



Planning, Regeneration & Engagement Statement

Bridgewater House, Chester Road

Oriel Planning Limited on behalf of
Watch This Space (Jembrana) Ltd

August 2022

Oriel Planning

PO Box 305, Nantwich CW5 9EL

e: info@oriel-planning.co.uk

CONTENTS

1. INTRODUCTION..... 1

2. SITE AND SURROUNDINGS 3

3. STAKEHOLDER ENGAGEMENT 6

4. PROPOSED DEVELOPMENT 7

5. POLICY FRAMEWORK 9

6. PLANNING CONSIDERATIONS..... 14

7. SUMMARY AND CONCLUSIONS..... 39

APPENDICES

A1. SUPPORTING DOCUMENTATION

1. INTRODUCTION

1.1 This Planning Statement has been prepared by Oriel Planning Ltd, on behalf of Watch this Space (Jembrana) Limited (the 'Applicant'), to support full planning and listed building consent applications, for the residential-led conversion and redevelopment of Bridgewater House site.

1.2 The planning application description of development is:

Restoration and conversion of the abandoned Grade II listed Bridgewater House (including replacement windows, rear facing dormers, insertion/removal of windows and doors and recreation of lightwells) and redevelopment of car park area (including partial demolition of rear and side boundary walls) to create a ground plus three storey apartment building; overall providing 53 new homes, including landscaping to courtyard, bike storage and associated works.

1.3 The listed building consent description of development is:

"Refurbishment and conversion of abandoned Grade II listed Bridgewater House to create apartments and partial demolition of rear and side boundary walls to facilitate the construction of a new build apartment block on existing car parking.

Comprehensive internal and external works including: repair/replacement of roof structure (including new rear facing dormers); repair/replacement to ceilings, staircases, plasterwork, joinery details and floors; alterations to planform (including stud walls, blocking up and opening up works); general repairs to brick and stone work; replacement wooden windows throughout; reopening some windows previously blocked up at basement level; new mechanical and electrical interventions to light, heat and provide drainage to the building; new entrance doors in existing window openings with steps down to the reinstated front gardens on the Chester Road, and new door openings along Crown Street also in existing window openings."

1.4 Watch This Space (WTS) acquired the site from Renaker last year, they have reviewed different development options (including commercial/hotel/mixed use), settling on the residential-led conversion and redevelopment of the site. The listed building has been vacant for over ten years and

is in desperate need of repair and conservation. The new build element of the scheme will make the capital investment in the listed building possible, giving the site a long-term sustainable future.

- 1.5 Watch This Space (WTS) is a Manchester-based investment and development company that looks to transform ordinary spaces into amazing places. Since starting the company in January 2016, WTS have already delivered numerous commercial and residential schemes, winning regional and national awards for the quality of the schemes. They have delivered on sympathetic refurbishments of two Grade II listed buildings, 31 Princess Street in Manchester City Centre and Billy's Space in the Lake District. They have also completed numerous residential projects with examples including the recent completion of townhouses on Richmond Street and Wood Street both in Manchester City Centre.
- 1.6 WTS are committed to delivery and will start work on the scheme in a phased way, as soon as consent is secured.
- 1.7 The purpose of this statement is to identify and address the main planning issues associated with the proposed development, demonstrating how the proposal would be acceptable in the context of the Development Plan (DP) and other material planning considerations.
- 1.8 This planning statement is structured as follows:
 - Section 2 describes the application site, its surroundings and context;
 - Section 3 outlines the engagement that took place with the stakeholders and the Council;
 - Section 4 describes the proposed development;
 - Section 5 identifies the planning policies relevant to the determination of this application;
 - Section 6 assesses the material planning considerations associated with this application;
 - Section 7 concludes that planning permission should be granted.
- 1.9 Details of the documents submitted to support this application can be found in **Appendix A.1** of this document.

2. SITE AND SURROUNDINGS

- 2.1 This section describes the application site, the surrounding area and its policy designations/allocation.

Site and surroundings

- 2.2 The Bridgewater House site extends approximately 0.21 hectares ('ha') and comprises the former two-storey Bridgewater Canal Office building and associated car park. The site is located in Manchester city centre and is bound by Chester Road and Great Jackson Street to the north/east and Silvercroft Street to the south.
- 2.3 The red brick Georgian style building is Grade II listed (listed 3 October 1974). The site is not within a Conservation Area, though is close to the Castlefield Conservation Area, which covers a large proportion of the northern half of the city centre. To the north west of the site is the Middle Warehouse (Grade II listed). The building has been vacant since at least 2005 and the rear yard has been used as a car park. The site was formerly in the ownership of Renaker, the adjacent developers/landowner.
- 2.4 The site is in the Great Jackson Street Strategic Regeneration Framework area, as a consequence the site is surrounded by a large number of tall buildings, including the 51 and 21 storey scheme immediately to the west (Crown Street Phase 1) (LPA ref. 119806/FO/2018) and the four towers of 37-63 storeys at Deansgate Square to the east/south east developed under LPA ref. 111719/FO/2016/C1. In addition, planning permission was recently granted for Phase 2 of the Crown Street development directly to the south-west which will provide an additional two 52 storey tower buildings (LPA ref. 126668/FO/2020). It is also understood that the DeTrafford site (opposite on Great Jackson Street) has been acquired and a scheme is being developed (following a lapse in consent).
- 2.5 The site's location within the city centre and Great Jackson Street Strategic Regeneration Framework area makes it sustainable and accessible, being a walkable distance to a wide range of services and facilities. In addition, it is accessible to nearby public transport including the Deansgate/Castlefield tram stop, Deansgate Train Station which provides regular services to Manchester Oxford Road, Manchester Piccadilly, Manchester Airport, Liverpool Lime Street, Southport and Blackpool North. There are also a number of bus services along Chester Road.

2.6 The following Development Plan allocations/designations apply to the site:

- Manchester City Centre;
- Regional Centre;
- Manchester City Boundary;
- Greater Manchester Combined Authority Air Quality Management Area (AQMA);
- Flood Zone 1 meaning there is a low probability of flooding; and
- Manchester Conurbation Core Critical Drainage Area.

2.7 There is also a restrictive covenant on the site limiting the height of any new build element to ground plus three storeys.

Planning history

2.8 Planning permission (LPA refs: 084119/FO/2007/C3 and 084122/LO/2007/C3) on 23 November 2007 for the refurbishment and alteration of the building to allow the re-use for use classes A2 (financial and professional services), B1 (business) and D1 (non-residential institutions). Planning permission was granted (LPA ref: 084119/F O/2007/C and 094241/REP/2010/C1) to extend the time limit of the application on 15 October 2010, however neither permissions were implemented and both have now lapsed.

2.9 As referred to above, there have also been a large number of recent nearby applications within the vicinity and Great Jackson Street Development Framework area. Key applications include:

- Crown Street Phase 1: Planning permission (LPA ref: 119806/FO/2018) was granted in July 2018 for the erection of two tall buildings (51 storeys and 21 storeys) comprising 664 residential units (use class C3) and commercial space (A1, A3 or D1), provision of two levels of basement parking, alterations to surface level car park, landscaping, highway alterations, access and associated works.
- Crown Street Phase 2: Planning permission (LPA ref: 126668/FO/2020) was granted in August 2020 for the erection of two 52-storey residential buildings (Use Class C3), residential amenity facilities, commercial units (Use Classes A1, A2, A3, or D1) at ground floor and first floor levels,

together with private and public basement car parking, landscaping (including a public park), servicing and access arrangements, highways improvements, and other associated works. Outline planning permission (with all matters reserved) was also granted for an educational facility (Use Class D1).

