14 October 2024

Manchester City Council
Planning
PO Box 532
Town Hall
MANCHESTER
M60 2LA

Dear Sir or Madam,

FULL PLANNING APPLICATION FOR PROPOSED ALTERATIONS TO SHOPFRONT

BARCLAYS BANK, 86-88 MARKET ST, MANCHESTER M1 1PD

On behalf of Barclays Bank Plc ('the Applicant', hereafter referred to as Barclays), please find enclosed a Full Planning Application for proposed alterations to the shopfront at 86-88 Market St, Manchester M1 1PD ('the Site'). The Site is located within the administrative boundary of Manchester City Council ('the Council' or 'MCC').

The formal description for which consent is being sought, is as follows:

> *"Alterations to existing shopfront, including conversion from frameless to framed shopfront, replacement glazing and alterations to ATM"*

The application has been submitted via the Planning Portal (ref: PP-13467896) and comprises the following:

Document Title
Planning Application Forms and Certificates
This Covering Letter Including Planning Justification
Design and Access Statement
Location Plan (Ref: Loc-01)
Site Plan (Ref: Site-01)
Existing Floor Plans (Ref: DH109452_002 Rev B)
Proposed Floor Plans (Ref: DH109452_012 Rev C)
Existing Elevations and Sections (Ref: DH109452_021 Rev C)
Proposed Elevations and Sections (Ref: DH109452_031 Rev I)

Despite the minor nature of the proposals, the site is located within a Conservation Area and has an existing floor area in excess of 100sqm. As such a Design and Access Statement is technically required, with a level of detail appreciate to the scale of development. The proposals are small in scale and limited to a replacement shop frontage, as such please see the supporting Design and Access Statement.

The requisite planning application fee of £293.00 has been paid online via Planning Portal. In addition, the proposed development constitutes a minor development in accordance with Town and Country Planning (Development Management Procedure) (England) Order 2015 given that under 1,000sqm new floor space is to be created and the site area is less than 1 hectare. As such, we look forward to receiving confirmation that the application is valid and will be subject to an 8-week determination period.

This supporting statement provides context to the application proposal and justification for its approval, having regard to relevant planning policy, in the following sections:

- Site Description (site location, designations and planning history);
- Background to the Application Proposal;
- Application Proposal;
- Planning Policy Framework;
- Planning Merits of the Proposed Development;
- Design and Access (as required).

Site Description

The Application Site –

The Site is located within the administrative boundary of Manchester City Council.

The Site comprises a retail unit which fronts onto Market Street in the centre of Manchester. The retail unit is currently occupied by Barclays Bank and the frontage currently provides a frameless solution.

The Arndale Centre is located to the north of the site and further retail premises fronting onto Market Street abut the Site to the east and west. Market Street lies within the Primary Shopping Area and as such, the unit occupies a prominent position along a street with heavy footfall.

Currently, there is hoarding in situ at the unit which is to protect the frontage from a high-risk threat of vandalism following intelligence known to Barclays bank. Images are provided in Appendix 1.

Site Designations

The Site is located within Manchester City Centre and as such a number of City Centre Policies (CC1-CC10) are relevant to this application. The Site is located within the designated City Centre Primary Shopping Area and as such Policy CC2 is relevant. The Site is located within City of Manchester (UPPER KING STREET) Conservation Area 1985 and as such Policy CC9 and Policy EN3 are relevant.

Site Planning History

A desktop review of the Site's planning history has bene undertaken utilising Manchester City Council's Planning website. The planning history of relevance pertaining to the Site is set out below:

Reference	Description	Decision and Date
138705/FO/2023	Installation of 2no. automated teller machines (ATMs) to replace existing automated teller machines.	Approved 12 Jan 2024
135305/NMC/2022	Non material amendment to planning permission 118823/FO/2018 to make elevational alterations	Withdrawn 14 Dec 2022
125558/AO/2019	Installation of 1no. internally illuminated fascia sign, fixed to scaffolding for a temporary period of 6 months.	Temporarily Approved 22 Jan 2022
123790/AO/2019	Existing Barclays fascia sign to be refurbished and re-lamped, removal of existing projecting sign and installation of 1no. internally illuminated slimline projecting sign, and 2no. illuminated QSP surrounds.	Approved 27 Nov 2019
123789/FO/2019	Main shopfront to be retained and refurbished. Right hand section of glazing and existing 2no. ATM's to be removed and glazing replaced to enable the installation of 2no. QSP machines, with associated CCTV.	Approved 27 Nov 2019

The hoarding for the unit remains in situ to protect the frontage from a high-risk threat of vandalism following intelligence known to Barclays bank. It is intended to leave the hoarding pending the outcome of further alterations proposed, the subject of this planning application.

