



Alberton House, St Mary's Parsonage Planning and Tall Building Statement

July 2022

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1. Introduction

- 1.1. This Planning and Tall Building Statement ('the Statement') has been prepared by Deloitte LLP in support of the application for Full Planning Permission made by Bruntwood RB Limited ('the Applicant'). The application seeks approval for the full demolition and redevelopment of Alberton House in Manchester City Centre.
- 1.2. The Proposed Development seek to bring forward a high quality office-led mixed-use scheme, to deliver a new Grade A office building with supporting ground floor commercial uses and office-related amenity space ('the Proposed Development'). The Proposed Development also includes enhancements to the surrounding public realm at Trinity Way located between Alberton House and Albert Bridge House to the west.
- 1.3. The term "Proposed Development" used within this Report refers to all stages of demolition, construction and operation of the development.
- 1.4. The 0.26 hectare Site (Figure 1.1) is within the St Mary's Parsonage area, in Manchester City Centre. The Site is bounded by Cardinal House to the east, St Mary's Parsonage to the south, Alberton Bridge House (car park) to the west and the River Irwell to the north. The Site is identified for redevelopment within the St Mary's Parsonage Strategic Regeneration Framework (SRF).

Figure 1.1 Existing Site Location Plan with red line boundary and blue line denoting Applicant's land ownership (EPR Architects)

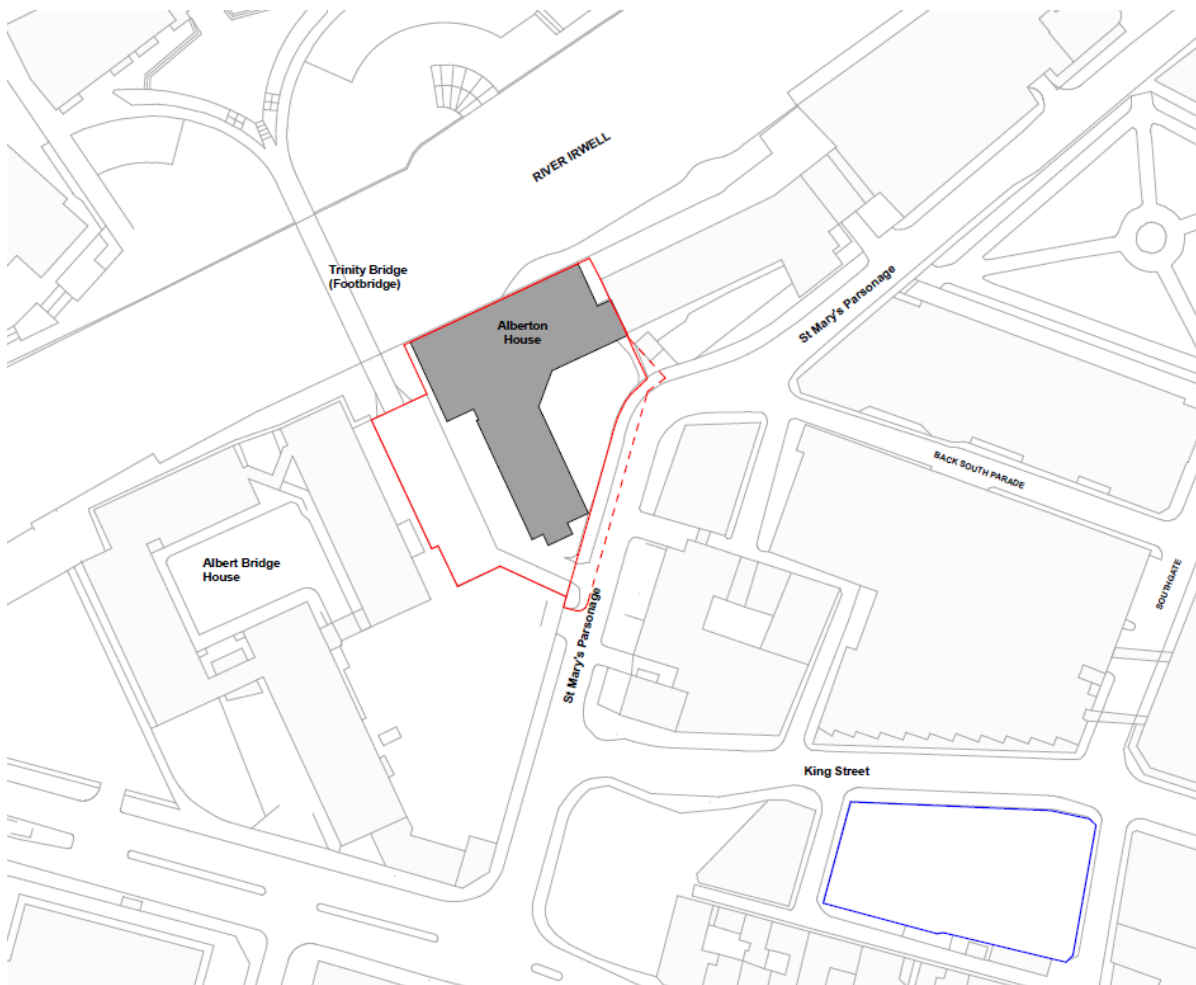
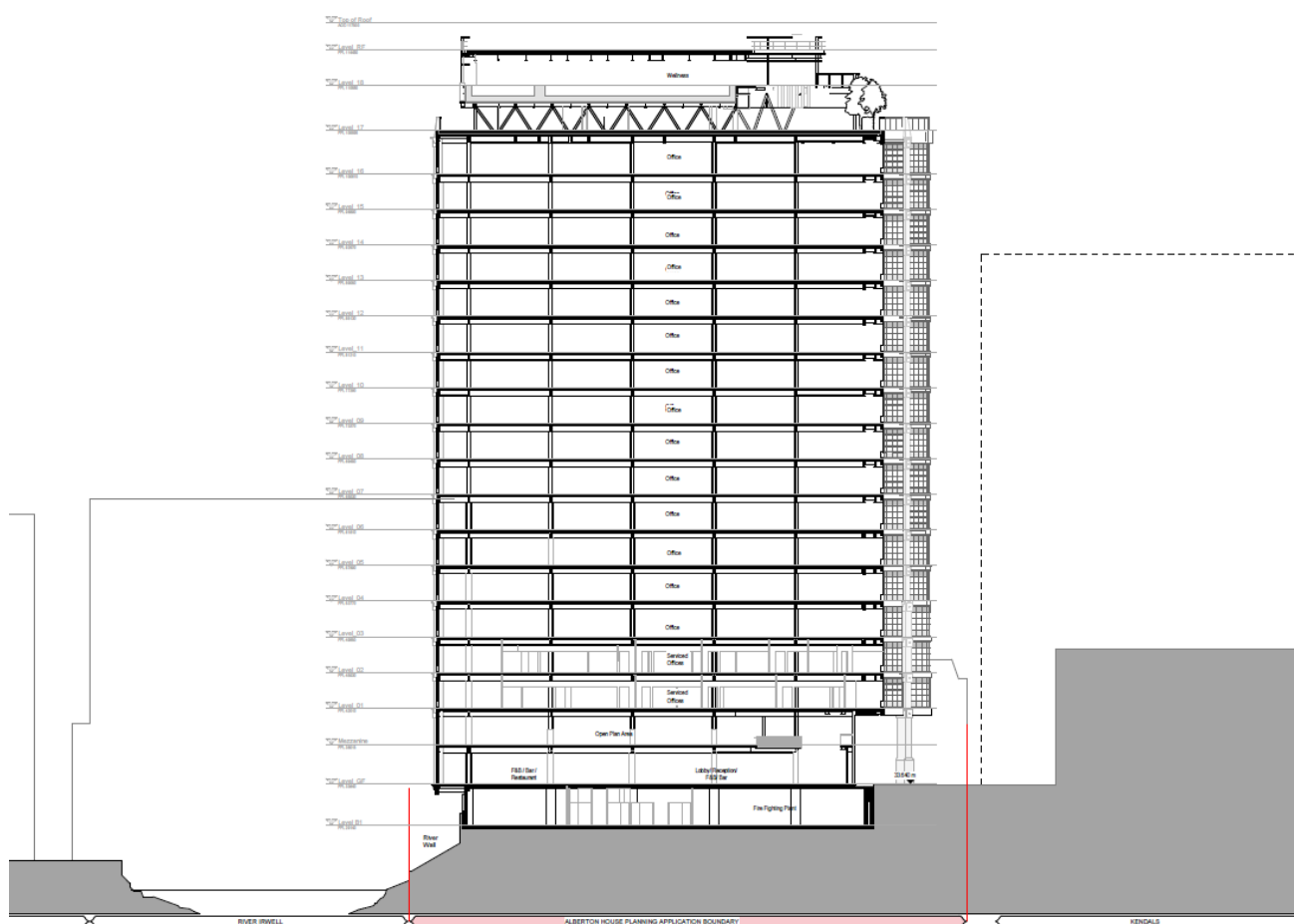


Figure 1.2 Proposed Site Cross Section Plan with red line boundary (EPR Architects)



- 1.5. The Site currently comprises a part 12 (ground +11), part 4 storey (ground +3) office building, which has an L-shaped footprint with its main entrance set back from the street edge of St Mary's Parsonage. The 12 storey (including ground) part of the building abuts the River Irwell on its north western edge and back of house servicing access is provided off St Mary's Parsonage along the Site's south western edge.
- 1.6. Immediately adjacent to the service access route, to the west of the Site is the access to the pedestrian footbridge (Trinity Bridge), which provides a key connection between Salford and Manchester City Centre. The existing footbridge access off St Mary's Parsonage is positioned between the Albert Bridge House car park and the Alberton House service road.
- 1.7. This Statement considers the Proposed Development in its strategic as well as local urban and environmental context and assesses its acceptability in the context of the Development Plan and other material considerations such as the National Planning Policy Framework (NPPF) and relevant guidance including Historic England's Tall Buildings Guidance (2015), which provides recommended criteria for assessing tall building Proposed Development. Other considerations that are addressed within this statement include the St Mary's Parsonage SRF.

The Opportunity

- 1.8. Over the last twenty years, Manchester City Council has driven the physical and economic renewal of the City Centre through the development and implementation of strategic frameworks for sustained regeneration, investment and service improvement to ensure that Manchester maintains its position as the nation's leading City Centre location.

- 1.9. The success of this approach sees Manchester successfully compete as an international investment location and visitor destination. However, as development continues across the City, there is a finite supply of land within the City Centre to support further growth and this underpins the need to support the regeneration of the application site in order to deliver sustainable growth. In addition, the construction industry is a vital sector to ensuring a quick and sustainable recovery from the economic impact of COVID-19, which is addressed in Section 3 of this Statement.
- 1.10. Despite the considerable impact COVID-19 has had on the office sector and in particular the way we work, more than a third (37%) of developers expect homeworking to have no impact on the demand for leasing, three times more than in winter 2020 (12%). Furthermore, only 24% of UK businesses have expressed an intention to increase homeworking going forward. The proportion of individuals only working remotely has also been falling since the 2021 high of 37% in February, dropping by 12 percentage points to 25% in May 2021¹.
- 1.11. At the same time, 85% of individuals currently working from home have indicated that they would like to use a 'hybrid' approach in the future, combining both home and office working. The number of days in the office or at home will vary greatly from employee to employee, however. Evidently, the way in which office space is used has changed and is likely to continue to change, requiring office buildings to be as flexible as possible. Any new regulatory guidance and restrictions on working in the office would inevitably have an impact².
- 1.12. In response to these changes, during the past year there have been initiatives by corporates and office occupiers to improve the employee experience, to attract the best talent. A recent Deloitte survey found that 61% of executives now focus on reimagining work compared to only 29% before the start of the pandemic. Moving forward, we can expect offices to offer more in the way of on-site facilities and amenities to improve employee well-being such as gyms, eateries, roof terraces, and collaborative and entertainment space³.
- 1.13. Whilst it may take further time to understand the full implication of demand for office space, it should be recognised that Manchester has a strong economy, with existing and growing clusters of businesses in key sectors.
- 1.14. Manchester City Council stated their ambition to become a net zero carbon city by 2038 and the promotion of sustainable transport modes is an important thread to achieving this. In line with this objective, and alongside investments in sustainable transport infrastructure, there is an opportunity to reduce the amount of available car parking in the City Centre, allowing better utilisation of that land and in turn delivering environment improvements such as better air quality as well as reduced levels of conflict between cars, pedestrians and cyclists. This in turn allows spaces and connections to be more pedestrian friendly, reduces the need for signage and other street clutter and frees up opportunities for public realm enhancements to take place. Newer car parking delivered or in the pipeline has generally been directed to locations with immediate access to the inner ring road in order to reduce city centre through traffic.
- 1.15. Strategically, the Site has a prominent location close to Deansgate, a principal thoroughfare forming part of Manchester's main retail area, connecting the northern and southern areas of the city centre. St Mary's Parsonage also provides pedestrian connections to Spinningfields, Central Salford and the Trinity Riverside. As such, the Site undoubtedly presents an opportunity to deliver dynamic and active uses at ground floor and basement, and a new distinctive high-quality office offering within the City Centre.
- 1.16. In its current state, Alberton House is considered to be outdated and visually unattractive from an architectural / design perspective. It is therefore not realising its full potential as a gateway site along the River Irwell and between Central Salford and Manchester City Centre. Owing to the buildings age, the building also offers little in respect of its sustainability credentials and the energy efficiency of the structure is relatively low, therefore a higher grade offer should be provided on site to compete with demand for this product. The Proposed Development will deliver a significant improvement to the overall design, sustainability of the building during its operation whilst providing on-site amenities and facilities to improve employee wellbeing and entice more workers back into the office environment.

¹ Deloitte, Manchester Crane Survey 2022

² Ibid

³ Ibid

- 1.17. The SRF sets out a clear vision for the future enhancement and regeneration of this part of the city centre, through the identification of opportunity sites that will catalyse further investment and drive positive change. In particular, the development that will take place within the framework will help to create a commercially-led mixed use neighbourhood in the heart of Manchester City Centre. Development on sites such as Alberton House provides opportunities to deliver Grade A office space to address continued strong occupier demand and take up rates, overall helping to regenerate St Mary's Parsonage and helping to recover faster from the economic impact of COVID-19.

Proposed Development

- 1.18. The Proposed Development includes the redevelopment of Alberton House, located on St Mary's Parsonage. This includes the demolition of the existing building and the erection of a new, contemporary 19 storey (including ground floor with mezzanine and excluding basement) Grade A office building, including F&B floorspace on the ground floor, and a rooftop amenity and wellness space (floors 17 & 18).
- 1.19. Overall the Proposed Development will deliver c. 32,260 sqm (GEA) of commercial floorspace. The quantum of the Proposed Development is set out below:
- Office (Class E(g(i))) – c. 26,420 sqm (GIA) (*including mezzanine*)
 - Office ancillary and amenity (Use Class E(g)(i)) – c. 1,330 sqm (GIA)
 - Flexible commercial (F&B) ((Use Class E (a), (b), (c) and/ or drink establishment Sui Generis – c. 1,470 sqm (GIA) *at ground floor*
 - Ancillary Wellness Centre (Sui Generis and, Use Class E (a), (b), (g(i)) and/ or drinking establishment Sui Generis)– directly associated with Bruntwood's commercial customers) including swimming pool – c. 1,740 sqm (GIA) *at levels 17 and 18.*
- 1.20. The Proposed Development will deliver an exemplar highly sustainable building, providing new, high quality Grade A office space, flexible commercial space (F&B) and amenity/ wellness facilities. High quality management support spaces, site infrastructure, and back of house facilities for the office uses will be provided to encourage use of sustainable transport modes and support the delivery of a highly sustainable office development of the highest specification for wellness, including through the provision of the rooftop amenity wellness space.
- 1.21. A key part of the Proposed Development is the opportunity to create an open and inviting ground floor entrance which enhances public realm and connectivity. To support this the ground floor will provide publicly accessible commercial uses along the key pedestrian route linking with Trinity Bridge and the River Irwell frontage. The Proposed Development will provide an investment into public realm which will encourage further investment into the area and its wider transformation, consistent with the St Mary's Parsonage SRF.

Description of Development

- 1.22. The description of development, as stated on the application form is as follows:

"Demolition of existing building and erection of a 19 storey (basement, ground including mezzanine, plus 18) building to form a mixed use office development with ancillary office amenity (Use Class E(g(i))) flexible commercial floorspace at ground floor and mezzanine (Use Class E (a), (b), (c) and/ or drinking establishment Sui Generis), flexible office floorspace (Use Class E(g(i))) at Levels 1-16, and two floors of wellness centre (Sui Generis) at Levels 17 and 18 including ancillary food and beverage (Use Class E (a), (b), (g(i)) and/ or drinking establishment Sui Generis), cycle parking, landscaping, highways and other associated works."

Construction Programme

- 1.23. In support of Proposed Development, an indicative construction sequence and programme has been prepared, which assumes the Applicant is able to lawfully implement the proposals in September / October 2022.
- 1.24. On this basis, this planning application is based on the building becoming operational in Q1 2025. Full details of the construction programme are contained in Chapter 5 of the Environmental Statement.

EIA Screening and Scoping

- 1.25. As directed within Regulation 5(4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 a relevant planning authority should have regard to whether the Proposed Development falls under Schedule 2 and therefore constitutes as 'EIA Development'. The Proposed Development are not of a type listed in Schedules 1 or 3 of the EIA Regulations.
- 1.26. The EIA Regulations state that the Proposed Development may be considered to be Schedule 2 development under Category 10 'Infrastructure Projects,' of the EIA Regulations:
- 1.27. Sub-section 10 (b) relates to 'Urban development projects', and states that development should be screened for the need for EIA if: (i) the development includes more than 1 hectare of urban development which is not dwellinghouse development; (ii) the development includes more than 150 dwellinghouses; or, (iii) the overall area of development exceeds 5 hectares. As the Proposed Development involves a change within an existing urban area, Schedule 2, sub-section 13 (b) also applies.
- 1.28. The Proposed Development also involves a change within an existing urban area as covered by Schedule 2, sub-section 13(b). Screening would be required where the 5.0 hectare threshold as set out in Schedule 2 10 (b) is met or exceeded, respectively.
- 1.29. A formal EIA screening and scoping request was submitted to Manchester City Council on 25 February 2022, requesting formal screening opinion and confirmation as to the proposed scope of the Environmental Impact Assessment required in respect of the Proposed Development. A formal scoping opinion was received on 20 May 2022 (Appendix B). The following chapters have been scoped into the EIA:
- Built Heritage
 - Townscape and Visual Impact
 - Ground Conditions
 - Climate Change

Application Documentation

- 1.30. This Planning Statement should be read in conjunction with the following supporting documents submitted as part of this application.

Table 1.1: List of Application Documents

Document	Prepared By
Application Form and Certificates	Deloitte
Site Location Plan	EPR Architects
Existing Site Plan	EPR Architects
Existing and Proposed Plans, Sections and Elevations	EPR Architects
Landscaping Plans	Planit-ie
Design and Access Statement (Architectural)	EPR Architects
Accommodation Schedule	EPR Architects
Landscaping Design and Access Statement	Planit-ie
Statement of Consultation	Deloitte
Ventilation Strategy	Hilson Moran
Green and Blue Infrastructure Statement (appended to this Statement)	Deloitte
Archaeology Desktop Study	Salford Archaeology
Arboricultural Survey	Bowland
Economic Impact Assessment	Ekosgen
Lighting Strategy included within Landscaping DAS	EPR Architects
Energy Statement	Hilson Moran
Environmental Standards Statement	Hilson Moran

Document	Prepared By
Air Quality Assessment	Hilson Moran
Crime Impact Statement	Greater Manchester Policy (GMP)
Topographical Survey	West Coast Geomatics
TV Reception Survey	Pager Power
Technical Aerodrome Safeguarding Assessment	Pager Power
Ecological Assessment (including Biodiversity Net Gain Assessment)	Penny Anderson Associates
Noise and Vibration Assessment	Sandy Brown
Wind Assessment	GIA
Daylight, Sunlight and Overshadowing Assessment	GIA
Site Waste Management Strategy	Curtins
Interim Travel Plan	Curtins
Transport Statement	Curtins
Flood Risk Statement and Drainage Strategy (SuDs)	Curtins
Local Labour Agreement	Bruntwood RB Limited
Environmental Statement Volume 1:	
• Chapters 1-4: Introductory Chapters	Deloitte
• Chapter 5: Construction Management and Programme	Sir Robert McAlpine Ltd and PP O'Connor
• Chapter 6: Townscape and Visual Impact	Chris Burnett Associates
• Chapter 7: Built Heritage	Stephen Levrant Heritage Architecture
• Chapter 8: Ground Conditions	Curtins
• Chapter 9: Climate Change	Ramboll
Environmental Statement: Volume 2 – Technical Appendices	EIA Technical Consultants
Environmental Statement: Non-Technical Summary	Deloitte with input from EIA Technical Consultants

Pre-Application Stakeholder Engagement

- 1.31. A Statement of Consultation has been prepared in support of the application. The document explains the programme of pre-application consultation that has been undertaken in order to provide all key stakeholders with an understanding of the emerging scheme, in addition to the development and design rationale that underpins the Proposed Development.
- 1.32. Meetings with Manchester City Council Planning Department that have taken place periodically during design development stages, from August 2021 to June 2022, to brief Planning Officers on the emerging proposals, and respond to key planning considerations. This process was also supported by agreement of the form of the planning application, which included a formal EIA Scoping Opinion.