- Olympia Trading Estate, Great Jackson Street: Planning permission (LPA ref: 116850/FO/2017) was granted in May 2019 for the demolition of the existing buildings on the site and construction of three residential buildings, 32, 26 and 18 storeys in height, comprising a total of 399 residential units (C3) and 50 retirement living units (C2) with a roof top ancillary restaurant, 675 sqm of commercial floor space (Use Classes A1, A2, A3, A4, B1, D1 or D2); associated basement car and cycle parking, public realm and landscaping, access and servicing arrangement and other associated works.
- Deansgate Square, Owen Street: Planning permission (LPA ref: 111719/FO/2016/C1) was granted in July 2016 for the construction of four residential buildings with an ancillary amenity building (including a tennis court, swimming pool and gym facilities) (Use Class C3), ground floor retail units (Use Classes A1, A2, or A3), residential amenity space, a new public realm and landscaping, basement car parking and related highway, access, servicing, engineering and associated works.
- Land At Chester Road/Bridgewater Viaduct: Planning permission (LPA ref: 110730/FO/2015/C1) was granted in March 2016 for the erection of a 13-storey building (plus basement level) comprising 53 one and two bedroom apartments (Use Class C3), a commercial unit (Use Classes A1/ A2/ A3/ A4/ B1/D1), associated car parking, landscaping and vehicular and pedestrian access.

3. STAKEHOLDER ENGAGEMENT

- 3.1 Paragraphs 39 and 132 of the NPPF emphasise the importance of engagement with key stakeholders in the planning process and highlight how engagement should guide the development process.

Stakeholder engagement

- 3.2 WTS have also met with all immediately adjacent neighbours and key local stakeholders, including – Renaker (adjacent landowner), Deloitte (who developed the SRF for Great Jackson Street), Ian Simpson (local architect), the owners of the Gaddum building opposite and Castlefield Estates (who control the adjacent car parks).
- 3.3 Site notices have also been erected to notify the general public of the development proposals and to provide them with contact details should they wish to learn more about the scheme.
- 3.4 Copies of the plans have also been posted to local neighbouring businesses providing them with contact details should they wish to learn more about the scheme.

Pre-application discussions

- 3.5 A pre-application request was submitted to the Council in early 2022, in respect of the proposal to restore and convert the abandoned Grade II listed building and redevelopment of the car park area to provide new homes.
- 3.6 A meeting was held with council officers on 18 February 2022 and verbal feedback was given,. Draft plans were also sent to officers for comment but no feedback was forthcoming at the time of writing this statement.
- 3.7 Seeking to frontload the application and engaging with officers should help to ensure that any issues are addressed early in the planning process and should make the process more streamline, as supported by the NPPF. Where provided the advice has been used to help shape the proposed development.

4. PROPOSED DEVELOPMENT

- 4.1 This section outlines the proposed development and should be read in conjunction with the Design and Access Statement (DAS), prepared by Snook Architects, which accompanies this application.
- 4.2 The application proposes the restoration and conversion of the abandoned Grade II listed Bridgewater Canal office building which has dilapidated since its former use, and the redevelopment of the car park area to provide four storey new build apartments, providing a total of 53 new homes, together with a shared courtyard and private amenity space, cycle and bin storage and associated landscaping.
- 4.3 The proposal has been developed with careful consideration to the highly constrained nature of the site, including the importance of protecting it's heritage significance and the existence of a covenant on the property preventing more than four storeys being built on the rear car park. Therefore, the scheme has been developed to ensure it can be viably delivered to a high standard within these constraints, to bring life back to the abandoned historic property and make a positive contribution within the community and to the surrounding area.
- 4.4 Given the capital investment the listed building requires and the limit on development to the rear, the viability of the scheme is very narrowly balanced. It is anticipated that a phased approach would be taken during the build out of the scheme.
- 4.5 The proposed development comprises 53 dwellings - the proposed mix is as follows:

Table 4.1 Proposed housing mix

	1p1b	1b2p	2b
Market	14 (26%)	11 (21%)	28 (53%)

- 4.6 The proposal:
- is designed to the Nationally Prescribed Space Standards and Manchester's residential space standards, where possible;

- has access to a storage space for a bicycle(s) for each apartment;
- communal amenity space within the development for all of the residents to enjoy;
- Dedicated bin storage meeting Manchester City Council requirements; and
- The new build will be heated via Air Source Heat Pumps (installed on the roof).
- The proposal also involves significant renewal/repair to the historic internal and external fabric of the Grade II listed building, enhancing its special interest; namely through:
- The retention and repair of the original stone flag floors to the stair hall and the former stair hall of the other (west) house;
- Restoration and retention of original doors (primarily surviving to the stair hall and attic level) subject to fire safety regulations and new, appropriate ironmongery;
- Replacement of any modern flush doors (that are located in original door openings) with copies of the original panelled doors;
- Use of the main staircase hall as the principal entrance to the apartments;
- Reuse of attic spaces and retention/restoration of doors and fire surrounds;
- Re-slating of the roof with original slates (kept in basement) with the preference of utilising these on the front elevation first;
- Reutilising the former two entrances into the rear outrigger from Crown Street with the use of appropriately designed doors;
- Re-utilising the original garden gate opening;
- Replacement of the c1970s wall/railings to the perimeter of the front garden with an appropriate solution; and
- Restoration of timber floors and roof structure, subject to further survey and subject to scheme viability.

5. POLICY FRAMEWORK

- 5.1 This section provides an overview of the Development Plan and guidance relevant to the consideration of these proposals.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan (DP), unless material considerations indicate otherwise.
- 5.3 While planning policy is locally led with the Development Plan, there is also a national level of policy which offers strategic guidance and legislative requirements to consider given the listed status of the site.

The Development Plan

- 5.4 This section will consider the relevant planning policy in relation to the determination of this application.
- 5.5 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires any planning application to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.6 The Development Plan consists of the following documents:
- Manchester Core Strategy (July 2012); and
 - Saved policies of the Unitary Development Plan (UDP) for the City of Manchester (1995).
- 5.7 Further, the following supporting documents represent material considerations in determining the planning application:
- The NPPF (2021);
 - Planning Practice Guidance ('PPG') (as updated); and
 - Relevant Supplementary Planning Guidance ('SPG').

5.8 The Council have begun the first stage of a review of its Local Plan and consultation on the Local Plan issues document ran in April 2020. The next stage will be a draft Local Plan though this is yet to be published or consulted on.

5.9 The key policies of each development plan document are identified below.

Manchester Core Strategy (July 2012)

- Policy DM1 (Development Management)
- Policy CC6 (City Centre High Density Development)
- Policy CC9 (Design and Heritage)
- Policy CC10 (A Place for Everyone)
- Policy EN1 (Design Principles and Strategic Character Areas)
- Policy EN2 (Tall Buildings)
- Policy EN3 (Heritage)
- Policy EN4 (Reducing CO2 Emissions by Enabling Low and Zero Carbon Development)
- Policy EN8 (Adaptation to Climate Change)
- Policy SP1 (Spatial Principles)
- Policy EC1 (Employment and Economic Growth in Manchester)
- Policy EC2 (Existing Employment Space)
- Policy CC7 (Mixed-use development)
- Policy CC3 (Housing)
- Policy H1 (Overall Housing Provision)
- Policy H8 (Affordable Housing)
- Policy EN16 (Air Quality)
- Policy EN19 (Waste)

- Policy T1 (Sustainable Transport)
- Policy T2 (Accessible areas of opportunity and need)

Saved policies of the Unitary Development Plan (UDP) for the City of Manchester (1995):

- Policy DC18 (Conservation Areas)
- Policy DC19 (Listed Buildings)
- Policy DC7 (New Housing Development)
- Policy DC26 (Noise)

Other material planning considerations

Legislation

- 5.10 Given the proposal involves development to a listed building it will be necessary for the Local Planning Authority (LPA) to pay special attention to the desirability of preserving the setting of listed buildings, as required by Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990.
- 5.11 An assessment is outlined within this planning statement, and a full detailed assessment is contained within the accompanying Heritage Impact Assessment (HIA). The HIA also considers the desirability of preserving or enhancing the character or appearance of the adjacent conservation area, as required by Section 72(1) of the same Act, and finds no impact.