Background to the Application Proposal

The purpose of this application is to secure alterations to the bank's frontage, following a Barclays board-level decision to improve the resilience of its UK stores nationally in terms of vandalism protection and repair. A variety of options have been considered to ensure continuity across the Applicant's portfolio, whilst ensuring a robust product that maintains active frontages and is characteristic of the high street locations many of their stores are situated in.

The resultant solution across the majority of its sites, is to move from frameless glazing systems to framed systems with laminated glazing. This will allow for a more efficient replacement and / or repair of frontages reducing timescales from several weeks to 2-3 days, ensuring the integrity of stores is not impacted, the safety of customers and passer-by's is not at risk and to ensure the function of the high street locations can progress with limited disturbance. Other alterations are also proposed on a case-by-case basis, such as strengthening ATMs, signage and security. The alterations specific to the Manchester Market Street branch are discussed later in this letter.

In most instances Planning Permission is not actually required for the proposed works, since the alterations do not result in a material change to the appearance of the store frontage and as such do not class as development. However, following a helpful pre-application response from Manchester City Council it is agreed that Planning Permission is required in this instance.

The proposed works not only seek to ensure improvements to any future repair works if required as a result of vandalism, but also to limit any negative impact on the high street.

Any hoarding that is required (as per recent vandalism for the Market Street site) is in situ for several months. This negatively impacts on the appearance and vibrancy of the high street. The proposal would result in a shorter programme of repair works including if there is future vandalism, therefore shorter period of hoarding, if required, thus contributing more positively to the appearance, vibrancy and vitality of the high street.

Furthermore, the hoarding creates a dark and cold environment for staff and customers within the branch as hoarding has no insulation or windows. This is not inviting to customers, impacting on their experience and service; and is impacting negatively on staff morale, particularly during inclement weather and winter months. Significantly reducing the period of hoarding is essential to the operation and appearance of the branch to ensure that Barclays can continue to provide a high quality service on the high street.

Pre-Application Engagement

The Agent met with Manchester City Council on 18 September 2024 and it was agreed that Planning Permission is required in this instance.

Application Proposal

The proposed works have been introduced earlier in this letter and comprise a number of minor alterations to the shop frontage. The proposed works are limited in scale and only impact the ground floor of the building. The changes specific to Market Street are identified as follows:

1. Replacement of frameless shopfront entrance to framed shopfront entrance with double framed sliding auto door;
2. ATM Hardening.

1. <u>Replacement of Shopfront Entrance</u>

The works comprise the replacement of the existing frameless shopfront entrance to a new framed shopfront entrance. It will also include removal of the black plinths at floor level.

The proposed framing solution will align with the vertical frames of the upper floor of the building to ensure continuity. A framed sliding auto doors with pocket is also proposed as part of the works.

The new framed system will comprise laminated glass panels, which will replace the existing glazing. The laminated glazing prevents glass from shattering and is therefore a much safer material. Meanwhile a framed system restricts damage from spreading to other panels and results in easier repairs as one only has to replace damaged panels, as opposed to entire frontages. As such, this reduces the order and repair timings from several weeks or months to 2-3 days and will enable the store to reopen with limited disturbance.

2. <u>ATM Hardening</u>

The works also comprise the introduction of new smart ATMs, with laminated glass surrounds finished in winter silver to match the framing. As shown on drawing ref: DH109452_031 Rev I, the glazing above and around the

ATMs will sit within a laminated glass fascia, the reverse of which will be finished in RAL5011 (Barclays Blue). As above, the laminated glazing prevents glass from shattering and is therefore a safer material.

Planning Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. Section 38(5) states that where there is a difference in policy then the most recently adopted policy takes precedence.

The Statutory Development Plan relating to the Site comprises:

- Manchester Unitary Development Plan 'saved' policies (1995);
- Manchester Core Strategy (2012);
- Greater Manchester Joint Waste Development Plan Document (2012)
- Greater Manchester Joint Minerals Plan (2013)
- Places for Everyone Joint Development Plan for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 to 2039 (2024);

Regard should also be had to the following material considerations:

- The Government's National Planning Policy Framework (NPPF, 2023);
- The Government's National Planning Policy Guidance (NPPG, 2014 as amended); and
- Supplementary Planning Documents and Guidance.

