PLANNING STATEMENT

In support of a planning application for a change of use from Use Class E (commercial, business and service) to Use Class C1 (hotel), including extension to lift shaft, installation of dormers and rooflights and external alterations

at

68-70 High Street
Manchester
M4 1AE

NORTHERN PLANNERS

SEPTEMBER 2023

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1 INTRODUCTION

1.1 This Planning Statement has been prepared by Northern Planners in support of an application for a change of use from Use Class E (commercial, business and service) to Use Class C1 (hotel), including extension to lift shaft, installation of dormers and rooflights and external alterations at 68-70 High Street, Manchester. It explains the proposal and its merits in relation to the premises and material planning issues.

1.2 This Statement should be read in conjunction with the following documents which support this Application:

- Planning Application Form;
- Design and Access Statement;
- Proposed Site Plan (Drawing No. A002);
- Existing Ground Floor Plan (Drawing No. A100);
- Existing First Floor Plan (Drawing No. A101);
- Existing Second Floor Plan (Drawing No. A102);
- Existing Third Floor Plan (Drawing No. A103);
- Existing Roof Plan (Drawing No. A104);
- Proposed Ground Floor Plan (Drawing No. A110);
- Proposed First Floor Plan (Drawing No. A111);
- Proposed Second Floor Plan (Drawing No. A112);
- Proposed Third Floor Plan (Drawing No. A113);
- Proposed Fourth Floor Plan (Drawing No. A114);
- Proposed Roof Plan (Drawing No. A115);
- Existing Front Elevations (Drawing No. A200);
- Existing Side Elevations (Drawing No. A201);
- Proposed Front Elevations (Drawing No. A202);
- Proposed Side Elevations (Drawing No. A203);
- Proposed 3D Views (Drawing No. A901);
- Proposed Massing (Drawing No. A902);
- 3D Axonometrics (Drawing No. A903);
- Proposed Visuals (Drawing No. A904);
- Air Quality Assessment by Miller Goodall Acoustics and Air Quality;
- Crime Impact Statement by Greater Manchester Police;
- Preliminary Bat Roost Assessment Report by Collington Winter Environmental;
- Nocturnal Bat Survey Report by Collington Winter Environmental;
- Energy Statement by Base Energy;
- Heritage Statement by Williams Conservation Surveying;
- Noise Assessment by Peak Acoustics;
- Servicing Strategy; and
- Waste Servicing Details by Fresh State Waste Services.

2 THE SITE, ITS CONTEXT AND PLANNING HISTORY

The Site and its Context

2.1 The application site is located on a corner plot to the South East of High Street, South West of Turner Street and North West of Edgehill Street, and to the south of the site is No.66 High Street. The site is located centrally within Manchester being within the Northern Quarter of Manchester City Centre.

2.2 The site comprises a building that is roughly triangular in shape and 3 storeys in height (but also has roof space and a basement).

2.3 The ground floor area is occupied by two commercial units, one being in a retail use and the other being in a hot food takeaway use, as well as a lobby area to access the upper floors of the building which has its own Italianate classical doorcase access off Turner Street. The commercial units have a relatively modern frontage and take up a majority of the ground floor of the building.

2.4 The first, second and third floors of the building were last used as an office, but they have been vacant for some time now (believed to be over 20 years). The lawful use of these floors is Class E. The first and second floor levels of the building are finished in red brick and above the second floor is a brick parapet, which largely conceals the roof structure. The roof structure consists of 4 pitches finished in natural slate serving the High Street and Turner Street elevations. Beyond these pitches, the roof form is more complicated.

2.5 The site is surrounded by a mixture of uses, including residential units, offices, shops, cafes/restaurants, hot food takeaways, bars/pubs. Of note, to the south of the site on the ground floor of No.64-68 High Street is the English Lounge bar, and beyond this at No.60-62 High Street is Salt and Pepper fast food restaurant, whilst No.58 High Street comprises High Street Townhouse aparthotel. To the West of the site is the Arndale shopping centre with a mixture of commercial uses, whilst to the North East at No.72 High Street is Little Aladdin restaurant and to the North is Salvi's restaurant at No.60-67A High Street. To the South East of the site is No.8-12 Turner Street which accommodates residential apartments. Residential apartments are also located to the North East of the site at No.11-21 Turner Street.

2.6 There is an eclectic mix of buildings in the locality in terms of design and scale. Buildings in the immediate vicinity range from 3 to 8 storeys in height, albeit there is a 17 storey building approximately ~65 metres to the North East of the site on Nicholas Croft Street. The site is at the western edge of the Northern Quarter which accommodates a number of historic buildings, whilst to the East of the site is the brutalist Arndale shopping centre.

2.7 To the North West of the site and running along High Street to Nicholas Croft is the Metrolink tramline serving the navy, green and yellow tram lines. There is also a bus stop within close

proximity to the site on High Street and Manchester Shudehill Interchange is ~80 metres to the north of the site, whereas Manchester Victoria Railway Station is located ~550 metres to the North West of the site.

2.8 The site is located within the western edge of the Smithfield Conservation Area and is part of a series of 19th Century buildings on the eastern side of High Street. However, the building is not listed, nor is it adjacent to any listed buildings.