- 1.33. Local Ward Councillors were consulted on 8 December 2021 to discuss the principle of development, present the developed design proposals further to the Strategic Regeneration Framework and seek views on the design. A follow up virtual meeting took place on 27 April 2022 which was attended by Councillor Jeavons and Deloitte as project team representative. The follow up meeting provided an opportunity to update on the public consultation and the proposed amendments to the roof design following further detailed design development.
- 1.34. A series of detailed online public engagement surveys and presentations of the proposals through a website that have taken place periodically during design development to help inform the local public and seek their views. Surrounding landowners and developers with land interests close by have been provided with a consultation briefing and regular project updates in order to co-ordinate and maximise the regeneration benefits of the scheme. A public consultation online webinar was held on 6 January 2022 to virtually present the proposals and gain feedback from the public.
- 1.35. The Proposed Development has also been informed by consultation with MCC Highways and Environmental Health, Historic England, Greater Manchester Police Secure by Design and NATS. In addition, the Proposed Development was presented at Places Matter! Design Review Panel to secure feedback on initial concept Proposed Development before these were presented to members of the public. A full description of the pre-application stakeholder engagement process including responses to the key issues are set out within the Statement of Consultation, prepared by Deloitte, submitted as part of this application.

Document Structure

- 1.36. This Statement is structured as follows:
- **Section 2** provides a Site description and considers the wider context of the Site;
 - **Section 3** sets out the strategic and economic context of the Proposed Development and summarises the contribution of the Proposed Development;
 - **Section 4** describes the application Proposed Development and their design evolution;
 - **Section 5** details the relevant documents that make up the Development Plan and material considerations;
 - **Section 6** assesses the Proposed Development against the policies in the Development Plan and in relation to the key planning and material considerations of relevance to this application;
 - **Section 7** provides a detailed evaluation of the proposed tall buildings against relevant criteria;
 - **Section 8** provides a full account of the public benefits case associated with the Proposed Development; and
 - **Section 9** provides conclusions in relation to the overall merits of the Proposed Development.

2. Site and Surroundings

- 2.1. This Chapter includes a description of the Site, its context in relation to the surrounding area and the Site's suitability for the Proposed Development.

Site Description

- 2.2. The Site is located to the west of Manchester City Centre and is entirely within the St. Mary's Parsonage Conservation Area, in close proximity to Manchester Victoria mainline railway station.
- 2.3. The 0.26 ha Site is bounded by Cardinal House to the east, St Mary's Parsonage to the south, Albert Bridge House (car park) to the west and the River Irwell to the north.
- 2.4. The Site, Alberton House, currently comprises a part 12 (ground +11), part 4 storey (ground +3) office building, which has an L-shaped footprint with its main entrance set back from the street edge of St Mary's Parsonage. The 12 storey part of the building abuts the River Irwell on its north western edge and back of house servicing access is provided off St Mary's Parsonage along the Site's south western edge. The Site is identified for redevelopment within the endorsed St Mary's Parsonage Strategic Regeneration Framework ('the SRF'), which will form a material consideration in the determination of all future planning applications within the SRF area.
- 2.5. Immediately adjacent to the service access route, to the west of the existing building, is the access to the pedestrian footbridge (Trinity Bridge), which provides a key connection between Salford and Manchester City Centre. The existing footbridge access off St Mary's Parsonage is positioned between the Albert Bridge House car park and the Alberton House service road.
- 2.6. To the south of the Trinity Bridge pedestrian access is Albert Bridge House, an 18 storey 1950's commercial office building. To the south east is 3 St Mary's Parsonage and Reedham House, which are each four storey Grade II listed buildings. To the north of the Site is Cardinal House, which is a ten storey commercial office building, built in the 1970's. All three of these neighbouring sites are identified within the SRF as having potential for complete or partial redevelopment, although no formal Proposed Development have been submitted for the sites to date.
- 2.7. Motor Square, an area of public realm is located to the south east of the Site, forming one of the gateways into the Parsonage Gardens area. Motor Square is currently recognised as a disjointed and underused space and so is identified by the SRF as requiring a comprehensive redesign to enhance activity and vibrancy.

Site Context

St. Mary's Parsonage Strategic Regeneration Framework

- 2.8. The Site falls within an area covered by the St. Mary's Parsonage Strategic Regeneration Framework (SRF) (August 2020)⁴, which provides guiding development principles for the future regeneration and development of key sites within this part of the city centre.
- 2.9. The SRF seeks to refocus the priorities of the area in order to establish St Mary's Parsonage as a clearly definable and cohesive City Centre neighbourhood, with a distinctive character and sense of place. The Proposed Development set out the ambition to create a commercially-led, mixed-use district, set around high quality public space. A key underlying principle of the SRF is the retention and celebration of the area's special qualities and assets, including its heritage assets, public spaces and green and blue infrastructure.
- 2.10. The St Mary's Parsonage SRF proposes that Parsonage Gardens will build upon its existing asset base, and its positive adjacencies to other parts of the City Centre, to successfully host an eco-system of best in class employment – from global businesses to start ups - and other high quality uses including residential, hotel, retail and leisure.

⁴ https://www.manchester.gov.uk/downloads/download/7208/st_marys_parsonage_srf

- 2.11. The St Mary's Parsonage area will deliver a series of significant regeneration benefits, which will be fully integrated and connected into the wider City Centre and will draw activity and support the further expansion of the City Centre's quality activity into the area. This will make the most of its positive adjacencies to other successful and vibrant parts of the City Centre including Spinningfields, the Primary Retail Area, the Central Business District, and support the growth and enhanced productivity of the City.
- 2.12. The Proposed Development has been directly informed by the strategic objectives of the SRF, and detailed options testing will be undertaken to ensure they can be supported wherever feasible and where other strategic objectives can also be maintained.

Planning History

- 2.13. A planning history search was undertaken using Manchester City Council's (MCC) public access system. There are no recent planning applications of relevance to the Site.

Site Specific Designations

Environmental Designations

- 2.14. The Site is situated in the Greater Manchester Combined Authority Air Quality Management Area (AQMA).
- 2.15. The Site is not within, nor does it contain, any ecological designations including Sites of Specific Scientific Interest (SSSI), Sites of Biological Importance (SBI) or Special Protection Areas (SPA).
- 2.16. There are no habitats of principal importance, as defined under Section 41 (S41) of the Natural Environment and Rural communities (NERC) Act 2006, within the Site.
- 2.17. It should be noted that one European Protected Site is within a 10km radius of the Site, Rochdale Canal is classed as a Special Areas of Conservation (SAC) and Site of Special Scientific Interest (SSSI), located approximately 6 kilometres to the north-west and designated for its aquatic and emergent flora.

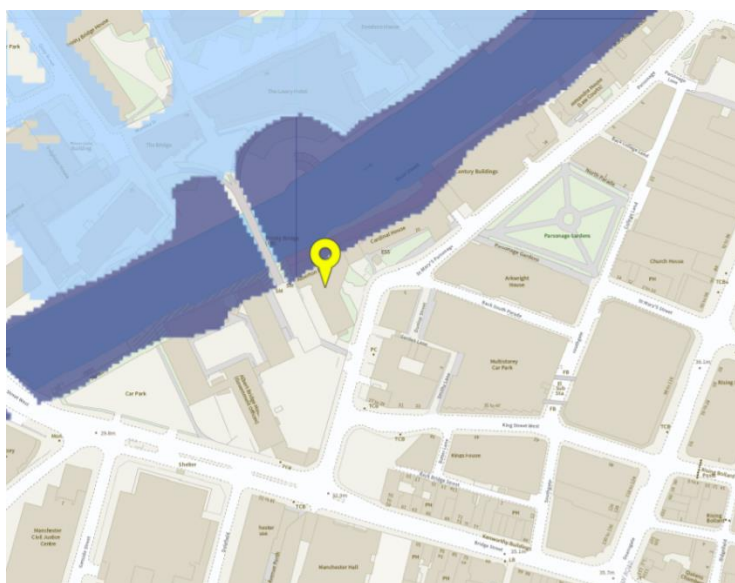
Protected Species

- 2.18. As part of the Phase 1 Habitat Survey undertaken by Penny Anderson Associates Ltd a small number of birds were seen, including a starling, stock dove, mallard and house sparrow.
- 2.19. Access to the riverbanks was restricted and close inspection was not possible during the survey, however it should be noted that the otter population underwent a widespread decline during the 20th Century, thought to be related to the introduction of pesticides in the mid-1950s. It is considered that there is a possibility that otter are using the River Irwell for foraging and commuting and the small area of vegetation along the riverbank could provide some, albeit highly limited, daytime cover. It is extremely unlikely that water vole are present. The fluctuating height in river levels and the lack of suitable foraging available on the banks make the habitat wholly unsuitable for water vole.
- 2.20. Notwithstanding the above, the Proposed Development does not extend beyond the existing cantilever over the riverbank along the Site's north west boundary.
- 2.21. The building inspection undertaken as part of the Phase 1 Habitat Survey found no features that provide suitable conditions for roosting bats. Overall, the Site was assessed as having negligible roost potential.

Flood Risk

- 2.22. The Site, for the majority, is located in Flood Zone 1, as shown in Figure 2.1. This portion of the Site is therefore of a low risk of flooding. The north western boundary of the Site is located within Flood Zone 3 as a result of the River Irwell forming this boundary. This part of the Site is within an area with a high probability of flooding; however the Proposed Development will be cantilevered approximately 6m above the river level. For further details please refer to the Flood Risk Statement and Drainage Strategy, prepared by Curtins.

Figure 2.1: Flood Map for Planning with the Site indicated in yellow (source: Government Flood Map for Planning)



2.23. The Site is located within the Manchester Conurbation Core Critical Drainage Area.

Conservation and Heritage

2.24. The Site does not contain any heritage assets that are afforded statutory protection, such as Scheduled Monuments, listed buildings, or any Registered Parks and Gardens, and it does not fall within a conservation area.

2.25. The Site is situated within close proximity to Parsonage Gardens Conservation Area (as shown in Figure 2.2), with the conservation area 10m to the east Site, on the opposite side St Mary's Parsonage.

2.26. The Site is also located within 100m of the Deansgate/Peter Street Conservation Area and within 200m of St Ann's Square Conservation Area, Albert Square Conservation Area and the Flat Iron Conservation Area in Salford.

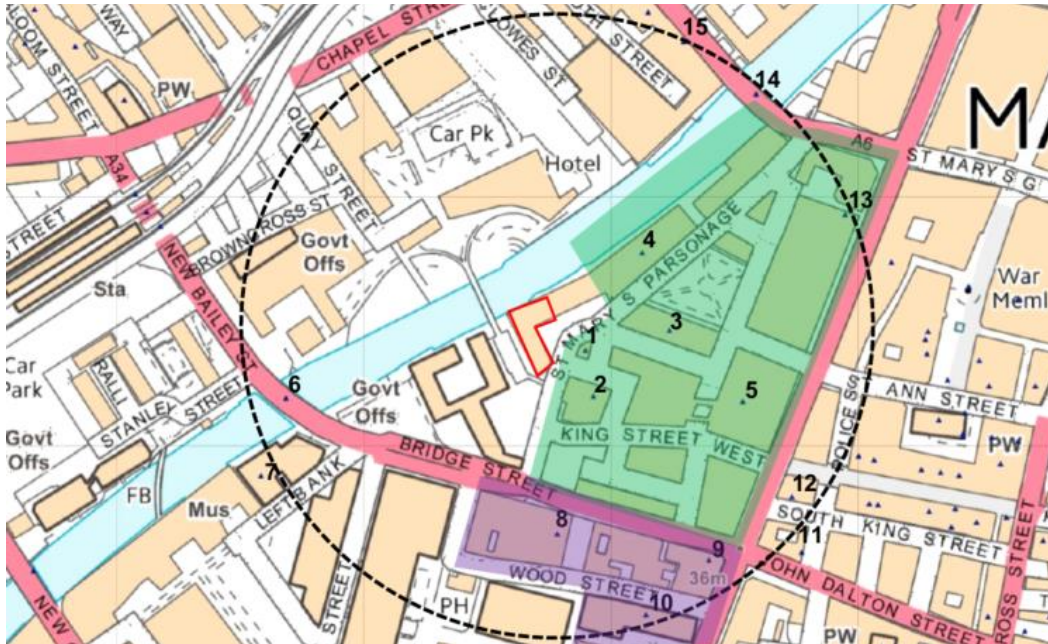
2.27. The Site is located within 200m of 15 listed buildings and within 150m of six listed buildings. The Site is within the setting of a number of listed buildings, with two listed buildings located directly to the south east of the Site, 3 St Mary's Parsonage and Reedham House, which are both four storey Grade II listed buildings.

2.28. The 15 built heritage assets within a 200m radius of the Site boundary are as follows (as shown in Figure 2.2):

1. 3 St Mary's Parsonage – Grade II Listed
2. 31 and 33 King Street West (including 3 Smithy Lane) – Grade II Listed
3. Arkwright House – Grade II Listed
4. Century Buildings (National Buildings), 14 St Mary's Parsonage – Grade II Listed
5. 98 – 116 Deansgate (Kendals) – Grade II Listed
6. Albert Bridge – Grade II Listed
7. Former Hydraulic Power Station (in Grounds of City College) – Grade II Listed
8. Masonic Temple – Grade II Listed
9. Sawyers Arms Public House – Grade II Listed
10. John Rylands Library (and Attached Railings, Gates and Lamp Standards) – Grade I Listed
11. 105 – 113 Deansgate – Grade II Listed
12. 4 -14 King Street – Grade II Listed

13. Haywards Building – Grade II Listed
14. Blackfriars Bridge – Grade II Listed
15. The Crown Tavern – Grade II Listed

Figure 2.2 Heritage Asset Map (listed buildings within 200m are numbered and identified by blue triangles with the Parsonage Conservation Area identified in green)



- 2.29. For further details please refer to Chapter 7 (Built Heritage) of the Environmental Statement Volume 1 and accompanying Heritage Statement (Appendix 7.1 – ES Volume 2) both prepared by Stephen Levrant Heritage Architecture.

Accessibility

- 2.30. The Site is located within the heart of Manchester City Centre, in close proximity to one of its principal thoroughfares (Deansgate) within its Primary Retail area and adjacent to its Central Business District. It is highly accessible by all forms of transport. The wider SRF area benefits from a range of natural assets including its adjacency to the River Irwell, and proximity to Parsonage Gardens.
- 2.31. Major cross-city routes, including Blackfriars Street, Deansgate and Bridge Street are in close proximity of the Site. These are defined as key commuter corridors and shopping frontages and provide connections between different parts of the City Centre. The Trinity footbridge located immediately to the west of the Site provides a pedestrian and cycle connection between the cities of Manchester and Salford.

Pedestrian

- 2.32. The Site is well connected to key destinations by a comprehensive network of pedestrian routes, typical of a City Centre location. However, the condition of the pedestrian footpaths between Southgate and St. Mary's Parsonage. The Proposed Development has scope for improving the pedestrian environment along St Mary's Parsonage and the pedestrian and cycle route which links up with the Trinity footbridge, thus enhancing connectivity within the Parsonage Gardens area, and beyond, including to the north with Salford.
- 2.33. Key leisure, cultural, business and retail facilities on Deansgate, Spinningfields and King Street are within easy reach of the Site on foot and within under 5 minutes walking time. The ability to cross Deansgate has recently been improved in this location by the partial pedestrianisation, brought in as a temporary response to COVID-19, and is now closed to the majority of vehicular traffic.
- 2.34. The Site is also located near First Street (approximately 15 minute walk from the Site), Market Street and the Arndale Centre (both approximately an 8 minute walk from the Site).

Cycling

- 2.35. The Site is in close proximity to a network of cycling routes that connect across Greater Manchester. For example, Deansgate joins onto the Bridgewater Canal cycleway, which links the Site to Old Trafford, Stretford, Sale, Altrincham, Trafford Park and Media City.
- 2.36. The Ashton Canal Cycleway is also accessible from Manchester City Centre, which links through to East Manchester through a dedicated cycle route to this part of the City Centre. National Cycling Route 6 can be accessed from the Liverpool Road junction of Deansgate. This links the Site to Bury as well as onto Route 55 to Wigan and Route 85 to Wilmslow.
- 2.37. Moving forward, the Made to Move Beelines Strategy sets out to provide 1,000 miles of walking and cycling routes across Greater Manchester, both promoting sustainable transport and connecting communities, of which there are routes proposed adjacent to the Site on Deansgate. Deansgate has been temporarily closed to most motorised traffic to improve cycling accessibility in the City Centre.

Public Transport

Metrolink

- 2.38. Over 43 million Metrolink journeys were made to and from the City Centre during 2019, prior to the COVID-19 health crises impacting use of public transport in the short term⁵, making it the most used light rail system outside of London. The Metrolink has been the subject of significant ongoing investment and expansion of routes in recent years. Recent changes include the introduction of contactless payments in July 2019 and the 'Get Me There' app.
- 2.39. More recently, the Metrolink has been expanded to extend the Metrolink to the intu Trafford Centre; the line known as the Trafford Park Line launched in March 2020. The Trafford Park line has six new tram stops, with the new line running from the existing Pomona Metrolink stop, through Trafford Park, terminating at intu Trafford Centre.
- 2.40. Exchange Square Metrolink stop is 0.3 miles northeast of the Site (approximately 6-minute walk) and St Peter's Square Metrolink stop is 0.4 miles south east of the Site (approximately 8-minute walk). Both Metrolink stops provide frequent cross-city links within Manchester and provide access to a range of destinations across Greater Manchester.

Rail

- 2.41. Manchester Victoria Station, a major regional interchange, is approximately a 10-minute walk from the Site. It serves a range of destinations, including direct rail services to Liverpool (with a fast service at 36 minutes journey time) and Leeds (approximately 49 minutes journey time).
- 2.42. Manchester Piccadilly Station, the rail hub for the North West, is also located within a reasonable walking distance of the Site (approximately 20 minute walk). Manchester Piccadilly provides frequent and rapid services between Manchester and to a wide range of locations in the UK.
- 2.43. The Transpennine Express line at Manchester Piccadilly links all major cities in the North of England (and Scotland) including Newcastle, Liverpool and Hull. For instance, there are 46 services to Liverpool and 62 services to Leeds every day.
- 2.44. Trains to Birmingham run every half hour and Manchester Airport benefits from up to 8-9 services an hour, with services operating 24 hours a day. Trains also travel every 20 minutes to and from London between 6am and 9pm daily, taking approximately 2 hours 10 minutes journey time.

Bus

- 2.45. There are several bus stops near the Site on Bridge Street/ John Dalton Street and Deansgate. These bus stops provide services to other parts of the City Centre including Piccadilly Gardens, Shudehill and Albert Square via the Free Bus, as well as localities further afield via transport providers, such as South Manchester, Worsley, Bolton, Salford, Leigh and Atherton.

