



Paul Butler Associates

Planning, Development & Heritage Consultants

12 July 2022

Mrs Julie Roscoe
Head of Planning
Manchester City Council
Town Hall
Albert Square
Manchester, M60 2LA

20.1451/pv

Dear Mrs Roscoe,

Cameron House, Brunswick Street, Manchester, M13 9SG
Application for Planning Permission for Installation of Solar PV to Roof

On behalf of our client GGC Polygon Manchester Ltd, please find enclosed an application for planning permission for the installation of solar PV on the roof of Cameron House, Brunswick Street. The proposed solar installation will reduce carbon consumption at the property and thus contribute to the national aim of reducing carbon emissions.

In order to provide an understanding of the application proposal this letter provides a description of the application site and surrounding area; an overview of the proposal; a review of the national and local planning policy of relevance to the proposal; and, an appraisal of proposal against its relevant planning policy context.

It is noted that PV installations may be progressed under a prior approval process where certain criteria are met. As the subject building is currently under-construction and is for mixed-use this planning application has been progressed.

The Application Site and Surrounding Area

The application site comprises Cameron House, Brunswick Street, Manchester, M13 9SG (refer to submitted site location plan). The building is currently under construction although the shell and structure are complete, with the works continuing to progress on site. Prior to the construction of Cameron House the site was a cleared site which was overgrown with vegetation. Once constructed Cameron House will be six storey, comprising apartments on the upper levels with commercial use / resident amenities at ground floor level.

The site is approximately 0.02 hectares in size and is located approximately 0.6 miles east of Manchester City Centre. It is roughly triangular in shape and is bounded on its three sides by highways: Stockport Road, Polygon Street and Brunswick Street. It is located next to an important roundabout that links the immediate area to the City Centre (to the west), Great Ancoats Street and Eastlands (to the east), Brunswick, Longsight and beyond the University and Hospitals (to the south).

The site is within the Central Manchester Regeneration Area. It is not located in a conservation area. The immediate surroundings of the application site are occupied by a mix of land uses. To the north of the site is Ardwick Green Park and beyond a mix of residential and commercial/industrial uses. To the east, and on the opposite side of Stockport Road, is the grade

It listed Apollo Theatre and behind this the Apollo Business Park. To the south is the Brunswick Neighbourhood which includes an extensive area of housing, together with a local shopping centre on Brunswick Street and a parade of shops on Stockport Road. This area has recently been the subject of a large scale regeneration scheme which includes a new build mixed-use retail and apartment block on the opposite side of Polygon Street.

To the immediate west of the application site is a Tesco Express and Petrol Station, the Vallance Centre healthcare facility, a Sure Start Children's Centre and Medlock Primary School. Planning permission has recently been granted for a five storey apartment building on the land between the Petrol Station and the Vallance Centre.

Stockport Road (A6) and Hyde Road (A57) – arterial routes which are well served by numerous bus routes – run adjacent to the application site, whilst Piccadilly train station (and its Metrolink connections) and Ardwick station are within 1/2 mile. The area enjoys good access to other major arterial routes including Oxford Road and Upper Brook Street, as well as to the University of Manchester, Manchester Metropolitan University, Manchester Royal Infirmary and Royal Manchester Children's Hospital. The site is within walking distance of Manchester City Centre and is accessible by walking and cycling.

The Proposal

The application proposal is for a solar development comprising 82 roof mounted solar PV panels with a total output of 37.720kWp. The layout is identified by the submitted application drawings and shows installations to the flat / mono-pitched roof elements of the building (i.e. the elements fronting Stockport Road and Brunswick Street). A product specification of the solar panels has also been provided. The panels will be fixed to a mounting rail and a mansafe system will be installed to allow for maintenance.

Planning Policy Context

The application proposal should be considered against national and local planning policy requirements. Planning policy of relevance to the proposal and which provides the context for its assessment is provided within the following documents:

- National Planning Policy Framework (2021);
- National Planning Practice Guidance;
- Manchester Core Strategy Development Plan Document (2012);
- Manchester Unitary Development Plan (1995); and,
- Guide to Development in Manchester Supplementary Planning Document 2007 (SPD).

National Planning Policy Framework, 2021

The NPPF sets out the Government's planning policies for England and is a material consideration in the determination of planning applications. A revised NPPF was published in July 2018 and updated in July 2021. The document states that the purpose of the planning system is to contribute to the achievement of sustainable development. It seeks to achieve this objective by:

- Setting out that there is a need for the planning system to perform a number of roles, including an economic role, social role and environmental role. The economic objective relates to building a strong, responsive and competitive economy and ensuring that sufficient land of the right types is available in the right places. The social objective seeks

to support strong, vibrant and healthy communities. The environmental objective seeks to protect and enhance the natural, built and historic environment and make effective use of land, minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low carbon economy (Paragraph 8).