2.9 Manchester City Council's Local Development Framework Map Browser illustrates that the site lies within the designated Manchester City Centre and designated Manchester Regional Centre.

2.10 In terms of flood risk, the Environment Agency flood risk map indicates that the entire site lies within Flood Zone 1 which represents a chance of flooding less than 0.1% in any given year (low probability).

2.11 The site has been identified as being within the Manchester Air Quality Management Area.

Planning History

2.12 Based on the information available online via Manchester City Council's Public Access database, the following planning history has been identified (excluding advertisement consent):

LPA Reference	Description of Development	Decision and Date
127837/JO/2020	Variation of Condition 2 (specified plans) on application ref. 124351/FO/2019 to allow for revised disabled access arrangements.	Approved on 3rd November 2020
124351/FO/2019	Sub-division of vacant shop (use class A1) to provide self-contained shop (use class A1) and change of use of newly created unit to self-contained hot food takeaway (use Class A5) including installation of additional entrance from High Street and reuse of existing flue.	Approved on 7th February 2020
CDN/18/0956	Discharge of conditions 3 (CMP), 4a (footway survey) and 10 (acoustic insulation) attached to previously approved application 121327/P3OPA/2018.	Approved on 11th February 2019
121327/P3OPA/2018	Prior approval application for change of use of first and second floors plus roofspace from office use (Use Class B1a) to 11 no. 1 bed residential apartments (Use Class C3)	Approved on 16th November 2018

089939/FO/2009/C2	Installation of replacement flue to rear of building to 1m above eaves levels with capped rain resistant cowl.	Approved on 23rd November 2009
072016/VO/2004/N1	CITY COUNCIL DEVELOPMENT – Erection of 2.4m high single gates between 8 and 60, 70 and 76, 144 and 122 Gaskell Street and between 79 and 81 Leng Road (4 in total). Erection of 2.4m high double gates between 100 and 102 Gaskell Road and adjacent to 11 Clovelly Street (2 in total). Erection of 2.4m high double gates and fencing to rear of 50 Gaskell Street.	Approved on 19th July 2004
045599/FU/CITY/94	Change of use of the basement and ground floor of vacant shop unit into a take-away hot food shop.	Approved on 8th July 1994

2.13 Of particular note, prior approval was granted for the change of use of the upper floors of the building subject to this planning application from office use (previously known as Use Class B1a), to 11 no. residential apartments (Use Class C3) (Local Planning Authority reference: 121327/P3OPA/2018). Under this application, the Local Planning Authority (LPA) considered that the development was acceptable in terms of: transport and highways impacts; contamination risks; flooding risks; and noise from commercial premises on the intended occupiers. It is pertinent to note that the LPA determined that the noise impacts upon proposed residents from commercial uses could be made acceptable, and residents are considered to be more sensitive to noise than hotel guests, especially given that hotel guests do not tend to occupy rooms for a long period of time.

2.14 Whilst certain conditions attached to the prior approval permission were discharged under LPA reference. CDN/18/0956, this permission has not been implemented and is no longer extant. In addition, on 1st May 2019 an Article 4 Direction came into force to remove the change of use from offices to residential under permitted development in Manchester City Centre. Whilst no longer extant, given that a number of considerations were assessed under this prior approval application (e.g. noise and transport and highways impacts), it is considered this permission is a material consideration of some weight in the assessment of this current planning application.

2.15 At the ground floor level of the building, planning permission was granted on 7th February 2020 for the sub-division of a retail unit to form a smaller retail unit and hot food takeaway (LPA Ref: 124351/FO/2019), with revised details of this being approved on 3rd November 2020 under a Section 73 application (LPA reference: 127837/JO/2020). This permission has been implemented.

2.16 Pre-application advice was sought from the LPA for a relatively similar proposal to the one submitted under this planning application, and the LPA provided comments on that scheme (this advice has been submitted alongside this application). Where relevant, the responses

contained in the pre-application advice are referenced further in the Assessment section of this Statement, and it is important to stress that these have been taken into account in the submitted scheme.

3 THE PROPOSAL

3.1 The proposed development comprises the change of use from Use Class E (commercial, business and service) to Use Class C1 (hotel), including an extension to the lift shaft, the installation of dormers and rooflights and a number of other external alterations. The proposals are illustrated in detail on the plans submitted with the application.

3.2 The hotel rooms will be accommodated in the upper floors of the building, and the application seeks to create a fourth floor. The upper floors are proposed to accommodate 26 no. hotel rooms, each with their own private bathroom, with 7 no. rooms at first floor level, 7 no. rooms at second floor level, 7 no. rooms at third floor level and 5 no. rooms at fourth floor level.

3.3. The rooms on the third floor will receive natural light from newly installed conservation grade rooflights on the pitched roofs facing Turner Street and High Street, and these 9 no. rooflights will be flush with the roof.

3.4 5. No dormer windows are proposed to serve the newly created fourth floor. 3 no. of these dormers will be on the roof pitch facing High Street, whilst the other 2 no. dormers will be on the roof pitch facing Turner Street. The dormers will have flat zinc roofs as well as zinc walls for the cheeks and faces.

