

June 2024



Planning, Design and Access Statement incorporating a Heritage Impact Assessment

**Change of use from vacant Bank (E(c) use class) to a
betting shop (Sui Generis use class), minor alterations to
shopfront and Advertisement Consent to display 1no
fascia sign and 2no projecting signs**

130 Market Street, Manchester, M60 1AY

On behalf of

Done Brothers (Cash Betting) Ltd

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1.0 Introduction, Site Context and Planning History

Introduction

- 1.1 This Planning, Design and Access Statement incorporating a Heritage Impact Assessment has been prepared on behalf of Done Brothers (Cash Betting) Ltd to support a Full Application for the change of use from vacant Bank (E(c) use class) to a betting shop (Sui Generis use class), minor alterations to shopfront and Advertisement Consent to display 1no fascia sign and 2no projecting signs at 130 Market Street, Manchester.
- 1.2 Betfred already operate a betting shop in the Piccadilly Gardens area of the City Centre trading daily from the ground floor unit of the Grade II listed 10 Mosley Street, Manchester. This is a short distance of 78 metres away from the application site, less than a 1-minute walk.
- 1.3 Betfred are seeking to relocate their business from 10 Mosley Street to 130 Market Square. This Application seeks to facilitate this relocation of their existing betting shop in Manchester City Centre. Both Betfred's current unit and the proposed change of use unit are within the City Centre Primary Shopping Area (PSA) detailed under Core Strategy Policy CC2.
- 1.4 The Statement provides an appraisal of the proposed development in relation to planning policies within the Development Plan, National Policy and other relevant planning guidance documents, to assist the Local Planning Authority's consideration of the suitability of the proposal.

Site Context

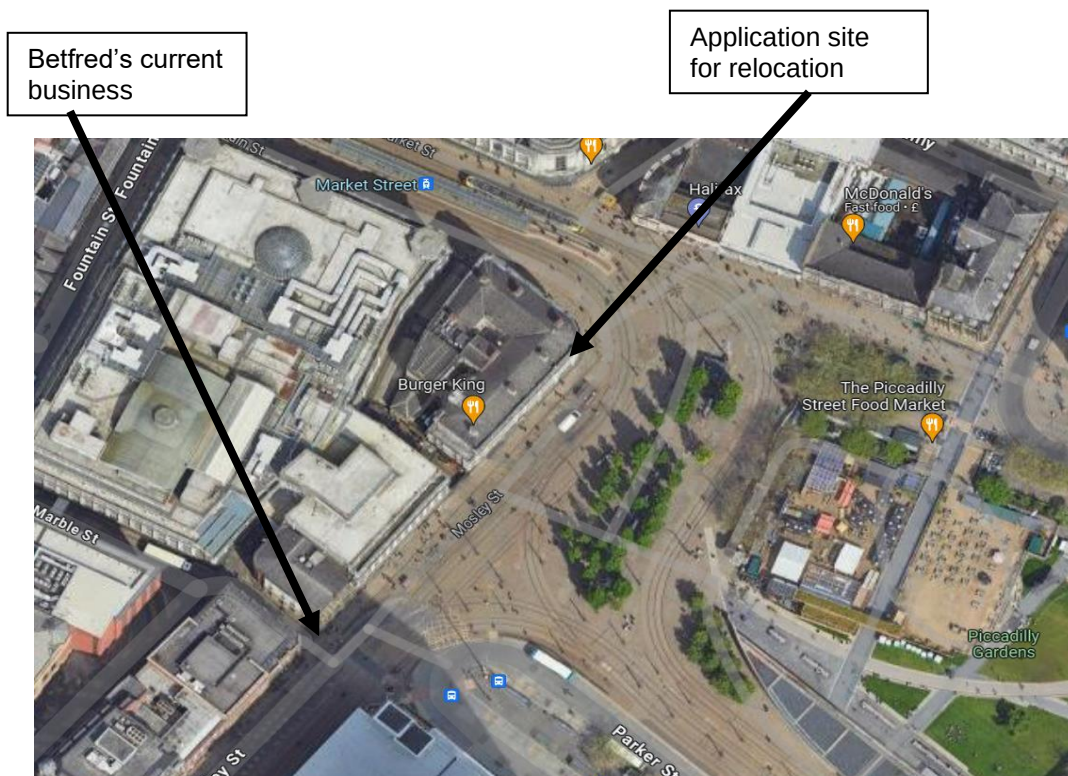
- 1.5 The Application site comprises of the ground floor unit of 130 Market Street located in Piccadilly Gardens (within the Deansgate Ward) of Manchester City Centre. Due to its location at the corner of Market Street and Mosley Street, it occupies a pivotal location fronting Piccadilly Gardens (Piccadilly Gateway), which visitors to the city walk through on their way to Market Street & the Arndale Shopping Centre. Mosley Street and Market Street are largely pedestrianised except for trams and public buses. Piccadilly bus station, train station and tram stop are all within close proximity to the site.
- 1.6 The change of use unit is not listed but is a non-designated heritage asset which is detailed within Chapter 5.0 of this Statement. The unit is in proximity to a number of listed buildings and is also outside of, but within the setting of, four Conservation Areas. The building is known as the Royal Buildings and comprises of a four-storey building with a mix of commercial uses at ground floor. Planning permission was recently approved for the upper floors of the building to be converted to a Zedwell hotel which is detailed in the Planning History of this Statement.

- 1.7 Given the corner position on a major junction, the immediate street frontage on Market Street and Mosley Street contains a varied mix of city centre uses including Burger King, Primark, Skipton Building Society, Costa Coffee, Debenhams, Starbucks, Halifax Bank, Greggs, Boots, McDonalds and Superdrug.
- 1.8 Figure 1 below shows the frontage of the ground floor unit currently and Figure 2 shows the location of Betfred's current unit and the application site where they wish to relocate to.