- Requiring that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible (paragraph 47).
- Advising that planning policies and decisions should aim to achieve healthy, inclusive and safe places (paragraph 92).
- Requiring that planning decisions should ensure that developments: will function well and add to the overall quality of the area, not just for the short-term but over the lifetime of the development; are visually attractive as a result of good architecture; are sympathetic to local character and history including the surrounding built environment; maintain a strong sense of place; and, create places that are safe, inclusive and accessible, with a high standard of amenity for existing and future users (Paragraph 130).
- Advising that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure (Paragraph 152).
- Stating that when determining planning applications for renewable and low carbon development, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and b) approve the application if its impacts are (or can be made) acceptable (Paragraph 158).

National Planning Practice Guidance (NPPG)

National Planning Practice Guidance is a web-based resource which provides guidance across a range of planning matters. Guidance is provided in relation to renewable and low carbon energy, which advises:

- Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.
- Renewable energy developments should be acceptable for their proposed location. In addition to the factors that should be considered regarding the acceptability of a location for any form of renewable energy development there are particular considerations for the following technologies: hydropower, active solar technology (photovoltaics and solar water heating), solar farms and wind turbines. Also, local planning authorities may wish to consider how planning conditions or planning obligations can mitigate the impacts described.

- Active solar technology, (photovoltaic and solar water heating) on or related to a particular building is often permitted development (which does not require a planning application) provided the installation is not of an unusual design, or does not involve a listed building, and is not in a designated area. Where a planning application is required, factors to bear in mind include:
 - the importance of siting systems in situations where they can collect the most energy from the sun;
 - need for sufficient area of solar modules to produce the required energy output from the system;
 - the effect on a protected area such as an Area of Outstanding Natural Beauty or other designated areas;
 - the colour and appearance of the modules, particularly if not a standard design.

Manchester Core Strategy Development Plan Document, 2012

The Core Strategy, adopted in July 2012, is the key Development Plan Document against which proposals should be judged. Core Strategy objectives and policies of particular relevance to the application proposal include:

- Spatial Objective SO6: 'Environment' seeks to protect and enhance the natural and built environment of the city, ensure the sustainable use of natural resources, and secure a high standard of design in all development proposals.
- Policy SP 1 'Spatial Principles' which advises that development should enhance/protect the built/natural environment, enhance or create character, minimise emissions, and ensure efficient use of natural resources.
- Policy CC 9 'Design and Heritage' which states that development in the City Centre needs to be of the highest standards in terms of appearance and function and should preserve or enhance conservation areas.
- Policy EN 1 'Design Principles and Strategic Character Areas' which states that all development in Manchester will be expected to follow the seven principles of urban design, as identified in national planning guidance and listed above and have regard to the strategic character area in which the development is located.
- Policy EN 3 'Heritage' which states that developments must be designed to support the council in preserving or, where possible, enhancing the historic environment.
- Policy EN 4 'Reducing CO2 Emissions by Enabling Low and Zero Carbon Development' notes that the Council will seek to reduce fuel poverty and decouple growth in the economy, growth in CO2 emissions, and rising fossil fuel prices, through a variety of actions including:
 - Wherever possible new development and retrofit projects, including energy generation plant, must be located and designed in a manner that allows advantage to be taken of opportunities for low and zero carbon energy supplies.
 - Where possible new development and retrofit projects will be used as a mechanism to help improve energy efficiency and provide low and zero carbon energy supplies to existing buildings.

- Where appropriate new development and retrofit projects will be required to connect to and/or make contributions to low or zero carbon energy schemes and/or to incorporate provision to enable future connection to any existing/potential decentralised energy schemes.
- Policy DM 1 'Development Management' which sets out various issues that development should have regard to, including amongst other things appropriate siting, layout, scale, form, massing, materials and detail; and, effects on amenity.

Saved Policies of the Unitary Development Plan (UDP) for the City of Manchester (adopted 1995)

The UDP was superseded by the Core Strategy. However, a number of UDP policies have been 'saved'. Extant policies contained within the UDP which may be of relevance to the development proposal include:

- DC19.1 'Listed Buildings' states that in determining planning applications for development involving or having an impact on listed buildings the Council will have regard to the desirability of protecting their general setting.

Guide to Development in Manchester Supplementary Planning Document, 2007

This document aims to support and enhance the on-going shaping of the City by providing a set of reasoned principles which will guide developers, designers and residents to the sort of development that everyone wants to see in Manchester. Section 2 of the SPD relates to design whilst section 4 relates to environmental standards including renewable energy.

Planning Appraisal

Having regard to the planning policy context set out above, the key planning issues against which the application proposal should be considered relate to the principle of PV installation; design, visual and heritage impact; and potential glint and glare. These issues are considered below:

Principle of PV Installation

The application proposal involves the installation of an array of 82 solar panels with a total energy output of 37.720kWp. The scheme will clearly help meet an identified need for reducing CO2 emissions by enabling low and zero carbon development in Manchester. As a renewable technology, the installation will achieve a carbon reduction and can be regarded as sustainable. It is also important to recognise that many PV installations are allowable as permitted development therefore representing Government support for the principle of this type of development.