National policy

- 5.12 The revised National Planning Policy Framework (NPPF) was published on 20 July 2021. Any applications made after this date are required to give material considerations to this version, even if the adopted development plan documents were adopted under the previous NPPF (2012 or 2018).
- 5.13 The NPPF (2021) emphasises the importance of sustainable development and sets out the core planning principles guided by the Government's planning policies. Under Paragraph 47, development proposals that accord with the Development Plan should be approved without delay.
- 5.14 The NPPF is supported by the National Planning Policy Guidance (NPPG) which provides interpreting guidance.

Other relevant policy documents

- 5.15 The following SPDs provide further guidance and information with regards to what the Council considers good practice in development proposals, relevant to the site and its location. These are material considerations when determining a planning application and as such, appropriate consideration of these documents have been taken when developing the proposals presented in this application.

Great Jackson Street Development Framework (2018)

- 5.16 The Great Jackson Street Development Framework ("Framework") was prepared to guide the comprehensive regeneration of the Framework area within the City Centre to create a high quality residential led neighbourhood at a key point of entry into the City Centre, and support Manchester's growth, productivity and quality of life. Its key vision is to 'create a vibrant, safe, secure and sustainable community'.
- 5.17 It notes Bridgewater House as the only building of historic significance in the Framework area and that proposals should seek to preserve, and where possible enhance, the setting of Bridgewater House and secure its future sustainable re-use.

The Guide to Development in Manchester SPD and Planning Guidance (2007)

- 5.18 The Guide to Development in Manchester defines and explains a set of principles that the Council expects to apply to new development in the City. The Guide was brought forward in advance of the Core Strategy (2012) and is therefore based on, and provides further detail on the saved UDP (1995) policies, and was used to inform and support Core Strategy policies as they were developed. Its key objective is to deliver the creation of sustainable communities by integrating Manchester's environmental, economic and social activities.

Manchester Residential Quality Guidance (2016)

- 5.19 Manchester's Residential Quality Guidance outlines the considerations, qualities and opportunities that will help to deliver high quality residential development as part of successful and sustainable neighbourhoods across Manchester. It however does not intend to impose any architectural styles and is keen to ensure it does not replace or stifle innovation. Rather, it sets out minimum requirements and standards for new residential development to ensure high quality design is achieved.

Summary

- 5.20 The proposed development has been carefully designed in response to the relevant national and local policies and guidance of which this planning statement demonstrates compliance to.

6. PLANNING CONSIDERATIONS

- 6.1 This section will consider the key planning issues to assess when determining this application for
- 6.2 This section identifies the key planning considerations relating to the scheme and assesses the proposed development in the context of relevant national and local planning policy and other material considerations.

Principle of development

- 6.3 A key principle at the heart of the NPPF and Manchester's Core Strategy is the presumption in favour of sustainable development and placemaking. Paragraph 119 of the NPPF goes on to state that the planning system should make as much use as possible of previously developed 'brownfield' land to promote an effective use of land in meeting the needs of homes, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 6.4 The proposal would make more effective use of this brownfield site through the redevelopment of the car park area in a highly accessible location within the city centre for more housing.
- 6.5 The development will also create a well designed place that enhances and creates character, make a positive contribution to health, safety and wellbeing, be inclusive and protect and enhance the built and natural environment, as highlighted in Paragraph 8 of the NPPF and Policy SP1.

Residential use

- 6.6 The Great Jackson Street Development Framework ("Framework") was originally endorsed in 2007 and was updated in 2015 and 2018 to reflect the potential for further growth in this part of Manchester City Centre. The proposed development would support the Framework's primary objective to help create a high-quality residential neighbourhood that would support the growth of the economy by attracting and retaining a diverse labour market, maximising the site's strategic location as a gateway into Manchester City Centre. In addition, Policy CC3 recognises the Castlefield area as a key area for residential development. Therefore, the principle of residential development in this area is acceptable and has already been accepted given the level of recent residential development in the area. It is also the optimal viable use as determined by the Heritage Impact Assessment and the Financial Viability Statement.

- 6.7 Bridgewater House is a vacant former office building (Class E) which is understood to have not been in use since 2001. It has since fallen into a sorry state of disrepair and is in need of investment to secure its future. Although planning permission had been granted in 2007 and extended in 2010 for the refurbishment and alteration of the building for its re-use for Use Classes A2 (now Class E), B1 (now Class E) and D1 (now Class F.1), this was not implemented and has now lapsed. On the basis the building has not been in use for over ten years following the former owner's intentions vacating the site and the building's dilapidated physical condition, it is considered that the building has been abandoned and is in "nil" use.
- 6.8 Therefore, there would be no loss of existing office space on site, and the proposed development would make a valuable contribution to housing supply on a sustainable, underutilised and dilapidated brownfield site in the city centre, as sought under Policies H1 and CC6.
- 6.9 While Policy CC7 generally promotes mixed use development within the city centre and seeks to include employment as part of residential development, the provision of a mix of uses on site would impact on the site's ability to feasibly deliver a viable scheme given its size and context being delivered separately to the recent surrounding developments. The submitted viability report provides evidence of the assessment of alternative uses, which are not viable. Further, recent development in the immediate area has provided an extensive mix of commercial uses to support the residential development, providing a wide range of sustainable services and facilities for both existing and future occupants.
- 6.10 The delivery of 53 new dwellings will contribute towards meeting Manchester Housing Strategy's (2022-2032) target of delivering 36,000 new homes by 2032.
- 6.11 The proposed range of housing sizes amongst the surrounding mix of sizes within recent residential development in the vicinity will encourage mixed communities and support growth on a previously developed site in a sustainable location, as established in Policy H1.

Restoration of Bridgewater House

- 6.12 Importantly, the proposed development would secure the future sustainable re-use of Bridgewater House through its restoration, which as recognised within the Framework area, as the only building of historic significance. Therefore, the development would make a vital contribution to rebuilding a sense of place and community through restoring the site's heritage significance as recognised within Policies SP1, DC19 and EN1.

Contribution towards regeneration

- 6.13 The DAS includes an assessment of the design principles established by the Framework and explains how the redevelopment of this heritage asset on a prominent location on Chester Road would complement wider regeneration in Great Jackson Street area.

Regenerating a derelict brownfield site, identified as a long-term regeneration priority, and demonstrably improving the character and appearance of the local environment, and will help to realise the City's visions as underpinned by Policy SP1. There will be an active ground floor, entrances and the apartments will animate Great Jackson Street. This proposal will help form an important gateway into the regeneration area and re-purpose the oldest Georgian house in Manchester.

- 6.14 There would be one, and two-bed apartments in sizes largely consistent with the City's space standards – providing a good range and choice of housing. Further these new homes will have the ability to create an estimated 167 jobs to support the local economy and significant contributions towards local and national tax revenue, which in turn can help to support local services, helping the development to contribute towards the city's economic sustainability.
- 6.15 There are also economic benefits for local authorities through financial receipts generated in the form of New Homes Bonus (NHB) payments and ongoing Council Tax (circa £59,861.38).
- 6.16 The socio-economic benefit are significant and would remove an underutilised site and support economic and population growth which would create jobs and increase local spending and taxation.
- 6.17 Overall, the scheme will ensure a key regeneration objective that "historic sites and areas of particular heritage value should be both safeguarded for the future and, where possible, enhanced for their own heritage merits and as part of wider heritage regeneration proposals" (Paragraph 12.21 of Policy EN3).