3.5 To create lift access to the fourth floor, the lift shaft to the rear of the building is proposed to be extended. The extension to the lift shaft will be constructed from zinc cladding.

3.6 Access to the hotel is proposed from an existing ground floor access on Turner Street. It is proposed to replace the existing door with a new glazed entrance doorway. At ground floor level will be a reception area, with a lift and stairs to access the hotel rooms on the upper floors from the ground floor. A cellar can also be accessed from ground floor level, and this is where refuse is to be stored (waste is to be collected on a daily basis as set out Waste Servicing Details document by Fresh State Waste Services).

3.7 Other external alterations proposed include:

- Glazing to former roller shutters facing Turner Street to match existing shop front of the building;
- A fire escape door to replace existing roller shutter facing Edgehill Street;
- The restoration of historic banding;
- The repair of existing timber windows at first and second floor levels;
- The repointing and repair of existing brickwork where required; and
- Existing stonework around all windows to be repaired and restored.

4 PLANNING POLICY

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all applications are to be determined in accordance with the Development Plan unless there are material considerations that indicate otherwise. In this case the Manchester City Council Development Plan comprises the following:

- Manchester Core Strategy (2012-2027) (adopted on 11th July 2012);
- Saved Unitary Development Plan Policies (adopted 1995);
- Greater Manchester Joint Waste DPD (adopted 1st April 2012); and
- Greater Manchester Joint Minerals DPD (adopted 26th April 2013).

4.2 The National Planning Policy Framework (NPPF) and the associated National Planning Practice Guidance (NPPG) are material considerations.

4.3 The Guide to Development in Manchester Supplementary Planning Document and Planning Guidance (adopted April 2007) is also a material consideration.

4.4 The emerging development plan document, Places for Everyone Plan, which would cover nine council areas in Greater Manchester, including Manchester City Council is acknowledged, but in accordance with Paragraph 48 of the NPPF, very little weight can be afforded to the policies within this at the draft plan.

4.5 The Development Plan documents and policies considered relevant to this application are outlined below:

<u>Manchester Core Strategy (2012-2027)</u>

- SP1 – Spatial Principles
- EC1 – Employment and Economic Growth in Manchester
- EC2 – Existing Employment Space
- EC3 – The Regional Centre
- CC1 – Primary Economic Development Focus: City Centre and Fringe
- CC4 – Visitors – Tourism, Culture and Leisure
- CC5 – Transport
- CC6 – City Centre High Density Development
- CC9 – Design and Heritage
- CC10 – A Place for Everyone
- C1 – Centre Hierarchy
- T2 – Accessible area of opportunity and need

- EN1 – Design Principles Strategic Character Areas
- EN4 – Reducing C02 Emissions by Enabling Low and Zero Carbon Development
- EN5 – Strategic Areas for low and zero carbon decentralised energy infrastructure
- EN6 – Target Framework for C02 reductions from low or zero carbon energy supplies
- EN8 – Adaption to Climate Change
- EN15 – Biodiversity and Geological Conservation
- EN16 – Air Quality
- DM1 – Development Management

Extant Unitary Development Plan Policies

- DC18 – Conservation Areas
- DC26 – Development and Noise

4.6 In national policy terms, the latest National Planning Policy Framework (NPPF) was published in September 2023. It sets out the Government's planning policies for England and how these are expected to be applied. At its heart is a presumption in favour of sustainable development.

4.7 Paragraph 11 of the NPPF states that decisions should apply a presumption in favour of sustainable development and development proposals should be approved if they accord with the local Development Plan.

4.8 Section 7 of the NPPF relates to ensuring the vitality of town centres and 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. Annex 2: Glossary, contained within the NPPF, defines 'Main Town Centre Uses' and this includes tourism development (including hotels).

4.9 Section 9 of the NPPF relates to promoting sustainable transport. Paragraph 110 states that in assessing application for development it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location. Paragraph 111 outlines that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highways safety, or the residual cumulative impacts on the road network would be severe.

4.10 Section 11 of the NPPF sets out that planning 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. Paragraph 120 states that planning decisions should promote and support the development of under-utilised buildings.

4.11 The Government also seeks to secure well-designed places. Section 12 of the NPPF requires all development to achieve high standards of design to produce visually attractive development. The NPPF also emphasises how good design is a key aspect of sustainable development. Paragraph 130 makes clear that developments should be sympathetic to the local character, function well and add to the overall quality of an area. Paragraph 134 goes on to state that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design (i.e. the National Design Guide and the National Model Design Code).

4.12 Section 14 of the NPPF details that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. Paragraph 154 notes that new development should be planned in ways that can help reduce greenhouse gas emissions, such through its location, orientation and design. Paragraphs 159-169 of the Framework set out guidance on the location of development with respect to areas at risk of flooding. The Framework outlines that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).

4.13 Section 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 174 states that planning decisions should, amongst other things, protect and enhance valued landscapes and minimise impacts on and provide net gains for biodiversity. In addition to this, Paragraph 185 outlines that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or wider area to impacts that could arise from the development. Paragraph 186 states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas, and cumulative impacts from individual sites in local areas. Further to this, Paragraph 187 sets out that planning decisions should ensure that new development can be integrated effectively with existing business and community facilities.