Figure 1: Street view of the application unit seen from Piccadilly Gardens



Figure 2: Location of Betfred's current shop and the application unit



- 1.9 The application unit is vacant and was last occupied by a non-retail use as Santander Bank (former A2 use) which now falls within E(c) use class following changes made to the Town and Country Planning (Use Classes) Order in September 2020. The bank closed on the 13 April 2023 and the unit has been vacant and marketed since this time for a 14-month period.
- 1.10 Betfred was founded in 1967 and is the world's biggest privately-owned betting company and one of the UK's biggest privately-owned retail outlets operating around 1,650 shops across the United Kingdom. The majority of Betfred's shops are within town and city centre high streets and indoor shopping centres.
- 1.11 Licensed betting shops are regarded as main town centre uses under Annex 2 (Glossary) of the National Planning Policy Framework (NPPF) as they are defined as a leisure and entertainment use. Betting shops as a main town centre use, have been evidenced to support the main retail function of town and city centres nationwide through linked shopping trips.

Planning History

- 1.12 The following Planning History covers the whole building including the ground floor unit and is relevant to the Application proposals.

Ref Number	Description	Decision	Date
F/AD03548	Non-illuminated name signs on front and returns of proposed canopy over entrance doorway to shops and offices.	Approved	March 1982
F17065	Construction of a canopy and alterations to entrance to offices.	Approved	March 1982
F/AD03809	(A) Illuminated individual letter name sign. (B) Illuminated double sided projecting box sign.	Approved	September 1982
040882	Installation of new entrance doors, security gates and feature canopy within the existing main arched entrance.	Approved	March 1992
041727	1a) Illuminated fascia name sign. b) 2 illuminated double-sided projecting box signs 2 2 nonilluminated sign panels	Approved	August 1992
042341	2 Non illuminated double	Approved	November

	sided banners one on market street elevation and one on Mosley Street elevation		1992
045830/FU/CITY1/94	Change of use to provide computer training facilities	Approved	August 1994
050574/FO/CITY1/96	Extension to existing fire escape including new landing and fire escape door at 3rd. floor level	Approved	October 1996
058416/FO/CITY1/00	Installation of air conditioning equipment with associated works	Approved	May 2000
061904/FO/CITY1/01	Installation of air conditioning unit at suite 1, 3rd floor	Approved	June 2021
075658/FO/2005/C1	Alterations to main entrance, including new doors and disabled access ramp	Approved	July 2005
091533/AOH/2009/C1	Display of advertisement banner on scaffold mesh for a temporary period of 6 months	Approved	December 2009
092281/FO/2010/C1	Change of use to the second floor to B1 (office) and D1 (non-residential institution)	Approved	April 2010
096698/FU/2011/C1	Change of use of 4th floor from Class B1(a) Office to a mixed (sui generis) B1(a) (office) and D1 (education use)	Approved	September 2011
110267/AO/2015/C1	Installation of two advertisement screens behind the glazing	Approved	December 2015
117831/FO/2017	Change of use of third floor to English Language School (D1) or Office (B1)	Approved	December 2017
118043/FO/2017	Glazed shopfront and glazed double door	Approved	January 2018
123911/FO/2019	Installation of replacement glazed panels to the existing shopfront, relocation of 2no. existing ATM's, installation of 1no. additional ATM and associated vinyl	Approved	December 2019
137450/FO/2023	Change of use of upper floors from offices (Use Class E) to hotel (Use Class C1), including infilling of lightwells,	Approved	December 2023

	with boundary treatment to Meal Street		
139269/FO/2024	Elevational alterations including installation of a new shopfront	Approved	May 2024
139468/AO/2024	Installation of 1no. illuminated fascia signage and 1no. illuminated projecting signage	Withdrawn	April 2024

2.0 The Proposed Development

Use

- 2.1 The proposed development seeks full planning permission to change the use of the ground floor unit at 130 Market Street from a vacant Bank (E(c) use class) to a betting shop (Sui Generis use class) alongside minor alterations to the shopfront and Advertisement Consent to display a new fascia sign and two projecting signs.

Design

- 2.2 The proposed floor and elevation plans alongside the shopfront visuals demonstrate how the frontage will appear in the street scene, the general shopfront design and proposed signage. The façade of the building would remain largely unchanged. The shopfront framework would be repainted in RAL5017 blue and the Pallister and door would be repainted black.
- 2.3 A new fascia on Elevation B would be provided alongside two hanging signs on Elevations A and C for which advertisement consent is also sought. The former 'Santander' fascia and projecting sign would be removed and replaced.
- 2.4 The heritage brown plaque commemorating the Football League on Elevation A of the building would be retained as existing.
- 2.5 Internally, the proposed ground floor layout retains an open access through the main entrance door. Customer toilets and staff facilities are provided internally as shown. The existing access door internally in the building is an emergency exit and would be secured to open outwards only for security reasons. No changes to the internal structure of the building are proposed, removable partition walls seek to divide up general areas internally where required as shown on the proposed floorplan.
- 2.6 The windows on all three elevations would be kept open allowing light into and through the unit. It is proposed to internally provide a removable vinyl design on the windows of Elevations A and C as shown on the submitted Elevations Plan and Visual Images.

Signage

- 2.7 Advertisement consent is also sought for one fascia sign and two projecting signs on the frontage of the unit. Full details and dimensions are shown on the submitted plans.

Access

- 2.8 The unit would be accessed via the existing front door from the main street. The door would be altered from a double to a single door for security reasons with detail shown on the proposed elevations plan.