Manchester City Council Core Strategy

Manchester 's Core Strategy was adopted on 11 July 2012 and is the key Development Plan Document in the Local Development Framework (LDF). The policies relevant to the proposals are set out below:

Policy C1 'Centre Hierarchy' acknowledges that, in order to maintain the vitality and viability of it's centres, the City Centre will be the focus for comparison retail for the Manchester City Region. Moreover, Policy C1 sets out that *'the focus for new comparison retail is the Primary Shopping Area. The City Centre is also the regional focus for commerce, culture, leisure and tourism. The City Centre has a need for additional convenience retail to meet the needs of a growing residential population, but this role is distinct from its comparison retail function, with a different catchment'.*

Policy CC1 'Primary Economic Development Focus' sets out that *'provision of a range of economic development uses, such as retail, leisure, entertainment, cultural and tourism facilities will be encouraged in the City Centre, in line with Policy C1, to support the development of a vibrant employment location attractive to businesses, employees and visitors to the City Centre'.*

Policy CC2 'Retail' sets out that *'the Council will promote the growth and improvement of retail provision in the City Centre'.* Moreover, '*within the City Centre comparison retail development will be concentrated within the Primary Shopping Area (PSA), followed by accessible locations on the edge of the PSA. Proposals for new development will be assessed against relevant design policies in the Manchester LDF and in particular must respect existing built heritage and public realm. Proposals should also be developed in line with Policy CC8 (Change and Renewal) to ensure that development delivers the most attractive and usable shopping environment. Ancillary commercial and leisure services (such as those within the A Use Class) are also acceptable within the PSA, providing retail remains the predominant use and proposals do not conflict with other policies within the Local Development Framework'.*

Policy CC7 ‘Mixed Use Development’ sets out that *‘active ground floor uses (shops, food and drink and leisure) will be appropriate in locations which have an established public function, or as part of a development which will create such an environment’.*

Policy CC9 ‘Design and Heritage’ sets out that ‘*development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings, conservation areas and scheduled ancient monuments’.*

Policy EN1 ‘Design Principles and Strategic Character Areas’ sets out that ‘*all development in Manchester will be expected to follow the seven principles of urban design and have regard to the strategic character area in which the development is located’*. Policy EN1 sets out that the ‘*City Centre 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. Its core area presents a particularly dense environment that accommodates a wide and closely integrated range of uses including commercial, civic and residential activities’.*

Policy EN3 ‘Heritage’ sets out that ‘*the Council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods, including those of the City Centre’.*

DM 1 ‘Development Management’ sets out that ‘*all development should have regard to the following specific issues for which more detailed guidance may be given within a supplementary planning document:*

- *Appropriate siting, layout, scale, form, massing, materials and detail.*
- *Impact on the surrounding areas in terms of the design, scale and appearance of the proposed development.*
- *Development should have regard to the character of the surrounding area.*
- *Effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise.*
- *Accessibility: buildings and neighbourhoods fully accessible to disabled people, access to new development by sustainable transport modes.*
- *Community safety and crime prevention. Design for health.*
- *Adequacy of internal accommodation and external amenity space.*
- *Refuse storage and collection.*
- *Vehicular access and car parking.*
- *Effects relating to biodiversity, landscape, archaeological or built heritage.*
- *Green Infrastructure including open space, both public and private.*
- *The use of alternatives to peat-based products in landscaping/gardens within*
- *development schemes.*
- *Flood risk and drainage.*
- *Existing or proposed hazardous installations.*
- *Subject to scheme viability, developers will be required to demonstrate that new*
- *development incorporates sustainable construction techniques’*

Manchester Unitary Development Plan ‘saved’ policies

The Unitary Development Plan for the City of Manchester (the UDP) was adopted by the Council on 21 July 1995 as the statutory document which set out guidelines for all development in Manchester and provided a framework from which to base decisions about planning applications.

However, Manchester 's Core Strategy was adopted on 11 July 2012 which is the key Development Plan Document in the Local Development Framework (LDF). It replaces significant elements of the UDP. A number of policies have been ‘saved’ and those relevant to the proposals are set out below.

DC18.1 'Conservation Areas' sets out that '*the Council will give particularly careful consideration to development proposals within Conservation Areas.*

a. The Council will seek to preserve and enhance the character of its designated conservation areas by carefully considering the following issues:

i) the relationship of new structures to neighbouring buildings and spaces;

ii) the effect of major changes to the appearance of existing buildings;

iii) the desirability of retaining existing features, such as boundary walls, gardens, trees, (including street trees);

iv) the effect of signs and advertisements;

v) any further guidance on specific areas which has been approved by the Council.

b. The Council will not normally grant outline planning permission for development within Conservation Areas.

c. Consent to demolish a building in a conservation area will be granted only where it can be shown that it is wholly beyond repair, incapable of reasonably beneficial use, or where its removal or replacement would benefit the appearance of character of the area.

d. Where demolition is to be followed by redevelopment, demolition will be permitted only where there are approved detailed plans for that redevelopment and where the Council has been furnished with evidence that the development will be undertaken.

e. Development proposals adjacent to Conservation Areas will be granted only where it can be shown that they will not harm the appearance or character of the area. This will include the protection of views into and out of Conservation Areas'.

NPPF (2023)

The revised National Planning Policy Framework (2023) sets out the Government's planning policies for England and how these are expected to be applied.

