

8 August 2023

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

FAO Lucy Harrison

Dear Lucy

Embassy Village, Manchester – Application for Removal/Variation of a Condition to Planning Permission Reference 129923/FO/2021

On behalf of our client, Embassy (the “Applicant”), we hereby submit an application under Section 73 of the Town and Country Planning Act 1990 (as amended) to make a Minor-Material Amendment (“MMA”) for the variation of conditions 2, 25, and 26 to Planning Permission 129923/FO/2021.

The Site

The Site, spanning 0.61 hectare, sits within the Castlefield Conservation Area in Manchester City Centre. It is bound by the River Medlock to the north, the Bridgewater Canal to the south and west, and Egerton Street (Ring Road / A635) to the east (‘the Site’).

The Site is located under the railway and tram arches which are owned by Network Rail and Transport for Greater Manchester (TfGM) respectively.

Planning History

Planning permission for Embassy Village was granted on 2nd August 2021 under planning permission reference 129923/FO/2021 (the “Planning Permission”). The Planning Permission provided consent for the creation of 40 single-occupancy residential pods, a reception pod, a “Village Hall”, car parking spaces, and other associated works. The description of development as stated on the decision notice for the Planning Permission (ref: 129923/FO/2021) is as follows:

“Full planning permission for the creation of the Embassy Village (Sui Generis) comprising 40 single-occupancy residential accommodation pods; a site reception pod; a flexible multi-use ‘Village Hall’ providing internal amenity space, and a staff accommodation pod, four car parking spaces and cycle parking provision; soft and hard landscaping; drainage arrangements; servicing and access arrangements; and other associated works.”

A Listed Building Consent in relation to the installation of drainage infrastructure was granted for concurrently on 2nd August 2021 under Listed Building Consent reference: 129924/LO/2021 (“the Original LBC”).

The approved description of development as written on the Original LBC decision notice (ref: 129924/LO/2021) is as follows:

“Listed Building Consent for the installation of drainage infrastructure adjacent to and within the canal wall.”

Description of Development

The Description of Development for this Application, as stated on the Application Form, is as follows:

“Application to vary conditions 2 (Approved Plans), 25 (Management Strategy), and 26 (Crime Impact Statement) of planning permission ref. 129923/FO/2021 – Full planning permission for the creation of the Embassy Village (Sui Generis) comprising 40 single-occupancy residential accommodation pods; a site reception pod; a flexible multi-use 'Village Hall' providing internal amenity space, and a staff accommodation pod, four car parking spaces and cycle parking provision; soft and hard landscaping; drainage arrangements; servicing and access arrangements; and other associated works, in order to reflect changes to the general arrangement of the development, removal of site entrance / security pod, and amendments to the external and internal components of the development.”

Proposed Amendments

Following the grant of Planning Permission 129923/FO/2021, the Embassy Village proposals have been subject to further detailed design development. As a result of this process, a number of amendments are proposed to support the deliverability of the scheme. Further consideration has also been given to how the Site operates and the management strategy, which is also incorporated into the proposed amendments.

The proposed amendments that are the subject of this Application are summarised as follows, and set out in detail below:

- Removal of site entrance pod and associated revised site operational management and security strategy.
- Confirmation of physical changes to accommodate a brick masonry solution to pods (instead of a prefabricated solution). Detailed design has resulted in a number of associated layout and architectural changes:
 - Minor alterations to the siting of residential pods and an associated increase in the floorspace for each residential pod.
 - Alterations to the stair core arrangement and design (rationalisation as a result of changes to the siting (increased length of residential pods).
 - Height increase to pods – to achieve compliant roof design and drainage requirements.

- Changes to the design of windows (the approved circular and bathroom windows of the residential pods).
- Removal of some elements of decorative external lighting on residential pods.
- Location swap of servicing area and sports pitch within the arches.

The principle of use established by the Planning Permission 129923/FO/2021 is unchanged as a result of the proposed amendments. In addition, the proposed use, and number of residential pods remains unchanged, with the usability and functionality of the space improved from the consented scheme.

Update to Approved Plans Condition

Condition 2 attached to Planning Permission 129923/FO/2021 states that the development shall be carried out in accordance with the approved plans listed.