- 2.9 The site is located in a highly accessible location with various options of local transport routes available in the immediate vicinity. The Site benefits from a high level of pedestrian and vehicular accessibility, and offers exceptional linkages to a variety of multi-modal public transport connections, and has a Greater Manchester Accessibility Level (GMAL) of 8, the highest level of accessibility.
- 2.10 Manchester Piccadilly Station is the closest city centre station to the site, and is accessible via around a 10-minute walk (800m). Bus stops provided at Piccadilly Gardens Bus Interchange 80m (1-minute walk) from the site provide access to approximately 32 bus services, providing regular bus services to and from a range of destinations across Greater Manchester.
- 2.11 The Manchester Freebus also operates across Manchester City Centre. Such buses are highly branded and are instantly recognisable, running on around a 10 or 12-minute frequency. The site is also highly accessible by tram. Market Street is the closest Metrolink stop to the site located 80m from the site's frontage with Mosley Street. Piccadilly Gardens Metrolink stop also is located 250m from the site.

Vacancy and Marketing Information

- 2.12 The unit has been vacant for a 14-month period since Santander's closure in April 2023. Savills have marketed the unit to a wide range of local and national operators during this 14-month period but have been unable to secure a retail, commercial or other tenant during this time. Methods of marketing included a board on the building, advertised on Zoopla and Rightmove, directly targeting local and national operators and advertised on Savills website at the following address - [130 Market Street, Manchester, M60 1AY | Property to rent | Savills](#)
- 2.13 Given the length of time the unit has been vacant and marketed exceeding 12 months, it can be reasonably considered that the unit is long term vacant in this respect which is harmful to the vitality and viability of the City Centre and setting within proximity to designated Heritage assets.
- 2.14 The occupation of the vacant unit has many positive impacts on the vitality and viability of Manchester City Centre and would allow Betfred to retain and relocate their existing business in the Piccadilly Gardens area, supporting local employment and economic growth whilst also occupying a vacant prominent unit and creating an active shopfront.

3.0 Planning Policy Review

- 3.1 The Sixth Edition of the National Planning Policy Framework (NPPF) was published in December 2023 and replaces the guidance in the previous 2023, 2021, 2019, 2018 and 2012 versions of the document. The framework sets out the Government's planning policies for England and how these are expected to be applied. The following policies are considered applicable to the proposed change of use application.
- 3.2 Paragraph 8 of the NPPF confirms the purpose of the planning system is to contribute to the achievement of sustainable development "There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
- **An economic role** – build a strong, responsive and competitive economy
 - **A social role** – creating a high-quality built environment, with accessible local services
 - **An environmental role** – contributing to protecting and enhancing our natural, built and historic environment
- 3.3 Paragraph 11 sets out the presumption in favour of sustainable development. It states that plans should seek opportunities to meet the development needs of their area. The Framework details that development proposals which accord with an up-to-date development plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless:
- The application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 3.4 Paragraph 119 of the NPPF sets out that 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating need, in a way that makes as much use as possible of previously developed or 'brownfield' land'.
- 3.5 Section 6 provides guidance on supporting economic development. Paragraph 85 confirms 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."
- 3.6 Section 7 of the NPPF provides guidance on ensuring the vitality of town centres. Paragraph 90 states that "Planning policies and decisions should support the role that

town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.”

- 3.7 Paragraph 124 states that development proposals that make an efficient use of land should be supported.
- 3.8 Chapter 14, paragraph 153 seeks to take a proactive approach in mitigating and adapting to the climate change.
- 3.9 Chapter 16 of the NPPF sets out guidance on conserving and enhancing the historic environment. Paragraph 209 states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

The Development Plan

- 3.10 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 3.11 The Development Plan for Manchester relevant to the proposed development comprises of the following:
 - Places for Everyone Joint Plan (2024)
 - Manchester Core Strategy 2012 – 2027 (2012)
 - Saved Unitary Development Plan Policies (1995)
- 3.12 In addition to the Development Plan, the Council are working on the following draft policy documents which have been considered as part of the development proposals:
 - Manchester Local Plan Review

Supplementary Planning Documents (SPDs) and Development Frameworks

- 3.13 The following SPDs and development Frameworks are also considered applicable to the proposed change of use:
 - Guide to development in Manchester (2007)
 - Manchester Piccadilly Strategic Regeneration Framework (2018)
- 3.14 The following Development Plan Policies are relevant to the development proposals.

Places for Everyone Joint Plan (2024)

- 3.15 The Places for Everyone Plan created by the Greater Manchester Combined Authority (GMCA) was adopted on the 21st March 2024 and is a long-term plan for jobs, new homes, and sustainable growth. The Plan covers development in Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan.
- 3.16 There is no site-specific regeneration relating to the site within the Places for Everyone Plan. The site is located within the Core Growth Area under Policy JP-Strat 1, which will seek to be protected and enhanced, with development supporting major growth in the number of jobs provided across the area. In addition to being part of the Core Growth Area, the Site also lies within the identified boundary of the City Centre. Under Policy JP-Strat 2 the City Centre will remain the focus for business, retail, culture, leisure and tourism for Greater Manchester.

Manchester Core Strategy 2012 - 2027

- 3.17 The Manchester Core Strategy sets out the City Council's Vision for Manchester to 2027 and is the main policy document in which the proposal is assessed against.
- 3.18 Policy EC3 (The Regional Centre) highlights that proposals for town centre uses will be assessed according to Policy C1.
- 3.19 Policy CC1 (Primary Economic Development Focus – City Centre and Fringe) states 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.
- 3.20 Policy CC2 (Retail), retail development will be prioritised in the Primary Shopping Area (PSA), followed by accessible locations on the edge of the PSA. The Policy confirms that ancillary commercial and leisure services are also acceptable within the PSA, providing that retail remains the dominant use, and proposals do not conflict with other policies within the Local Development Framework.
- 3.21 Policy CC4 (Visitors – Tourism, Culture and Leisure) posits a focus on the City Centre as a hub for culture and leisure in the City Region. As such, proposals which improve the appearance, use and accessibility of all cultural, visitor and leisure attractions and associated facilities will be supported.
- 3.22 Policy CC6 (City Centre High Density Development) confirms City Centre development will generally be high-density. It is a location where land should be used to maximise its efficiency.
- 3.23 Policy CC7 (Mixed Use Development) acknowledges the opportunity for mixed-use development in the City Centre and promotes using land as efficiently as possible. In locations which have an established public function, active ground floor uses are appropriate.