Viability

- 6.18 This section should be read in conjunction with the viability assessment prepared by CBRE.
- 6.19 The Financial Viability Assessment (FVA) is in line with accepted residual method, as advised in national guidance. Assessment based on detailed construction costs provided by the CINNS together with relevant market evidence and market knowledge gained through CBRE's previous viability work,

Red Book valuations, and their involvement in the disposal of numerous residential development sites on behalf of both public and private sector clients.

6.20 The HIA finds that the optimal use is as residential, owing to the fact this is the original intended use, nevertheless CBRE have assessed six land use scenarios.

6.21 Option 5 is the applied scenario – in this case the key inputs are:

- Net Development Value is £13,571,270 based on 100% market housing and costs including the Benchmark Land Value (BLV) is £11,696,270.
- The extensive repair/restoration works, outlined in Section 7.2 of the HIA, have been taken into account in the costings provided by CINNS – this is caveated to note where it is possible to estimate costs. There remains a significant unknown cost of repairing the roofs - budgetary figure has been assumed but the cost will remain unknown until such time that the building has been made safe and access given for the structural engineer and specialist surveyors.
- The developer's outturn return is at 13.82% on GDV which is below the minimum level of developer's return within the range set out in the PPGV.
- BLV of £353,283 represents the minimum incentive required for the landowner to release their site for development whilst allowing a sufficient contribution to fully comply with policy requirements.

6.22 The scheme will provide nil affordable housing and no S106 contributions. The reasons are fully explained in CBRE's supporting report, but in summary the deficit is mainly attributable to the higher build/abnormal costs associated with the fact that the building is listed and derelict.

6.23 Notwithstanding, the applicant is committed to delivering the proposed development at the subject site which would regenerate a listed building and vacant site. The regeneration will make a clear positive contribution in meeting local housing need and in enhancing the quality of the residential offer in the locality and the Framework area bringing a range of social, economic and environmental benefits. However, CBRE's report is clear that this will only be possible should the relevant exemption clause in Policy H8 be applied. Without this flex in policy, there would need to be a reduction in the BLV and/or developer's profit to levels which would not provide the landowner or developer with a sufficient incentive to bring the site forward for development. This would subsequently threaten the

opportunity to secure the optimal viable use for the building, putting into question its long-term future and the delivery of new housing.

- 6.24 Given the marginality of this scheme, WTS wish to phase the development and would welcome a discussion with officers about this.

Design and layout

- 6.25 The section should be read alongside the DAS, prepared by Snook Architects.

Amount and mix

- 6.26 The Framework seeks to create a sustainable mixed community for the area through bringing forward a range of accommodation types. Paragraph 3.8 of the Framework suggest a mix of 1, 2 and 3 bed apartments due to the location and proposed density of the area, with the overall mix to be justified per plot based on market demand. It also seeks a maximum of 33% of 1 bed apartments. The proposal would provide a balance mix of housing - the number of 2 beds has been increased as a result of pre-application discussions with officers. Although the proposed mix would provide a proportion of 1 bed units slightly above 33%, this would ensure that a viable scheme can be delivered.
- 6.27 The mix will also be suitable in the context of the site's city centre location to meet the needs of the working population and support the growing local economy to help create a vibrant, inclusive and thriving active community. The mix has also been constrained by the sub-division of the listed building.

Density, form, and layout

- 6.28 Policy CC6 states development will generally be high-density to maximise its efficiency and that the appropriate scale, massing and height will significantly exceed what is appropriate elsewhere in the city. The latest update to the Framework sought to increase the height and density of buildings in reflection of the site's location as a key location to the city centre.
- 6.29 While the Framework Masterplan sets out indicative densities for the surrounding plots within the Framework area, a target density has not been provided for the Bridgewater House site. The scheme therefore, firstly responds to the constraint of the listed building, the wider context of the SRF and the viability of the scheme driving what is feasible.

6.30 In addition, the revised Framework and design evolution of the masterplan seeks to enhance the format of high density development to enable the provision of a higher level of public realm and improve the quality the residential environment including via the following three main components:

- maximising separation distances between buildings;
- increasing the quantum and variety of public spaces and improving pedestrian connections; and
- enhancing sunlight and daylight penetration into the site.

6.31 Therefore, rather than setting a target density, the Core Strategy and Framework both seek to ensure development delivers a density suitable to the unique context of the site to maximise its efficiency while delivering a high-quality residential environment as part of a distinctive and broader place-making strategy. This scheme strikes that balance.

6.32 The form, layout and resulting density ensures the heritage significance of the listed building is protected by providing sufficient separation to the sympathetically designed new build element, while remaining integrated via a communal courtyard area. This delivers a high quality and inclusive residential environment, creating a sense of place and community both within the development site and across the surrounding developments by creating a pedestrian link through the site from Great Jackson Street to Crown Street. The courtyard and proposed layout also helps to enhance sunlight and daylight penetration into the site.

Quality of accommodation and space standards

6.33 The Manchester Residential Quality Guidance (2016) sets out that space standards, which combine Nationally Described Space Standards and the London Housing Design Guide space standards. However, the Guidance goes on to note that this does not preclude the consideration of approaches that do not meet these standards where it can be demonstrated that the units would still be appropriate to user demands, be of the highest quality and benefit the community.

6.34 The tables below shows how the scheme complies with the Quality Guidance:

Table 6.1 Converted building space standards

	1bp1	1b2p	2b3p	2b4p
Conversion				

Apartment 01	39.2			
Apartment 02	35.9			
Apartment 03				72.4
Apartment 04		52.9		
Apartment 05		52.2		
Apartment 06		47.1		
Apartment 07		61.1		
Apartment 08		51.1		
Apartment 09				78.9
Apartment 10			62.5	
Apartment 11	39.2			
Apartment 12		52.3		
Apartment 13			56.2	
Apartment 14			65.7	
Apartment 15				75
Apartment 16		53.8		
Apartment 17				76.8
Apartment 18			66.2	
Apartment 19				82.5
Apartment 20				78.7

Table 6.2 New build space standards

	1bp1	1b2p	2b3p	2b4p
6.35 New build				
Apartment 0-1		49		
Apartment 0-2		49		
Apartment 0-3		49		
Apartment 0-4		53.7		
Apartment 0-5	37.2	6.36		
Apartment 0-6	39.2	6.37		
Apartment 0-7				73.3
Apartment 0-8			68.1	
Apartment 0-9			68.1	
Apartment 1-1	44			
Apartment 1-2	44			
Apartment 1-3	44			
Apartment 1-4			67.3	
Apartment 1-5			69.5	
Apartment 1-6			61.9	
Apartment 1-7			61.9	
Apartment 1-8			61.9	
Apartment 2-1	6.38 44	6.39	6.40	6.41
Apartment 2-2	44			

Apartment 2-3	44			
Apartment 2-4			67.3	
Apartment 2-5			69.5	
Apartment 2-6			61.9	
Apartment 2-7			61.9	
Apartment 2-8			61.9	
Apartment 3-1	44			
Apartment 3-2	44			
Apartment 3-3	44			
Apartment 3-4			67.3	
Apartment 3-5			69.5	
Apartment 3-6			61.9	
Apartment 3-7			61.9	
Apartment 3-8			61.9	

- 6.42 Due to the constrained nature of the site and need to deliver a viable scheme within this context, some apartments marginally fall below the standards, but the vast majority are in excess and some within the listed building will be extremely well proportioned.

Character and appearance

- 6.43 The NPPF attached great importance to the design of the built environment as a key part of sustainable development. Policies DM1 and SP1 establish general design principles for development alongside further guidance provided within the Guide to Development in Manchester SPD and Planning Guidance.