In order to facilitate the proposed amendments summarised above the relevant approved plans have been updated and submitted as part of this application to reflect the changes.

On the basis of the above it is requested that the wording of Condition 2 be updated, to account for the new drawing references detailed in Table 1.1 below.

Table 1.1 Plans References

Drawing Name	Approved Drawing Reference	New Drawing Reference
Landscape General Arrangement		
Landscape General Arrangement Plan	2596-PLA-XX-XX-DR-L-0001-P02	2596-PLA-XX-XX-DR-L-0001-P03
Accommodation Pod Plans		
Accommodation Pod Floor Plans	149_B1_02_2200	13095-AEW-B1-XX-DR-A-2101-P06
Accommodation Pod Detail Drawing *New Drawing		13095-AEW-B1-XX-DR-A-2102-P03
Accommodation Pod Elevations	149_B1_04_2200 REV A and 149_B1_04_2201 REV A	13095-AEW-B1-XX-DR-A-3101-P05
Accommodation Pod Sections	149_MP_04_1201 REV A	13095-AEW-B1-XX-DR-A-4101-P02
Village Hall Plans		
Village Hall Floor Plan	149_B2_02_2200	13095-AEW-B3-00-DR-A-2301-P06
Village Hall Elevations	149_B2_04_2200 REV A and 149_B2_04_2201 REV A	13095-AEW-B3-XX-DR-A-3301-P06

Drawing Name	Approved Drawing Reference	New Drawing Reference
Staff Pod Plans		
Staff Pod Floor Plan	149_B4_02_2200 REV A	13095-AEW-B4-00-DR-A-2401-P04
Staff Pod Elevations	149_B4_04_2200 REV A and 149_B4_04_2201 REV A	13095-AEW-B4-XX-DR-A-3401-P05
Site Plans & Location Plan		
Location Plan	_MP_00_0000	13095-AEW-SI-00-DR-A-1000-P01
Existing Site Plan	_MP_00_1000	13095-AEW-SI-00-DR-A-1001-P01
Proposed Site Plan	_MP_00_1200_Rev A	13095-AEW-SI-00-DR-A-1010-P08
Site Entrance Plan		
Site Entrance Plan and Views *New Drawing		13095-AEW-XX-XX-DR-A-1101-P03
Security/Entrance Pod Indicative Section *To be removed as not applicable	_B3_05_2200	
Security/Entrance Pod Elevations *To be removed as not applicable	_B3_04_2200_Rev A	
Proposed Security Pod Plan *To be removed as not applicable	_B3_02_2200_Rev A	

Removal of Site Entrance Pod and Revised Management Strategy

The Planning Permission established that the Site Reception pod would be utilised to house security personnel and to support the searching of individuals entering and leaving the Embassy Village site.

As set out above, following the grant of full Planning Permission, the scheme has been subject to detailed design development, with below ground servicing impacting the physical buildability of the Site Entrance Pod. As well as further cost and feasibility analysis which has resulted in updates and reconsiderations around the Site's operational management strategy (including access).

In response to this, this Application seeks to remove the approved Site Entrance Pod – this revised strategy and the associated proposed amendments are set out below:

- Removal of site entrance pod.
- Installation of CCTV and facial recognition or smart key card system for entry into the Site.

- Clarification on the proposed staff presence on the Site, including utilising the dedicated staff accommodation pod.
- Embassy retaining the right to search all residents, but residents not being subject to search procedures when entering the Site every time.

The proposed approach has been informed by Embassy's more recent experience with managing similar operations to that proposed for Embassy Village. Embassy have also visited similar schemes, such as Recycling Lives in Preston, to inform the revised operational and access strategy. This has sought to ensure a successful operation from day one.

Site Entrance Pod Removal

The removal of the Site Entrance Pod has been informed by the following deliverability and feasibility considerations:

- Below ground servicing and level changes along entrance route into the Site impact the physical buildability of a foundation solution for the entrance pod (applicable to both the prefabricated solution and the proposed brick masonry solution). Due to the foundations needed, it is not possible to build the pod over the top of underground services. Furthermore, the layout and physical constraints of the Site (i.e. being surrounded on three sides by water) the access slope is the only location where the underground services can be located.
- In turn, the above impacts on the fire access arrangements and access for Network Rail. If the pod were to be located elsewhere on the slope there would not be sufficient space or turning circle space for access for the relevant vehicles (e.g. fire engine, bin lorry etc).
- The prefabricated solution of the Site Entrance Pod has been discounted due to viability and costing challenges for the Applicant.
- The proposed solution has sought to respond to Network Rail requirements, requiring sufficient access to their assets (arches).