⁵ Source: DfT Light Rail and Tram Survey (June 2020) – Ref IRT0101

- 2.46. The Manchester Piccadilly Gardens Bus Station and tram stop is situated approximately 22 minutes' walk from the Site and the Shudehill interchange is approximately a 10 minute walk from the Site to the north. Both bus stations provide connections to the wider Greater Manchester region on regular services.
- 2.47. The Free Bus service ran by Transport for Greater Manchester has three different routes serving most of the City Centre. The Metroshuttle Route 2 has a stop on Deansgate, which provides a route to through to Piccadilly Train Station via Church Street in the Northern Quarter. The various free bus routes connect all main transport hubs in Manchester and Salford to improve connectivity through additional transport modes.

Summary

- 2.48. The Site is well connected through public transport links and sustainable modes of transport. The Site is near to all City Centre facilities including retail, cultural and leisure uses and residential development. These features make the Site well placed for the proposed office and retail use. A full setting out of the accessibility of the Site is provided in the Transport Assessment.

3. Strategic Context

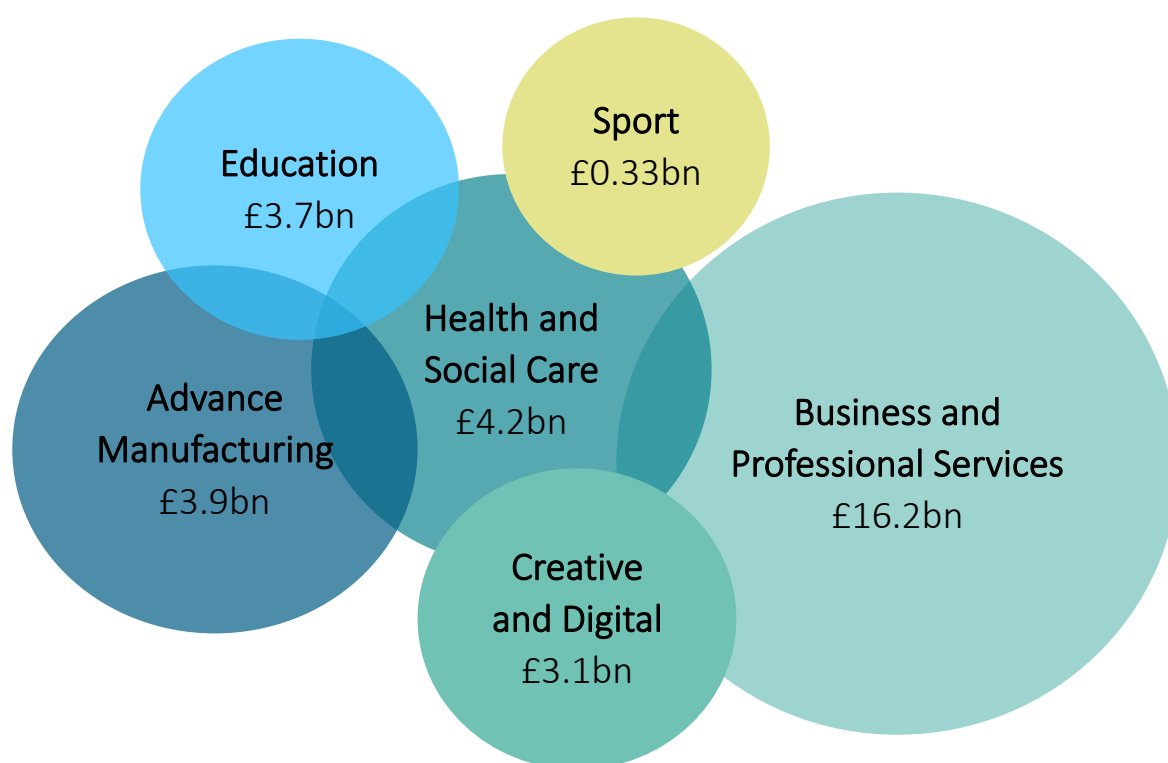
- 3.1. This Chapter details the socio-economic context of Manchester City Centre as a whole and sets out the key drivers of change and development within the City Centre.

Economic and Market Context

Manchester's Economic Outlook

- 3.2. The City of Manchester is a national engine of economic growth with a population of 555,741⁶, sitting at the heart of a conurbation of 2.84 million people in Greater Manchester⁷. The City's economic success has historically been driven by its growing role as the leading professional and business service centre outside of London; global connectivity through Manchester International Airport; and business and leisure visitors, with Manchester the third most visited city in the UK.
- 3.3. The New Economy Greater Manchester Key Facts (2019) highlights that in 2016 the key sectors of the Greater Manchester economy and their contribution towards the annual Greater Manchester GVA.

Figure 3.1: Greater Manchester Economic Outputs (Source: GM Key Facts, January 2019)



- 3.4. Over a thirty-year programme of transformation, Manchester has become recognised as one of Europe's most exciting and dynamic cities. With a diverse population of more than half a million people, the City of Manchester is located at the heart of Greater Manchester, the largest conurbation outside of London. Economic growth has also been supported by Manchester's expanding international connections, centres of excellence in research and higher education, and investment in transport infrastructure, which has deepened labour markets. The Greater Manchester sub-region has a combined Gross Value Added (GVA) of

⁶ Office for National Statistics (2021), Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland [Dataset] – Accessed [here](#).

⁷ Ibid.

approximately £75 billion and accounts for around two fifth of the North West's economic output⁸. In 2021, almost one third of the £75 billion of GVA generated in Greater Manchester was produced in the City of Manchester⁹.

Population Growth

- 3.5. Population growth in recent years has been particularly evident in the age bands that are typically considered to fuel economic growth, i.e., those at university-leaving age and above. The number of working age residents, defined as those aged 16 to 64, is forecast to show a modest rise over the next 10 years, before falling back after 2028, and therefore the working age population of GM is forecast to be just under 1.8 million in 2037, similar to the 2017 level¹⁰. This sector of the population creates demand for new lifestyle choices that offer access to city centre employment and amenities, and sustainable transport networks. This population growth provides a strong labour pool, making the City an attractive place for businesses to invest in.

Manchester's Economic Role

- 3.6. Manchester's economy has developed strongly post-recession and the foundations for further growth are in place. It is clear that much has been achieved in terms of GDP growth and wider development. The economy is becoming more diversified through an increasing amount of GDP growth attributable to new economies including logistics, business, financial and professional services and creative and digital industries. However, there is still a significant amount to be done to continue economic growth within Manchester and ensure that the right development comes forward to support this. This development, if correctly aligned spatially and economically, can help to accelerate growth and address the productivity gap.
- 3.7. The City of Manchester is the acknowledged capital of the north of England and the centre point of a trans-Pennine and pan-northern economy. The City and conurbation is an economic centre, a role which is increasing as investment in transport, innovation and economic infrastructure makes the City more accessible to towns and cities, business and high skilled workers in the Midlands and the North.
- 3.8. According to the 2020 GMCA Economic Forecasts for Greater Manchester Report, GVA is forecast to grow at an average annual rate of 2.4% between 2017 and 2037 (compared to UK average of 1.6%). Under the AGS, GM is projected to grow faster than the UK – reflecting the city-region's ambitions to help drive growth across the Northern Powerhouse. This is equivalent to an additional £38.9 billion of economic activity in GM by 2037¹¹.
- 3.9. Manchester's enhanced economic performance has been underpinned by a move from its traditional manufacturing and industrial role towards a service-based, high growth economy. Importantly, it is this sector of the economy that provides a large proportion of the high skilled and high productivity jobs in the national economy. As a primary driver of economic and employment growth, the City has increased the responsibility to provide the business infrastructure to match its role as an economic centre, capable of providing opportunities for the wider conurbation and beyond.
- 3.10. There are three factors which are changing the role of the Manchester and have particular implications for Manchester City Centre. These are:
- The move to a service based and high growth economy, at a time when national economic growth is increasingly driven by professional and financial services, creative and digital industries, science and technology, with key sub-sectors influenced by disruptive innovation.
 - Sectors which are influenced by agglomeration, where entrepreneurs, companies, new start-ups and talented workers, from disparate economic growth sectors, are keen to cluster in locations which can provide business and networking opportunities and deep labour markets offering an exceptional range of highly qualified and skilled staff.

⁸ Office for National Statistics, Regional Gross Value Added (balanced) per head and income components tables (released 26 May 2021 – Accessed [here](#)).

⁹ Ibid.

¹⁰ Greater Manchester Combined Authority (2020), Economic Forecasts for Greater Manchester February 2020

¹¹ Ibid.

- A return to urban living, with many highly skilled younger people and high earners keen to benefit from both the range of education and employment opportunities and the lifestyle offer of city living, with evening and weekend economies offering cultural, entertainment and leisure choices which cannot be matched in smaller towns or cities.

3.11. In all of these factors, Manchester City Centre is a location which has a unique contribution to make to the re-balancing of the national economy, and with a constrained city centre and limited other credible high growth locations, there is a need to ensure the city centre can provide the modern economic infrastructure to capture economic and employment growth.

A Service Based, High Growth Economy

- 3.12. The City's transformation to a service based high growth economy is a key part of the economic transformation of the north, as industrial employment continues to decline and new economy sectors begin to dominate the modern competitive economy. This has led to significant changes in economic geography across the conurbation and to a changing and unique role for Manchester City Centre.
- 3.13. The service sector now provides a large proportion of the high skilled and high productivity jobs in the national economy. Increasing the number and range of higher skilled service sector employment is now central to improving the performance of the regional economy and increasing the north's contribution to UK plc.
- 3.14. At a regional level, employment growth is largely driven by Business, Financial, and Professional Services - accounting for 45% of the net increase in the total number of jobs in GM up to 2037¹². The level of professional services in Manchester is considerable and reflects the City's role as both a major location for global and national companies and the headquarter location for large regional companies.
- 3.15. The City's Professional, Financial and Business Services sector is very diverse including leading global accountancy companies and consulting companies, legal partnerships, specialist technical, engineering, infrastructure and digital media companies. While many smaller companies serving a local market area distributed across the conurbation, the larger, leading companies are located almost exclusively in the City Centre.

Growth of the Creative, Digital and Tech Sector

- 3.16. A key growth area for the City is the Creative, Digital and Tech sector, as highlighted above. According to GMCA, jobs in the Digital Industries are set to increase by 13,000 additional jobs over the period 2017-2047 whilst in the Creative Industry jobs are forecast to grow by 6,000 up to 2037¹³. In regard to GVA, digital industries is the sub-sector that is forecast to grow the fastest by 4.3% per year from 2017 to 2037¹⁴.
- 3.17. The Creative, Digital and Tech sector has the ability to accelerate growth across all sectors in Manchester. New applications for creative and digital technologies were found in health and social care; business, financial and professional services; advanced manufacturing; and transport, amongst others. Notable creative, digital and tech companies located in Manchester include:
- Thoughtworks
 - TheLadBible
 - Coop Digital, Microsoft
 - CityVerve (the Internet of Things City Demonstrator)
 - UK Fast
 - WPP

¹² Greater Manchester Combined Authority (2020), Economic Forecasts for Greater Manchester February 2020

¹³ Ibid.

¹⁴ Ibid.

- 3.18. A majority of these new firms have located within developments such as Circle Square, the new innovation district, “ID Manchester”, together with Enterprise City (St John’s) and developments in NOMA and the Northern Quarter.
- 3.19. The Creative, Digital and Tech sector is therefore a significant growth area of the Manchester economy and will continue to be so for decades to come.

The Manchester Office Market

A Shift in the Way We Work

- 3.20. Despite the considerable impact COVID-19 has had on the office sector and in particular the way we work, more than a third (37%) of developers expect homeworking to have no impact on the demand for leasing. Furthermore, only 24% of UK businesses have expressed an intention to increase homeworking going forward. The proportion of individuals only working remotely has also been falling since the 2021 high of 37% in February, dropping by 12 percentage points to 25% in May 2021¹⁵, and is expected to fall further.
- 3.21. At the same time, 85% of individuals currently working from home have indicated that they would like to use a ‘hybrid’ approach in the future, combining both home and office working. As such, the way in which office space is used has changed and is likely to continue to change, requiring office buildings to be as flexible as possible¹⁶.
- 3.22. In response to these changes, there have been initiatives by corporates and office occupiers to improve the employee experience, to attract the best talent. A recent Deloitte survey found that 61% of executives now focus on reimagining work compared to only 29% before the start of the pandemic. Moving forward, we can expect offices to offer more in the way of on-site facilities and amenities to improve employee wellbeing such as gyms, eateries, roof terraces, and collaborative and entertainment space¹⁷.

Manchester City Centre’s Office Districts

- 3.23. Manchester has a number of very successful office buildings and districts. Spinningfields, NOMA, and St. Peter’s Square in particular have established themselves as such districts offering Grade ‘A’ floorspace. More recent examples include St. John’s and Circle Square and which are developing into much sought-after office locations.
- 3.24. It is considered that each of the locations share the same characteristics:
- **Public Realm** – a key element to a successful office location is having high quality public realm within the vicinity of the development. This space aids with permeability but also provides amenity space for occupiers. New office developments can also have a positive impact on existing public realm, introducing activity to an area which was neglected.
 - **Connections** – strong connections with other business areas and public transport infrastructure are important. Successful commercial locations are often on a more prominent route across the city centre – e.g., Oxford Road to Spinningfields, or NOMA on the inner-city ring road.
 - **Business Environment** – each location has a strong commercial identity. This goes beyond just having other office buildings nearby but also includes having a wide range of supporting businesses such as restaurants, shops, and bars that are necessary ingredients in professional life.

¹⁵ Deloitte, Manchester Crane Survey 2022

¹⁶ Ibid

¹⁷ Ibid



- 3.25. The CBD is centred around Manchester's Civic Quarter, including St. Peters Square, and Spinningfields. The City Centre Strategic Plan (2015) outlines that the CBD is:
- "home to a wide range of companies of varied sizes, across a range of business sectors and is fundamental to the city remaining as a business destination".*
- 3.26. The CBD accommodates a significant clustering of Financial and Professional Service businesses that are attracted to the area, its quality of environment, services, facilities, infrastructure, and agglomeration benefits.
- 3.27. There are other examples of successful office buildings in less successful commercial locations that have attracted investor and occupier interest. A majority of their success is due to a proactive owner or developer who has reacted to modern office occupier requirements.

The Market

- 3.28. Manchester City Centre has one of the largest office centres outside of central London with approximately 3.8 million sq.ft. of office floorspace. The Manchester office market remains highly competitive, building off the strength of the local economy and the desire for businesses to want to locate here for business combined with a growing population.
- 3.29. Land use and the historic nature of much of the prime office core has, in broad terms, led to development of modern high specification buildings with large floor plates. As such most of the new office developments taking place in the outer CBD to satisfy the larger space requirements of some of the major corporate occupational tenants, see for example St. John's and Circle Square. However, the core remains highly active and desirable, especially amongst the professional, financial services and increasingly Creative, Digital and Tech sectors. As of 2022 Manchester has retained its number one spot as the leading tech location, outside London¹⁸. In addition, and as outlined above in Section 2, the Professional, Financial and Business Services is a vital component of Manchester's economy, contributing to much of the economic growth across all office locations.

¹⁸ CBRE (2022), UK Tech Cities Report 2022

- 3.30. The latest figures from the Manchester Office Agents Forum ('MOAF'), released in January 2022 and reporting on 2021, highlight that over 1m sq.ft. of office floorspace space was leased, a 31% increase in uptake in 2020. MOAF anticipates that this will increase to a c.1.5m sq. ft 10-year average by 2022. The driving force of the increased take-up are smaller lettings, with approximately 75% of all transactions being below 5,000 sq.ft.
- 3.31. As of Q4 2021 there was £309m worth of office investment transactions, an 129% increase on the 10-year average¹⁹. Major transactions during the last quarter include:
- Cloud Imperium Games taking 87,130 sq. ft. at Allied London's **Manchester Goods Yard**
 - Deliveroo committing to 10,002 sq. ft. at **5 New York Street**
 - Accenture taking 25,000 sq. ft. at Bruntwood's Sci Tech's **Circle Square** scheme on Oxford Road
- 3.32. These figures demonstrate the continued investor appetite for office floorspace in Manchester where there is strong occupier market. The strong uptake of office space has led to a shortage of Grade 'A' office space as demand outstrips supply, with over 50% of the 2022 development pipeline already let and 30% of the 2023 development pipeline already being pre-let. There is now a flight to quality and the 'hotel-isation' of office space, with a focus on good quality accommodation and it is clear that occupiers are prepared to pay higher rents for the right space in the right location²⁰.
- 3.33. The highest number of recent office completions was in the City Core, including the following high-quality schemes located close to Alberton House:
- **The Lincoln** – Creation of a new office development to deliver 150,000 sq. ft. of Grade A flexible office space with additional ground floor retail space. The Lincoln was delivered by The Prudential Assurance Company and has recently completed towards the end of 2021.
 - **11 York Street** – Creation of a new office building to deliver 89,600 sq. ft. of Grade A flexible office space with additional ground floor retail space. 11 York Street was delivered by Aviva and completed in the beginning of 2021.
 - **125 Deansgate** – Creation of a new office development to deliver 113,500 sq. ft. of Grade A flexible office space with additional ground floor retail space.
- 3.34. The significant investment and strong pipeline of demand, coupled with significant rental growth over the past 10 years, has resulted in many refurbished schemes matching or quoting higher than Grade A rents²¹. Given this high demand, 2022 will present great opportunities for pro-active landlords in delivering a refurbished product.
- 3.35. In Manchester City Centre, the 10-year average take-up is circa 1.2 million square feet, with 350,000-450,000 sq ft of space let within new build or grade A premises. It is currently anticipated that there will be a net supply of 2-2.2million square feet by 2025. However, a proportion of schemes may not receive planning or may not be built speculatively or without a significant pre-let.
- 3.36. The pipeline assumes that on average there is take-up of 100,00 square feet each year across Manchester City Centre, meaning there is a continuous demand in the City for the new supply that is brought forward.
- 3.37. Within this context, the Applicant's on-going commercial market analysis indicates future demand in Manchester and the other large regional cities is likely to come from five key areas.
1. Firstly North Shoring, which has seen large corporates look to the UK for new office space, is expected to accelerate.
 2. Secondly, the Public Sector and the levelling up agenda will drive demand across the UK. This has recently seen the GCHQ, Ofcom and DCMS all commit to Manchester.
 3. Thirdly, it is expected that tech clusters will continue to form across the big six regional cities which will add new hubs to those already held by key tech firms. This is evident with the recent letting activity at St

¹⁹ Knight Frank (2022), Manchester Office Market | Research, Q4 2021

²⁰ Manchester Office Agents Forum (2022), Manchester Office Market

²¹ CBRE (2020), The latest view on the Manchester Office Market

Johns which was over 70% pre-let (December 2021), and Circle Square developments, which is now 95% let (December 2021).

4. The Life Science industry is evolving rapidly in response to megatrends with new occupier personas becoming increasingly influential in shaping the ecosystem. This will become a key driver of take-up moving forward.
5. Finally, a potential source of demand for regional office markets during uncertain times is corporates seeking to occupy space within lower-cost locations. This trend has been significant in recent years, with companies conducting reviews of their occupation leading to significant leasing deals in regional centres.

3.38. The wider strategic benefit of attracting employees back to the office is widely recognised, as increased footfall in the city centre will help the economic recovery, breath life back into the city centre and drive productivity and collaboration in our thriving businesses. As a result, customers are increasingly looking for new office spaces that provide onsite lifestyle and wellness facilities. There is now greater demand for flexible office space, which can adapt to an even greater range of occupier needs than what the market has traditionally been required to address.

Summary

3.39. The office market in Manchester remains strong with continued appetite. There has also been an increased demand for good quality refurbishment projects in the right location within the City Centre. Complementing this, there has been an increase in demand for flexible working spaces and smaller floorplates. These smaller floorplates typically appeal to the Creative, Digital and Tech sector, and as such the growth of this sector in Manchester is reflected in the subtle shift in the office market.

Strategic Context

3.40. This section sets out the Council's vision for the City Centre. It outlines the key documents of relevance to the Proposed Development. The documents outline the strategic context of the Site and surrounding regeneration initiatives.