- 6.44 Policy establishes that development should enhance the local character of an area and provides further principles to be followed to ensure that the standard of development is high.
- 6.45 The restoration and refurbishment of the abandoned listed building, and the sympathetic design of the ground plus three-storey new build element has evolved from a detailed understanding of the heritage significance of the site from the undertaking of an initial heritage appraisal. A heritage specialist has been appointed and a full Heritage Impact Assessment accompanies this application.
- 6.46 The height of the new build development (constrained by covenant) provides a significant step down from the surrounding high rise development, protecting views into the site and onto the Grade II listed building. The facade of the new build will comprise of green brickwork, creating a muted and sympathetic appearance within the streetscene.
- 6.47 These principles have been considered and incorporated into the design process, to ensure that the development complies with policies DM1 and SP1, and uses these principles to establish its own identity.

Landscape/amenity space

- 6.48 The proposed design and layout enables the creation of a high quality public realm as part of the development site, comprising a large communal landscaped courtyard area at the heart of the development. The positioning of the apartments surrounding this area creates a form of natural surveillance while the courtyard itself facilitates sufficient separation distances to opposing windows within the site to maintain appropriate levels of privacy. It also helps to create a sense of place amongst residents on site and within the surrounding area in accordance with Policies SP1 and DM1, and provides high pedestrian accessibility through the site between Great Jackson Street and Crown Street, connecting residents to a variety of green space within the wider Great Jackson Street masterplan area; a key component highlighted within the Framework area.
- 6.49 High quality private amenity space is provided in the form of private courtyards to the new build ground floor apartments - each of which will have appropriate boundary treatments to ensure sufficient levels of privacy, and in the form of juliet balconies for upper floor apartments.
- 6.50 Further, and a significant heritage benefit to the scheme, the front garden to Bridgewater House will be recreated and sub-divided with appropriate planting to create spaces for the ground floor flats facing Chester Road.

Crime Impact

- 6.51 Policy DM1 states that all developments should have regard to community safety and crime prevention and Paragraph 92b of the NPPF also states that developments should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
- 6.52 This application is accompanied by a Crime Impact Statement (CIS), prepared by Greater Manchester Police. The statement includes a review of the existing crime statistics within the area and considered the security measures, which the DAS confirms are considered by the design, will help to reduce the risk of crime. The proposals will therefore meet the requirements of Policy DM1 and Paragraph 127 of the NPPF.

Refuse collection and servicing

- 6.53 Policy EN19 states that the Council will require all developers to demonstrate the proposals consistency with the principles of the waste hierarchy, and that all developers will be required to submit a waste management plan.
- 6.54 Refuse and recycling will be stored in a designated and landscaped compound within the courtyard area, providing sufficient bins and access from Crown Street for servicing. The proposed waste strategy has also been reviewed by the transport consultant. Further waste and servicing details are included within the DAS and the City Council's Waste proforma, submitted showing compliance with Policy EN19.

Impact on neighbouring amenity

- 6.55 In the context of the Framework area and the extensive tower developments on adjacent sites, this site will have negligible impact on the amenity of neighbours.
- To the west of Crown Street where the Renaker towers are located, the regeneration of the site will improve outlook and visual amenity.
 - To the north of the site on the adjacent side of Chester Road there are residents but these flats are set back from the road, so there are no direct impacts and the general improvement to the streetscene brought about by the development will help improve visual amenity.
 - The brownfield site located on Great Jackson Street (immediately to the east), does not have a consent but is identified for redevelopment. The proposed new build element of the scheme is

modest in scale and the width of the road, should cause no future issues between residents (should that site be brought forward for housing).

- To the south of the site is the Gaddum building and again the improved outlook should help with the future redevelopment potential of this site.

6.56 Further a Daylight & Sunlight (impact on neighbouring properties), has been prepared by GIA, finding that all of the properties surrounding the site will fully accord with the BRE target criteria for daylight and sunlight with the proposed development in place. The impact to daylight and sunlight is negligible and therefore wholly acceptable.

Heritage assessment and impact

6.57 The application is accompanied by a HIA, prepared by Heritage Architecture Ltd. This section can also be read alongside the DAS and window schedule (prepared by Snook), the Fire Engineer note, the Window note and Structural Report (prepared by HBL).

6.58 The HIA sets out the statutory and policy tests in detail (along with Section 5 of this statement), so they are not repeated here apart from where they guide the assessment.

6.59 The aim of the team from the beginning has been to secure a viable scheme through sustainable restoration/re-use of the site; whilst putting the preservation considerations of the asset first.

6.60 The assessment of significance was provided to the architects early on in the process and the proposed layout of the apartments has come about as part of an iterative process. There have been various amendments made to the layout and alterations to the facade on the request of the heritage consultant, including: moving partitions (where possible away from chimney breasts and other original features); limiting new openings; limiting the removal of original doors (and where unavoidable keeping the door in-situ sealing it) to allow the original plan form of the building to be read; and generally limiting the extent of new interventions. However, in developing a scheme the challenge from the outset has been the asset's derelict condition and the desperate need to secure an optimal viable future for it. The upfront capital costs needed to secure its future are significant and the ability to use the rear yard to drive value is constrained (by its proximity to the asset, its size and the height restricting covenants).

6.61 This is a key corner site in the Framework area fronting one of the main roads into the city centre and it has stood empty since 2005. The current owners acquired the site in 2021 and have spent the last

10 months looking to develop a scheme that works for the heritage asset, and one which works from a viability perspective. The scheme which is put forward for consideration looks to strike this balance and overall seeks to preserve the special interest of the asset.

Significance

- 6.62 Paragraph 194 of the NPPF directs applicants to describe the significance of any heritage assets that are affected by development. The level of detail provided should be proportionate to the importance of the asset and it should also evaluate the potential impact of the scheme on the significance of that heritage asset, including its setting. The HIA provides such an assessment through a detailed review of the historical development of the site; followed by an assessment of the asset's significance. The assessment of significance has informed the design of the proposals.

Impact

- 6.63 The HIA takes a methodical approach to assessing impact based on Historic England's "Conservation Principles" (2008).
- 6.64 There is an assessment on the three views that have been selected and a full physical impact appraisal (of internal and external works to the listed building's fabric is provided at Section 7.2 of the report), which describes the intervention and assigns an impact – a summary is provided below.

Views

- 6.65 The visual impact assessment has concluded that:
- There will be one instance of negligible adverse impact, one instance of minor adverse impact and one instance of moderate beneficial impact.
 - Consequently it is considered the visual impact assessment as a whole will result in an overall minor adverse impact.
 - While there is harm this is at a lower level and is owing to the change in the setting of the listed building.
 - The proposals will have no impact on the Castlefield Conservation Area or any other nearby listed buildings.

Physical works

- 6.66 Where there is less than substantial harm to the asset, these 'adverse' impacts are often required to facilitate the building's successful conversion i.e. installation of bathrooms and kitchens (negligible adverse), replacement of floors (minor adverse), retaining doors but sealing shut (minor adverse), new door openings (minor adverse) and new walls to form rooms (minor adverse).
- 6.67 There is also moderate adverse impact identified for the replacement of the ceilings, alterations to some parts of the plan form in the 18th century former dwellings, removal of cornice in the office wing, blocking up the entrance hall archway to Great Jackson Street, insertion of rear dormers, creation of four new entrance doors to the existing windows on office wing, and insertion of doors onto reformed landscape area fronting the Chester Road.
- 6.68 And finally, there is a major adverse impact for the wholesale replacement of windows with a hardwood histoglass product. There is a small number of slightly different window designs across the existing building; once all windows can be accessed and a detailed survey can be undertaken, all different types will be detailed separately (and controlled subject to condition as with other details). This product will however improve the noise environment for future residents.
- 6.69 Where harm is judged as 'adverse' this is largely owing to conversion works (which have been designed as sensitively as possible whilst considering how to provide practical living spaces), bringing the building up to standard, or where there is removal of fabric and replacement with a sensitive modern alternative (only proposed where the extent of damage is beyond what the scheme can viably provide).
- 6.70 While there are adverse interventions, there are many positive ones (assessed as having a degree of 'beneficial' impact), including:

18th century dwellings

- The general approach to all plasterwork and cornicing throughout (minor/moderate beneficial);
- Retain and replace all joinery in 18th century dwellings (minor beneficial);
- Make shutters operable in 18th century dwellings (moderate beneficial);
- Floorboards to be repaired and insulated within voids – to be left exposed where possible (minor beneficial);

- Recreate the original panelled doors using three surviving examples and rehang once 1970 door widths returned to 18th century dimensions (moderate beneficial); and
- Repair entrance hall and servant's staircase to attic accommodation like for like (minor beneficial).