Given the above, including the topography of the access slope into the Site, it has not been practical nor viable to deliver prefabricated or traditional masonry build solution for the Site Entrance Pod.

Gate Access and Installation of CCTV and Facial Recognition or Smart Key Card System

Given the above, the project team is proposing an alternative solution which seeks to maintain the security and safety measures established in the approved Operational Management Strategy.

A fence and intelligent gate access system is proposed that would use CCTV and either facial recognition or swipe card to allow access and egress. The facial recognition and swipe card options are set out in more detail below:

Proposed Card System

- Allow residents to access the Site and their individual residential pods. The card system also automatically emails Embassy staff if anyone tries to enter a different resident's accommodation.

- System provides a live list / record of residents (and staff) who are present at any given moment on site.

Proposed Facial Recognition

- Installing a small pod with secure site entry technology that utilises facial recognition biometrics and only allows faces registered to enter.
- This system tackles the issue of tailgating as it has two doors, and should two or more people be detected coming into the space between the two doors this is picked up and access is denied.

The revised site entrance proposals will seek to deliver improved access arrangement through the incorporation of advanced technologies.

The location of the revised site entrance is carefully considered. As opposed to the consented scheme, it is proposed to be located further down the entrance ramp, away from the edge of the site boundary, and closer to the Village Hall located outside the servicing area. This could prevent potential traffic / servicing vehicles going into Embassy Village overflowing onto the Ring Road (as shown on Proposed Site Plan – Ref: 13095-AEW-SI-00-DR-A-1010-P06).

Staff Presence Clarification

Within the Planning Statement (prepared by Deloitte) and the Site Management Strategy (prepared by Embassy) submitted with the approved application, it was proposed that the on-site operation would have a 24/7 staffed presence, accommodated by the approved staff accommodation pod to facilitate security and management outside of normal office hours.

In accordance with the approved Operational Management Strategy Embassy staff or security staff would be based in the Village Hall during normal office hours and come to the gate once alerted. It is anticipated that the staff accommodation pod will be utilised by one of Embassy Village's responsible graduates, who would stay in the accommodation rent free in return for being present out-of-hours – overnight and at weekends.

Search Procedure - Revisited

The previously proposed search procedure established within the approved Operational Management Strategy) has been revisited, and it is considered that such processes would be overbearing on future residents. Embassy have a well-established, effective onboarding process in place. Future residents will have medium or low needs which can be accommodated and supported at the Embassy Village.

In summary, Embassy will seek to retain the right to search residents as set out in the approved strategy but it is proposed that regular searches when entering the Site are considered unnecessary and invasive, with strict search procedures considered to counter the resettlement ambitions of the scheme.

For further details on the Operational Management Strategy Addendum prepared by Embassy, which includes further details on the revised access/ entrance arrangements, and key safety and security considerations.

Update to Management Strategy Condition

Condition 25 attached to Planning Permission 129923/FO/2021 states that the development shall be carried out in accordance with the approved Management Strategy.

We request the wording of Condition 25 attached to the Planning Permission be updated as follows:

“The development hereby approved shall be carried out and managed in accordance with The Embassy Village Management Strategy received by the City Council as local planning authority on 29th April 2021, and the Embassy Village Operational Management Strategy Addendum received by the City Council as local planning authority on 18 July 2023.”

Update to Crime Impact Statement Condition

Condition 26 attached to Planning Permission 129923/FO/2021 states that the development shall be carried out in accordance with the approved Crime Impact Statement.

We request the wording of Condition 26 attached to the Planning Permission be updated as follows:

“The development hereby approved shall only be carried out in accordance with the recommendations of the Crime Impact Statement dated ~~5th March 2021~~ 31st July 2023 by Greater Manchester Police and the development shall not be occupied or used until the City Council as local planning authority has acknowledged in writing that it has received written confirmation of a secure by design accreditation.”