In line with paragraph 11 of the NPPF 'Plans and decisions should apply a presumption in favour of sustainable development'. Moreover, in line with paragraph 38 of the NPPF '*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.*

Section 6 is entitled '*Building a strong, competitive economy'* and sets out at paragraph 85 that *'planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development'.*

In relation to design, the NPPF within paragraph 124 notes that *'the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.*

Planning Merits of the Proposed Development –

Principle of Development / Land Use

The proposed works are limited in scale and only impact the ground floor of the building. The proposed changes to the frontage are to ensure that the Site remains safe and operational, as well as to ensure that disruption is

kept to a minimum for customers, employees and users of Market Street as a whole. The proposal will also remain aesthetically appropriate within the primary shopping area.

NPPF paragraph 85 sets out that planning '*decisions should help create the conditions in which businesses can invest, expand and adapt'.* Currently, the hoarding which is in place creates a dark and cold environment for staff and customers within the branch as hoarding has no insulation or windows. This is not inviting to customers, impacting on their experience and service; and is impacting on staff morale, particularly during inclement weather and winter months. Significantly reducing the period of hoarding is essential to the operation and appearance of the branch to ensure that Barclays can adapt and continue to provide a high quality service on the high street.

Local Policy CC2 sets out that *'the Council will promote the growth and improvement of retail provision in the City Centre'* and Local Policy C1 acknowledges the importance of maintaining the vitality and vibrancy of the City Centre. It is considered that any repair works based on the current framed system would result in several months of hoarded frontage. This will negatively impact on the appearance and vibrancy of the high street. The proposals would result in a shorter programme of repair works and therefore a shorter period of hoarding, if required. Thus, contributing more positively to the appearance, vibrancy and vitality of the high street. As such, it is considered that the proposals are in accordance with local and national planning policy.

Design Consideration

Local Policy CC2 sets out that 'p*roposals for new development will be assessed against relevant design policies in the Manchester LDF and in particular must respect existing built heritage and public realm'.* The proposed works are limited in scale and it is considered that the design of the frontage has been carefully considered, to reflect the prominent position that the unit occupies along Market Street, as well as to mitigate against any further damage.

The works serve to improve the turnaround of any repairs and would result in reduced period of time that hoarding is required therefore reducing any negative impact on the high street, improving amenity for customers, employees and users of Market Street as a whole. It is therefore considered that the proposals are in line with Local Policies CC2, CC9, EN1 and NPPF (2023).

Access Considerations

The works comprise the replacement of the existing frameless shopfront entrance to a new framed shopfront entrance with framed sliding auto doors with pocket. The proposals will therefore ensure that full pedestrian access is restored to the unit.

Currently, the hoarding which is in place is not inviting to customers, impacting on their experience and service; and is impacting on staff morale, particularly during inclement weather and winter months. Therefore, significantly reducing the period of hoarding is essential to the operation, accessibility and appearance of the branch to ensure that Barclays can continue to provide a high quality service on the high street and can be accessible to all those who use this service.

The proposals will ensure that full pedestrian accessibility is restored at the Site and therefore it is considered that the proposals are in line with Local Policy DM 1.

Heritage

The Site is located within City of Manchester (UPPER KING STREET) Conservation Area 1985. Overall, the proposed alterations are limited to the ground floor and maintain the active frontage by the retention of glazing. It is considered that the proposed works are limited in scales and do not impact the function and integrity of the conservation area. As such it is considered that the proposals are inline with local policy CC9, EN3 and DC18.1.

Conclusions

The site has a recent history of frontage alterations, as identified in the planning history review earlier in this letter. The alterations proposed, are required to provide greater security against vandalism and to ensure an efficient repair process, should such events occur.

In terms of design, the laminated glazing prevents glass from shattering and is therefore a much safer material. Meanwhile a framed system restricts damage from spreading to other panels and results in easier repairs as one only has to replace damaged panels, as opposed to entire frontages. As such, this reduces the repair timings from several weeks or months to 2-3 days and will enable the store to reopen with limited disturbance.

With regard to the ATM, the laminated glazing is more robust than current glazing but there is imperceptible difference as colour treatment will match existing.

Overall, the proposed alterations are limited to the ground floor, maintain the active frontage by the retention of glazing and do not impact the function and integrity of the conservation area.

The balance of limiting damage in the first instance and ensuring efficient and effective repairs if/when required is of benefit to the overall functioning of the high street, protecting customers and passers-by, and avoiding long term hoarding whilst repairs are undertaken.

Indeed, the improvement in turnaround of any repairs would result in reduced period of time that hoarding is required therefore reducing any negative impact on the high street as a key part of the city centre.

In light of the above and positive engagement with Manchester City Council to date, we trust you are able to support these proposals and respectfully request that Full Planning Permission is granted.

We look forward to receiving your acknowledgement of validation and if you require any further information, please do not hesitate to contact the team.

Appendix 1 – Images of Market Street Site