- 3.24 Policy CC8 (Change and Renewal), states that development most likely to deliver the vision for the City Centre is supported.
- 3.25 Policy CC9 (Design and Heritage) requires the design of new buildings to be of the highest standard in terms of appearance and function. It notes the need to preserve and enhance the city's heritage assets. The policy supports proposals for high density and mixed-use development in the City Centre where due consideration is given to the specific design challenges which arise.
- 3.26 Policy C1 (Centre Hierarchy) states that in order to maintain the vitality and viability of its centres, provide services as locally as possible and minimise the need to travel by car, the City Centre is the focus for comparison retail for the Manchester City Region. 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.
- 3.27 Policy C10 (Leisure and the Evening Economy) states that new development and redevelopment that supports the evening economy, contributes to the vitality of district centres and supports a balanced and socially inclusive evening/night-time economy will be permitted, subject to the following considerations:
- Cumulative impact – in areas where there is already a concentration of bars (A4), hot food takeaways (A5) and other night-time uses which are detrimental to the character or vitality and viability of the centre, there will be a presumption against further facilities.
 - Residential amenity – the proposed use should not create an unacceptable impact on neighbouring uses in terms of noise, traffic and disturbance.
 - Balance - new uses in Manchester centres should support both the day-time an evening/night-time economy whilst not undermining the role of the primary shopping area.
- 3.28 Sub text 10.60 and 10.61 of Policy C10 confirms that the policy aims to encourage evening and nighttime economy uses that contribute to the vitality of the Manchester's centres and that support the creation of a safe, balanced and socially inclusive evening economy. The Council recognises that a vibrant evening economy is important, both to the well-being of its residents and as a source of economic activity. The Council will seek to prevent concentrations of uses that would harm a centre's attractiveness to shoppers or its residential amenity, where relevant. The Council will seek to ensure that, where permission is granted, any potential harm to the area from the proposal can be controlled, for example by limiting the hours of operation or ensuring that shutters are not left down during the day.
- 3.29 Within Policy C10, the following percentages are given as a benchmark in the Primary Shopping Area to achieve the Policy requirements:
- Proportion of non-retail uses within the Primary Shopping Area (ground floor) – less than 40%
 - Vacancy Rate - less than 15%

- 3.30 Policy EN1 (Design Principles and Strategic Character Areas) requires that all development in Manchester will be expected to have regard to the strategic character of the location of the development and follow design principles outline in the NPPF.
- 3.31 Policy EN3 (Heritage) seeks that new developments must be designed in support of the Councils objectives to preserve and enhance the existing historic environment. Proposals should complement historic features within the vicinity and acknowledge the importance of listed features.
- 3.32 Policy DN1 (Development Management) details the key amenity issues to be considered through development proposals. These relate to matters such as appropriate siting, layout, scale, form, massing, materials and detail. Additionally, it must consider the potential effect on amenity, including privacy, light, noise, vibration, air quality and additional factors of importance.

Saved Unitary Development Plan Policies (UDP) (1995)

- 3.33 Some policies from Manchester City Council's UDP (1995) remain extant and relevant to the consideration of planning applications.
- 3.34 Policy DC18.1 aims to ensure that development proposals adjacent to Conservation Areas are only granted where it can be shown that they will not harm the appearance or character of the area, including the protection of views into and out of Conservation Areas.

Draft Manchester Local Plan Review

- 3.35 The Council are in the initial stages of undertaking a review of Manchester's Local Plan, setting out how the city should meet the need for new development over the next 15-20 years.
- 3.36 An Issues and Options consultation was undertaken between February-May 2020, with current timescales indicating the next stage will be consultation on the Draft Plan prior to it being submitted for examination by the Inspectorate. As the Local Plan Review is at an early stage and there are no draft policies to review, no weight is given to it in the consideration for this proposed development.

Guide to development in Manchester SPD (2007)

- 3.37 The Guide to Development in Manchester was adopted in April 2007. The guide reflects the growing recognition of the importance of well-designed and well-maintained neighbourhoods in supporting sustainable development and neighbourliness.
- 3.38 The guide places significant importance on new development creating a 'sense of place' under seven key principles as follows:

- character and context;
- continuity and enclosure;
- legibility;
- ease of movement;
- quality of the public realm;
- diversity; and
- adaptability.

3.39 Developments should be informed, both in terms of design and layout, by the wider context. The document is clear to point out that it is the character and identity of an area that will determine appropriate densities and form, which will vary across the city. The SPD specifically states that the conversion of existing buildings for a range of new uses is encouraged.

Manchester Piccadilly Strategic Regeneration Framework (2018)

3.40 This Framework builds upon a 2014 Report and sets out guidance for development in the Piccadilly area of the city in response to the proposals for HS2 and Northern Powerhouse Rail (NPR) into Manchester. The Framework seeks to use this new development as a catalyst and opportunity to transform and regenerate the eastern side of the city centre.

3.41 Manchester Piccadilly represents one of the biggest development opportunities in the UK, and has the potential to make a significant impact on both the growth of the city, and also the national economy. The area includes Piccadilly Station, Piccadilly Basin and Portugal Street East. Following redevelopment, it is anticipated that the proposed new investment in the area could bring up to 40,000 new jobs, 13,000 new homes and 820,000 square meters of new commercial development.