Proposed Brick Masonry Solution and Associated Layout and Architectural Changes

As part of the approved Planning Permission each pod was designed on the basis of a prefabricated, modular solution, namely utilising shipping containers, however a brick masonry solution is now proposed which has also resulted in a number of associated design changes.

Proposed Masonry Solution

The Planning Permission provides sufficient flexibility to ensure that should the detailed prefabricated (shipping container) solution presented not be deliverable or feasible then a brick/ masonry solution could also be delivered. This flexibility was provided due to uncertainties around cost and the availability of materials, at the point of submission and during the determination period.

The original layout, illustrated by the approved drawings (under the Planning Permission), shows a pre-fabricated / shipping container solution. Detailed design development has determined that this layout is no longer feasible with the greater wall depth of the masonry solution, and so design has been updated accordingly. As such, there is a requirement to update the approved drawings, to ensure adherence / compliance with the proposed drawings. This application therefore includes revised drawings to support the proposed changes.

Detailed design development, including the associated costings, has taken place following the grant of planning permission. This further design development process has indicated that it is not viable to deliver a prefabricated modular approach (including shipping containers), for a number of reasons:

- The significant costs associated with a prefabricated modular solution would make the scheme unviable.

- Construction challenges associated with a constrained site - due to the constraints of the site, including being bound by water on three sides and being within the viaduct / arches, it is not possible to lift the prefabricated 'pods' into place.
- Following the grant of Planning Permission, the Building Regulations (Approved Documents L, F, and O – Document L were updated in February 2023, (with Documents F and O were updated in June 2022) requiring an uplift to the specification and performance of external walls – the prefabricated shipping container solution presents challenges in complying with the updated Building Regulations.

As a result of the above, a prefabricated modular solution (including shipping containers) has been discounted. In response, a brick masonry solution has been developed as part of the detailed design process.

In summary, the brick solution comprises masonry external walls in profiled cladding. This revised approach is considered to provide the following:

- Support the overall buildability of the scheme.
- Ensure adherence to the updated Building Regulations.
- Deliver a more permanent-like solution:
 - The proposed masonry solution is considered to represent an improvement compared to the prefabricated solution as it creates a stronger sense of permanence which resonates with the overarching vision for Embassy Village - to provide a home to homeless individuals by providing them with a front door and supporting residents to (re)enter the workplace and live independently.
- Deliver improvements to the internal acoustic performance of the residential pods, noting the location beneath the arches of the railway and metro:
 - The masonry solution has thicker, denser which provides increased levels of sound insulation (particularly at lower frequencies). This will reduce the train and tram noise heard within the units, improving the overall amenity of future residents. A Noise Assessment has been submitted as part of this Application which evidence this.

The proposed masonry solution has also resulted in a number of associated design changes which set out below in detail.

Siting and Floorspace of Residential Pods

The proposed masonry brick solution results in a narrowing to the width of the residential pods and a lengthening to the residential pods. It should be noted that the increased length of the residential pods is taken from the external stair core space which residential pods open onto.

Despite this proposed change to the siting of the residential pods set out above, the overall floorspace for each residential pod has increased (as a result of the proposed masonry solution) – from 15.5 sq. m. (GIA) per residential pod to 16.1 sq. m. (GIA).

It should be noted the residential accommodation pods do not meet national space standards for a typical one bed one person studios in a traditional residential development or apartment scheme. The principle of this was established and accepted as part of the Planning Permission – full details are set out and justified in the approved Planning Statement prepared by Deloitte.

In justifying the departure from national space standards, it was noted that the temporary nature of the accommodation and the extensive internal and external amenity space provided supports the creation of a high-quality living environment, whilst simultaneously fostering a sense of community.

In the context of the above, the detailed design development process (following the grant of planning permission) has therefore provided an opportunity to increase the floorspace for each pod, which is reflected in the incremental increase in floorspace.