4.14 In Section 16, the NPPF seeks to conserve and enhance the historic environment assets in a manner appropriate to their significance. This is to ensure that they can be enjoyed for their contribution to the quality of life of existing and future generations.

4.15 National Planning Practice Guidance supports the National Planning Policy Framework with regards to how the NPPF should be implemented in practice and can be a material consideration in the decision-making process.

5 PLANNING APPRAISAL

The Principle of Development

5.1 In terms of the principle of the development, there are considered to be two strands to this:

- The loss of the office use and its replacement with a hotel; and
- The impact upon the vitality and viability of Manchester City Centre.

The loss of the office use and its replacement with a hotel

5.2 Policy EC2 of the Manchester Core Strategy states that:

> *"The Council will seek to retain and enhance existing employment spaces and sites. Alternative uses will only be supported on sites allocated accordingly or if it can be demonstrated that:*
>
> - *The existing use is un-viable in terms of business operations, building age and format;*
> - *The existing use is incompatible with adjacent uses;*
> - *The existing use is unsuitable for employment having has regard to the Manchester – Salford - Trafford SFRA; or*
> - *On balance, proposals are able to offer greater benefits in terms of the Core Strategy's vision and spatial objectives that the existing use."*

5.3 Following on from this, Policy CC4 of the Manchester Core Strategy states the following:

> *"The City Centre will be the focus for culture and leisure in the City Region. Proposals to improve the appearance, use and accessibility of all cultural and visitor attractions and associated facilities will be supported. The improvement of facilities for business visitors will also be supported.*
>
> *Development in the City Centre which improves facilities for visitors, including Manchester residents, will be promoted. In order that the existing visitor attractions can reach their potential it is also important that the City Centre has the infrastructure to accommodate the necessary volume of visitors. Hotels have become an increasing important use across the City, and these will be particularly important in the City Centre. New hotel development which contributes to the quality of the City Centre hotel offer will be supported."*

5.4 The lawful use of the upper floors is an office use (Class E(g)) and this was established under the previously approved prior approval application (LPA reference: 121327/P3OPA/2018) for the change of use of first and second floors plus roofspace from office use (Use Class B1a) to 11 no. 1 bed residential apartments (Use Class C3). When this prior approval application was

being assessed by the Local Planning Authority (LPA) in 2018, the upper floors of this building were vacant, and they have been ever since.

5.5 Therefore, the proposal will result in the loss of office space. However, the site is within the designated Manchester City Centre and as outlined above, Policy CC4 of the Manchester Core Strategy offers strong support for new hotel development which contribute to the quality of City Centre hotel offer and adds that hotels are an 'important use' in the City Centre.

5.6 In addition to this, the upper floors of the building have been vacant for some time (believed to be over 20 years). It is considered the upper floors of this building are not as attractive as more modern purpose-built offices within the City Centre which better cater for 21st Century business requirements, hence a reason why the upper floors have been vacant for so long.

5.7 The proposal for a main town centre use within these upper floors will also make effective use of this under-utilised building (promoted by Section 11 of the NPPF) as well as positively contributing to the vitality and viability of Manchester City Centre. Of note, the use will assist the City Centre's night time economy by providing visitors a place to stay overnight. As the building is considered to make a positive contribution to the significance of the Smithfield Conservation Area, the provision of a viable use for the building is also a benefit of the proposal. Further to this, another benefit of the proposal is that the use will provide direct employment (approximately 10 no. jobs in total with 6 no. full time jobs and 4 no. part time jobs).

5.8 All these factors combined are considered to clearly offer greater benefits in terms of the Core Strategy's vision and spatial objectives than the existing use, in accordance with Policy EC2 of the Manchester Core Strategy.

5.9 It is noted that an application for the conversion of office space to a hotel was recently approved in Manchester City Centre (LPA Ref: 132232/FU/2021) and the LPA concluded here that the change of use will offer greater benefits in terms of the Core Strategy's vision and spatial objectives than the existing use.

5.10 Given the above, the principle of the loss of the office space and its replacement with a hotel is deemed acceptable as the proposed use will offer greater benefits in terms of the Core Strategy's vision and spatial objectives than the existing use, in accordance with Policies EC2 and CC4 of the Manchester Core Strategy.

The impact upon the vitality and viability of Manchester City Centre

5.11 As noted above, the site is within the designated Manchester City Centre and designated Manchester Regional Centre. However, the site is not within a designated Primary Shopping Frontage.

5.12 In terms of the Regional Centre, Policy EC3 of the Manchester Core Strategy states that proposals for other town centre uses than offices and leisure uses will be assessed in accordance with Policies C1 and C9 of the Core Strategy, unless included in an allocation or the uses are ancillary to the main employment use.

5.13 Policy C1 of the Manchester Core Strategy relates to Manchester's centre hierarchy which aims to maintain the vitality and viability of its centres. In relation to Manchester City Centre, the following is stated:

> *"The City Centre is the focus for comparison retail for the Manchester City Region. Its catchment exceeds the City boundaries and the capacity for future comparison development reflects this. 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 (see policies CC1-10 for detailed policy guidance)."*

5.14 Policy CC1 of the Manchester Core Strategy outlines that the provision of a range of economic development uses, such as retail, leisure, entertainment, cultural, and relevant to this application, tourism facilities, will be encouraged in the City Centre, in line with Policy C1 of the Core Strategy, so as to support the development of a vibrant employment location attractive to businesses, employees and visitors to the City Centre.