Delivering the Northern Powerhouse Agenda

- 3.41. The Northern Powerhouse concept is designed to create a competitive northern region that can act as an economic counterbalance to the dominant south-east. A number of key announcements have been made and milestones achieved over the past c. 8 years since the Northern Powerhouse concept was devised:
- In the 2014 Autumn Statement, the Coalition Government reiterated a commitment made during August 2014 to help lay the foundations of a Northern Powerhouse to rival the economic strength of London. In November 2014 it was announced that Greater Manchester would have a directly elected Mayor by 2017, with responsibility for a £300mn housing investment fund, devolved and consolidated budgets in transport and health and social care, along with key strategic planning powers, and an additional £7 billion of investment to build the Northern Powerhouse. In May 2017, Andy Burnham was elected as Greater Manchester Mayor with oversight of the health and social care budget, worth £6bn. He also has various Greater Manchester-wide powers and responsibilities including for transport, planning and housing.
 - In June 2016 the Northern Powerhouse Independent Economic Review prepared by SQW Ltd and Cambridge Econometrics was published. This broadly concludes that there is a significant performance gap between the North, measured by GVA per capita, which is persistently averaging about 25% below the rest of England (10-15% when London is removed).
 - In April 2018 the Transport for the North ('TfN') was formally enshrined in legislation. The TfN is a partnership of public and private representatives working with the Government and national transport bodies to develop and deliver strategic transport infrastructure across North of England. Within their scope is the provision of the Northern Powerhouse Rail programme, which aims to deliver a transformed rail network in the North of England and bring new opportunities to millions of people and businesses. As of 2022, following the Government's amended Integrated Rail Plan ("IRP"), TfN is now in a co-partnership role with the government in order to deliver improved rail across the North including the

Northern Powerhouse Rail. The Government also included a promise for £17.2bn for a 40-mile high-speed line between Warrington, Manchester and Marsden in Yorkshire within their IRP.

- The February 2022 Levelling Up White Paper pledged funding for the continued provision of development under the British Business Bank (“BBB”) Northern Powerhouse Investment Fund, that has already delivered over £1bn of public and private sector debt and equity investment to places across the UK with some of the most acute financial challenges. The next generation of BBB Regional Investment Funding will include £660m for the Northern Powerhouse Investment Fund, including expansion into the North East of England.

Greater Manchester Combined Authority

- 3.42. Manchester, and the wider Greater Manchester region, is at the heart of the Northern Powerhouse. A forward-looking and collaborative approach between the different Greater Manchester local authorities, under the umbrella of the Association of Greater Manchester Authorities (AGMA), has led to a ground-breaking agreement with Central Government to devolve certain powers and budgetary responsibility. In April 2011 the Greater Manchester Combined Authority (‘GMCA’) was formed. As outlined above, Andy Burnham was elected at the Greater Manchester Mayor in 2017 and chairs the GMCA.

The Greater Manchester Strategy

- 3.43. The Greater Manchester Strategy (‘GMS’) was originally prepared in 2009 as a response to the MIER – the most robust analysis ever undertaken of a city, led by global experts – before being updated again in 2013. It identified priorities to enable the Manchester City Region to pioneer a new model for sustainable economic growth based around a more connected, talented and greener City Region where the prosperity secured is enjoyed by many.
- 3.44. Since the 2013 publication, significant changes happened in the city that needed further renewed analysis of progress and priorities. This led to the most recent refresh of the GMS in October 2017 which sets out a very clear vision for the city-region, stating that:

“Our vision is to make Greater Manchester one of the best places in the world to grow up, get on and grow old: A place where all children are given the best start in life and young people grow up inspired to exceed expectations. A place where people are proud to live, with a decent home, a fulfilling job, and stress-free journeys the norm. But if you need a helping hand, you’ll get it. A place of ideas and invention, with a modern and productive economy that draws in investment, visitors and talent. A place where people live healthy lives and older people are valued. A place at the forefront of action on climate change with clean air and a flourishing natural environment. A place where all voices are heard and where, working together, we can shape our future”

- 3.45. In order to successfully achieve the vision, set out above, which is very people-centric in nature, ten priorities for the region have been identified. These can broadly be placed within a number of themes including supporting young people and children from an early age, providing good jobs that support a dynamic local economy, creating stronger and healthier communities, providing good quality housing, creating an age-friendly city-region, delivering a green city-region with a high-quality culture and leisure offer, and continuing to develop world-class connectivity within Greater Manchester.
- 3.46. The GMS provide a high-level framework for action based on a robust evidence base and the results of public consultation. More detailed plans as identified below, have been developed and led by city-region-wide partnerships, and set out the specific actions, interventions and investment required to deliver the GMS strategic priorities and achieve the GMS vision. These plans are set out below.

Greater Manchester Places for Everyone Joint Development Plan (August 2021) – February 2022 Submission Stage

- 3.47. Places for Everyone is the new long-term joint development plan for nine Greater Manchester districts.¹⁴ On 14 February 2022, the Plan and supporting documents were submitted to the Secretary of State for examination. It continues on the intentions of the Greater Manchester Spatial Framework (“GMSF”) following the decision of Stockport Metropolitan Borough Council to cease their involvement in the Framework. The PfE will enable an informed, integrated approach to strategic development planning across the city region. The purpose of the PfE is to enable GM to manage land supply across the city region in the

most effective way to achieve the vision set out in the GM Strategy based on a clear understanding of the role of places and the connections between them.

- 3.48. It will provide a framework for the maximisation of the use of brownfield land and urban spaces while protecting Green Belt land from the risk of unplanned development, it will also ensure all new developments are sustainably integrated into Greater Manchester's transport network or supported by new infrastructure. It will ensure GM is able to meet current and emerging occupier demand to support a market-facing strategy for housing and employment growth.
- 3.49. A key tenet to securing sustainable, inclusive and equally distributed economic prosperity throughout the wider region is by maximising the growth potential of a number of key growth locations. The City Centre will be the largest player and is expected to continue to provide a high concentration of jobs, innovation and research activities whilst The Quays will deliver sustained growth as a major business location and internationally important digital and creative cluster. Outside of these areas, the seven main town centres of Greater Manchester (Altrincham, Ashton-under-Lyne, Bolton, Bury, Oldham, Rochdale and Wigan) are also highlighted as opportunities for a stronger focus on local economic activities which may exploit potential future rail linkages.
- 3.50. As the economic core of the sub-region, Manchester City Centre will accommodate more than half of all new office floorspace. This concentration of office space in this location will take full advantage of the existing and proposed public transport linkages including the arrival of HS2 and Northern Powerhouse Rail, helping to affirm Manchester's position as the premier office location outside of the capital. The PfE states that at least 1,900,000 sqm of accessible new floorspace over the period 2021-2037. This can be facilitated through the refurbishment of existing office accommodation.
- 3.51. The overall picture at a regional level is that a collaborative approach between local authorities is geared towards driving growth in the right places. The focal point of economic growth within GM is undoubtedly Manchester City Centre and delivering positive change that helps the city grow is pivotal to continuing the growth of the region. This is best achieved through encouraging development that brings services or facilities which do not currently exist in Manchester and supporting the pivotal growth areas.

Greater Manchester Transport 2040

- 3.52. The strategy sets out a vision for *"World class connections that support long-term, sustainable economic growth and access to opportunity for all"* and seeks to address the four critical transport challenges of supporting sustainable economic growth, improving quality of life, protecting the environment and developing an innovative city region. Organised by spatial themes and supported by a five-year delivery plan, the strategy takes a long-term view of transport requirements across GM and the wider North and highlights the priority interventions needed to meet those requirements.

The Greater Manchester Investment Fund

- 3.53. The Investment Fund supports the implementation of the GM Strategy through investment to create and safeguard jobs, primarily through loans to support development encouraging business growth and investment in property and infrastructure, to maximise the impact of investment over several funding cycle.

The Five-Year Environment Plan

- 3.54. The Plan sets out the steps that will be taken to become carbon neutral by 2038 and the urgent actions we all need to take in the next five years to help achieve this including investing in our natural environment to respond to climate change and to improve quality of life.

City Centre Strategic Plan

- 3.55. The vision for the City Centre is well developed through a number of specific Strategic Regeneration Frameworks, which are effective vehicles for place led regeneration, but also through the overarching City Centre Masterplan (2015-2018) endorsed by Manchester City Council's Executive in March 2016.
- 3.56. The purpose of the new plan is to provide an update on progress since 2012; to identify the key drivers that will influence growth and development over the next few years; and to set out the City's planned direction of travel. Additionally, the plan also presents a progress report on key schemes within the City Centre.

- 3.57. The Strategic Plan identifies that the City Centre should act as a driver of economic growth and a major employment centre which is expected to experience further significant employment growth in the coming years with another 15,600 jobs predicted by 2025.
- 3.58. The vision for the City Centre is well developed through a number of Strategic Regeneration Frameworks ('SRF'). Alberton House is strategically located in close proximity to a number key regeneration areas, including: Spinningfields, the Civic Quarter: Manchester Central and St Michael's (Jackson's Row), see Figure 2.1. The associated SRF documents help to envisage a more connected city centre, with new mixed-use development spread across the city centre with higher levels of accessibility across the City Centre.

Place Making in Regeneration Areas

- 3.59. The Council outlines in the City Centre Strategy Document (2015-2018) that,
- "Investment in 'place' will continue to create and maintain a city centre that attracts visitors and is an attractive place to live, invest and work. This will ensure that we have the right local environment and infrastructure, both physical and digital, for all users of the city. Creating an attractive and safe environment through effective street management and security will be essential [...] High quality, well-managed green spaces, trees and waterways will be key features of the city centre within both existing areas and those being transformed over the next few years"*
- 3.60. There is therefore an importance placed on the provision of placemaking to ensure the long-term success and growth of the City Centre.

St Mary's Parsonage Strategic Regeneration Framework (2020)

- 3.61. The Site is located within the St. Mary's Parsonage Strategic Regeneration Framework (SRF) area, which was endorsed by the Executive Committee on 3rd July 2020.
- 3.62. The SRF seeks to refocus the priorities of the area in order to establish St Mary's Parsonage as a clearly definable and cohesive City Centre neighbourhood, with a distinctive character and sense of place. The Proposed Development set out the ambition to create a commercially led, mixed-use district, set around high-quality public space.
- 3.63. The St Mary's Parsonage area will deliver a series of significant regeneration benefits, which will be fully integrated and connected into the wider City Centre and will draw activity and support the further expansion of the City Centre's quality activity into the area. This will make the most of its positive adjacencies to other successful and vibrant parts of the City Centre including Spinningfields, the Primary Retail Area, the Central Business District, and support the growth and enhanced productivity of the City.
- 3.64. The St Mary's Parsonage SRF proposes that Parsonage Gardens will build upon its existing asset base, and its positive adjacencies to other parts of the City Centre, to successfully host an eco-system of best-in-class employment – from global businesses to start ups - and other high-quality uses including residential, hotel, retail and leisure.
- 3.65. A key principle of the SRF will be the retention and celebration of the area's special qualities and assets, including its heritage assets, public spaces and green and blue infrastructure. The SRF sets out a clear vision for the future enhancement and regeneration of this part of the city centre, through the identification of opportunity sites that will catalyse further investment and drive positive change. The Proposed Development is a critical component of this strategy.
- 3.66. The St Mary's Parsonage SRF also sets out a number of guiding development principles, notably, stating the following in relation to the Site:
- **Height:** Alberton House is in a transitional location between Albert Bridge House and Century Building, presenting an opportunity for a more substantial increase in height in this location.
 - **Permeability:** Identifies importance of Trinity footbridge approach and expectation for landowners to collaborate to deliver improved access.
 - **Heritage:** Consideration of surrounding heritage assets, including listed buildings and setting of Conservation Area.
 - **Servicing:** Off-street servicing expected to be continued as part of future proposals.

- **Active frontage:** Seek to maximise active frontage and minimise any servicing impacts on pedestrians and heritage assets. Better engage with St Mary's Parsonage and seek to include publicly accessible ancillary uses

- 3.67. The Proposed Development has a critical part to play in delivering the Strategic Regeneration Framework. Not only will it significantly transform a significant area within the SRF. Key to this will be the redevelopment of an outdated, vacant office building; the addition of a critical mass of high-quality city centre uses; and the related investment in public realm and pedestrian routes as part of the public realm and landscaping enhancements.
- 3.68. Planning permission for the redevelopment of Kendal Milne and Fraser Building was approved in 2021, although the permission has not yet commenced.
- 3.69. The Proposed Development will also complement the objective of adjoining Framework areas and key projects, as set out below.

Civic Quarter Framework

- 3.70. The Civic Quarter Regeneration Framework (October 2009) was produced to guide investment in the Civic Quarter and deliver transformational change. It identifies the Civic Quarter as being ideally located to accommodate new buildings which can keep pace with the demands of the market. The Civic Quarter Regeneration Framework area is located c.600m to the southeast of the Site.
- 3.71. The Framework anticipates that the scale of investment proposed in the Civic Quarter will increase the existing floorspace by 67% - to almost 500,000 sq. m - providing first class facilities and Grade 'A' office space to equal the offer of Spinningfields This would, in turn, cater for an estimated 9,000 new full-time jobs.
- 3.72. In September 2012 Manchester City Council's Executive Committee endorsed an updated Regeneration Framework for St Peter's Square. The Regeneration Framework confirms that St Peter's Square has the potential to be the exemplar of the very best in Manchester civic architecture, to showcase and reflect the City's growing international status.
- 3.73. The St Peter's Square Regeneration Framework has largely been realised. Successes including longstanding works on improving the public realm around the Central Library and Town Hall Extension such as the establishment of 1 St Peter's Square as an iconic 'Grade A' office location that has secured a number of high-profile lettings. The completion of 2 St Peter's Square, 24 Mount Street and Peterloo House ensures that their high-quality office accommodation available within the Civic Quarter in the future, further establishing the area as an office destination. The above are supported by excellent transport connections with St Peter's Square Metrolink station and the completion of the Second City Crossing.
- 3.74. In 2019, the Axis development, a 27-storey residential tower was completed. The development creates visual interest and activity, making an important contribution to integrating and linking parts of the City Centre.
- 3.75. In 2017 Planning Permission was granted for the construction of a 40-storey residential building on the Former Bauer Millet Site, regenerating the area the existing Manchester Central building. The Former Bauer Millet development will include high quality, new public realm as an extension of the existing public realm created around Deansgate-Castlefield Metrolink station. The development will also include approximately 32,000 sqm of Grade A office floorspace. The development started on site towards the end of 2020 and is expected to complete construction in the second quarter of 2024.

Spinningfields

- 3.76. To the south of the Site is Spinningfields, which is Manchester's premier business district. The area has undergone a 20-year transformation, starting with the Masterplan in the mid-1990s. The redevelopment of the retail and commercial core has created a distinctive and contemporary commercial centre. Spinningfields is located c. 200m to the south(east) of the Site.
- 3.77. The renewal of the city centre through Spinningfields has brought many benefits to the City and the wider region, with landmark buildings and high-quality new spaces and infrastructure. As a result, it has attracted and continues to retain high profile occupiers such as HSBC, RBS, Barclays, PWC, Shoosmiths, Weightmans, Bank of New York along with a number of other global business organisations. Together, this has created a business community of over 250 different companies operating in the area.

- 3.78. Spinningfields has successfully created a private business and entrepreneurial cluster. Now that it has completed, the momentum generated continues to provide the impetus for further commercial development, including, new opportunities in St. John's to the south, Salford Central to the west, and St Mary's Parsonage to the north. The successful regeneration of these areas in combination with Spinningfields is driving investment, creating jobs, contributing to the local and regional economy and further enhancing Manchester's economic growth potential and international profile.

St. John's Regeneration Framework (2015, 2017)

- 3.79. As mentioned above, St. John's is the next major transformative regeneration project that is being delivered by Allied London, located on the former ITV Granada Studios estate in Castlefield. The SRF was initially endorsed by Manchester City Council at Executive in February 2015 and an updated version was endorsed by the Council at Executive in January 2017. The St John's regeneration area is located c.400m to the south of the Site.
- 3.80. St John's will be delivering a new commercial zone referred to as Enterprise City. The commercial concept has been developed to establish a media and tech creative hub within St John's. Enterprise City will comprise a unique offering of multi-studios for TV, film and music recording/production, entertainment, places to start a retail brand, a restaurant or a café, all anchored on 21st Century workspace infrastructure.
- 3.81. This initiative has significantly enhanced the prominence of St. John's as a business destination. Enterprise City is already creating a cluster of interconnected businesses, suppliers and institutions in the creative and tech fields, together with an emerging ecosystem of supporting business, retail and leisure.
- 3.82. St. John's therefore continues to offer a remarkable and immediate opportunity to lead the next phases of regeneration of Manchester City Centre and deliver "best in class" residential-led mixed use development. The Masterplan Proposed Development have ultimately initiated and guided the delivery of a new residential-led mixed-use, sustainable City Centre neighbourhood which will be accessible, offer a distinctive sense of place and offers life and vitality at all times through the year, day and night.
- 3.83. With momentum of new commercial, leisure and residential development coming forward generated by Spinningfields being carried over into St. John's, it enhances the business community within the city and provides good conditions for further investment in other areas of the city, such as Parsonage and the border between Salford and Manchester.

St Michael's

- 3.84. The St. Michael's development proposals were granted planning permission in March 2018. The St Michael's development is located c.450m to the southeast of the Site.
- 3.85. The proposed 40 storey tower will include hotel, office, and residential uses with ground floor retail units. The proposals aim to realise the Jackson's Row SRF vision and create a landmark destination in what is currently an underutilised part of an otherwise vibrant City Centre. It is expected that the development will lead onto knock-on economic benefits for the areas in between, with the agglomeration factor one that should not be underestimated. It will be important to capitalise on this and ensure that the routes between these areas are pleasant and easily traversable to maximise the benefits across the city, fuelling the overall growth of the City and the region.
- 3.86. The proposal began on site in January 2022, with an expected completion date of 2024.

Salford Central

- 3.1. The Salford Central Masterplan is a 20-year regeneration initiative and is one of the UK's largest development projects, particularly when combined with the activity taking place at Middlewood Locks. The Salford Central Masterplan area is located c.800m to the east of the Site, across the River Irwell.
- 3.2. Salford City Council is working with English Cities Fund (ECf), a joint venture company consisting of Muse Developments, Legal and General and the Homes and Communities Agency. The Salford Central Masterplan is made up of two inter-dependent but distinct areas; Chapel Street and New Bailey.
- 3.3. The Masterplan is supported by planning guidance and a development framework (adopted by the City Council in 2008/09); Salford City Council's largest ever planning application (a 15-year outline permission

across a 17.7-hectare area was granted in 2010) and a Compulsory Purchase Order (confirmed by the Secretary of State in March 2012).

- 3.4. Key elements of the project include revitalising Chapel Street and creating New Bailey, which is an exciting extension to Manchester's Central Business District situated in between the River Irwell and Salford Central Station.
- 3.5. The Middlewood Locks strategic site is also situated within the Masterplan boundary. The Salford Central Development Framework envisages a vibrant mix of uses for Middlewood, with a large residential element, making the most of the reinstated canal basin for waterside development and establishing connections through the site. Notably, Plots G and H of Middlewood Locks completed in December 2021, delivering over 500 new homes, and planning permission was granted in February 2022 for Plot N and Plots E1 and E2 which will collectively delivery over 900 additional new homes as well as flexible floorspace at the ground floor.
- 3.6. Significant progress has been made since the adoption of the Masterplan, submission of outline and Reserved Matters applications. The first phases of Middlewood Locks are complete comprising almost 600 homes, Salford Central has seen the construction of three new major office blocks (One, Two and Three New Bailey) and three residential blocks comprising the Slate Wharf development. Most recently, construction on Plot G of the Slate Ward development started February 2022.
- 3.7. In addition, major transformation works have taken place on Chapel Street that have enhanced the public realm and the placemaking of Salford City Centre. As a result of the investment in the area, this has enabled further residential development to come forward in Salford through a range of private developers bringing forward a range of owner-occupied and build to rent developments to support residential growth.
- 3.8. Salford City Centre is located directly to the west of the Site and again provides a supportive context of new residential development to provide additional supplies of labour through local residents. Similarly, the location of new businesses within Salford further enhances the agglomeration benefits that are provided by development taking place nearby.