4.0 Planning Assessment

4.1 This section of the Statement provides an assessment of the proposals against the national and local policy framework detailed in Chapter 3 and sets out why the development is policy compliant and can be approved. A Heritage Impact Assessment is provided separately at Chapter 5.0 of this Statement. The following planning matters have been considered and assessed:

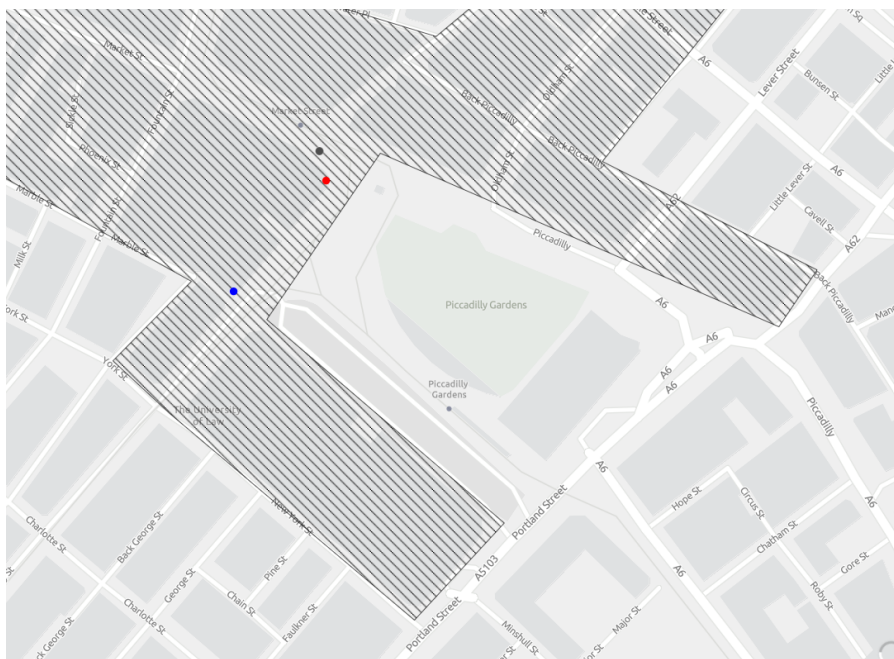
- Principle of Development
- Sustainable Development
- Design
- Crime and Safety
- Supporting the Evening Economy
- Amenity
- Servicing and Waste Management

Principle of Development

4.2 The proposal is for a relocation of Betfred's existing business from 10 Mosley Street to 130 Market Street which is a short distance of 78 metres between the two units, less than a 1-minute walk. Both Betfred's current unit and the proposed change of use unit are within the City Centre Primary Shopping Area (PSA) under Core Strategy Policy CC2. The same retail, commercial and leisure planning policies apply to both units in terms of appropriate uses in the PSA.

4.3 Figure 3 below shows the extent of the PSA from the Core Strategy Proposals Map. The red dot shows the location of the application site and the blue dot shows Betfred's current location

Figure 3 – Extent of the Primary Shopping Area (PSA)



- 4.4 The relocation of Betfred's existing business from 10 Mosley Street allows the company to continue to successfully operate their business within the Piccadilly Gardens area of Manchester and would not result in the addition of any further betting shops in the City Centre.
- 4.5 Core Strategy Policy CC1 supports leisure, entertainment, cultural and tourism facilities 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. The proposed development would continue to deliver a leisure and entertainment use within the City Centre in accordance with Policy CC1 and C1.
- 4.6 Core Strategy Policy CC2 states that retail development will be prioritised in the Primary Shopping Area (PSA), however importantly, the Policy also confirms that ancillary commercial and leisure services are also acceptable within the PSA, providing that retail remains the dominant use, and proposals do not conflict with other policies within the Local Development Framework.
- 4.7 This ties in with Core Strategy Policy C10 which sets out target thresholds for ground floor uses within the PSA. The Policy seeks to achieve a proportion of non-retail uses within the Primary Shopping Area (ground floor) of less than 40% and a vacancy rate of less than 15%
- 4.8 The unit sits on a corner frontage with Mosley Street and Market Street which leads to the major Arndale Shopping Centre. Occupied units on the immediate street frontage include:
- Primark (E(a) use class)
 - Burger King (E(b) use class)
 - Skipton Building Society (E(c) use class)
 - Costa (E(b) use class)
 - Caffè Nero (E(b) use class)
 - Debenhams (E(a) use class)
 - Starbucks (E(b) use class)
 - Halifax Bank (E(c) use class)
 - Greggs (E(b) use class)
 - Superdrug (E(a) use class)
 - McDonalds (E(b) use class)
- 4.9 The majority of uses on the street frontage have an established flexible E use class so can accommodate a wide range of main town centre uses including retail shops, food and drink outlets and professional services as would be typically found in the City Centre. These units can readily accommodate a retail use without the need to seek further planning permission. The proportion of non-retail uses on the street frontage is well in excess of the minimum 40% threshold requirement of Policy C10. In this regard, the change of use of the application site from vacant (E(c) use to Sui Generis would comply with the requirements of Core Strategy Policy CC2 and C10.