5.15 Policy CC10 of the Manchester Core Strategy sets out that the City Centre will develop as a location which appeals to a wide range of residents and visitors and that development which promotes this objective will be supported, particularly through:

- Uses which increase the diversity of activity in the City Centre, with an emphasis on family-oriented activity; and,
- High standards of accessibility to buildings and across spaces in the City Centre.

5.16 The proposal will not result in the loss of a retail use or other main town centre use at ground floor level and the existing retail use within the building will remain. In addition to this, the proposal is for a 'Main Town Centre Use' (as the defined within NPPF) in Manchester City Centre. The provision of a hotel is also considered to assist in diversifying the activity in the City Centre as supported by Policy CC10, support the development of a vibrant employment location in the City Centre (as encouraged by Policy CC1), and as discussed above, Policy CC4 is very supportive of additional hotels within the City Centre. Further to this, the proposed works at ground floor level to replace the roller shutters with glazing along Turner Street will create a more active frontage than existing.

5.17 The proposal is therefore considered to positively contribute towards the vitality and viability of Manchester City Centre in accordance with Core Strategy policies and Section 7 of the NPPF. Given the above, the principle of the development is considered acceptable.

Design and impact on the character and appearance of the area (including Smithfield Conservation Area)

5.18 Policy DM1 of the Manchester Core Strategy states that all development should have regard to:

> *"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."*

5.19 In addition, Policy CC9 of the Core Strategy states that in Manchester City Centre, the design of new buildings will need to be of the highest standard in terms of appearance and function. This policy goes on to note 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.

5.20 As noted above, the site is within the designated Smithfield Conservation Area. Section 72 of the Planning (Listed Buildings & Conservations Areas) Act (1990) requires that LPA's pay special attention to the desirability of preserving or enhancing the character or appearance of any conservation area where relevant.

5.21 It is pertinent to note that a Heritage Statement and Design and Access Statement have been submitted alongside this planning application and should be read in conjunction with this Planning Statement. The latter document in particular explains the design development and rationale for the proposed development.

5.22 The Heritage Statement submitted alongside the application outlines that the building at Nos. 68-70 High Street is considered to be of medium to low significance, but that it is nonetheless a positive contributor to the special character of the Smithfield Conservation Area, and a good example of the distinctive Italianate revival style of Mancunian commercial architecture, popular during the mid to late 19th Century.

5.23 It is relevant to note that pre-application advice was sought from the LPA in relation to the external works, and this advice has been provided alongside this submission. The comments provided by the LPA have been taken into account and the proposed drawings reflect this.

5.24 The pre-application advice from the LPA in relation to previous drawings , which included dormers, noted that the principle of dormers could be accepted on the building. It is acknowledged the LPA raised concerns with the number, design and position of dormers with the initial plans provided to them, outlining that they will create a top-heavy intervention, which would cause a degree of harm to the building and the conservation area. It is also noted that the LPA outlined that the proposed dormers should better align with the existing windows and be less top heavy. The LPA went on to recommend fewer dormers and/or smaller and more lightweight units that fit better in the existing context, in size, location and design.

5.25 The LPA advice in relation to the siting, scale and design of the dormers was considered and this has influenced the submission drawings. The dormers now are considered to be proportionate to the roof of the building as well as the building itself and relate better to existing openings.

5.26 In relation to the finishing material, the LPA raised no concerns with the use of zinc cladding in their pre-application advice and this is what is proposed under this application. The zinc face and cheeks of the dormers is considered to be compatible with the existing natural slate roof. It should also be noted that the parapet brick wall will somewhat screen these dormers from the public domain. Further to this, even with the addition of another storey, it is considered that the building will appear in keeping with the scale of surrounding development especially as the fourth storey will not increase the maximum height of the building and given the height of neighbouring development. The Heritage Statement supports this view and states that the proposed dormers would provide a high standard of new design, reflecting the existing layout of the elevations whilst clearly distinguishing the proposed new dormer windows from the surrounding historic fabric, in accordance with conservation best practice.

5.27 In relation to the proposed rooflights, which will serve the hotel rooms at the third floor level, these will be mainly screened from the public domain due to the parapet wall on the building. Nonetheless, these will be conservation grade rooflights that sit flush with the existing slates in accordance with LPA pre-application advice.

5.28 In relation to the lift shaft, a zinc cladded extension is proposed to provide access to a new fourth storey, with the Heritage Statement noting that it's position reflects that of the original hoist od c. 1907. This extension will be mainly be sited behind the pitched roof facing the more well-used elevations of High Street and Turner Street and therefore will not be highly noticeable from these streets.

5.29 At ground floor level, the proposal will look to replace the roller shutters on Turner Street with new glazed openings. Not only will this discourage anti-social behaviour in relation to graffiti, but it will create a more attractive active frontage along this street which is considered to enhance the character and appearance of the area (which lies within Smithfield Conservation Area). In addition, the existing Italianate classical doorcase facing Turner Street will be utilised, with the door and fanlight being glazed as advised within LPAs pre-application advice.