Lincoln Square Masterplan

- 3.9. The Lincoln Square Masterplan area is located c.350m to the southeast of the Site.
- 3.10. A number of development projects came forward within an area bordered by Albert Square and the Town Hall to the east and Deansgate and Spinningfields to the west. The previous state of the public realm was in need of investment in order to provide a suitable public and destination space for the buildings that surround it.
- 3.11. Heron House, Commercial Union House, John Dalton House have all been subject to refurbishment for office or hotel use; new buildings of 125 Deansgate and the Lincoln, replacing the former Brazennose House, have also completed. The public spaces between these buildings are proposed to be boosted by £4m worth of investment for new surface treatments, new street trees and the relocation and reorientation of the Grade II Listed Lincoln Statue. The redevelopment of Lincoln Square completed in February 2022, whilst The Lincoln and new QBIC Hotel on Deansgate both having completed in June 2021,
- 3.12. This improved part of the city centre, forming a series of new buildings and new public realm provides a part of a network of spaces running from St. Peters Square, Albert Square, Lincoln Square, Hardman Square from east to west, with connections improved to Parsonage Gardens via Deansgate. From north to south, the area is located in the middle of Deansgate Square, Great Northern Square, Lincoln Square and through to St. Ann's Square. This concerted effort is shaping the city centre and the public realm areas that form a key part of improving connections, a place to work, and live.

Ramada Deansgate (2018)

- 3.13. This Strategic Regeneration Framework ('SRF') for the Ramada site was endorsed in March 2018, and originally sought to guide the future comprehensive regeneration of land adjoining Blackfriars/Deansgate and the River Irwell in Manchester City Centre. The Ramada SRF area is located c.300m to the northeast of the Site, along Deansgate.
- 3.14. Planning permission was secured for the refurbishment and reconfiguration of the Renaissance Hotel to deliver a new 4-star hotel. A subsequent phase of development for an office building with ground floor

flexible uses was approved by Manchester City Council in October 2021. A further phase of development for residential use is also pending planning determination.

Summary

Overall Summary

- 3.15. In summary, this Chapter has outlined the strategic, economic and regeneration context, demonstrating the suitability of the Proposed Development within St Mary's Parsonage and the opportunities to be sought through development. The Proposed Development is situated within the City Centre, within short distances of a number of key services and amenities within the City Centre core.
- 3.16. Presently, the Site is underutilised as an outdated vacant office building, which is no longer fit for purpose. The Proposed Development will directly contribute to the Council's strategic objectives and will deliver a number of economic, social and environmental benefits which all contribute to the growth and success of the City and City Region. The Site is located within close proximity to a number of regeneration areas and has the opportunity to be a key linkage between these areas to help create a cohesive City.

4. Proposed Development

- 4.1. This Section should be read in conjunction with the submitted application drawings and Design and Access Statement, prepared by EPR Architects. It provides a summary of description of the key elements of the Proposed Development.

Design Brief

- 4.2. The current Proposed Development are the product of an iterative design process. The design team has engaged closely with the LPA and other key stakeholders throughout this period to develop what the Applicant considers to best address the key principles of the St. Mary's Parsonage Strategic Regeneration Framework ('SRF') (2020) and deliver an optimised design solution for the Site.
- 4.3. The overarching vision for the SRF area is summarised below:
- **A place where people live, work, relax and socialise** – where all Mancunians also have the ability to share in the long-term success of the area
 - **Thriving and sustainable neighbourhood** – embraces Manchester's zero carbon ambitions and delivers jobs and opportunities for all by building on the existing residential and business communities, as well as being a place for enterprise and innovation
 - **Host an eco-system of best-in-class employment** – from global businesses to start-ups and other uses such a residential, hotel, retail and leisure
 - **Fully integrated and connected into the wider city** – this will draw activity into the area from other vibrant parts of the city centre including Spinningfields, the Primary Retail area, the Central Business District and support the growth and enhanced productivity of the city
 - **Conserve and promote the area's qualities and characteristics** – contribute towards raising the city's international profile by delivering appropriate density of development, taking into account the city centre's finite land resources, to ensure the full economic potential of the area is realised
 - **Retention and celebration of the area's special qualities and assets** – including heritage assets, public spaces and green & blue infrastructure
 - **Focus on maintaining and enhancing the quality of the environment** – rebalancing the vehicular access, servicing and operational management arrangement for the existing residential and commercial uses in the area, as a well as review of car parking provision.
- 4.4. The SRF identifies the potential for adjacent land owners to explore the opportunities to improve the pedestrian environment (relating to the footbridge / pedestrian connection to the west of the Site), accessibility and visibility of the route, to improve the experience and encourage increased use of this valuable asset.
- 4.5. The SRF states that any future proposals will need to be considered in respect of their impact on the setting of surrounding heritage assets.
- 4.6. The Site is located between Albert Bridge House, which is identified as having greatest potential for height in the SRF, and the centre of St Mary's Parsonage Conservation Area. In this respect, the Site is considered to be in a transitional location, with SRF identifying an opportunity for a more substantial increase in height, whilst respecting the landmark status of buildings to the south.
- 4.7. The SRF notes that the existing servicing and parking arrangements for Alberton House are off-street and seeks to retain that approach as part of any future proposals for the Alberton House site.
- 4.8. Considering the current set back from street and the resulting dead space that is creates, the SRF also recognises the opportunity to engage more with St Mary's Parsonage, by bringing the ground floor entrance forwards and incorporating publicly accessible ancillary uses to help to animate this key route.

Design Development

- 4.9. A summary of the design development and options testing from the brief to the Proposed Development is also provided in Section 3 of the Design and Access Statement, prepared by EPR.

Proposed Development

- 4.10. The Proposed Development comprises the full demolition and redevelopment of Alberton House to deliver a new Grade A office building with supporting ground floor commercial uses, office-related amenity space, including food and beverage, and wellness facilities.
- 4.11. The description of development, as stated on the application form is as follows:

“Demolition of existing building and erection of a 19 storey (basement, ground including mezzanine, plus 18) building to form a mixed use office development with ancillary office amenity (Use Class E(g(i))) flexible commercial floorspace at ground floor and mezzanine (Use Class E (a), (b), (c) and/ or drinking establishment Sui Generis), flexible office floorspace (Use Class E(g(i)) at Levels 1-16, and two floors of wellness centre (Sui Generis) at Levels 17 and 18 including ancillary food and beverage (Use Class E (a), (b), (g(i)) and/ or drinking establishment Sui Generis), cycle parking, landscaping, highways and other associated works.”

Use and Amount

- 4.12. The Proposed Development will deliver c.32,260 sqm (GEA) of commercial floorspace. The proposed floorspace per use class is set out in detail in Table 4.1.

Table 4.1: Proposed Development floorspace

Use Class	Existing Floorspace (GIA)	Proposed Floorspace (GIA)
Office (Use Class E(g(i)))	c.7,620sqm	c.26,420 sqm (including mezzanine)
Office ancillary and amenity (Use Class E(g(i)))	-	c. 1,330 sqm
Flexible commercial (Use Class E (a), (b), (c) and/ or drinking establishment Sui Generis)	-	c.1,470 sqm (at ground floor)
Ancillary Wellness Centre including ancillary food and beverage (Use Class E (a), (b), (g(i)) and/ or drinking establishment Sui Generis) - directly associated with Buntwood's commercial customers) including swimming pool	-	c.1,740 sqm (including swimming pool)

Site Layout

- 4.13. The proposed building is broadly triangular shaped, fronting St Mary's Parsonage to the south and abutting the riverbank of the River Irwell to the north. The main body of the Site is bounded by Cardinal House to the east, St Mary's Parsonage to the south, Alberton Bridge House (car park) to the west and the River Irwell to the north.
- 4.14. The ground floor comprises a large lobby with provision of a food and beverage offer (open to the officer users and the public), with the inclusion of a restaurant, retail floorspace and a coffee bar. Two revolving doors form the primary entrance to the building, on the corner of St Mary's Parsonage and the Trinity Bridge walkway. The primary entrance to the buildings includes a double height space and feature staircase. A secondary entrance with two revolving doors is also located along the Trinity Bridge walkway (western façade) opening out onto an external terrace area.
- 4.15. The large open reception and amenity space on the ground floor provides a direct link to the staircase serving the upper office floors, as well as the lift lobby, where access is controlled via speed gates.
- 4.16. The office bin store is also located on the ground floor which has separate door entrances, providing direct access onto St Mary's Parsonage, along the Cardinal House side of the eastern elevation.

- 4.17. Cyclist access is through a dedicated entrance along St Mary's Parsonage, adjacent to the bin store entrance. This provides a direct connection to the cycle lift and the cycle store entrance. Cyclists will take cycles down to the basement level via the lift or step ramp with integrated bicycle channel. A cycle fixing station, changing rooms and drying rooms are located on the basement level, accessed via the separate, dedicated cycle hub core.
- 4.18. The basement level of the building comprises the gym, cycle storage, changing facilities, back of house, servicing areas and plant space. The gym is accessed via the lifts and stairs located within the main core of the building; the changing rooms are located immediately to the south of the gym, also accessible via the main core.
- 4.19. Above ground the mezzanine level is accessed via the feature staircase and stairs and lift located within the main core of the building. The mezzanine level comprises meeting rooms, a prayer room, post room, phone booths and an open plan area, intended to be used as a co-working, serviced space and a customer lounge. The mezzanine level also includes back of house and servicing areas.
- 4.20. Above the ground and mezzanine level, the first to sixteenth floor is made up of office floorspace and associated facilities that are accessed via the main core stairs or eight lifts, from the ground floor. The proposed floorplate from the first to sixteenth floor is the same.
- 4.21. The seventeenth floor comprises plant space (including pool plant / maintenance), back of house, and office amenity lounge space and an events bar and lounge. It also includes a panoramic terrace area which runs around the entire perimeter of the building. The undercroft created by the rooftop design greatest a year-round covered terrace which link directly to the proposed lounge amenity space and events bar and lounge, creating a hybrid inside- outside space.
- 4.22. The eighteenth floor is a rooftop amenity space, with provision of a high-end leisure, fitness and wellness offering, including a pool, vitality pool, steam room, sauna, experience showers and a juice bar.

Scale and Massing

- 4.23. The Proposed Development comprising one building which has carefully considered the principles contained within the St Mary's Parsonage SRF, the adjacent Parsonage Gardens Conservation Area and the outcome of the design development process.
- 4.24. As referenced above, the Site is located in a transitional location within the St Mary's Parsonage area, between Albert Bridge House and Century Building; the SRF identifies an opportunity for a more substantial increase in height in this location, whilst noting that any increase in height will need to respect the landmark status of buildings to the south.
- 4.25. The central northern part of the SRF located wholly within the conservation area largely contains mid-rise buildings. The SRF recognises the tall building zone in the southwest concern of the SRF area, and so the Site represents an opportunity to mediate height towards the mid-rise zone to the northeast of the SRF area.
- 4.26. The Proposed Development will redevelop the existing part 12 (ground +11), part 4 storey (ground +3) Alberton House building. This includes the demolition of the existing building with the erection of a replacement office at 19 storeys, including ground floor (with mezzanine). The replacement Alberton House building consists of two components, the main block massing and the (upper) roof terrace amenity block massing.
- 4.27. At the rooftop level on the 17th and 18th floor, the rooftop massing is set back from the edges of the lower main block massing, which creates the full perimeter roof terrace on the 17th floor. On the 18th floor the juice bar and lounge at the southern side extends onto a balcony on the south corner (fronting St Mary's Parsonage and the Trinity Bridge walkway). The form of the building is shown as a clear step back from the main façade, which embeds the new rooftop feature to the main massing block.
- 4.28. The proposed building has considered both the design principles set out in the SRF and the surrounding context, including the adjacent Parsonage Road Conservation and nearby heritage assets.

Appearance and Materiality

- 4.29. The appearance and materiality of the Proposed Development seeks to respect the sensitive views of the Site and contribute to the architectural variety expressed in older and more modern buildings of Manchester.

- 4.30. The appearance seeks to respond to the rich, eclectic character of the surrounding area. The adopted approach seeks to create a distinctive building with its own identity which suitably respects the wider local and site's industrial heritage, making a valuable contribution to the historic environment.
- 4.31. Whilst elements of the Proposed Development's materiality seeks to respond to modern office developments, like those that have been delivered at Spinningfields the vertical and horizontal express references the façade rhythm and architectural features of nearby historic buildings, such as at 3 St Mary's Parsonage and Kendals.
- 4.32. A copper-coloured material concept is proposed, which derives from the Site's historic use as a brass and cooper works. The proposed material palette is a mix of stone for the junction elements and ceramic/ terracotta for the cornice. The materiality of the proposed Alberton House comprises red brick, critall glazing, exposed structure and warehouse detailing.
- 4.33. The proposed materiality concept seeks to deliver a new building that conveys a unique contemporary warehouse aesthetic, which harnesses the Proposed Development as a key landmark building.
- 4.34. The proposed rooftop feature for the building comprises metal fin cladding with port hole opening which ties in with the industrial concept adopted for the façade of the lower main block massing.
- 4.35. At the ground floor level, the Proposed Development has been designed to respond to the existing (and future) surrounding context, including Motor Square to the south, Bridge Street to the southwest and Deansgate to the east. The primary entrance located at the southern corner of the building, fronting St Mary's Parsonage and the Trinity Bridge walkway) features a double height space, improving visibility and creating a vibrant frontage. Floor to ceiling glazing is proposed at the ground floor level which further supports the creation of an active frontage which seeks to enhance the surrounding streetscape and pedestrian experience.
- 4.36. Overall, the Proposed Development will employ high quality materials which seeks to respond to the Site's history, the historic industrial context and enhances the local streetscape.

Public Realm and Highways

- 4.37. The design of the public realm has been undertaken to respond to the strategic principles set within the St. Mary's Parsonage SRF. The proposed public realm enhances connectivity by improving key linkages and routes, that reinforce the key objectives of the SRF, including:
- The vision is to establish Parsonage Gardens as a clearly definable and cohesive part of the City Centre, recognised by its distinctive character and sense of place. It will be a commercially led mixed use neighbourhood, anchored by high quality public space at its heart and a range of leisure and retail facilities to create a vibrant destination in Manchester City Centre. It will be a place where people live, work, relax, socialise; and crucially it will be a place where all Mancunians have the ability to share in the long-term success of the area.
 - A key underlying principle of the SRF will be the retention and celebration of the area's special qualities and assets, including its heritage assets, public spaces and green & blue infrastructure.
 - Equally, there must be an important focus on maintaining and enhancing the quality of the environment for existing residential and business communities, rebalancing the vehicular access, servicing and operational management arrangements in the area, and a review of car parking provision to ensure that the essential requirements of the City Centre from a functional point of view are properly assessed against value-add opportunities that rationalisation would deliver within the area.
- 4.38. The public realm seeks to respond to the opportunities set out in the St Mary's Parsonage SRF, namely:
- An improved streetscape in front of Alberton House and along St Mary's Parsonage.
 - A public square to the south of Alberton House that creates a destination space for Trinity Bridge that crosses the River Irwell to Salford.
 - Future potential frontages where Alberton House fronts onto St Mary's Parsonage and the connecting link space to Trinity Bridge.

- 4.39. A key aspect of the Proposed Development is to open up the Site's interaction with the Trinity Bridge walkway. The newly created landscaped terrace area located at the ground floor level along the eastern elevation, seeks to address the walkway. The creation of a more active frontage will improve the pedestrian environment and therefore enhance connectivity between St Mary's Parsonage and Trinity Bridge. This will more broadly enhance connectivity between the St Mary's Parsonage area of Manchester and Salford to the north of the River Irwell.
- 4.40. The public realm includes seating opportunities to allow the public to wait, to rest or meet, although large social gatherings are not catered for. The proposed landscaping and public realm includes the following key design features:
- External terrace on the eastern façade at the ground floor level (around the secondary entrance) for cafe spill out with flexible seating elements and a densely planted green edge, accessible via single level.
 - Stepped secondary access to the secondary entrance,
 - Multi-level terrace style seating plinths, between the terrace and Trinity Bridge footway, encased by dense planting to help active and green the pedestrian route.
 - 4 new trees are proposed to replace the 3 existing trees along the eastern elevation/ along Trinity Bridge Footway which will be lost during construction.
 - Four existing trees along the west of the Trinity Bridge walkway route will be retained.
 - Additional planting added to west of the walkway to further green up the route.
 - Widened footway along west side of St Mary's Parsonage whilst retaining two-way traffic movement with the addition of a new street tree helping to frame the view of the buildings primary entrance.
 - A proposed loading bay has been provided to allow easy servicing of the building close to primary entrance.
- 4.41. All vertical elements, such as trees, lampposts, bollards and signage, are located as not to impede pedestrian flows. Routes through to the primary entrance are to be left uncluttered, to further allow free flow of pedestrian movement, with changes in surface materials, patterns and finishes to promote spill out space for ground floor retail and amenity space; activating the street scene.
- 4.42. The Proposed Development seeks to prioritise pedestrians, making the surrounding routes more accessible for people of all ages and levels of mobility. All new footways around the proposed building will retain a minimum 2m width around the entire Site. In addition, a clearly defined hierarchy of pedestrian and servicing routes will establish clarity of movement, particularly along St Mary's Parsonage this approach supports the creation of clear and legible spaces as part of the public realm proposals.

Cycle: Provision and Amenities

- 4.43. The Proposed Development will deliver a cycle hub at the basement level, with showering facilities and secure cycle parking. The cycle hub is accessed via a dedicated entrance on St Mary's Parsonage.
- 4.44. 120 secure cycle parking spaces are proposed within the cycle store comprising at the basement level, comprising 102 parking bays in two tier racks and 18 Brompton lockers. The cycle store also includes bike charging lockers and a fixing station. In addition a total of 24 standard showers are provided as well as one accessible shower / changing room. On this basis, a 1:4 ratio of showers to cycle spaces is provided, as well as one accessible shower.
- 4.45. 14 short stay Sheffield stands are proposed within the public realm along St Mary's Parsonage. This will provide cycle parking for the public and visitors, whilst the dedicated secure cycle parking located in the basement will be dedicated for office-users and employees.
- 4.46. Overall, the Proposed Development will provide 134 cycle parking spaces.

Car Parking Provision

- 4.47. The Proposed Development does not include any dedicated parking provision on the Site. The Site is located in a highly sustainable location with numerous public transport hubs within reasonable walking or cycling distance.

Servicing and Access

- 4.48. The SRF identifies an objective for the building to be serviced off-street, consistent with the current building, to assist with de-engineering of the highway and maintain the quality of streetscape along St Mary's Parsonage. Within this context, the location and layout of the service bay has been subject to options analysis during the design process. Whilst the current arrangements are off-street, they result in the creation of inactive frontage along the length of the Site's south western boundary, creating an unwelcome pedestrian route between St Mary's Parsonage and the Trinity Bridge. It will therefore be necessary to service the building from St Mary's Parsonage, to ensure substantial improvements can be delivered along the full length of the south wester Site boundary, whilst also delivering active frontage along the majority of the eastern ground floor elevation. Through engagement with MCC Highways and through undertaking an iterative design process, the Applicant proposes a servicing layout and management arrangements that maintain pedestrian access, maintains streetscape and does not detract from the overall quality of the proposed building.
- 4.49. The primary route into the ground floor of the Proposed Development via the main entrance on the southern corner (of Trinity Bridge footway and St Mary's Parsonage). This entrance is positioned in a key location opening out onto St Mary's Parsonage and Motor Square to the south (on the opposite side of the road).
- 4.50. A secondary entrance is located along the western elevation, which is accessed by the level threshold entrance via the ramps/paths included within the landscaping. It can also be directly accessed from the lower level of the Trinity Bridge walkway via the steps leading up to the proposed terrace.
- 4.51. Level access is provided at every entrance into the Proposed Development, to ensure access for all is achieved. In terms of internal accessibility level access to all lifts is provided. In addition, a new lobby and ground floor amenity space, and the building core will comply with Part M and BS83000, incorporating vision panels and clear widths for wheelchair users.
- As referenced above, a bin store is proposed at ground floor level, directly accessed via a dedicated entrance along St Mary's Parsonage for commercial occupiers, including F&B. The bin store is located in close proximity to a newly created loading bay on St Mary's Parsonage. The commercial bin store has a separate back of house entrance from the F&B / kitchen area on the ground floor. The servicing strategy minimises potential impact on front of house areas of the Proposed Development through the inclusion of dedicated servicing routes and back of house areas. It is proposed that management staff will move the bins out on collection days to the dedicated area adjacent to the loading bay, before moving the bins back into the store following collection.
- 4.52. For further details on waste capacity and collections please refer to section 6 of the Design and Access Statement, prepared by EPR.