[There are further improvements made throughout the building where original door widths are reinstated, original floors are revealed and repaired, and sympathetic later partition additions are removed].

Exterior of 18th century buildings

- Introduce new sash windows into two blocked original window openings in basement (minor beneficial);
- Retain and repair 19th century panelled double doors on Great Jackson Street (minor beneficial);
- Replace 1970 rear doors to Silvercroft Street/courtyard with original door design (moderate beneficial);
- Creation of front gardens for ground floor apartments in former dwellings (moderate beneficial);
- Reuse original slates on the original Chester Road elevation (any missing slates sourced to match) (minor beneficial);
- Insertion of seven conservation skylights in original and new locations (minor beneficial);
- Replace all PVC rainwater goods with aluminium (minor beneficial);
- Repoint brick work and splice like for like bricks where necessary (minor beneficial); and
- Repair/replace timber moulded bargeboards to eaves on Chester Road elevation (minor beneficial).

1842-3 office

- Remove all modern flush 1970 doors and reduce openings installing modern replacements, removal of modern partitions, and modern toilet fixtures/fittings (negligible beneficial);
- Retain and refurbish original stone staircase/balustrades to south of wing (minor beneficial);
- Create walk-in wardrobes and bathrooms in locations of original walk-in vaults (minor beneficial);
- Replace all PVC rainwater goods with aluminium (minor beneficial);

- Repair and repoint where necessary brick and stone work (minor beneficial); and
- Introduce planting in rear courtyard (moderate beneficial).

[There are fewer beneficial impacts here owing to the extreme damage to this part of the building].

- 6.71 The heritage consultant concluded that there are various instances of both adverse and beneficial impacts upon the listed building (both direct and indirect). Instances of minor and moderate beneficial impact focus on the restoration and repair of original high significance elements, and regrettably where there are adverse interventions these are a result of where a certain quantum of development to allow the scheme to be viable. Consequently, they conclude that the combined physical (direct) impacts on the Grade II listed Bridgewater House will be moderate adverse.

Overall assessment and balancing exercise

- 6.72 As the HIA finds the proposals look to restore and refurbish the listed building, with the focus of restoration/conservation being on the earliest and highest significance parts comprising the original 18th century dwellings fronting Chester Road, whose condition is marginally better than that found in the later, office wing to the rear. This focus has allowed for a great many detrimental alterations that were undertaken during the 1970s to be bettered or reversed. However, the effect of the combined visual and physical impact of the current proposals are considered to result in an overall moderate adverse impact on the Grade II listed building, which equates to “less than substantial harm”. Given this conclusion it is necessary to engage Paragraph 202 of the NPPF.
- 6.73 The HIA confirms that the proposal is the building’s optimum viable use (and its original and intended use), as supported by the financial appraisal in CBRE’s report. However, the benefit of the asset being in its optimum viable use has to be balanced against broader public benefits owing to the degree of harm. The public benefits providing satisfying Paragraph 202 include:
- Removing a derelict brownfield site, identified as a long-term regeneration priority in the Great Jackson Street area, demonstrably improving the character and appearance of the local environment. The Government recognises that brownfield land (i.e. land that has been previously developed) suitable for housing has a vital role to play in meeting the country’s need for new homes while protecting the countryside.
 - The repair and restoration of the derelict listed building will improve the immediate streetscene and will also help the general public have a better appreciation of the historical and architectural

significance of the asset which is located on a prominent route into the city, which will sit in proud contrast to the modern towers around it.

- Utilising a highly accessible site, accessible by a range of modes of sustainable transport to support a sustainable pattern of development. Further supported by the Manchester Housing Strategy (2022-2032) also aims to ensure that at least 80% of all homes are on brownfield sites close to public transport.
- Much need housing – the 53 new homes could accommodate 127 additional residents, going some way to meet Manchester Housing Strategy's (2022-2032) aim of delivering 36,000 new homes by 2032.
- Creating an inclusive development that provides new homes in line with, or more than, Manchester's Residential Quality Guidance provisions, where possible.
- Further these new homes will have the ability to create an estimated 167 jobs to support the local economy and significant contributions towards local and national tax revenue, which in turn can help to support local services, helping the development to contribute towards the city's economic sustainability.
- There are also economic benefits for local authorities through financial receipts generated in the form of New Homes Bonus (NHB) payments and ongoing Council Tax (circa £59,861.38).

6.74 In conclusion, in developing a scheme the required regard has been given to Paragraph 197 of the NPPF and overall the proposals will:

- Sustain the significance of heritage asset and putting it into viable use, consistent with its conservation, securing it for future generations;
- Make a positive contribution to sustainable communities including their economic vitality; and
- Positively contribute to local character and distinctiveness bringing back into a derelict asset which has been empty since 2005.

6.75 With regard Section 66 of the 1990 Act "less than substantial harm" is a physical alteration or development affecting the setting of a designated heritage asset which may alter but does not fundamentally compromise its "special architectural or historic interest".

- 6.76 Fundamentally, the legislation (like Paragraph 202) requires LPAs to apply proportionate weight to the desirability of preserving the significant fabric, architectural character and historic interest of designated heritage assets when determining planning proposals, balanced against identifiable public benefits. This assessment should be based on an appropriate analysis of the site as a whole, and its physical and visual relationship to any neighbouring designated heritage assets (including conservation areas), as provided. The key planning consideration is whether the proposals will cause any demonstrable, unmitigated 'harm' or erosion of the interests of the identified heritage assets. Taking a proportionate view of the status of the affected heritage asset and the nature of the proposed changes (along with the stated public benefits), the special architectural or historic interest can be preserved.
- 6.77 Overall, the proposals have been carefully developed in response to the asset's significance, creating a high-quality design that is sensitive as possible to the asset, and its setting, as required by the relevant statutory tests, NPPF, Policy CC9 and EN3, and saved UDP Policies DC18 and DC19. And whilst there will be less than substantial harm caused to the asset this can be balanced against the public benefit of bringing the site back into its optimal viable use.

Below ground

- 6.78 Paragraph 189 of the NPPF (2019) states that:

"where a Site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation".

- 6.79 The application is therefore accompanied by an Archaeological Desk-based Assessment, prepared by RPS.
- 6.80 The report concludes that the site is unlikely to contain remains of a significance that would require to be designed around/preserved in situ. The areas of greatest surviving potential are also currently in use as car-parking. Consultation will be sought with the Greater Manchester Archaeological Advisory Service (GMAAS) through the consultation period of the application – particularly looking at the potential for Romano-British activity.

- 6.81 If deemed appropriate, a program of archaeological monitoring should be put in place during Site Investigation works (either geotechnical boreholes or test pits) and agreed as a planning condition. If deemed necessary, then trial trenching can be undertaken to inform a mitigation strategy as necessary.