5.30 In addition, the proposal importantly seeks to revitalise this building, which is considered to make a positive contribution to the conservation area by providing a viable use within a large proportion of this building which has been vacant for some time, as well as proposing a number of external works to restore the building.

5.31 Given the above, the proposal is considered to prevent harm to the character and appearance of the area and the significance of the Smithfield Conservation Area. The Heritage Statement further confirms that and states that the impact of the proposals is considered to be 'minor beneficial' in respect of the effect upon the significance of the Smithfield Conservation area

and it is not considered that any "harm" would be incurred to the designated heritage asset (the conservation area) as a result of the proposed refurbishment of the building.

5.32 Should the LPA come to a different conclusion, i.e. that the proposed development results in less than substantial harm to the conservation area, with regard to Paragraph 202 of the NPPF there are considered to be a number of public benefits which should be afforded significant weight that outweigh such harm, including:

- The proposal will make effective use of a large amount of this under-utilised building within the City Centre and Smithfield Conservation Area and provide a viable use for it.
- The proposal will positively contribute towards the vitality and vitality of Manchester City Centre by providing active frontages along Turner Street and by providing a use that will assist the other uses within the City Centre, notably the night time economy by offering visitors a place to stay overnight. The active frontages and the removal of the stark roller shutters will help to create a more attractive environment and deter anti-social behaviour.
- The proposal would provide much needed tourist accommodation in Manchester City Centre supported, which Policy CC4 of the Manchester Core Strategy is very supportive of.
- The proposal will provide direct employment (approximately 10 no. jobs in total with 6 no. full time jobs and 4 no. part time jobs).

5.33 The proposal is therefore considered to be in accordance with Policies DM1 and CC9 of the Manchester Core Strategy and Chapters 12 and 16 of the NPPF.

Amenity & Environmental Pollution

5.34 Policy DM1 of the Manchester Core Strategy states that all development should have regard to the effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This Policy goes onto note that this could also include proposals which will be sensitive to existing environmental conditions, such as noise.

5.35 Saved Manchester UDP Policy DC26 requires consideration to new development that is likely to be a generator of noise, as well as development that could be sensitive to existing sources of noise.

5.36 Many of the hotel rooms will be served by existing openings, and any new openings are not considered to gain materially different views of neighbouring properties than currently gained from this building. It is therefore considered that the proposal will avoid undue harm to surrounding occupiers in terms of overlooking or loss of privacy.

5.37 Whilst there are some extensions proposed to the building, as these only comprise of minor additions, these being dormer windows and a slight extension to the lift shaft, it is considered that these changes will not lead to undue impacts upon neighbouring occupiers in terms of overshadowing, loss of light or loss of outlook.

5.38 The site is within a City Centre location and there are a range of commercial uses within the vicinity of the site as well as the Metrolink Tramline adjacent to the site, therefore the potential for noise to impact upon the proposed use requires consideration.

5.39 A Noise Assessment has been submitted alongside this planning application. This Noise Assessment relates to residential apartments within the upper floors of the building (not the hotel use proposed) and concludes that by using mitigation for the building façade (appropriate glazing and ventilation systems) residential occupiers would experience an acceptable level of amenity in relation to noise impacts. This Noise Assessment was previously submitted alongside the consented Prior Approval application (LPA Reference: 121327/P3OPA/2018) for the upper floors to be converted into residential apartments. Under this application, the LPA determined that the impact of noise from commercial premises on the intended residential occupiers was acceptable.

5.40 Whilst it is acknowledged that this noise assessment was conducted in 2017, and that there have been some changes with surrounding uses since this time, notably a takeaway use occupying part of the ground floor of the building, it is still considered to be a material consideration of some weight. This is especially because residential occupants are deemed to be more sensitive users than hotel guests, especially given that hotel guests occupy rooms for a relatively short period of time. These hotel guests are also potentially making use of these nearby uses, which are subject to any conflict. It is therefore considered that the proposed visitors/guests will experience an acceptable level of amenity in relation to noise.

5.41 The lawful use of the upper floors of the building is office space, but these upper floors have been vacant for some time. There will be a change in the hours of operation in which this area of the building is in use as a result of the proposal. Whilst there are residential uses within the vicinity of the site, as noted the site is within Manchester City Centre and surrounded by a range of commercial uses, including shops, restaurants, bars and takeaways, some of which are open late. Given this and that hotels are not a high noise generating uses, it is considered that the proposal will not detrimentally impact the existing uses in the area, including residential uses, in terms of noise.

5.42 Furthermore, there are no minimum space standards for hotel rooms within local or national policy, but each room is considered of good size.

5.43 Given the above, it is considered that the proposed development will not cause undue harm to the amenities of neighbouring occupiers and that visitors/guests to the hotel will

experience acceptable levels of amenity, in accordance with Policy DM1 of the Manchester Core Strategy, saved Policy DC26 of the Manchester UDP and Chapters 12 and 15 of the NPPF.