Summary

- 4.53. Overall, the Proposed Development seeks to support the objectives and ambitions of the St Mary's Parsonage SRF, which provides the key contextual considerations and development principles to guide future development Proposed Development and maximise wider regeneration benefits. The Proposed Development seeks to do so in following ways:
- **A place where people live, work, relax and socialise** – the Proposed Development are delivering a new high quality publicly accessible ground floor, which will include food and beverage provision. The ground floor has been designed to be accessible on two sides, as well as being fully visible, which will deliver much needed active frontage to surrounding streets and improve passive surveillance and animation of streets
 - **Thriving and sustainable neighbourhood** – the Proposed Development are underpinned by ambitious net zero carbon targets and will create new office floorspace for existing and new business to relocate to the area. In turn, this will make a positive contribution to the local economy and vibrancy of the local area
 - **Host an eco-system of best-in-class employment** – the Proposed Development will deliver genuinely market leading commercial floorspace in the form of Bruntwood Works' flagship 'Pioneer' office design. This will raise the benchmark for office space in the city and will attract the very best office occupiers

- **Fully integrated and connected into the wider city** – connectivity with the surrounding area is a fundamental design principle, with the Proposed Development directly enhancing the quality and accessibility of adjacent pedestrian and vehicular routes, including improvements to the footway approaching the Trinity Bridge
- **Conserve and promote the area's qualities and characteristics** – this part of the SRF is identified for additional height, transitioning away from the Conservation Area towards greatest height in the southwest corner. The Proposed Development therefore represent a design, height and quantum of development that optimises the site's potential and enables the delivery of a contextually appropriate and high-quality architectural design, as well as enhancements to surrounding public realm
- **Retention and celebration of the area's special qualities and assets** – the proposed design is rooted in the site's history, through the articulation of the façade and use of high-quality materials and colour
- **Focus on maintaining and enhancing the quality of the environment** – the Proposed Development will improve the adjacent public highway and ensure the proposed public realm improvements are coordinated with neighbouring landowners to ensure a cohesive and high-quality public realm strategy can be delivered.

5. Planning Policy Framework

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2. This section examines the planning policy framework which forms the basis for the consideration of the development proposals.

Local Development Plan

- 5.3. Within the context of Manchester, the Development Plan comprises the following documents which are relevant to this application:
- Manchester Core Strategy (2012);
 - Manchester Proposals Map (2012);
 - Saved Policies of the Manchester Unitary Development Plan (2005);

Manchester Core Strategy (2012)

- 5.4. The Core Strategy was adopted on 12 July 2012. It sets the overall strategic direction for planning in Manchester over the plan period from 2012 to 2027. The policies of the Core Strategy establish where major development and other forms of investment should be located in order to be sustainable, meet local needs and take full advantage of opportunities.
- 5.5. In regard to the local economy, the Core Strategy emphasises that the economic priorities for Manchester are to increase productivity, grow the market and labour force, attract investment, improve skills and support businesses. This is identified by Strategic Objective 2 which states:
- SO2. Support a significant further improvement of the City's economic performance and spread the benefits of this growth across the City to reduce economic, environmental and social disparities, and to help create inclusive sustainable communities.*

Saved Policies of the Unitary Development Plan (1995)

- 5.6. The Unitary Development Plan was adopted in July 1995. Coinciding with the adoption of the Core Strategy in 2012 significant proportions of the UDP have been replaced, however, a number of policies were saved on 11 July 2012 and remain extant.

Material Considerations

- 5.7. The following published policy, executive reports and guidance documents are relevant material considerations:
- National Planning Policy and Guidance:
 - National Planning Policy Framework (NPPF) 2021, and
 - Planning Practice Guidance (PPG).
 - Supplementary Planning Guidance
 - National Design Guide
- 5.8. A number of additional Supplementary Guidance Documents have been identified below:
- Our Manchester Strategy 2016-2025 (please refer to Section 3 of this Statement);
 - Guide to Development in Manchester Supplementary Planning Document (2007) and Technical Guidance (2015);
 - Manchester Climate Change Framework: 2020-2025
 - Manchester Zero Carbon Framework (2020);

- Manchester's Green and Blue Infrastructure Strategy (please refer to Section 3 of this Statement);
- Design for Access 2 (2003);
- Places For Everyone Joint Development Plan (August 2021) – Publication Stage;
- St Mary's Parsonage Strategic Regeneration Framework (2020);
- City Centre Transport Strategy;
- GD04: Waste Storage and Collection Guidance for New Developments (September 2017); and
- Planning and Noise Technical Guidance (June 2022)

National Planning Policy Framework

- 5.9. The National Planning Policy Framework (NPPF) (revised version published July 2021), articulates the priorities of the Plan for Growth within planning policy.
- 5.10. At the heart of the 2021 revised NPPF lies the 'presumption' in favour of sustainable development, which supports proposals that are in accordance with policies in an up-to-date Development Plan. Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.
- 5.11. The NPPF states that *'the purpose of the planning system is to contribute to the achievement of sustainable development'* (paragraph 7). It summarises the objective of sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 5.12. Section 11 of the NPPF 'Making effective use of land' supports the remediation and redevelopment of brownfield land, by stipulating:
- "Planning policies and decisions should: ...
b) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land"* (paragraph 120).
- 5.13. The purpose of the planning system is to achieve sustainable development. Paragraph 8 of the NPPF states that to achieve this, there are three overarching objectives, which need to be pursued mutually. Firstly, the economic role should contribute to sustainable development by building a strong, responsive and competitive economy and ensuring the sufficient amount of and right type of development to support growth. Secondly, the social role is required to support strong, vibrant and healthy communities by creating a high-quality built environment with accessible local services to reflect the needs of the community. Lastly, the environmental role should protect and enhance the natural, built and historic environment.

Planning Practice Guidance

- 5.14. The Planning Policy Guidance ('PPG') was published in March 2012 and is regularly updated. It sets out advice, information and best practice on a wide range of planning issues with the overall objective of becoming a single source for planning guidance which is maintained as a live resource.
- 5.15. The PPG stresses the importance of well-designed places and good design that takes the opportunity to improve the character and quality of an area and the way it functions.

National Design Guide

- 5.16. The National Design Guide was published by the Ministry of Housing, Communities and Local Government in 2019. This document forms part of the governments planning practice guidance and was created to outline key characteristics that make well-designed places.
- 5.17. There are 10 characteristics of well-designed places within the National Design Guide and these are listed below:
- Context – enhances the surroundings
 - Identity – attractive and distinctive
 - Built form – a coherent pattern of development
 - Movement – accessible and easy to move around
 - Nature – enhanced and optimised

- Public Spaces – safe, social and inclusive
- Uses – mixed and integrated
- Homes and buildings – functional, healthy and sustainable
- Resources – efficient and resilient
- Lifespan – made to last

Supplementary Planning Documents and Guidance

Guide to Development in Manchester Supplementary Planning Document (2007) and Technical Guidance (2015)

- 5.18. The Guide to Development in Manchester - Supplementary Planning Document and Planning Guidance (SPD) was originally adopted on 11 April 2007. The document reflects and provides guidance on the importance of creating attractive, well-designed, well-maintained neighbourhoods. It includes a set of reasoned principles which will guide developers, designers and residents to the sort of development which is anticipated in Manchester.
- 5.19. In addition, technical guidance for developers was published in December 2015. It is composed of two documents, GD03 Environmental Protection and GD05 Planning and Noise.
- 5.20. The documents reflect and provide guidance on the importance of creating attractive, well-designed, well-maintained neighbourhoods. It includes a set of reasoned principles which will guide developers, designers and residents to the sort of development which is anticipated in Manchester.

Manchester Climate Change Framework 2020-2025 and Manchester Zero Carbon Framework (2020)

- 5.21. There is increasing evidence of global temperature rises and the prospect therefore of increasing incidences of extreme weather as well as risk of water and food shortages and flooding, all causing increasing insecurity. Whilst Manchester may not feel these effects as severely as other areas globally, there is an identified urgent need for all cities to consider what they need to do to play their full part in addressing climate change.
- 5.22. In November 2018, Manchester City Council made a series of commitments, informed by the Manchester Climate Change Agency's (MCCA) work with the world-renowned Tyndall Centre for Climate Research based at University of Manchester. The key commitments are as follows:
- To becoming zero carbon by 2038, significantly accelerated from the original target of 2050;
 - To adopt a carbon budget and emit only a maximum of 15 million tonnes CO₂ for the period 2018-2100. This has been transposed from a global carbon budget which has been calculated as "likely" to maintain global temperature change within 2°C as agreed in the Paris Agreement;
 - To achieve a 13% year-on-year reduction in citywide CO₂ emissions from 2018 to achieve this carbon budget.
- 5.23. A draft Manchester Zero Carbon Framework has been developed which sets out the City's overarching approach to meeting its science-based climate change targets over the period 2020-38 and draft action plans for the period 2020-22 are being developed by the Council and other strategic organisations and sectors.
- 5.24. On 10 July 2019, a motion asking Manchester City Council to formally declare a climate emergency was unanimously agreed. The motion declares that climate change is a serious risk to Manchester's future and committed to embedding the issue as an integral part of council decision-making – making sure that all key decisions are taken with the city's target of becoming zero-carbon by 2038 in mind.
- 5.25. It further strengthens the emerging Manchester Zero Carbon Framework. In March 2020 the Executive adopted the Manchester Climate Change Framework 2020-2025. The five-year framework sets out measures that MCC will take in order to reduce carbon emissions from its buildings, energy use and transport.

Design for Access 2 (2000)

- 5.26. The Design for Access Manual was published in January 2000, it provides a practical guidance to inclusive design. It requires developments to be fully inclusive and accessible and the Council's vision is for

Manchester to be recognised as the most accessible City in Europe. MCC recognises that inclusive design needs to take account of cross-impairment and community-based issues.

- 5.27. The Design for Access Manual provides further details and design standards for external areas and for within buildings.

Greater Manchester Places For Everyone Joint Development Plan (August 2021) - February 2022 Submission Stage

- 5.28. The Places for Everyone Joint Development Plan Document – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan Publication Plan, was considered at the Places for Everyone Joint Committee on July 20, 2021, and was subsequently approved by each of the nine districts for publication.
- 5.29. The plan has been submitted to the Secretary of State for examination on 14 February 2022 together with all the supporting documents, background evidence, and representations received during the final stage of public consultation. It should be noted that no Modifications were considered necessary prior to Submission, therefore the Submission Plan remains unchanged from that published under Regulation 19 in August 2021. Independent Inspectors will now be appointed to undertake an independent examination into the plan.
- 5.30. Places for Everyone is a long-term plan of nine Greater Manchester districts for jobs, new homes, and sustainable growth. It has been published by the GMCA on behalf of the nine districts.
- 5.31. The plan is a joint development plan of the nine districts which will determine the kind of development that takes place in their boroughs, maximising the use of brownfield land and urban spaces while protecting Green Belt land from the risk of unplanned development. It will also ensure all new developments are sustainably integrated into Greater Manchester's transport network or supported by new infrastructure.
- 5.32. The plan is the result of a process that began as the Greater Manchester Spatial Framework (GMSF) in 2014 and has been informed by the feedback received from residents, businesses and the development industry to previous consultations on that Plan. The nine districts decided to continue to produce a joint plan following the withdrawal of Stockport Council from the Greater Manchester Spatial Framework.
- 5.33. The Places for Everyone Joint Development Plan was subject to a final stage of consultation which commenced on 9 August 2021 and ran for 8 weeks, ending on 3 October 2021. The consultation was on whether the plan meets the 'test of soundness'. The plan is currently at Publication Stage, whereby following the final stage of consultation analysis is currently being undertaken following the consultation period, in preparation for the examination in public. The plan will be submitted to the Secretary of State for Examination. The examination phase is expected to take place in January 2022, with the publication of the final plan anticipated for 2023.
- 5.34. Paragraph 48 of the NPPF states that local planning authorities may give weight to relevant policies in emerging plans according to: the stages of preparation; the extent of unresolved objections; and the degree of consistency of the relevant policies in the emerging plan to this Framework. Whilst the Places for Everyone Joint Development Plan is not adopted it is at the final stage of consultation and so it is considered to carry some weight in the determination of planning applications.
- 5.35. The Places for Everyone Joint Development Plan sets out 10 strategic objectives:
1. Meeting our housing need.
 2. Create neighbourhoods of choice.
 3. Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.
 4. Maximise the potential arising from our national and international assets.
 5. Reduce inequalities and improve prosperity.
 6. Promote the sustainable movement of people, goods and information.
 7. Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.
 8. Improve the quality of our natural environment and access to green spaces.
 9. Ensure access to physical and social infrastructure.
 10. Promote the health and wellbeing of communities.

St Mary's Parsonage Strategic Regeneration Framework (2020)

- 5.36. The Site is located within the St Mary's Parsonage SRF, which was endorsed by the Executive Committee on 3 July 2020.
- 5.37. The SRF sets out to refocus the priorities of the area, in order to establish St Mary's Parsonage as a distinct, cohesive City Centre neighbourhood. The proposals set out the desire to generate a strong sense of place, alongside an ambition to create a commercially led, mixed-used district, set around high-quality public spaces.
- 5.38. The St Mary's Parsonage area will deliver a series of significant regeneration benefits, which will be fully integrated and connected into the wider City Centre and will draw activity and support the further expansion of the City Centre's quality activity into the area.
- 5.39. Please refer to Section 3 for further details on the St Mary's Parsonage SRF, including site specific considerations and design.

City Centre Transport Strategy (2021)

- 5.40. A City Transport Strategy to 2040 was endorsed by MCC's Executive on 17 March 2021 and Salford City Council's Regeneration Committee on 22 March, before being fully ratified by the Greater Manchester Combined Authority on 26 March 2021.
- 5.41. The strategy presents an overarching vision for a well-connected, zero-carbon City Centre at the heart of the North, offering our residents, employees and visitors a great place to work, live in and visit. In order to achieve this, seven ambitions are set out:
- Ambition 1: Walking is the main way of getting around the City Centre
 - Ambition 2: The City Centre is cleaner and less congested
 - Ambition 3: more people choose to cycle to destinations within the City Centre
 - Ambition 4: The City Centre benefits from better public transport connections
 - Ambition 5: Parking in the City Centre is smarter and integrated with other modes
 - Ambition 6: Goods are moved and delivered sustainably and efficiently into and within the City Centre
 - Ambition 7: Innovation is embraced where it benefits the City Centre and its users.
- 5.42. As part of the Transport Strategy, The 'City Centre Triangle' has been proposed as a strategic intervention that builds on temporary road closures introduced in response to the COVID-19 pandemic and the Northern Quarter Bee Network scheme. After securing funding, this intervention will consider some of the remaining links in the City Centre Triangle, particularly on Deansgate, Liverpool Road, Aytoun Street and Whitworth Street to provide Network standard infrastructure that connects the heart of the City Centre.
- 5.43. It is also recognised that the amount of Metrolink and train journeys made into the City Centre at peak hours will almost double by 2030. Measures and improvements are proposed to both systems in order to alleviate congestion and increase the capacity of the network.
- 5.44. In September 2021, Greater Manchester have asked government to back early delivery of a London-style public transport system for the city-region. As part of the vision, which requires an initial £1.4 billion of funding from national government, Greater Manchester will deliver significant investment in transport facilities. This is considered integral to the infrastructure required to create the Bee Network, creating vital new connections between towns, high streets and communities, fast orbital bus routes, new and improved stations and high-quality cycling and walking routes. The target for this initiative is to be in place by 2024.

- 5.45. As highlighted by the strategy, the Manchester Salford Inner Relief Route can act as a barrier for people accessing the City Centre core, therefore the seamless integration of new developments, uninterrupted by these barriers is important for sustainable and inclusive growth as the city expands.

GD04: Waste Storage and Collection Guidance for New Developments (September 2017)

- 5.46. GD04 is a practical guide to minimum standards to assist in planning and designing systems for the storage and collection of refuse, and for recycling in domestic and commercial properties. It highlights that details of the location, volume, management and collection arrangements for domestic and non-domestic waste and recyclable materials must be submitted. It states the MCC encourages all new developments to carefully consider the provision of waste receptacles that encourage recycling.
- 5.47. In summary the GD04 guidance highlights that all new development must include a waste management strategy, which includes the following, as well as a completed waste pro-forma:
- Estimate volumes and types of waste produced by the development
 - Details of internal and external stores for both waste and recycling
 - Location of the proposed collection point and details of the route the collection vehicle will take
 - Details of how waste will be transferred between stores and the collection location.
 - Details of number and capacity of bins proposed and collection frequency.

Planning and Noise Technical Guidance (June 2022)

- 5.48. The Planning and Noise Technical Guidance aims to provide help and advice in relation to noise in a planning context to encourage good acoustic design. It outlines what is expected in relation to current guidance and policy with the aspiration that new developments achieve the highest possible standards without compromising the health and well-being of people that live and work within Manchester. The document provides guidance to applicants and consultants concerning the assessment and prediction of environmental noise associated with a particular development.

Summary

- 5.49. The above policy and supplementary planning documents have informed the Proposed Development and are assessed further in Section 6 of this document.

6. Planning Policy Assessment

- 6.1. This Section assesses the proposals against the policies in the Development Plan and in relation to the key planning considerations of relevance to this application.
- 6.2. Where material considerations provide additional requirements or detail to the policies of the Development Plan that merit discussion, these are considered.
- 6.3. The following matters are considered relevant to the determination of the Planning Application:
- Contribution to Manchester's Vision and Spatial Objectives;
 - Principle of Use;
 - Design;
 - Sustainable design and construction;
 - Archaeology
 - Built heritage and townscape;
 - Ecology and biodiversity;
 - Arboriculture;
 - Air quality;
 - Ground conditions;
 - Flooding and drainage;
 - Transport;
 - Noise and vibration;
 - Sunlight, daylight and overshadowing;
 - Wind;
 - Safety and Security;
 - Site waste management;
 - Construction management;
 - TV and radio reception;
 - Aviation consideration;
 - Local labour agreement; and
 - Economic.

Contribution to Manchester's Vision and Spatial Objectives

- 6.4. The Core Strategy sets out Manchester's 15-year vision for the City 2012 - 2027, which sees Manchester at the front rank of cities in Europe and the rest of the world, with a growing economy driven by the strength of the Regional Centre. The vision states that Manchester's knowledge-based economy will flourish within an entrepreneurial community, characterised by a fully skilled, inclusive working population.
- 6.5. To achieve this vision, the Core Strategy sets out a number of Strategic Objectives (SO) for the City. These include:
- SO1: Provide a framework within which the sustainable development of the City can contribute to halting climate change.

- SO2: Support a significant further improvement of the City's economic performance and spread the benefits of this growth across the City to reduce economic, environmental and social disparities, and to help create inclusive sustainable communities.
- SO3: Provide for a significant increase in high quality housing provision at sustainable locations throughout the City, to both address demographic needs and to support economic growth.
- SO4: Provide a network of distinctive, attractive and high-quality centres, strengthening local identity, providing essential services close to homes and local access to healthy food.
- SO5: Improve the physical connectivity of the City, through sustainable and accessible transport networks, to enhance its functioning and competitiveness and provide access to jobs, education, services, retail, leisure and recreation.
- SO6: Protect and enhance both the natural and built environment of the City and ensure the sustainable use of natural resources, in order to mitigate and adapt to climate change, support biodiversity and wildlife, improve air, water and land quality, recreational opportunities and provide networks of high quality green infrastructure, ensuring that the City is inclusive and attractive to residents, workers, investors and visitors.

