

FAO Eve Woolstencroft,
Manchester City Council Planning,
Manchester City Council,
P O Box 532,
Manchester
M60 2LA

20th September 2022

Submitted via the Planning Portal Ref: PP-11507158

Dear Ms Woolstencroft,

TWO ST PETER'S SQUARE, MANCHESTER – FULL PLANNING APPLICATION

Please find enclosed a full planning application made by CBRE Limited, on behalf of DWS Grundbesitz GmbH, to Manchester City Council (MCC), in relation to the retrospective erection of plant machinery comprising an extraction duct required as an exhaust for the building's generator.

The description of development is as follows:

Full planning application for the retrospective erection of plant machinery.

Site Location

The exhaust has been installed at the rear of Two St Peter's Square on the elevation fronting Back George Street. It is located approximately 6m above ground level and protrudes from the building above the service entrances on the ground floor.

Two St Peter's Square is located in Manchester city centre and comprises ground floor commercial units fronting St Peter's Square with 11 storeys of Grade A office space above. It was completed in April 2017 and is fully occupied, with tenants including the Department for Work & Pensions, accountancy firm EY, and Wagamama.

Application Background

The present planning application seeks retrospective permission for the installation of an exhaust at the rear of the building, which is fed from the building's generator located in the basement. The current exhaust replaces a previous exhaust which was installed as part of the building's construction. The previous exhaust was fitted flush with the building's ground floor, immediately underneath a short overhang due to the floors above having a slightly larger floorplate.

The generator was tested in 2021 as part of the building's regular maintenance schedule. Under test, the heat from the generator caused a fire under the external cladding directly above the exhaust. As such, the exhaust was found to pose a serious risk to the fire safety of the building and its occupants.

The recommendation from the applicant's specialist contractor was that the exhaust needs to be extended out of the building and up, to ensure that the heat is expelled into unobstructed airspace. A replacement exhaust was installed on 31st August 2021 to a specification recommended by the contractor.

Development

The exhaust comprises galvanised steel ducting made out of 0.9mm 304BA stainless steel, insulated with 25mm ceramic fibre lagging and clad over with 0.5mm thick 304BA stainless steel. The ducting is 254mm in diameter, 1308mm in length, and 1016mm in height. The ducting protrudes from the façade 0.49mm when viewed from the north east and 0.55mm when viewed from the south west.

Planning Policy Position

The statutory development plan for Manchester currently comprises the Manchester Core Strategy, covering the plan period 2012 to 2027. The Core Strategy was adopted in July 2012.

The site is within the George Street Conservation Area. The site is identified as part of the Regional Centre and the City Centre.

The following are considered to be the relevant policies of the statutory development plan:

- **Policy CC9 Design and Heritage** states that development should preserve or enhance identified heritage assets, and developers must recognise the specific design challenges that must be overcome to ensure complementarity of function and form.
- **Policy EN1 Design Principles and Strategic Character Areas** requires all development to follow seven principles of urban design relating to: character; continuity and enclosure; quality of the public realm; ease of movement; legibility; adaptability; and diversity.
- **Policy EN3 Heritage** states that development must preserve or, where possible, enhance the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance.
- **Policy EN16 Air Quality** states that developers will be expected to take measures to minimise and mitigate emissions from developments.
- **Policy DM1 Development Management** states that development should have regard to several specific issues including design, character, amenity, odours, and noise.

MCC's validation requirements, issued in January 2020, require that mixed use schemes ensure provision for internal ducting in risers that terminate at roof level.

Planning Assessment and Conclusions

The following issues are considered to be relevant to the determination of this planning application:

- Location of the exhaust
- Ventilation, extraction, and odour
- Visual appearance
- Heritage

Location of the exhaust

The applicant has confirmed that there were two options available in terms of the location of the exhaust:

- A. Installing a new exhaust running the full length of the building and coming out onto the roof.
- B. Installing a flue which protrudes out from the building in the same position as the previous exhaust.

The applicant recognises that Option A would be preferable in relation to MCC's validation requirements which state that ducting should be routed to the roof of mixed-use buildings. However, the route of the ducting to the previous exhaust was established and agreed with MCC under the implemented planning permission for the building's construction (ref. 106601/JO/2014/C2). It is therefore considered that the current location of the exhaust is acceptable in planning terms given that it has operated in this position since the building's completion in 2017.

Option A was not considered to be a workable, practical solution as this would have involved substantial works impacting the 11 floors of office space in the building which are all fully occupied. To route the exhaust using this option would be highly disruptive and lead to a reduction in amenity for the building's tenants during construction. The installation period would have also been extended significantly in order to design, prepare and install the ducting, along with returning the affected areas of office space to their original condition. This would have posed further safety risks

for the building by prolonging the length of time before the generator could be returned to safe operation. As such Option A has been discounted and is not considered feasible.

Option B was considered the most suitable location for the exhaust as it links into the existing exhaust pipework. It was necessary to have it protruding from the building to avoid causing another fire, as the original fire was caused by having the exhaust concealed within the building. This is the smallest size of flue that could have been installed for the size of the generator. It was also fitted as close to the building as was safely possible.