- 4.10 The proposed change of use also accords with Core Strategy Policy CC4 which focuses the City Centre as a hub for culture and leisure in the City Region and confirms that proposals which improve the appearance, use and accessibility of all cultural, visitor and leisure attractions and their associated facilities will be supported.
- 4.11 There is not considered to be a high number of betting shops within the PSA or City Centre as a whole. A GOAD Plan is provided at Appendix 3 of this Statement which shows in red the location of current trading betting shops in the City Centre post 2019 and the blue units show betting shops which have ceased trading since 2019. As is clear, there is not an overconcentration or high number of betting in shops in this location. The nearest betting shops trading to the application site are Ladbrokes and Paddy Power on Piccadilly Plaza.
- 4.12 The unit has not been in use for retail within the PSA for a significant number of years having formerly been Santander Bank. Its change of use would not result in the loss of a retail unit from this location. Upon relocation, 10 Mosley Street would become available and marketed to accommodate a retail or other occupier subject to any required planning permissions.
- 4.13 The Council are able to retain full control over the number of betting shops in the PSA and City Centre including what occupier goes into 10 Mosley Street both through the planning system but also through the licensing system for gambling.
- 4.14 Betfred are required to surrender their existing gambling licence when they vacate 10 Mosley Street and re-apply for a new licence to operate from 130 Market Street. This allows the Council retain full control over the number of betting shops in the PSA through both the Planning and Licensing process.
- 4.15 The vacant change of use unit was last occupied by Santander Bank (former A2 use) which now falls within E use class following changes made to the Town and Country Planning (Use Classes) Order in September 2020. The bank closed on the 13 April 2023 and the unit has been vacant for a 14-month period despite being actively marketed by Savills. As such a complementary main town centre leisure and entertainment use is now proposed to secure the long-term future of the Unit.
- 4.16 The proposal supports the main retail function of the PSA by bringing a long-term vacant unit within a prominent corner position in the City Centre back into active use. The proposal would also support the wider regeneration framework for this part of the City Centre and re-development of the Piccadilly Gardens area where works have recently commenced to improve the public realm.
- 4.17 Betfred was founded in 1967 and is the world's biggest privately-owned betting company and one of the UK's biggest privately-owned retail outlets operating around 1,650 shops across the United Kingdom. The majority of shops are within town and city centre high streets and indoor shopping centres.

- 4.18 Licensed betting shops are regarded as being main town centre uses under Annex 2 (Glossary) of the National Planning Policy Framework (NPPF) as they are defined as a leisure and entertainment use. Betting shops as a main town centre use, have been evidenced to support the main retail function of town and city centres nationwide through linked shopping trips.
- 4.19 Further detail on this is provided at Appendices 1 and 2 of this Statement which provide a Betfred Brochure with general information on the business and also a Market Research Report undertaken independently by NEMS Market Research which provides detail of customer behaviours and linked trips between betting shops and the wider retail shops of town and city centres.
- 4.20 Taking all of the above into account, and the established benefits of the proposal, it's concluded that the principle of development and relocation of Betfred's existing business is demonstrably acceptable when assessed against Core Strategy Policies CC1, CC2, CC4, CC8, C1 and C10 alongside national guidance in chapters 6 and 7 of the NPPF which supports economic growth and flexibility in town and city centres.

Sustainable Development

- 4.21 The proposal accords with the three strands of sustainable development as follows:
- **An economic role** - The proposed development comprises a main town centre use as defined by the NPPF Glossary which builds a strong, responsive and competitive economy in Manchester City Centre. The proposal supports an economic role by facilitating a relocation of Betfred's existing Bookmaker Business from 10 Mosley Street, a short distance away. The proposal also brings a long-term vacant unit back into active use, supporting local employment.
 - **A social role** – the proposal creates a high-quality built environment, with accessible local services by retaining and facilitating a relocation of a successful business in the City Centre which continues to provide a bookmaker service for residents and visitors to Manchester.
 - **An environmental role** – the proposal contributes to protecting and enhancing our natural, built and historic environment by conserving and enhancing the appearance of the currently vacant ground floor unit, providing an open and active shop frontage, bringing the unit back into active use with daily pedestrian activity, making effective use of land and conserving and enhancing the non-designated heritage asset and also the setting of a number of designated Heritage assets in proximity.

Design

- 4.22 The design of the development proposes minor external alterations to the shopfront and new signage which will preserve the existing architectural characteristics of the

non-designated heritage asset and therefore have little material impact within the context of the area in accordance with Core Strategy Policy EN1.

- 4.23 The design of the unit frontage has been undertaken to be sensitive to its corner location, extent of window frontage and general character of the area including upper floor uses and permission to be converted into a hotel. The external appearance of the building and its façade will generally remain unchanged as a result of the change of use.
- 4.24 The internal layout is shown on the proposed floorplan. Internal vinyl coverings are proposed on the windows of Elevations A and C as shown on the plans. Views and light into the unit are retained through the three windows.
- 4.25 The re-development has been considered to ensure it conserves the architectural characteristics of the external façade. The surrounding area is characterised by buildings demonstrating a mix of scale and form. It is considered that the development of the site will respect the buildings status as a non-designated heritage asset, as well as the setting of the surrounding conservation areas, in line with Policy EN3 of the Core Strategy. The proposals will ensure efficient use of land in line with Policy CC6 of the Core Strategy.
- 4.26 Taking the above into account, the proposal provides a well-designed shopfront that seeks to conserve and enhance the setting of Piccadilly Gardens, the building itself and surrounding heritage assets in accordance with Development Plan Policies CC9, EN1 and EN9.

Crime and Safety

- 4.27 In terms of designing out crime and staff safety, Betfred implement various security measures in all of their shops including panic alarms for staff under the main counter, means of escape from behind the counter into a staff kitchen area with a lockable door and CCTV monitoring within the unit to deter crime opportunities. Staff also receive regular training on health and safety matters including crime prevention.
- 4.28 The proposals meet the requirements of Core Strategy Policy DM1, the Guide to Development SPD and paragraph 92 of the NPPF which states that developments should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

Supporting the Leisure and Evening Economy

- 4.29 Core Strategy Policy C10 (Leisure and the Evening Economy) states that new development and redevelopment that supports the evening economy, contributes to the vitality of district centres and supports a balanced and socially inclusive evening/night-time economy will be permitted, subject to the following considerations:
- Cumulative impact – in areas where there is already a concentration of bars (A4), hot food takeaways (A5) and other night-time uses which are detrimental to the

character or vitality and viability of the centre, there will be a presumption against further facilities.