Transport and parking

- 6.82 A Transport Statement and Interim Travel Plan, prepared by SK Transport, has been submitted in support of the application.
- 6.83 Policy T1 seeks to encourage modal shift away from car travel to public transport, cycling and walking. Policy T2 recognises the highly accessible nature of the city centre and therefore the appropriate level of car parking will be assessed on a case-by-case basis.
- 6.84 As part of SK Transport's assessment they engaged in discussions with the highway authority prior to submission and have looked at what TRO modifications might be necessary and have looked at swept paths for servicing vehicles.
- 6.85 SK Transport conclude that the site is within a highly accessible location, close to a wide mix of services and facilities as well as sustainable transport modes, reducing the need to travel by private car. The existing parking controls in the area will remove the practicability of storing a car on street. In the unlikely event that a resident owns a car, opportunities exist nearby for residents to arrange contract parking in public car parks. This finding is in line with MCC conclusions on adjacent and larger approved developments including Crown Street Phase 1 and Phase 2.
- 6.86 The proposal includes a generous level of cycle parking, reinstatement of redundant access points, bounding footway re-surfacing, and a Travel Plan. The interventions proposed directly and reasonably relate to the scale and nature of the proposed development. No further interventions are considered to be required to make the development acceptable in planning terms.
- 6.87 The proposal includes modifications to the TRO on Great Jackson Street to provide a disabled parking space. The TRO proposal does not result in a net loss of existing Pay & Display spaces. Further, service access and refuse collection arrangements have been designed to fit with those agreed for the consented Crown Street Phase 1 development.

- 6.88 Overall, the traffic impact and road safety assessments show that the proposal will not have an impact on existing highway operation or road safety patterns, both when considered in isolation or when compared to the previous use of the site as a commuter car park.
- 6.89 It is concluded that the proposed development meets the requirements of local and national policy, and that the residual traffic and road safety impact of the proposal will not be severe or unacceptable when examined in the context of NPPF. It is also shown that the proposal meets the sustainable transport requirements of NPPF.

Sustainability and energy

- 6.90 In support of this application an Environmental Statement has been submitted to demonstrate how the proposed scheme contributes to sustainable development in relation to strategic, design and construction considerations. The statement looks at the new build and the Bridgewater House separately, given the constraints of the listed building.

New build

- 6.91 The new build will overall achieve a 25% reduction in the CO2 emissions of the building, over the Part L1A (2006).
- 6.92 The development as a whole will meet this through 23% of the energy demand being met through renewables (in excess of 20% policy target). The scheme proposes Air Source Heat Pumps (ASHP) for the heating and hot water demand within the new build to remove the reliance on Natural gas services and combustion technology.
- 6.93 Further, utilising a 'fabric first' approach to the design of the new build properties, the design team have reduced the U-values of the property, in comparison to the Part L 1 2021 guidance.

Bridgewater House

- 6.94 Within Part L volume 1 for the refurbishments of the existing buildings the requirement for compliance is an incremental improvement over the existing dwelling. Given that the building was last used as offices, there is a material change of use for the building, as such the requirement for full compliance with the three criteria from Part L does not apply. However, there are improvements to U-Values that must be made under Part L 1 section 11.7

- 6.95 Utilising a 'fabric first' approach to the design of the refurbished properties, the design team have improved the U-values of the property, against the existing with the addition of Kingspan internal cladding. This will reduce the reliance on heat generating technology and will reduce the requirement for energy use within the building. Windows, which are to be replaced are to be replaced to meet more modern standards than the existing with wooden frame and improved U-Values. Additional roof insulation is to be included within the roof replacement to improve the values to a suitable level.
- 6.96 Alongside the new build, the existing building is included within the requirement for onsite generation of the final site energy demands from renewable technologies.

Summary

- 6.97 Overall, the proposed scheme is in general compliance with the NPPF and Manchester's overarching principles relating to sustainable development and the requirements for sustainable construction established in Policy EN4. This Policy seeks to reduce fuel poverty and CO2 emissions through the Energy Hierarchy principle to reduce the need for energy through design and energy efficient features as well as the use of low or zero carbon energy generating technologies.

Flood risk and drainage

- 6.98 Policy EN14 (Flood Risk) adopts the national risk-based sequential approach to direct development away from sites at the greatest risk of flooding, and towards sites with little or no risk of flooding; taking account of all sources of flooding.
- 6.99 The site is in Flood Zone 1 and there are no other sources of flooding. As outlined in the supporting Flood Risk and Drainage Statement, prepared by HBL, the development will have a properly designed drainage system, so should not increase risk of flooding elsewhere, as required by policy.
- 6.100 A provisional drainage strategy was produced using the source control module of Microdrainage and found that a combined permeable paving and cellular storage system could be used to attenuate surface water generated from the buildings themselves and associated hardstanding. In the absence of infiltration data, a discharge rate of 5l/s was used, which resulted in a permeable paving and cellular storage system.
- 6.101 This combined system would provide sufficient attenuation for the 1 in 100 plus 20% climate change event. For completeness a test was run for the 1 in 100 plus 40% climate change event and found that there was 3.7m3. This would equate to approximately 10.2mm of flooding across the

hardstanding and as such it is believed that this could be temporarily stored within the hardstanding before feeding back into the main drainage system. The size of these systems could be further reduced using additional SuDS features such as raingardens and tree pits as part of the proposed landscape strategy. This will need to be explored further as part of the detailed design process and is proposed to be controlled via condition.

- 6.102 In comparison the foul flows are likely to be increased, however, the risk of flooding from this source should be mitigated by ensuring that the system is properly designed and appropriate approvals from the water authority obtained prior to connection into the adopted sewer.

Noise

- 6.103 Policy DM1 (Development Management) and saved Policy DC26 (Noise) seek to protect the amenity of existing and future occupants with regards to noise. Given the proximity to Chester Road and city centre location, a Noise Impact Assessment, has been prepared by Lighthouse Acoustics, in support of this application.
- 6.104 The report is based on background noise level measurements taken in July 2022. The report makes an assessment and uses heat maps to show how the noise impact will differ around the site and suggests an appropriate acoustic performance as well as ventilation.

Windows

- 6.105 The new build requirements can be met by specifying an appropriate window product. However, it is not possible for the listed building to meet the specified standard.
- 6.106 The application proposes to replace all windows in the listed building with a histoglas (thin double glazing) product in timber replica hardwood frames, the laboratory test data (octave band) shows that the acoustic performance of the windows will be 34bD – falling short of the standard recommended by the acoustician.
- 6.107 While the recommendation can not be met, the proposal is considered to be the best solution for the building from a heritage and health perspective, for the following reasons:
- The building will benefit from an improvement in internal noise environment over what the repaired single glazed windows could have provided.

- Alternative window products have been considered including a unit that would meet up to 47dB acoustic performance, however this would mean the inclusion of large spaced double-glazed units, rather than the replica frames currently proposed.
- Specifying secondary glazing with cavity widths of 100/150mm would be possible, but this would clash with the original historic shutters and aesthetically would be unsightly causing further harm to the building. There is also a further cost implication for secondary glazing which would make a marginal scheme even less viable.

Ventilation

- 6.108 Both the listed building and the new build have a MVHR system in order to comply with the new building regulations and will have the ability to have a summer boost function to ensure a comfortable living environment and no undue overheating.

Outdoor space

- 6.109 As the report notes the gardens facing Chester Road will unfortunately not meet the amenity standards without a significant acoustic barrier which would significantly detract from the setting of the listed building. Therefore, no mitigation is proposed here.

Summary

- 6.110 Whilst mitigating noise impacts, there is of course a delicate balance to be achieved between retaining the historic fabric and character of the building whilst at the same time making it warm and habitable, we feel the proposals strike the best balance possible, whilst having due regard to policy.

Air quality

- 6.111 Policy EN16 (Air Quality) seeks to improve air quality, particularly within AQMAs (the site is in the Greater Manchester Combined Authority AQMA). As such an Air Quality Assessment has been prepared by Miller Goodall Ltd.
- 6.112 The report assesses the air quality impacts during construction and operation of the proposed development and concludes:
- Residual dust impacts during the demolition and construction phase are not significant.