Highways, Accessibility and Parking

5.44 Policy T2 of the Manchester Core Strategy states that the Council will actively manage the pattern of development to ensure that new development is easily accessible by walking, cycling and public transport. Policy T2 goes on to note that within the City Centre development should provide a level of car parking which reflects the highly accessible need of the location, as well as the realistic requirements of the users of the development.

5.45 Policy CC5 of the Manchester Core Strategy outlines that the Council will seek to ensure that development includes adequate parking provision for cars and bicycles (and that this should be based on the parking standards described in Appendix B of the Core Strategy). Appendix B of the Core Strategy notes that maximum standards for car parking do not apply to the City Centre as each development in the City Centre will be considered on a case-by-case basis.

5.46 Policy DM1 of the Manchester Core Strategy outlines that proposals should have regard to access to new development by sustainable transport modes, as well as vehicular access and parking and buildings.

5.47 The application site is in a highly sustainable location being within Manchester City Centre, with good access to public transport. Of note, the site is within walking distance of the Metrolink tram line, bus stops and Manchester Victoria train station.

5.48 It is not envisaged that the change of use of this building from offices to a 26 bedroom hotel will result in a significant increase in demand on the local highway network.

5.49 In terms of car parking, as noted above, Appendix B of the Manchester Core Strategy does not provide parking standards in the City Centre. The proposal will be a car free development, and this is considered acceptable given the highly sustainable location of the site as alluded to above. Nonetheless, there are a number of car parks throughout the City Centre, including the Arndale Centre car park directly to the west of the site which is open 24 hours, every day of the week. It is also pertinent to note that the lawful office use on the upper floors operated without any dedicated on-site parking.

5.50 In terms of the storage of waste associated with the proposed use, a cellar is accessible from ground floor level, and this is where refuse is to be stored. Waste is to be collected on a daily basis as set out Waste Servicing Details document by Fresh State Waste Services.

5.51 Given the above, the application is considered acceptable taking into account matters relating to access, parking and highway safety. The proposal is considered to accord with Core Strategy Policies DM1, CC5 and T2 and Chapter 9 of the NPPF.

Air Quality

5.52 Policy EN16 of the Manchester Core Strategy states that the Council will seek to improve the air quality within Manchester, and particularly within Air Quality Management Areas (AQMAs). The policy goes on to note that developers will be expected to take measures to minimise and mitigate the local impact of emissions from traffic generated by the development, as well as emissions created by the use of the development itself, including from Combined Heat and Power and biomass plant. Further to this, Policy EN16 outlines that when assessing the appropriateness of locations for new development the Council will consider the impacts on air quality, alongside other plan objectives. This includes cumulative impacts, particularly in AQMAs.

5.53 The site is located within an AQMA and an Air Quality Assessment has been submitted alongside the application. This document concludes that the proposed development is not expected to have a significant impact on local air quality. It is pertinent to note that the proposal is for a car free development which is re-using an existing building. In addition, the AQA concludes that the application site is suitable for the proposed use with regards to air quality. The proposal is therefore considered to be in accordance with Policy EN16 of the Manchester Core Strategy and Chapter 15 of the NPPF in relation to air quality.

Biodiversity

5.54 Policy EN15 of the Manchester Core Strategy outlines that the Council will seek to maintain or enhance sites of biodiversity and geological value throughout the City. The Policy goes on to note that developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to linkages between valuable or potentially valuable habitat areas where appropriate.

5.55 There are no nationally important ecological sites within close proximity to the site and the impact upon nearby locally important sites would not be significant.

5.56 A Preliminary Bat Roost Assessment (PRA) has been submitted alongside the application, and this outlines that multiple potential roost features were identified as well as potential external access points. The PRA therefore concludes that the building is assessed as having moderate bat roosting potential and that further nocturnal/re-entry surveys (a minimum of two) should be undertaken to determine usage by bats.

5.57 Following this, further survey work was conducted. A Nocturnal Bat Survey Report has been submitted alongside this application. This notes that a single common pipistrelle bat was recorded roosting within the building during the survey, which was assessed as being a transitional/summer day roost of common pipistrelle. The Report goes on to note that this

type of roost is categorized as 'low conservation significance' and the loss of this roost type due to the development is not considered to be significant.

5.58 As a bat roost has been identified, the Report states provides a number of recommendations in Section 4.2, including that a Bat Licence shall be obtained to proceed with the proposed development. It goes on to recommend alternative roost provision in the form of two general purpose bat boxes. The recommendations of the Report can be conditioned should permission be granted.

5.59 Given the above, subject to conditions, the proposal is unlikely to cause harm to protected species and is therefore in accordance with Policy EN15 of the Manchester Core Strategy and Chapter 15 of the NPPF.

Flooding Risk

5.60 Policy EN14 of the Manchester Core Strategy echoes the NPPF in that development should be directed away from sites at the greatest risk of flooding, and towards sites with little or no risk of flooding.

5.61 The site is identified as being within Flood Zone 1 (land having a less than 1 in 1,000 annual probability of river or sea flooding) and is at low risk of flooding, and it is considered that the development will not increase the flooding risk on the site or elsewhere therefore the proposal is in accordance with Policy EN14 of the Manchester Core Strategy and Chapter 14 of the NPPF.