- Residential amenity – the proposed use should not create an unacceptable impact on neighbouring uses in terms of noise, traffic and disturbance.
- Balance - new uses in Manchester centres should support both the day-time and evening/night-time economy whilst not undermining the role of the primary shopping area.

4.30 Sub text 10.60 and 10.61 of Policy C10 confirms that the policy aims to encourage evening and nighttime economy uses that contribute to the vitality of the Manchester's centres and that support the creation of a safe, balanced and socially inclusive evening economy. The City Centre has an important role as the focus for the City's evening economy. The Council recognises that a vibrant evening economy is important, both to the well-being of its residents and as a source of economic activity.

4.31 However, this needs to be balanced against the other functions of centres, and in particular the need to support daytime activity. The Council will seek to prevent concentrations of uses that would harm a centre's attractiveness to shoppers or its residential amenity, where relevant. The Council will seek to ensure that, where permission is granted, any potential harm to the area from the proposal can be controlled, for example by limiting the hours of operation or ensuring that shutters are not left down during the day.

4.32 The proposal brings a vacant unit back into daily use and as previously discussed and demonstrated at Appendix 3, does not result in an overconcentration of betting shops, nor does it result in an unacceptable cumulative impact with bars and hot food takeaways in the locality. In this regard the proposal is not detrimental to the character or vitality and viability of the centre and continues to provide a leisure and entertainment use in this location to support the City Centre evening and nighttime economy and the aspirations of Policy C10.

4.33 The proposal provides an opportunity for linked trips to the wider PSA and contributes positively to the City Centre's daytime and evening economy whilst not undermining the role of the primary shopping area. Betfred is generally open until 22:00 rather than closing at 17:00 as the previous use of the building would have closed. The longer operational hours support the evening economy and provides a natural surveillance over Piccadilly Gardens during later evening hours.

4.34 Taking the above into account, the proposal supports the leisure and evening economy and complies with Core Strategy Policy C10 respectively.

Amenity

4.35 It is acknowledged that permission has recently been approved to convert the upper floors of the building to a Zedwell hotel which is detailed in the Planning History,

therefore an assessment is also made as to whether the proposed use would harm residential amenity. The unit is within a busy area of the City Centre which has high pedestrian and transport movements at all times of the day and through the later evening hours so there is an existing level of general baseline noise given the location.

- 4.36 The proposed use is not excessively noise generating and televisions internally in the unit are set at an appropriate noise level and monitored during operational hours by staff. The site is in a highly accessible location near major public transport links and not dependent on private vehicles. In this regard, the proposed use is not expected to have an unacceptable impact on neighbouring uses in terms of noise, traffic, air pollution or general disturbance.
- 4.37 The unit is already well ventilated and has good levels of natural light from the three large windows on the front elevation.
- 4.38 Core Strategy Policy DN1 requires that new development proposals must consider the potential effect on amenity, including privacy, light, noise, vibration, air quality and additional factors of importance. It is not considered that the proposed change of use would have any unacceptable material impact on amenity and so accords with Policy DN1.

Servicing and Waste Management

- 4.39 The unit has existing commercial waste and recycling bins that would be utilised as normal upon relocation from Mosley Street. By the nature of the business, there are not significant amounts of waste produced. No parking is required for the change of use proposals as the unit is in a highly accessible location well serviced by public transport options in the City Centre.

5.0 Heritage Impact Assessment

- 5.1 This Chapter provides an assessment of the impact of the development on the setting of heritage assets both designated and non-designated in the local area.
- 5.2 The unit sits on the ground floor of the Royal Buildings which were constructed in 1909 following the demolition of the prominent Royal Hotel and was designed by Manchester architects Messrs J W Beaumont & Sons at the commission of Messrs Lewis's of Manchester and Liverpool.
- 5.3 The Site is a non-designated heritage asset due to its high-quality architectural design including detailed stone façade, which makes a positive contribution to the streetscape to reinforce a strong corner at the junction of Mosley Street and Market Street. On the Mosley Street Elevation of the unit, there is a Heritage Plaque commemorating the Football League.
- 5.4 Works to a non-designated heritage asset require planning permission as standard however additional consents, such as listed building consent, are not required. Chapter 203 of the NPPF states that: "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."
- 5.5 The Site is also not contained within a Conservation Area, however is within the setting of four Conservation Areas as follows:
- Smithfield
 - Upper King Street
 - Stephenson Square
 - George Street
- 5.6 The closest listed buildings to the site are shown as yellow dots at Figure 4 below and are:
- No.10 Mosley Street (Grade II) which is to the south of the site and currently accommodates Betfred;
 - The Rylands Building (Grade II) which is adjacent to the northwest of the site along Market Street;
 - No. 1 Piccadilly (Grade II) which is adjacent to the northeast, and
 - Peel Statue (Grade II) located at the northwest corner of Piccadilly Gardens.
- 5.7 Figure 4 below shows the location of the nearby listed buildings and extent of the Conservation Areas and their setting.

Figure 4 – Location of Designated Heritage Assets in proximity to the site



- 5.8 The Royal Buildings and application site do not contribute to the essential setting of these designated heritage assets, and minor alterations to the shopfront door and proposed signage are considered to have no material impact on these assets.
- 5.9 The façade of the building would remain largely unchanged and will have a minor impact on the visual appearance of the building's exterior. The shopfront framework would be repainted in RAL5017 blue and the Pallister and door would be repainted black.
- 5.10 The heritage plaque commemorating the Football League on Elevation A would be retained as existing and is shown on the Elevations Plan.
- 5.11 No changes are proposed to the internal structure of the building with internal, moveable partition walls provided where required as shown on the Plans.
- 5.12 A new fascia on Elevation B would be provided alongside two hanging signs on Elevations A and C for which advertisement consent is also sought. The former 'Santander' fascia and projecting sign would be removed and replaced. The addition of new signage is required to advertise the business and is of a similar scale as the previous Santander signs. It is considered that the proposed designs take into account the existing character and appearance of the building, and the materials

chosen will reduce potential visual impact where possible. The proposed works will contribute to the continued use and general maintenance of the property.