- 6.6. These objectives have been translated into individual policies within the Core Strategy, against which the Proposed Development has been assessed within this Statement.
- 6.7. Core Strategy Policy SP1 sets out that the Regional Centre will be the focus for economic and commercial development, leisure and cultural activity in relation to the Greater Manchester economy. Additionally, Core Strategy Policy SP1 states that all development should have regard to the issues and strategy for each regeneration area as described in the Strategic Regeneration Frameworks.
- 6.8. Developments which make significant contributions to the City Centre's role in terms of employment and retail growth or which improve the accessibility and legibility of the City Centre will be supported, subject to the proposal's impact on key aspects of the city's heritage and character. New development should fully exploit opportunities to contribute to the improvement of the City Centre in terms of character and function, taking account of other policies in the Core Strategy.
- 6.9. A commitment to good design which takes full cognisance of the sites' setting and character runs through national and local planning policy and guidance. Core Strategy Policy SP1 requires that all development make a positive contribution to neighbourhoods of choice including creating well designed places that enhance or create character.
- 6.10. The Proposed Development is located in the city centre in one of Manchester's most prominent locations – Deansgate. This will continue to allow the city centre to be the core focus for supporting economic growth and provide access to job opportunities. It will provide office accommodation within a highly sustainable area, together with a range of retail and leisure opportunities, to deliver the potential for the creation of a wide range of job roles in all sectors and levels of experience.
- 6.11. The remainder of this Section assesses the Proposed Development in relation to the relevant policies of the Core Strategy. These policies have been formulated based on the vision and strategic objectives for the City and should be reviewed in turn to determine their compliance. Overall, the Proposed Development is considered to be in line with the Core Strategy's vision and spatial objectives.

Principle of Use

- 6.12. Core Strategy Policy SP1 sets out that the Regional Centre will be the focus for economic and commercial development, leisure and cultural activity. Additionally, Core Strategy Policy SP1 states that all development should have regard to the issues and strategy for each regeneration area as described in the Strategic Regeneration Frameworks.
- 6.13. Core Strategy Policy EC1 states that Manchester City Centre is a key location for the most significant employment generating uses. Core Strategy Policy EC1 requires details of Local Employment Agreements should contain a commitment to work with the Work Skills Team to ensure that employment opportunities resulting from this development are made available to Manchester residents through existing recruitment offer and allow hard to reach groups equal opportunity to be successful in applying.

- 6.14. Core Strategy Policy EC3 states that employment generating uses including offices and other commercial development will be encouraged in the Regional Centre providing the development is well connected by sustainable transport to both the wider city and surrounding residential areas, and where the scale and type of office does not undermine employment in the City Centre.
- 6.15. Core Strategy Policy EC8 states that Manchester City Centre is expected to deliver approximately 14ha of employment land and that the Plan promotes development which has regard to ensuring employment within Central Manchester complements those uses.
- 6.16. Core Strategy Policy CC1 supports high density offices and states that the Council will give particular encouragement and support for these uses in the City Centre.
- 6.17. Core Strategy Policy CC8 identifies the types of development and approach to development which is considered most likely to deliver the vision for the City Centre and development which reflects this will generally be supported.
- 6.18. The Proposed Development must also consider the regeneration of the St Mary's Parsonage area as material consideration and deliver the key site-specific principles outlined in the endorsed St Mary's Parsonage SRF.

Applicant's Response

- 6.19. The Site is located within the Regional Centre, as defined by Policy EC3 of MCC's Core Strategy (2012) and Site also falls within the City Centre, as defined by Policy CC1 of the Core Strategy. The principle of development in this area of Manchester is established through planning policy, namely Policy CC1 'Primary Economic Development Focus: City Centre and Fringe' which supports high quality office developments on the Site.
- 6.20. The new office space being delivered as part of the Proposed Development will replace the outdated existing Alberton House building. The Proposed Development presents an opportunity to create a highly sustainable, net zero carbon building, providing new, high quality office space, flexible commercial space (F&B) and amenity/ wellness facilities.
- 6.21. The Proposed Development seeks to reinvent Alberton House and create a new destination in the St Mary's Parsonage area which takes advantage of the riverside location to become a flagship 'Pioneer' building within Bruntwood Works's wider commercial office portfolio. In addition to high quality and flexible office floorplates, the building incorporates industry leading sustainability credentials and an extensive amenity offer, creating spaces for work and play within one building.
- 6.22. There is continued demand for Grade A office floorspace within Manchester City Centre, as outlined above in in Section 3 of this Statement ('Manchester Office Market'). The Proposed Development has the potential to provide exemplary workspaces within Manchester City Centre.
- 6.23. The delivery of premium office space in the city centre will contribute to the economic success of the Greater Manchester Region. Furthermore, as companies are increasing environmental awareness and corporate social responsibility it is anticipated that the sustainability credentials of the building will be of significant appeal.
- 6.24. The Proposed Development will not only deliver a deliverable and viable scheme but will also set new benchmark for the quality of commercial office space on offer in Manchester city centre.
- 6.25. In line with Core Strategy Policy EC3 the Proposed Development will deliver significant employment floorspace within the regional centre, in a location which is highly accessible and connected via sustainable transport modes.
- 6.26. In accordance with Policy EC1, with regards to local labour sources, the Applicant has submitted a signed form that agrees to the principle of MCC's local labour objectives for each development site and will engage with relevant Officers to agree the details prior to commencement of the development. As such, the Applicant requests that this is secured via planning condition
- 6.27. With regard to policies SP1, EC1, EC3 and EC8, CC1 and CC8, the Proposed Development will ensure that the city centre remains the focus of employment generating activities through job creation during both the construction and operational phase of development. This is positioned within a highly sustainable location

and promotes high density development to maximise the Proposed Development's contribution to the city's economic development.

6.28. Overall, the Proposed Development will deliver c.32,260 sq. m. (GEA) of new commercial floorspace, comprising the following:

- c.26,420 sqm (GIA) of office floorspace.
- c. 1,330 sqm (GIA) of office amenity/ ancillary space at basement level.
- c.1,470 sqm (GIA) of café/ retail floorspace (F&B) at ground floor level.
- c.1,740 sqm (GIA) rooftop wellness and amenity space, including ancillary food and beverage.

This is a significant quantum of new development and the delivery of the Proposed Development will enhance the new job opportunities and growth of key sectors for Manchester and its residents.

Design

6.29. Core Strategy Policy EN1 (Design Principles and Strategic Character Areas) states that all development in Manchester will be expected to follow the seven principles of urban design (character, continuity and enclosure, public realm, ease of movement, legibility, adaptability and diversity) and have regard to the strategic character area in which the development is located.

6.30. Core Strategy Policy CC9 (Design and Heritage) requires the design of new buildings in the City Centre to be of the highest standard whilst preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance.

6.31. Core Strategy Policy DM1 (Development Management) states that development should have regard to appropriate siting, layout, scale, form, massing, materials and detail. In addition, Policy DM1 states that regard should be given to the "impact on the surrounding area in terms of the design, scale and appearance of the Proposed Development" and "development should have regard to the surrounding area"

6.32. Guide to Development in Manchester Supplementary Planning Document (2007) and Technical Guidance (2015) also provides design guidance for developers.

6.33. Chapter 12 of the NPPF (2021) emphasises the great importance placed on the creation of high quality buildings and places; good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. A number of factors help to ensure that developments are contributing to the creation of well-designed places:

- Function well and add to the overall quality of the area, over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history;
- Establish or maintain a strong sense of place to create attractive, welcoming and distinctive places;
- Optimise the potential of the site and support local facilities and transport networks; and
- Create places that are safe, inclusive and accessible and which promote health and well-being.

6.34. In addition, the NPPG states that well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process.

Scale and Density

6.35. Core Strategy Policy CC6 City Centre High Density Development outlines that City Centre developments will generally be high-density, and in a local to maximise its efficiency. The appropriate scale, massing and height of development in the City Centre will significantly exceed what is appropriate elsewhere in the City.

- 6.36. The St Mary's Parsonage SRF identifies the opportunity to accommodate taller buildings within the southwest part of the SRF area, whilst delivering improved permeability and enhanced public realm. This area of the SRF relates to Bridge Street, River Irwell and St Mary's Parsonage, including Alberton House. It is considered that taller buildings to the southwest of the SRF area will complement planned tall buildings to the northeast part of the SRF, with both zones of taller height density development straddling the heart of Parsonage Gardens conservation area.
- 6.37. The SRF also highlights that it is expected that additional height in relation to Alberton Houses would be expected to reflect the height of the modern extension on the north side of Century Building, in order to ensure the impact is mediated and balanced. It also considers that given the transitional location of Alberton House between Albert Bridge House and Century Building, there is an opportunity for a more substantial increase in height in this location, although any increase in height will need to respect the landmark status of buildings to the south.

Inclusive Design

- 6.38. Core Strategy Policy CC10 A Place for Everyone states that developments will be supported where they promote high standards of accessibility to buildings and across spaces in the City Centre. Core Strategy Policy DM1 Development Management also states that buildings and neighbourhoods should be fully accessible to people with disabilities.
- 6.39. Design for Access 2 is also relevant. This document provides guidance on measures that should be incorporated into schemes to increase their accessibility. Information of how the Proposed Development has been designed to respond to the requirements of Design for Access 2 is contained within the DAS submitted in support of this planning application.
- 6.40. Section 12 of the NPPF sets out the need for developments to be inclusive and accessible for existing and future users.

Applicant's Response

- 6.41. In response to the policy considerations set out above, the Proposed Development has been designed by a highly experienced design team through a process of close consultation with the LPA and key stakeholders including statutory and non-statutory consultees, Ward Councillors and the general public. This iterative design process is set out in full within the Statement of Consultation prepared by Deloitte and section 3 of the Design and Access Statement prepared by EPR.
- 6.42. The proposed design is therefore a considered response, which provides a high-quality development that will positively contribute to the local streetscape and wider built environment. The Proposed Development will improve the public realm and connectivity around the Site, and provides new, high quality office space, complemented by F&B space opening out onto the river, as well as a rooftop wellness facility.
- 6.43. The Proposed Development will provide an active frontage to St Mary's Parsonage and the Trinity Bridge walkway and deliver public realm enhancements which seek to improve connectivity and the pedestrian environment.
- 6.44. The development promotes walking and cycling over car use and this, in turn, should promote health and well-being, with a high standard of amenity. Similarly, the approach to design has been reviewed by Design for Security to ensure that the Proposed Development does not undermine the quality of life or community cohesion and resilience.

Layout, Scale and Massing

- 6.45. The scale and form of the Proposed Development responds to the surrounding built context and regeneration context with regards to height and massing. Site specific considerations have informed the design, including the location and accessibility of the Site, relationship with the River Irwell (to the north), the relationship with the existing built and historic context (including the Parsonage Gardens conservation area immediately to the southeast of the Site).
- 6.46. The St Mary's Parsonage SRF identifies a zone for tall buildings in the southwest corner of the SRF area and recognises an opportunity on the Site opportunity to mediate height towards the mid-rise zone to the northeast of the SRF area.

- 6.47. The Proposed Development includes the demolition of the existing Alberton House with the erection of a replacement 19 storeys building (including ground floor with mezzanine). For further details on the proposed layout, scale and massing please refer to Section 4 of this Statement.
- 6.48. The Proposed Development creates improvements to the urban design of the public realm, including Trinity Bridge walkway, enhancing pedestrian and cycle routes around the Site and connectivity more widely between Manchester and Salford (to the north of the Site).
- 6.49. The existing Alberton House is under-utilised in its current condition; the Proposed Development will reinforce and complement the surrounding and emerging context, including responding to the design principles set out within the St Mary's Parsonage SRF. Please refer to paragraph 4.53 of this Statement for details on how the Proposed Development responds to the key principles underpinning the overarching SRF vision. Tale 6.1 below provides details of how the Proposed Development responds to the guiding principles set out within the SRF in relation to Alberton House.

Table 6.1: Proposed Development Response to St Mary's Parsonage SRF Principles

Guiding Design Principles for Alberton House	
Alberton House is in a transitional location between Albert Bridge House and Century Building, presenting an opportunity for a more substantial increase in height in this location.	The context of the SRF area has been considered when assessing the height of the Proposed Development. The southwest part of the SRF area, where the Site is located, is considered to have the capacity to successfully accommodate taller buildings. The Proposed Development will deliver a new 19 storey (basement, ground including mezzanine, plus 18) office-led building in the south west of the SRF area. Albert Bridge House site has aspirational height of over 20 storeys, the proposed height of 19 storeys would link the taller Albert Bridge House heights to the current heights within the conservation area including Century Building located to the east of the Site.
Identifies importance of Trinity footbridge approach and expectation for landowners to collaborate to deliver improved access.	A key aspect of the Proposed Development is to open up the Site's interaction with the Trinity Bridge walkway. A landscaped terrace area is proposed at the ground floor level fronting the walkway which will provide a spill-out space for the food and beverage space. The active frontage will improve the pedestrian environment and enhancing accessibility and connectivity between St Mary's Parsonage and Trinity Bridge. The proposed public realm enhancements to the Trinity Bridge walkway and the activation of this space seeks to deliver a future proof design that will provide additional improvements when proposals for Albert Bridge House come forward.
Consideration of surrounding heritage assets, including listed buildings and setting of Conservation Area.	Heritage and TVIA assessments have been undertaken in support of this application. The proximity of the surrounding heritage assets, including Parsonage Gardens conservation area and a number of listed buildings have been considered during the design development process. The Proposed Development has sought to ensure that any harm is considered against the public benefits of the Proposed Development. For details please refer to paragraphs 6.111 to 6.125 and Chapter 8 (Public Benefits) of this Statement.

Guiding Design Principles for Alberton House

Off-street servicing expected to be continued as part of future proposals.	A loading bay has been provided along St Mary's Parsonage to allow easy servicing of the building close to the servicing and primary entrances. As such the Proposed Development seeks to appropriately balance servicing requirements for the Proposed Development whilst maintaining high quality pedestrian routes, particularly along St Mary's Parsonage
Seek to maximise active frontage and minimise any servicing impacts on pedestrians and heritage assets. Better engage with St Mary's Parsonage and seek to include publicly accessible ancillary uses	Any servicing impacts on the pedestrian environment and nearby heritage assets have been suitably considered, as set out above. Widened footways are proposed along the west side of St Mary's Parsonage whilst retaining two-way traffic movement with the addition of a new street tree helping to frame the view of the buildings primary entrance. The Proposed Development will improve the pedestrian, cyclist and city user experience, particularly along St Mary's Parsonage and Trinity Bridge walkway. Publicly accessible food and beverage floorspace is proposed at the ground floor level, activating the street scene and enabling the creation of an improved relationship with the street. Alongside this, the ground floor office entrances will create further activation and provide place-making benefits. Overall the Proposed Development will enhance the local streetscape, including St Mary's Parsonage through public realm and landscaping enhancements, the delivery of a high quality landmark building and the addition of active frontages.

- 6.50. Through the design development, the layout and scale of the masterplan has refined so that the Proposed Development provides an optimum, viable design solution, whilst providing a high-quality addition to Manchester's built environment.
- 6.51. The layout, scale and massing (and appearance) of the Proposed Development have been assessed within the TVIA and heritage assessments undertaken in support of this application (Chapter 6 and Chapter 7 respectively of the Environmental Statement Volume 1); these assessments have concluded that the scale, mass and quality of architecture will not have a significant impact and, in some instances, will result in beneficial effects on key views.
- 6.52. The Proposed Development is considered to be compliant with Core Strategy Policies DM1 and CC9, through the delivery of a scheme which is of an appropriate scale and massing, whilst delivering public realm enhancements improve connectivity within the St Mary's Parsonage area.
- 6.53. Overall, taking into account the Proposed Developments' layout, scale and massing, the scheme is considered to be compliant with the relevant policies of the Development Plan and National Planning Policy, including Core Strategy Policy DM1 which notes that schemes should have regard for the surrounding area.

Appearance and Materiality

- 6.54. The Proposed Development will employ a palette of high-quality materials that complements the surrounding built context whilst responding to the local and site-specific industrial heritage and emphasising the building's orientation, scale, massing and context. It is considered that the Proposed Development will add to the overall quality of the area by supporting regeneration objectives and capitalising on the growth of employment generating uses in this part of the city.
- 6.55. Section 4.6 of the Design and Access Statement prepared by EPR set outs details of the proposed materiality of the Proposed Development. A number of CGIs have been submitted as standalone documents as part of this Application, how show in detail how the appearance and materiality responds to the wider surrounding context.
- 6.56. In order to review the overall composition of the designs and their visual appearance, the Environmental Statement includes a Townscape and Visual Impact Assessment, undertaken by Chris Burnett Associates and

a Heritage Assessment undertaken by Stephen Levrant Heritage Architecture. The TVIA assessment concludes the following:

- 6.57. This identifies and assesses the impact of Proposed Development on potentially affected character areas and key views around the Site. In terms of visual impact, a total of 16 representative views within the established Zone of Theoretical Visibility (ZTV) have been selected for the analysis of visual effects. A study area radius of 1km from the centre point of the Site has been defined. This is based upon the ZTV, which has identified the likely (or theoretical) extent of visibility of the Proposed Development. The Townscape and Visual Impact Assessment concluded that five views that are assessed as 'significant' with regards to townscape and visual impact, and one additional view is assessed as 'significant' with regards to visual impact only.
- When considered from these identified viewpoints, the Proposed Development would result in:
 - **Three instances of Moderate Beneficial effects on townscape and visual impact** (Viewpoint 5 Riverside Walkway west side; Viewpoint 6 Blackfriars Bridge; Viewpoint 9 Parsonage Gardens)
 - **Two instances of Minor Beneficial effects on townscape and visual impact** (Viewpoint 10 Motor Square; Viewpoint 13 St Ann Street)
 - **One instance of Minor Beneficial impacts on visual impact only** (Viewpoint 4 Albert Bridge)
- 6.58. The heritage assessment also notes that despite the impact incurred by the height and scale of the proposed building, the design takes cues from the brass and copper works which historically occupied the Site in the early 19th century and utilises red brick and crittel windows - this is reflected in the instances of 'moderate' and 'minor' beneficial impact to the settings of listed buildings closest to the Site.
- 6.59. Furthermore, the Proposed Development will improve safety and security, with the final design proposals also having been informed by consultation with GMP. The redevelopment of the Site will strengthen local streetscape, enhancing local character and sense of place through the delivery of a key distinctive, landmark building. It will generate vitality and animation making a further positive contribution to local streetscape. The Places Matter! Design Review Panel expressed support for the active ground floor approach and the location of the main entrance at the nose of the building.
- 6.60. Full details setting out the high quality of the proposed design and the rationale for the design choices are provided in full within the Design and Access Statement prepared by EPR and are assessed in detail within the Townscape and Visual Impact Assessment prepared by Chris Burnett Associates.
- 6.61. The Proposed Development is considered to be in accordance with Core Strategy Policies CC9 and DM1 in that the proposed appearance and materiality is of a high standard, whilst referencing the materiality of the surrounding area.

Accessible and Inclusive Design

- 6.62. The Proposed Development have been designed to apply inclusive design principles to the internal spaces, creating a safe and secure environment which respond to the needs of all users. The design has been developed in full consideration of national legislation. This includes the provisions of BS8300: 2001 and The Building Regulations Part M (2015 edition incorporating 2016 amendments). The design also reflects the importance that the applicant places on complying with the requirements of the Equality Act 2010 and emerging Equality Act 2010 (Amendment) Bill 2015-16.
- 6.63. The considerations seek to ensure that people are not discriminated against regardless of disability, age or gender. These extend from accessing the new buildings and the public realm within the Site through to moving around the internal parts of the buildings and accessing information, including signage and contact details.
- 6.64. Consideration has also been given to the requirements of MCC Design for Access 2. The design team has endeavoured to develop the detailed design of the scheme to comply with DFA2 standards, whilst meeting the client brief. Further information on the measures incorporated is found within Section 4.1 of the DAS.
- 6.65. The public realm has also been designed to be inclusive and provides step-free access to the River Irwell, as well as across the rest of the public realm more generally. There are plenty and regular seating opportunities to also provide areas to pause as needed.

- 6.66. The Proposed Development has been designed to include step-free access to all upper floors and use.
- 6.67. In summary, the Proposed Development has been designed in accordance with regulatory guidance ensuring it promotes the principles of inclusive design.