Climate Change

5.62 Policy EC1 of the Manchester Core Strategy outlines that development proposals should have regard to climate change resilience demonstrating how CO_2 emissions will be minimised with an aim of zero carbon emissions, through energy efficiency, renewable energy and contributing to low and zero carbon decentralised energy infrastructure. Policy EN4 of the Core Strategy notes that the Council will seek to reduce in CO_2 emissions and provides a number of actions for doing so. Policy EN5 goes on to note that the Regional Centre, which the site is located within, will have a major role to play in achieving an increase in the level of decentralised, low and zero carbon energy supplies available.

5.63 Policy EN8 of the Core Strategy states that all new development will be expected to be adaptable to climate change in terms of the design, layout, siting and function of both buildings and associated external spaces. The Policy goes on to provide a list of matters which developers should have regard to in relation to achieving developments which are adaptable to climate change, including passive design.

5.64 Policy EN6 of the Manchester Core Strategy States that applications for development over 1,000 sqm (apart from residential) will be expected as a minimum to meet the target shown in Tables 12.1 or 12.2 within the Core Strategy unless this can be shown not to be viable. The Core Strategy notes that this should be demonstrated through an energy statement, submitted as part of the Design and Access Statement.

5.65 The proposal will involve the re-use of a vacant part of the building. The Energy Statement submitted with the application confirms that the development will limit energy demand through the inclusion of a thermally efficient building fabric and energy efficient services where feasible. The Statement details that the CO2 Emissions reduction as a result of energy efficient fabric and services is shown to be 27,990.11 kg/year (a reduction of 39.83%). The Energy Demand reduction is detailed to be 39.65%.

5.66 Whilst a number of low carbon technologies were considered for the proposed development, these were not considered appropriate in this case due to the location of the property within a conservation area. Nevertheless, as set out in the Servicing Strategy submitted alongside this application, it is noted that the intention is for the development to be eco-friendly, such as:

- having energy-efficient lighting, recycling programs, and the use of environmentally friendly cleaning products.
- guests being encouraged to participate in sustainability efforts, such as towel and linen reuse programs.
- Staff and guests being educated about sustainable practices and the importance of reducing their environmental impact.

5.67 Given the above, the proposed development is considered to be in accordance with Manchester Core Strategy policies and Chapter 14 of the NPPF in respect of tackling climate change.

Crime Prevention

5.68 Policy DM1 of the Manchester Core Strategy outlines that development should have regard to community safety and crime prevention. Policy EC1 of the Core Strategy states that development proposals should have regard to reducing opportunities for crime by applying current best practice in security design.

5.69 A Crime Impact Statement has been submitted alongside this application. This document produced by Greater Manchester Police summarises that the scheme is acceptable when assessed against the principles of 'Crime Prevention Through Environmental Design' subject to some recommendations as outlined in this Crime Impact Statement (for example, CCTV and locks for specific doors as well as following Secured by Design accreditation standards), and these could be implemented.

5.70 In addition to this, it should be noted that the occupation of the building, and the replacement of roller shutters with glazing at the ground floor will improve natural surveillance in the area. The removal of the roller shutters on Turner Street and Edgehill Street is considered to reduce the risk of graffiti too. Furthermore, as outlined in the Servicing Statement submitted alongside this application, there will always be a reception staff member on site which will enable the business to monitor any anti-social behaviour or issues that may arise. CCTV will also be in operation 24/7 which aims to deter crime.

5.71 It is therefore considered that the proposal is in accordance with Policies DM1 and EC1 of the Manchester Core Strategy as well as Chapter 12 of the NPPF in respect of crime prevention.

6 CONCLUSIONS

6.1 This application seeks planning permission a change of use from Use Class E (commercial, business and service) to Use Class C1 (hotel), including extension to lift shaft, installation of dormers and rooflights and external alterations at 68-70 High Street, Manchester.

6.2 The principle of the proposal, which includes the replacement of an office space with a hotel, is considered acceptable as the proposed use will offer greater benefits in terms of the Core Strategy's vision and spatial objectives than this existing office use and will positively contribute towards the vitality and viability of Manchester City Centre.

6.3 The proposed change of use and built development would not cause detrimental harm to the character and appearance of the building or locality, nor would it cause harm to the significance of the Smithfield Conservation Area. The proposal is not considered to have an undue impact upon the amenity of neighbouring occupiers and would provide an acceptable standard of amenity for hotel guests/visitors. In addition, the proposal is not considered to have any significant detrimental impacts upon highways safety, flooding risk, biodiversity, crime, climate change or air quality.

6.4 There are also considered to be a number of public benefits with the proposal which are material to the consideration of the application, including, but not limited to the effective and viable use of a vacant building within the City Centre and Smithfield Conservation Area, a more attractive and active ground floor and direct employment from the hotel. Further to this, the proposal would provide much needed tourist accommodation in the City Centre, which Policy CC4 of the Manchester Core Strategy is very supportive of.

6.5 In summary, the proposal is considered to constitute sustainable development and comply with the relevant Policies comprising the Manchester Development Plan, supplementary planning document and the Government guidance contained in the NPPF. There are no other material considerations that would suggest permission ought not to be granted.