- 5.13 The three windows on the unit shown on Elevations A, B and C would be kept open allowing light into and through the unit. It is proposed to internally provide a temporary vinyl design on the windows of Elevations A and C as shown on the submitted Elevations Plan and Visual Images. This vinyl design does not seek to block out the window and allows light to permeate through whilst providing privacy internally for customers. Should the Council have any concerns with regards the vinyl proposed on the windows, the Applicant is happy to discuss an alternative design if necessary or changes to the extent of vinyl covering.
- 5.14 The proposal would conserve and enhance the setting of the four adjacent Conservation Areas and nearby listed assets by bringing a long-term vacant unit back into an active use, with an open shopfront and changing window display. By bringing the unit back into an active use, this would complement the adjacent businesses in the PSA and maintains an attractive corner position at a busy junction in the City Centre.
- 5.15 In line with Paragraph 203 of the NPPF, this heritage impact assessment has considered the impact of the proposed development on non designated and designated heritage assets and has concluded that the proposed development on the ground floor unit of the Royal Building will result in no harm to the significance of the building as a non-designated heritage asset. The proposed works are small in scale and will have a minor impact on the visual appearance of the buildings exterior.
- 5.16 The works will provide sustainability benefits and maximise the units viable use by bringing a vacant unit back into occupation, repainting the shopfront alongside minor alterations to the door and installing new signage. The proposed designs of the shopfront and signage has taken into account the existing character and appearance of the building, and materials have been chosen to reduce any potential visual impact where possible. The proposed works will contribute to the continued use and maintenance of the property.
- 5.17 It is therefore considered that the proposals accord with Core Strategy Policies CC9, EN1, EN3 and Section 16 of the NPPF with regards to heritage impact.

6.0 Conclusions

- 6.1 This Planning, Design and Access Statement incorporating a Heritage Impact Assessment has been prepared on behalf of Done Brothers (Cash Betting) Ltd to support a Full Application for the change of use from vacant Bank (E(c) use class) to a betting shop (Sui Generis use class), minor alterations to shopfront and Advertisement Consent to display 1no fascia sign and 2no projecting signs at 130 Market Street, Manchester.
- 6.2 It supports the Regeneration of Piccadilly Gardens, and vibrancy and vitality of the City Centre. The proposal brings a prominent vacant unit back into an active use with a refreshed shopfront and daily activity. This is complementary to the leisure, shopping and entertainment offer in the area, adding vibrancy and activity to Piccadilly Gardens both throughout the day and into the evening economy.
- 6.3 This increased activity will add to the safety and security of the area. It will support the approved Zedwell Hotel on the upper floors of the building and provides economic benefits to the city to complement the existing commercial and leisure uses within the area. The proposal supports local employment and boosts the economy.
- 6.4 Betfred already operate a successful betting shop in the Piccadilly Gardens area of the City Centre trading daily from the ground floor unit of 10 Mosley Street, Manchester, which is a short distance of 78 metres away from the application site, less than a 1-minute walk. This Application seeks to facilitate this relocation of their existing betting shop in Manchester City Centre from 10 Mosley Street to 130 Market Square. Both Betfred's current unit and the proposed change of use unit are within the City Centre Primary Shopping Area (PSA) and are governed by the same policies.
- 6.5 The proposed change of use unit has been vacant since April 2023 despite being actively marketed for retail and other city centre uses but has been unable to secure any viable offers. An alternative but complementary main town centre Sui Generis use as defined by Annex 2 Glossary of the NPPF is now proposed which supports the wider retail function of the Primary Shopping Area. T
- 6.6 This accords with the provisions of Policy EC1 and paragraph 85 of the NPPF which states 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."
- 6.7 The proposed change of use will contribute to the economic, social and environmental improvement of the City Centre and represents sustainable development.
- 6.8 The proposal provides an opportunity for linked trips to the wider City Centre retail core as well as contributing to the centre's evening economy whilst retaining a

successful leisure and entertainment use in Piccadilly Gardens as detailed in Appendices 1 and 2.

- 6.9 The proposals would not result in an overconcentration of betting shops or other gambling premises in the PSA or the City Centre as demonstrated in the GOAD Plan at Appendix 3.
- 6.10 There would be no loss of a retail unit as the former use of the building was a Bank with an E(c) use class. The Application is for a relocation of Betfred's existing business therefore their current unit at 10 Mosley Street would in turn become available to accommodate a retail or other occupier subject to any required planning permissions. The Council retain control over the number of betting shops in the PSA and City Centre via both Planning and Licensing processes.
- 6.11 The proposal would not cause harm to the building as a non-designated heritage asset or nearby designated heritage assets as detailed at Section 5.0 of this Statement. The design of the shopfront and signage as proposed is considered to be appropriate and conserves and enhances the architectural characteristics of the external façade. The development of the site will respect the buildings status as a non-designated heritage asset, as well as the setting of the surrounding Conservation Areas. The proposals will also ensure efficient use of the land.
- 6.12 The proposals accord with the relevant policies of the Core Strategy, and supporting SPDs and Frameworks as detailed in Section 4.0 of this Statement. In terms of national planning policy, the scheme is consistent with the objectives outlined in the NPPF, in particular the need to provide sustainable development in the right locations.
- 6.13 In view of the above, the proposal satisfies both national and local policy and represents a suitable and sustainable use for the vacant unit. The proposal addresses all the relevant material considerations and, in this respect, we would invite the Council to assess the application and offer its full support for the proposal.

Appendices (submitted as separate documents)

1. Betfred Market Research Findings Report
2. Betfred Brochure
3. GOAD Plan