The NPPF outlines a presumption in favour of sustainable development which includes an environmental and economic component. Both are relevant to the PV installation which has the benefit of reducing carbon emissions and lowering energy bills for consumers. It also confirms that development proposals that accord with the development plan should be approved unless material considerations indicate otherwise. The proposal aligns closely with the provisions of the NPPF, in particular paragraphs 8, 152 and 158. There are no other policies in the NPPF that in our view would restrict the development proposed and any adverse impacts of granting planning permission would not significantly or demonstrably outweigh the environmental benefits of the

proposal. Similarly, the proposals are supported by NPPG which gives clear support for renewable energy installations.

At a local level support is also given by Core Strategy Objective SO6 and Policies SP 1 and EN4; and the Guide to Development in Manchester SPD. On the basis of the above the principle of the development is confirmed to be acceptable. Key planning issues requiring consideration relate to Design, Visual and Heritage Impact; and potential glint and glare. These matters are considered under the headings below.

Design, Visual and Heritage Impact

The proposed solar PV will be installed on the roof on the Stockport Road and Polygon Street elements of the building. These elements are flat or with a shallow mono-pitch which effectively means that the PV installation will not be visible from the street from within the vicinity of the building.

Whilst it is noted that the site's location on the roundabout means there are longer distance views of the building from several roads, it is not considered that the solar panels will have any significant visibility or materially affect the appearance of the building as they will be largely screened by the roof parapet.

Any minor views that may be possible will be seen within the context of the existing building and roofscape. Views from within the wider context will be even more limited due to the presence of existing buildings/development/vegetation which prevents a line of sight. On this basis it is confirmed that the proposal is acceptable from a design and visual impact perspective. Similarly, the proposal will not impact on the setting of the Apollo Theatre which is grade II listed.

For the above reasons the proposal complies with provisions of the NPPF, Core Strategy Policies SP 1, CC 9, EN 1 and EN 3; Saved UDP Policies DC18.1 and DC19.1; and the Guide to Development in Manchester SPD.

Glint and Glare

It is recognised that PV installations can sometimes be a source of glint and glare. Accordingly a 'Glint & Glare Assessment' prepared by Mabbett has been submitted as part of the application. This has assessed potential impact on nearby receptors including dwellings as well as road, rail and aviation infrastructure. The impacts on infrastructure are confirmed as no impact, or an acceptable impact. As such there are no safety concerns associated with the PV installation in this regard.

With regards to dwellings a nearby 13 storey apartment block will have visibility of the PV installation however the impact determined through modelling is only assessed as low. This result however assumes that clear sky conditions are observed all year round meaning that the glare duration will likely be less than the predicted value due to only 21% of the year being sunny in Manchester. Given this factor it is not considered that any glint and glare impacts would result in a significant adverse amenity impact. For the above reasons the proposal complies with provisions of the NPPF, NPPG, Core Strategy Policies SP 1 and DM1; and the Guide to Development in Manchester SPD.

In conclusion and for the reasons set out within this letter the scheme is consistent with relevant national and local planning policies. The proposal is for a much needed renewable energy project which will contribute to targets to reduce carbon emissions and achieve net zero by 2050. Potential impacts in terms of design/visibility and glint & glare have been appropriately considered and overall within the planning balance are considered to be firmly outweighed by the important sustainability aspects of this proposal. Paul Butler Associates are therefore pleased to submit this planning application and recommend its approval.

Submission Documents and Drawings

In addition to this application covering letter, the application is supported by completed application forms and the following drawings:

- Completed application forms for planning permission and certificates.
- 2066-ABWA-XX-XX-DR-A-(00)-0001 - Location Plan
- 2066-ABWA-Z1-XX-DR-A-(10)-0050 - Existing Site Plan
- 2066-ABWA-Z1-XX-DR-A-(10)-0100 - Proposed Site Plan
- 2066-ABWA-Z1-XX-DR-A-(95)-0001 - 3D Visualisations - from North West
- 2066-ABWA-Z1-XX-DR-A-(95)-0002 - 3D Visualisations - from South East
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0060 - Existing Polygon Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0061 - Existing Stockport Road and Polygon Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0062 - Existing Stockport Road Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0063 - Existing Stockport Road and Brunswick Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0064 - Existing Brunswick Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0065 - Existing Brunswick Street and Polygon Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0200 - Proposed Polygon Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0201 - Proposed Stockport Road and Polygon Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0202 - Proposed Stockport Road Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0203 - Proposed Stockport Road and Brunswick Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0204 - Proposed Brunswick Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(20)-0205 - Proposed Brunswick Street and Polygon Street Elevation
- 2066-ABWA-Z1-ZZ-DR-A-(30)-0050 - Existing Roof Plan
- 2066-ABWA-Z1-ZZ-DR-A-(30)-0100 - Proposed Roof Plan
- GB01_460W Option_PV Layout
- Product Specification – JASolar
- Glint & Glare Assessment by Mabbett

The above information has been submitted alongside the application forms via the planning portal. The application fee (amounting to £234) has been paid online at the time of submission.

We trust that this information is sufficient to enable validation and determination of the application. However, if you require any further information please do not hesitate to get in touch.

Yours sincerely



Tom Flanagan MTCP MRTPI
Director