14 of the ES. The technical team has confirmed that the revisions to the FRA do not affect the assessment conclusions presented in Chapter 14 or any other technical chapters / documents. Therefore, the ES and all other accompanying technical documents remain appropriate for determination purposes. However, Chapter 14 of the ES 'Flood Risk and Drainage' has been updated to amend wording at paragraph 14.64 to avoid any ambiguity in terms of the proposals to the windows or proposed basement usage. Paragraph 14.64 has been amended as follows:

*The existing flood zone cannot be altered without wider interventions within the River Medlock catchment area. However, locally with the development site, the basement ~~window cill levels are proposed to be raised~~ **windows are proposed to be blocked up** to mitigate the risk of flooding to the lower ground / basement level of the building. The basement level will also not include any ~~habitable space~~ **sleeping accommodation**. All other floor levels will be at or above existing floor ground floor level which is at least 30.79m AOD and is therefore higher than the 1:100 year flood event plus 240mm freeboard of 29.85m AOD.*

To reflect the above flood resistance measures, the following drawings, prepared by Hodder and Partners, have been updated and are enclosed herein:

- Proposed Level – 01 Plan (drawing ref. (--)0LG Rev P7)
- Proposed North West Elevation (drawing ref. (--)202 Rev P8)
- Proposed South East Elevation (drawing ref. (--)201 Rev P8)
- Proposed South West Elevation (drawing ref. (--)203 Rev P8)

These drawings replace the existing equivalent plans for the purposes of the formal determination of this application.

We understand that upon receipt of formal confirmation of the removal of the Environment Agency's objection to the application, the updated architectural plans will need to be presented to the Planning Committee. This will enable Members to confirm their approval of the design changes reflecting that their resolution of 30th May was based on a consideration of a slightly different scheme to that now proposed.

In the circumstances, I trust you are able to accept the enclosures as a formal submission made pursuant to this application and on behalf of the applicant.

Yours sincerely

Olivia Carr
Associate Director