Stair Core Arrangement and Design

The design and arrangement of the external staircase located in the central courtyard of the residential pod has been updated to revised to respond to the change in siting of the pods, namely the increased length of the pods which is reduced the size of the courtyard space. As such a (linear) staircase is proposed to replace the approved spiral staircase. Providing the same function but in a reduced floorspace. This is also considered to tie in with the design of the new square windows.

Changes to Window Design

The proposed brick solution has also resulted in a number of elevational changes to residential pods, the Village Hall, and the staff pod, namely the rationalisation of all circular windows to be replaced with a square window solution. This rationalisation provides ongoing maintenance benefits as well as being more cost effective for fixture and fittings. It is considered that the proposed design and materiality of the square windows does not compromise on the quality of the overall design.

The removal of the bathroom window (for residential pods only) is also proposed to maximise the usability of the internal area of all the residential pods.

Removal of External Lighting to Pods

As part of the design development process the overall lighting scheme has been reconsidered. Due to the up-lighting set out within the approved lighting scheme, it is considered that the lights originally proposed on the elevations of all the pods are not necessary. The omission of the elevational lighting is not considered to undermine safety and security. The proposed omission has also been discussed with TfGM who have confirmed that this is not an issue from their perspective.

Please note that this external lighting does not form part of the security strategy under the Planning Permission, but were introduced as decorative features. The proposed amendments to the external lighting will therefore neither impact site security nor residents' safety.

Height Increase to Pods

In order for the proposed masonry brick solution to achieve a roof design that is in compliant with Building Regulations and adhere to drainage requirements an increase to the height of all residential pods is

proposed. As part of the detailed design process, further consideration has needed be given to the following:

- Introduce falls to roofs to accommodate developed MEP design, to facilitate the masonry solution, and to facilitate drainage of rainwater;
- Provide increased levels of insulation; and
- Provide an alternative roof structure.

The above factors were not considered at the point of submission or during the determination period of the Planning Permission as the scheme was based on a detailed prefabricated solution (shipping containers).

As part of the detailed design process the MEP strategy has been developed. This has resulted in the identified need for some elements of the MEP system to be located within the ceiling zone, requiring a larger amount of space.

During the design development process, the option of maintaining the approved height of the pods was considered, however this would result in a reduction in ceiling height to the residential pods. As such, this option was discounted as it would not provide sufficient space and volume and so was considered to negatively impact the amenity of future residents.

On the basis of the above an increase in the height of all pods is proposed, which will create a larger zone for MEP infrastructure and so will enable the detailed MEP strategy to be delivered.

The proposed increase in the height of each pod is set out below:

Building/ Pod	Approved Height	Proposed Height
Village Hall	3.3m	3.6m
Residential Pod	5.83m	5.97m
Staff Accommodation Pod	3.0m	3.37m

Location Swap of Servicing Area and Sports Pitch

The proposed relocation is a result of detailed design development and further considerations of the Site's operational management and security strategy.

The proposed relocation of the servicing area represents an operational efficiency, with the proposed location reducing the drag distance for bin collection. As part of the approved Planning Permission, Curtins prepared a servicing strategy, as established by the swept path analysis (document reference: 77442-CUR-00-XX-DR-TP-05001-P01) for refuse vehicles – this established the principle of refuse vehicles stopping outside the Village Hall on bin collection days. This strategy is unchanged and so the relevant information submitted as part of the Planning Permission remains valid.

Planning Policy and Guidance

The Planning Policy Framework relevant to this Application has changed slightly since the approval of the Planning Permission for the Embassy Village development in August 2021.

The key Development Plan documents remain the 2012 Manchester Core Strategy and Saved Policies of the 2006 Manchester Unitary Development Plan.

The National Planning Policy Framework (NPPF) forms a Material Consideration in the determination of this Application. The National Planning Policy Framework (NPPF) was updated on 20 July 2021, but there have been no changes to the Framework or Planning Practice Guidance which would affect consideration of this Application.

Full consideration of the Embassy Village development against the planning policy framework is considered within the original Planning Statement prepared by Deloitte, approved by the Planning Permission (ref: 129923/FO/2021).