- Concentrations of NO₂ and PM₁₀ are likely to be below their respective long and short-term objectives at the proposed development site which is therefore considered suitable for residential/ commercial use with regards to air quality.
- Concentrations of PM_{2.5} are expected to be below the annual mean target.

6.113 Therefore, the proposed development is not expected to have a significant impact on local air quality and the application is in full compliance with Policy EN16.

Ecology and biodiversity

6.114 Policy EN15 (Biodiversity and Geological Conservation) states that the Council will seek to maintain or enhance sites of biodiversity and geological value throughout the city.

6.115 In light of the derelict condition of the building and its potential for roosting bats, Collington Winter were instructed to undertake a Preliminary Roost Assessment (PRA) which was followed up by a Nocturnal Bat Survey undertaken in 2022.

6.116 The supporting report concludes that no bats were recorded roosting within the building, and therefore no further surveys or mitigation with relation to roosting bats is required for any renovations to be completed on the building.

6.117 However, the report includes a number of recommendations which will be taken into account in the detailed design of the proposals:

- Proposed construction lighting should follow the protocols outlined in the Institute for Lighting Engineers document "Guidance for the Reduction of Obtrusive Lighting" (2005) and BCT's "Bats and Artificial Lighting in the UK" (2018) to minimise disturbance and sky-glow off site.
- A Sensitive Lighting Strategy should be developed which details lighting levels within the proposed development and provision of "Dark Zones". Lighting should be limited and sensitive wavelengths for bats used if possible.
- Multipurpose bat boxes be installed within the site to provide opportunities for roosting bats as an enhancement measure. It is anticipated three boxes would be appropriate for the size of the site.

- 6.118 The report also notes that the building does provide some value for nesting birds. So, if the building is to be refurbished within the breeding bird season (March – September inclusive), a nesting bird check should first be undertaken by a suitably experienced ecologist. If any nests, or nests in construction are located, a suitable standoff should be maintained until the young have fledged. The works should commence within 48 hours of the nesting bird check. It is anticipated that this will also be controlled by condition/informative on any grant of planning permission.
- 6.119 By implementing the recommendations above, reasonable opportunities to enhance and create new biodiversity will be provided, as required by Policy EN15.

Ground conditions

- 6.120 This planning application is accompanied by a Phase 1 Desk-based Site Investigation, prepared by Ensaf Consultants.
- 6.121 The preliminary risk assessment concludes that a Phase II intrusive investigation is recommended to provide an updated conceptual site model. The thickness and composition of the Made Ground should be investigated to determine the presence of contaminants within the underlying site strata and the potential for ground gas production from within the Made Ground and migrating from offsite sources. The underlying ground conditions should be assessed to determine the suitability for the proposed residential with gardens end use and the potential risk to human health receptors, flora and fauna, and buildings and services. An investigation of contaminants within the underlying groundwater from the principal and superficial aquifers should be undertaken to assess the impact of potential sources on controlled waters.
- 6.122 It is anticipated that this Phase 2 assessment will be secured by condition in the normal way, as supported by Policy EN18 (Contaminated Land and Ground Stability).

Construction management

- 6.123 A Construction Management Plan (CMP) has been prepared by CINNS and is submitted in support of the application. The CMP details the mitigation measures proposed during construction and seeks to minimise any impacts on adjacent landowners/residents and the highway.

7. SUMMARY AND CONCLUSIONS

7.1 This Planning Statement is submitted in support of a combined planning and listed building consent for the residential-led conversion and redevelopment of the site. The listed building has been vacant for over ten years and is in desperate need of repair and conservation. The new build element of the scheme will make the capital investment desperately required to preserve the listed building providing it with a long-term sustainable future.

7.2 The planning benefits of the scheme are as follows:

- Effective use of this brownfield derelict site that has been empty since at least 2005 in a highly accessible location within the city centre for more housing – in line with the regeneration priorities of the area, despite the marginality of the scheme's viability.
- Delivery of much needed housing.
- The proposals will renew and repair the historic internal and external fabric of the Grade II listed building, preserving its special architectural and historic significance. Whilst overall the HIA concludes that there is less than substantial harm this can be balanced against the public benefit of bringing the site back into its optimal viable use.
- The restoration of an abandoned and dilapidated historic building would provide a significant public benefit to the local community and contribute to the vibrancy of the surrounding area.
- The development provides a mix of housing, with the majority of the housing meeting the required space standards.
- The development will improve the visual amenity of the streetscene, and there will be no detrimental impact on neighbours.
- The scheme will improve perceived safety and fear of crime in the area.
- The site is in a sustainable location, there is adequate cycle parking provided and the development will have no impact on existing highway operation or road safety patterns. Servicing arrangements will also function and there is an Interim Travel Plan proposed.

- The proposed scheme is in general compliance with the NPPF and Manchester’s overarching principles relating to sustainable development – the new build fully complies and where the constraints of the listed building allow improvements are made.
- The site is in Flood Zone 1 and there are no other sources of flooding. The development will have a properly designed drainage system, so should not increase risk of flooding elsewhere, as required by policy
- Noise mitigation measures are proposed balancing the need to create a warm and habitable conversion whilst not unduly harming the fabric of the listed building. The new build will fully comply. Regard has also been given to overheating.
- The proposed development is not expected to have a significant impact on local air quality.
- There are opportunities to enhance and create new biodiversity through sensitive lighting design and installation of bat boxes.
- No ground contamination/conditions issued are anticipated but a Phase 2 is recommended.
- The construction impacts can be adequately mitigated and managed through principles established.

7.3 Despite the challenging viability WTS is fully committed to delivering the scheme and following an approval work would start on site without delay. Approvals and phasing allowing, they hope to be on site in Summer 2023.

7.4 The proposal will contribute towards forming a new sustainable community in the regeneration area, in line with the Development Plan. For the reasons outlined above, and throughout this document, this application should be approved.

A1. SUPPORTING DOCUMENTATION

Company	Document / Drawing	Rev
Oriel Planning (Agent)	Application form	-
Oriel Planning	Planning, Regeneration and Engagement Statement	July 2022
Snook	Design and Access Statement ○ Operational Schedule/Management Strategy ○ Residential Standards Statement ○ Photographs	Revision A
Snook	Drawing Pack – see drawing issue sheet	-
Snook	Window Schedule	
CBRE	Executive Summary Financial Viability Statement Financial Viability Statement [CONFIDENTIAL]	July 2022
Heritage Architecture Ltd	Heritage Impact Statement (above ground)	August 2022
RPS	Archaeology Statement (below ground)	V2 22.06.2022
SK Transport Planning Ltd	Transport Statement and Interim Travel Plan	220705/SK22236/TS01(-01)
Collington Winter	Bat Emergence Survey Report	CW20-195 RPT 001

hbl consulting	Drainage and Flood Risk Assessment	9757-HBL-XX-XX-RP-0001
hbl consulting	M&E drawings	See separate dwg issue sheet
hbl consulting	Structural Report	9757-HBL-XX-XX-RP-S-0001
Ensafe Consultants	Site Investigation Report	G79223 JUNE 2022
Lighthouse Acoustics	Noise Assessment/Report	0905/APR1 Revision 1 22.07.22
Miller Goodall Ltd	Air Quality Assessment	31.05.2022 - 102821
GMP	Crime Impact Statement	Version B 18.07.2022 2007/1245/CIS/01
CINNS	Construction Waste and Management Plan	V1 June 2022
GIA	Daylight & Sunlight Assessment	15.06.2022
Hulley & Kirkwood	Environmental Standards Statement	28.06.2022
	Fire engineer report	-
Snook	Waste management proforma	-
Preferred Joinery Ltd	Window letter	18.07.2022