Other than these two options, it would not be possible to fit the exhaust anywhere else. The first floor of the building has glazed curtain walling all the way around, precluding the installation of external plant machinery. From the second floor to the roof the building is clad in stone which would also not be suitable for affixing external plant. It would not therefore be possible to locate the flue anywhere else externally on the building without causing a more significant visual impact than the current arrangement.

As such, it is considered that the current location of the exhaust is appropriate given that locating the exhaust at roof level, while preferable from a policy perspective, does not represent a feasible solution to securing the fire safety of the building.

Ventilation, extraction, and odour

The extraction of fumes is controlled by Core Strategy Policies EN16 and DM1, which seek to ensure that development minimises its impact on amenity and the environment. The operation of the exhaust is unchanged compared to the previous exhaust which it replaces. The only substantive difference is that fumes are now extracted further from the building due to the protrusion of the new exhaust. As such, it is not considered that this application has a more significant effect on the ventilation or extraction of fumes at the site, compared with the previous location of the exhaust.

Visual Impact

It is acknowledged that the exhaust as installed has a greater visual impact than the previous exhaust which was flush with the building façade. Core Strategy Policy EN1 introduces requirements for development to be designed in accordance with its context. The applicant has considered several options to reduce this visual impact without having an adverse effect on the fire safety of the building. The options assessment has included altering its visual appearance either through the installation of a cover, or painting the ducting to better align with the rest of the building and its surroundings.

The possibility of installing a cover to alleviate the visual impact of the exhaust has been considered by the applicant. Following investigation including a visit to the site, the contractor advised that it will not be possible to fit a cover to the exhaust as it was not built to support the additional weight. Given that the façade above the exhaust is a double-glazed window, it is also the case that there are no suitable fixing points on the building itself to attach the cover to. It is also noted that the installation of a cover would likely add to the visual intrusiveness as this would increase the overall size of the unit.

Options to paint the ducting were subsequently considered. This was supported by comments received from officers at MCC during pre-application discussions. The first option assessed was dark grey paint to match the building (RAL 7016), however it was not possible to source this in a heat resistant paint. A standard heat resistant black paint was then considered. The contractor ultimately advised that as the ducting has been manufactured from stainless steel, heat resistant paint will not adhere. Stainless steel has been used in this instance because it does not corrode like normal mild steel which can be painted. This has the benefit that the exhaust will not rust or corrode, although with the drawback that it cannot be painted with heat resistant paint. Whilst it has not been possible to reduce the visual impact of the exhaust as installed, the applicant has demonstrated that options testing has been undertaken to assess several potential solutions using either a cover or paint. The exhaust represents a crucial part of the building's operational safety, and as such it is considered that this outweighs its increased visual impact.

Heritage

The site is located within the George Street Conservation Area. The following listed buildings and structures are within 100m of the site:

- Manchester Art Gallery (Grade I);
- The Atheneum (Grade II*);
- Town Hall Extension (Grade II*);
- Manchester War Memorial (Grade II*);
- Memorial Cross (Grade II);
- The Princess Buildings (Grade II);
- 14 and 16 Princess Street (Grade II);
- 26-30 Princess Street (Grade II);
- 34 Princess Street (Grade II);
- 83 Princess Street (Grade II);
- 39 and 41 George Street (Grade II); and
- 63 George Street (Grade II).

Core Strategy Policies CC9 and EN3 concern the protection of heritage assets. The position of the exhaust on Back George Street means it is only visible from the street itself and from Princess Street and Dickinson Street at their junctions with Back George Street. Back George Street is a back street which is typically only used for servicing and access (mainly secondary servicing access).

There is no reference to Back George Street within the relevant text available on MCC's website, and the street has limited value in terms of its contribution to the heritage character of the conservation area and surrounding listed assets.

The limited lines of sight to the exhaust, along with the nature of the street mean that the exhaust as installed does not have a detrimental impact on the setting of the various listed assets in proximity to the site. It is considered that the exhaust does not materially alter the character of the George Street Conservation Area.

Conclusion

It is considered that the exhaust as installed complies with planning policy, and that its increased visual impact compared with the original configuration is outweighed by its necessity for the fire safety of the building. It would not be feasible to locate the exhaust in any other location on the building, and its current location has been established by the building's originally implemented planning permission (ref. 106601/JO/2014/C2).

Application Scope

In accordance with national and local requirements, the application (submitted via Planning Portal – ref. PP-11507158) comprises the following drawings and technical reports:

APPLICATION DOCUMENTS	DOCUMENT NUMBER
Application Form & Certificate of Ownership	-
Detailed Covering Letter explaining the proposals	-
Location Plan	-
SE – Elevation 1	0476041-E1-SE Rev. A
SW – Elevation 2	0476041-E2-SW Rev. A
NE – Elevation 3	0476041-E3-NE Rev. A
Exhaust Ducting Specification	ATI2021-001 Rev. 2
Exhaust Photographs	-

Application Validation

I trust that the information submitted is appropriate and enables the application to be registered and validated. The application fee of £462 (based on a site area of less than 0.1 hectares) (plus Planning Portal Service Charge) has been sent via cheque to the planning portal. If there are any immediate queries, then please do not hesitate to contact me in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tim Sanders', written on a light grey rectangular background.

Tim Sanders

Graduate Planner – Planning & Development