Benefits of the Proposed Amendments

To conclude, the proposed amendments could bring forward multiple benefits in the context of planning policy and guidance primarily in adherence to Core Strategy Policy DM1 – Development Management, with particular respect to resident amenity and as follows:

- Masonry solution provides a greater sense of permanence for residents;
- Residential units are increased in size due to layout amendments, providing amenity enhancement to residents;
- Thermal and noise insulation is improved due to the adoption of masonry solution;
- Negating the need of exposing residents to excessive search procedures when entering the Site;
- Ensuring deliverability of the scheme, bringing forth secured accommodation for homeless people and associated move-on support;
- Ensuring adherence to Building Regulations (Approved Documents L, F, and O);
- improving residents' access arrangement due to incorporation of advanced technology and the Management Strategy informed by operational experience; and
- Increased operational functionality with the proposed swap of the servicing area and sports pitch.

Pre-Application Consultation

The consented scheme was subject to a comprehensive process of pre-application public and stakeholder engagement, including engagement with MCC Planning Officers, Local Ward Councillors, Greater Manchester Police, MCC Homelessness team and the Supported Needs Monitoring Group, MCC Highways, MCC Environmental Health Officers, the Lead Local Flood Authority (LLFA) – MCC, local businesses and local residents. The proposals were also subject to statutory consultation during the determination period of the Planning Permission.

This Application is submitted following pre-application consultation with the planning case officer, Lucy Harrison (MCC) on 14 June 2023. During this pre-application meeting it agreed that the proposed amendments could be applied for via a Section 73 Application (MMA) to the Planning Permission (ref: 129923/FO/2021). The proposed amendments were also agreed in-principle.

The Applicant, Embassy has engaged with Local Ward Councillors (Hulme), the Castlefield Residents Association and the Britannia Basin Residents Associations on the proposed amendments. Both residents association have provided positive comments in respect of the proposed amendments, and are supportive of Embassy's commitment to ensure that the Village is suitably managed.

It should be noted that the project team has also provided details of the proposed amendments to Greater Manchester Police's Secure by Design Team ('GMP') for comment. At the time of writing a response is still outstanding. However, the Applicant is keen to engage with GMP, particularly around the revised operational management and the associated safety and security strategy.

Summary

The Site, spanning 0.61 hectare, sits within the Castlefield Conservation Area in Manchester City Centre. It is bound by the River Medlock to the north, the Bridgewater Canal to the south and west, and Egerton Street (Ring Road / A635) to the east.

It should be noted that the proposed amendments above are the result of detailed design development and buildability challenges, and the changes to the overall design of the consented scheme are minor-material in nature.

The proposed amendments to the planning application will have no material effect on the siting, density and height of Planning Permission 129923/FO/2021. In addition, the proposed changes are in keeping with the original vision and objectives established by Planning Permission 129923/FO/2021 for Embassy Village.

As part of the consultation process, the amendments have been considered by the Local Planning Authority as minor-material amendments to the Planning Permission.

The amended scheme will continue to accord with the Development Plan when taken as a whole and there are no material considerations which would justify refusal of the Application. We therefore respectfully request that this application be supported by the Local Planning Authority.

Application Submission

This Application comprises this Covering Letter and the following documentation:

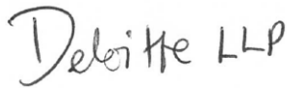
- Application Form prepared by Deloitte;
- Application Drawings (detailed in Table 1.1) prepared by AEW Architects;
- Application Supporting Report (ref: 13095-AEW-XX-XX-PP-A-0005-P04) prepared by AEW Architects;
- Crime Impact Statement (dated 31st July 2023) prepared by Greater Manchester Police;
- Updated Operational Management / Security Strategy prepared by Embassy; and

- Noise Assessment prepared by Cundall.

Payment of the planning application fee in the sum of £234 has been made directly to Manchester City Council under Planning Portal Reference PP-12243573. I would be grateful if you could please confirm receipt of this fee.

We would be grateful if you could notify us of validation of the Application and please do not hesitate to contact my colleagues Ellen Sanderson-Clark (esandersonclark@deloitte.co.uk / 0113 292 1119) or Jemma Brabrook (jbrabrook@deloitte.co.uk / 0161 455 6903).

Yours sincerely

A handwritten signature in black ink that reads "Deloitte LLP". The signature is written in a cursive, flowing style.

For Deloitte LLP

Encl.