Credibility of Design

- 6.68. EPR is an esteemed and award-winning architectural practice which is extremely experienced in designing and delivering high quality buildings in city centre locations and has a track record and capability to deliver a project of exceptional quality.
- 6.69. Stephen Levrant Heritage Architecture also has vast experience in providing specialist input on a range of projects within the historical cultural environment, on a wide range of historic buildings and conservation areas and have fed back their on-going assessment of the proposals throughout design development.
- 6.70. The design of the Proposed Development has been interrogated through extensive pre-application consultation with MCC officers, Places Matter! Design Review Panel, statutory consultees and through public consultation. The following points were raised by Places Matter with regards to the rooftop design, which have been responded to and addressed as part of the final design of the Proposed Development:
- *“there was some nervousness about the rationale for the shape of the top floor, which risks looking like a ‘bit of an afterthought’. This was felt to need more rigor and whilst the warehouse / pavilion aesthetic is attempting to pick up on the heritage angle, you were asked to look again at both the colour and shape of this floor. By all means make it a playful structure, but perhaps a more understated ‘hat’ is required? You were directed to City University Library, by Coffey Architects, as an exemplar.”*
 - *“You might also consider a larger step back of the top floor and more expression as it meets the sky. The forms were felt to be too residential for this type of building and this is the weakest part of the building.”*
- 6.71. The core design team has undertaken an extensive contextual analysis of the Site and surroundings and recognise the high-profile nature of the Site. In this respect, a significant amount of time has been spent developing the proposal through a number of design stages to deliver a high quality development that not only secures the viable future for the Site, but also delivers demonstrable enhancements and regeneration benefits to the surrounding area.

Sustainable Design and Construction

- 6.72. Paragraph 153 of the NPPF (2021) states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
- 6.73. In respect of climate change, Paragraph 152 of the NPPF (2021) advises 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.
- 6.74. Paragraph 153 also states that policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.
- 6.75. Further to this, Paragraph 154 states that new developments should be planned in ways that:
- Avoid increased vulnerability to the range of impacts arising from climate change;
 - Can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 6.76. Paragraph 155 of the NPPF goes on to state that to help increase the use and supply of renewable and low carbon energy and heat, plans should:
- Provide a positive strategy for energy from these resources, that maximises the potential for sustainable development, while ensuring that adverse impacts are addressed satisfactorily;
 - Consider identifying suitable areas for renewable and low carbon energy resources, and supporting infrastructure;

- Identify opportunities for development for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

6.77. The NPPG sets out guidance on climate change and it states:

“effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so, local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. Planning can also help increase resilience to climate change impact through the location, mix and design of development.”

6.78. *Core Strategy Policy EN4* encourages the reduction on CO2 Emissions through following the Energy Hierarchy principles:

- To reduce the need for energy through design features that provide passive heating, natural lighting and cooling.
- To reduce the need for energy through energy efficient features such as improved insulation and glazing to meet residual energy requirements through the use of low or zero carbon energy generating technologies.

6.79. *Core Strategy Policy EN6* seeks CO2 reductions from low or zero carbon energy supplies and includes the following targets:

- A CHP/district heating anchor or connection, or where not feasible.
- A 15% increase on Part L 2010.

6.80. *Policy EN8 Adaptation to Climate Change* of the Core Strategy sets out that all new development will be expected to be adaptable to climate change in terms of design, layout, siting and function of buildings and external spaces.

6.81. The 2013 edition of Approved Document L1A: Conservation of fuel and power in new dwellings gives guidance for compliance with Building Regulations for building work carried out in England.

6.82. The supplementary planning document, Guide to Development in Manchester (2007) also details the environmental standards developments in Manchester are expected to achieve, including energy efficiency, renewable energy, and environmental design.

6.83. *Draft Policy JP-S 2 Carbon and Energy of the Places for Everyone JDP (Publication / Submission Plan)* reinforces the aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions which will also be support through a range of measures, including an expectation that new development that all new dwellings should seek a minimum 19% carbon reduction against Part L of the 2013 Building Regulations.

Applicant's Response

- 6.84. An Environmental Standards Statement (ESS), Energy Strategy and Whole Life Carbon Assessment has been prepared by Hilson Moran. The document assesses the potential for incorporating renewable and low or zero carbon (LZC) technology and sets out how the Proposed Development will incorporate sustainability measures, including energy efficiency and environmental design.

Energy Strategy

- 6.85. The Energy Strategy provides details of the energy assessment that has been carried out to benchmark the proposed energy strategy and evaluate its performance against the relevant policies. The Energy Strategy also provides details on passive design elements, energy efficiency measures and low and zero carbon energy delivery systems.
- 6.86. The Energy Strategy has been developed by following the energy hierarchy; Be Lean, Be Clean and Be Green. The energy assessment is based on the current SAP 2012 emission factors in line with the building regulation emissions factors used to assess the building for Part L.
- 6.87. An energy assessment has been undertaken which indicate that the Proposed Development will achieve a minimum of a 24% improvement on Part L 2013, exceeding the 15% improvement requirement over Part L 2010 in Policy EN6, that equates to 9% improvement over Part L 2013. The Proposed Development also complies with Policy EN4 with its all-electric approach that includes air source heat pumps as heat source and a low carbon energy system.
- 6.88. The energy strategies applied are outlined below:
- The envelope of the Proposed Development will be significantly better than Building Regulations compliance standards with low U-values, g-values and low air leakage rates.
 - Design for Performance principles have been embedded within the design process. Extensive analysis has been carried out to optimise the facades so that heat losses are minimised whilst the size and position of openings has been optimised to maximise the use of natural light within each space. This has led to an optimised glazing to opaque area ratio.
 - Ventilation will be provided via the use of multiple Mechanical Ventilation Heat Recovery Units within each floor plate. This system allows office floor space zones to be independently operated and optimised to minimise energy consumption with both time clocks and CO2 control. The units will provide high levels of heat recovery during the winter which will minimise the heating demand of the development.
 - The Proposed Development will be energised solely from electricity which will benefit from grid decarbonisation.
 - An ambient loop will circulate within the core of the building. This loop will be heated and cooled to a nominal low temperature via high efficiency externally mounted air source heat pumps. There will be water to water heat pumps within the building which will provide low grade heating and cooling to fan coil units located within each floor space.
 - Energy efficient services employed in the development include high efficiency LED lighting coupled with occupancy and daylight controls to significantly reduce the lighting energy use.
 - Electrical and mechanical systems within the development will be metered and controlled with a full Building Management System (BMS). This will enable energy use to be tracked and opportunities for efficiency improvements to be made. The Proposed Development is targeting NABERS 5.5* and therefore the metering strategy for the development will be further enhanced.
 - Smart controls will be rolled out across the building to maximise energy efficiencies

Whole Life Carbon

- 6.89. A Whole Life Carbon Assessment (WLC) has been developed for the Proposed Development. Early Carbon assessments identify the potential for the proposed building achieving 641 kg CO₂/m² GIA (representing 20% improvement over RIBA 2030). However, due to the need for on-going detailed design development and likely changes to the final carbon savings achievable. On this basis the Proposed Development commits to

targeting 800 kg CO₂/m² GIA as a maximum, which is in line with the Applicant, Bruntwood's maximum target and RIBA 2030.

Health Well-Being and Comfort

- 6.90. An initial WELL assessment has been undertaken to establish potential credits that are available to the site. The design is incorporating these credits where practical. The Proposed Development will be designed to enhance occupancy health, wellbeing, and productivity, embracing the WELL Building Standard principles.
- 6.91. The Application is supported by a number of technical, environmental assessments which consider the potential impacts of the Proposed Development during the construction and operational phases, including in relation to air quality, daylight and sunlight, and noise and vibration. Please refer to the relevant sections of this chapter for further details.

Circular Economy

- 6.92. A circular economy approach to workplace design and construction has been taken, with the Proposed Development adopting the following key measures:
- Building materials, where possible, will be sourced locally to reduce transportation pollution and support the local economy. All timber will be procured from responsible forest sources.
 - The construction site will be managed in an environmentally sound manner in terms of resource use, storage, waste management, pollution. Recycling facilities will be provided on site for construction and operational waste.
 - Water use will be minimised by the specification of water efficient taps, dual flush toilets, and low water use appliances. Water metering will be installed to monitor and minimise wastage. Minimise surface water run-off from the site. Grey water will be used from the pool filter back wash water. This water will be stored on site and re-used within WC flushing. This will significantly reduce the volume of water being released into the waste system.

Ventilation

- 6.93. A Ventilation Strategy has been prepared by Hilson Moran. The Report summarises the ventilation strategies to ensure compliance with building Regulations Approved Documents B and F to maintain air quality and provide adequate occupant comfort levels. Any impact of the surrounding buildings and accessible areas have been mitigated by the following principles:
- Use of sound attenuators incorporated within ventilation systems to comply with acoustic criteria.
 - All intake points and exhaust points to have a minimum separation of 10m to comply with BREEM requirements.
 - Positioning of toilet exhausts such that they do not discharge on areas regularly occupied by people.
- 6.94. The environmental building services systems will generally be designed in accordance with the British Council for Offices (BCO) Guide to Specification (2019), and the Proposed Development is targeting BREEM Excellent.
- 6.95. Occupant comfort and flexibility are essential to ventilate commercial properties, as well as optimising usable floor space. Ventilation to both landlord and tenant area will be based on mechanical ventilation with integrated heat recovery.
- 6.96. A number of local Mechanical Ventilation Heat Recovery units (MVHR) will be installed at high level on each floor. The units will be ducted to fresh air intake and exhaust louvres at the perimeter of each floor level, allowing heat recovery from the exhaust air, minimising distribution ductwork and embodied carbon. The strategy is summarised below:
- **Reception:** will be naturally ventilated by the transfer of air via the main entrance revolving doors.
 - **Gym and basement showers / changing rooms:** local MVHR located at high level in the basement rooms with fresh air intake and exhaust via louvres on the rear elevation.
 - **Basement plant and ancillary:** A separate MVHR will provide ventilation to the plantrooms and ancillary spaces within the basement.

- **Toilet area:** local MVHR units located at high level within the toilet area on each floor will supply fresh air to the basin and lobby areas, and extract air from urinal and WC areas. Fresh air intake and exhaust will be via perimeter louvres with heat recovery from the extract air.
- **Ground floor retail and amenity:** local MVHR units at high level on the ground floor with fresh air intake and exhaust via perimeter louvres at that level. Space will be provided at roof level for future kitchen supply and extract ventilation plant.
- **Refuse:** A dedicated extract system will remove air from the refuse store with supply air to the space via louvered doors.
- **Leisure areas** (such as the event space, office, amenity/lounge, juice bar and spa reception): Upper Levels Local (MVHRs) Mechanical ventilation heat recovery units at high level with fresh air intake and exhaust via plenum and louvres on perimeter.
- **Rooftop changing room / shower:** Roof Air handling unit (AHU) via supply and extract ductwork.
- **Pool / pool hall areas:** Fresh air supply and extract AHU with recuperator recovery system positioned on the roof.
- **Smoke:** the building includes a firefighting core which incorporates a smoke shaft.
- **Plantrooms:** via louvres in the walls on the northern perimeter. The main heat rejection plant will be installed at roof level in order to maximise plant efficiency.

6.97. The ventilation strategy summarised above suitably responds to Core Strategy policies, including Core Strategy Policy DM1 Development Management which sets out that all development should have regard to effects on amenity. For further details please refer to the Ventilation Strategy prepared by Hilson Moran.

Archaeology

6.98. Chapter 16 of the NPPF (2021) 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.” (paragraph 194)

6.99. Core Strategy Policy DM1 Development Management sets out that all development should have regard to effects relating to archaeological heritage.

Applicant’s Response

6.100. An Archaeological Desk Based Assessment has been undertaken by Salford Archaeology. The conclusions of the assessment are summarised below:

- The Site is of archaeological interest and has potential to contain buried remains dating to the late medieval/post-medieval period to industrial period.
- Delivery of the development proposals will necessitate some ground-breaking and landscaping works across the Site, with potential to impact on buried archaeological remains.
- The Site has the potential to retain buried remains of post-medieval garden soils, an 18th-century industrial building known as Rock House, Manchester Gasworks and a police station. Any such remains that do exist within the Site are likely to be of low to medium significance and, without a programme of mitigation, the scheme could damage or destroy these remains.

6.101. In accordance with Policy DM1 the Proposed Development has considered effects relating to archaeological heritage. It should be noted that further details will be secured by condition, as further investigations can only take place once the existing Alberton House building has been demolished and the findings of any archaeological excavations are reviewed in situ.

Built Heritage and Townscape

6.102. The Planning (Listed Building and Conservation Areas) Act 1990 sets out the general duty on decision makers in exercising their planning functions with respect to heritage assets. Section 66 requires:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the LPA or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses...”

- 6.103. Section 72 sets out the corresponding duty in relation to conservation areas, it requires:
- “In the exercise, with respect to any building or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area...”*
- 6.104. Paragraph 8 of the NPPF notes that one of the key dimensions to sustainable development is protecting and enhancing our historic environment. Paragraph 199 to 201 requires that when considering the impact of the Proposed Development on the significance of the asset, great weight should be given to the asset’s conservation, the more important the asset the greater the weight should be. Any harm or loss requires clear and convincing justification.
- 6.105. *Core Strategy Policy DM1* states that development should have regard to appropriate siting, layout, scale, form, massing, materials and detail; and to impact on the surrounding areas in terms of the design, scale and appearance.
- 6.106. *Core Strategy Policy EN1 Design Principles and Strategic Character Areas* states that all development in Manchester will be expected to follow the seven principles of urban design (character, continuity and enclosure, public realm, ease of movement, legibility, adaptability and diversity) and have regard to the strategic character area in which the development is located. In addition, it explains that within the City Centre, developments will be expected to consider the City’s heritage and continue the rich pattern of activity in the core area.
- 6.107. *Core Strategy Policy CC9 Design and Heritage* requires the design of new buildings to be of the highest standard.
- 6.108. On a local level, *Core Strategy Policy EN3 Heritage* highlights that throughout the City, MCC will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods. New developments must be designed so as to support MCC in preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance. Proposals which enable the re-use of heritage assets are encouraged where they are considered consistent with the significance of the heritage asset.
- 6.109. *Core Strategy Policy CC9 Design and Heritage* references that development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings, conservation areas and scheduled ancient monuments. *Policy CC9* also requires the design of new buildings to be of the highest standard.
- 6.110. The St Mary’s Parsonage SRF highlights that heritage analysis is required to fully consider development options for future planning applications, in relation to Alberton House.

Applicant’s Response

- 6.111. Townscape and visual impact and built heritage have been scoped into the Environmental Impact Assessment undertaken in support of this Application (ES Volume 1 Chapter 7 and Chapter 6, respectively). Both assessments examine the impacts of the Proposed Development on receptors
- 6.112. The Site does not contain any heritage assets that are afforded statutory protection, such as Scheduled Monuments, listed buildings, or any Registered Parks and Gardens, and it does not fall within a conservation area.
- 6.113. The Proposed Development is within close proximity to Parsonage Gardens Conservation Area (see Figure 2.2), with the conservation area 10m to the east Site, on the opposite side St Mary’s Parsonage.
- 6.114. The Site is also located within 100m of the Deansgate/Peter Street Conservation Area and within 200m of St Ann’s Square Conservation Area, Albert Square Conservation Area and the Flat Iron Conservation Area in Salford.
- 6.115. As outlined in Chapter 2 of this Statement, there are 18 listed buildings within 200m of the Site, including six listed buildings 150m. The Site is within the setting of a number of listed buildings, with two listed buildings located directly to the south east of the Site, 3 St Mary’s Parsonage and Reedham House, which are both four storey Grade II listed buildings.

- 6.116. A Heritage Statement prepared by Stephen Levrant Heritage Architecture is submitted in support of this application and included at Appendix 6.1 of the Environmental Statement Volume 2.
- 6.117. The potential of the Proposed Development to impact the settings of the identified heritage assets, primarily within 200m of the Site, has been assessed through a Heritage Visual Impact Assessment (HVIA) of 8 views; as outlined in blue and red in section 7 of the Heritage Assessment (Appendix 6.1 ES Volume 2).
- 6.118. The Heritage Visual Impact Assessment concluded that, when considered from these identified viewpoints, the Proposed Development would result in:
- **Four instances of minor adverse impact** (Grade II Listed Arkwright House; Grade II Listed National Buildings; Grade II Listed 98-116 Deansgate; and non-designated Alberton Bridge House)
 - **Two instances of moderate beneficial impact** (Grade II Listed 3 St Marys Parsonage; Grade II Listed 31-33 King Street West)
 - **Three of minor beneficial impact** (Grade II Listed Blackfriars Bridge, Grade II Listed Masonic Temple, Grade II Listed Albert Bridge);
 - **Two instances of negligible impact** (St Ann's Square Conservation Area and Deansgate / Peter Street Conservation Area)
 - **Nine instances of neutral impact** upon the settings of designated and non-designated heritage assets around the Site (Grade I Listed: John Rylands Library; Grade II Listed: The Crown Tavern, Haywards Building, 4-14 King Street, 105-113 Deansgate, Sawyers Arms, Former Hydraulic Power Station; non designated: Bridge Tavern, 55-69 Bridge Street).
- 6.119. On the basis of the above, it is concluded that the Proposed Development will cause "less than substantial harm". In accordance with paragraph 202 of the NPPF the less than substantial harm have been considered against the public benefits of the proposal. Please refer to Chapter 8 of this Statement and Section 8.1 of the Heritage Assessment (Appendix 8.1 ES Volume 2).
- 6.120. Despite the impact incurred by the height and scale of the proposed building, the design takes cues from the brass and copper works which historically occupied the Site in the early 19th century and utilises red brick and crittal windows. This is reflected in the instances of 'moderate' and 'minor' beneficial impact to the settings of listed buildings closest to the Site.
- 6.121. The impact upon Arkwright House (Grade II) and the National Buildings (Grade II), is identified to be minor adverse overall. This conclusion has been reached due to the highly-positive, contextual design response which has sought to replace a building of lesser architectural merit and poor elevational treatment and introduce one with active frontages. Whilst the increase in mass and height would incur some adverse impact upon the settings of these designated heritage assets, when assessed as a whole, the degree of change incurred by the Proposed Development is considered to not diminish the significance of the listed buildings, or the ability to appreciate their contribution to the character and appearance of the Conservation Area.
- 6.122. Equally, whilst the proposed height and scale of the Proposed Development will impact views from within Parsonage Gardens looking north-east, the Proposed Development will enhance activity and permeability around Motor Square and enhance views from the Riverside, thereby offsetting some of the perceived impact upon the experience of the conservation area as a whole, resulting in an overall neutral (balanced) impact on the designated area.
- 6.123. The townscape and visual impact assessment undertaken by Chris Burnett Associates identifies and assesses the impact of Proposed Development on potentially affected character areas and key views around the Site. The conclusions of the townscape and visual impact assessment are set out above – for details please refer to paragraphs 6.57 and 7.27 to 7.31 of this Statement for the Applicant's response in relation to townscape and visual impact.
- 6.124. In accordance with Core Strategy policies EN3 and CC9, the Proposed Development seeks to complement the industrial heritage of the Site, whilst enhancing the historic environment. The Proposed Development will deliver a high quality new office-led building, which responds to the Site's historic use as a cooper and brass works, through the employment of a cooper coloured materials palette.
- 6.125. For further details please refer to the following reports and chapters:

- Environmental Statement Volume 1 – Chapter 6 Heritage, prepared by SLHA;
- Environmental Statement Volume 2– Appendix 6.1 Heritage Assessment
- Environmental Statement Volume 1 – Chapter 7 Townscape and Visual Impact, prepared by Chris Burnett Associates;
- Environmental Statement Volume 2 – Appendices 7.1 – 7.3

Ecology and Biodiversity

- 6.126. Chapter 15 of the *NPPF* (2021) relates to conserving and enhancing the natural environment. In particular it states that,
- “Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures” (paragraph 174(d)).
- 6.127. Core Strategy Policy EN15 Biodiversity and Geological Conservation outlines that the Council will seek to maintain and enhance Sites of ecological value throughout the City. Particular consideration should be given to Sites with international or national designations for their biodiversity value, and other Sites of biological value. Developers are required to demonstrate that they have assessed and taken account of the potential effect of the Proposed Development on biodiversity including European, national and locally priority species such as the great crested newt, pipistrelle bats and certain bird species.
- 6.128. Core Strategy Policy EN9 Green Infrastructure highlights that new development will be expected to maintain existing green infrastructure in terms of its quantity, quality and multiple function. It continues by stating that the Council will seek to protect existing street trees and promote new planting, whilst also recognising the continued network of green spaces, water bodies, canals, paths and cycleways as a key feature of Manchester’s green infrastructure.
- 6.129. Core Strategy *Policy EN17 Water Quality* states that development should avoid any adverse impact on water quality, including minimising groundwater contamination and to avoid pollutants reaching the watercourse.
- 6.130. Manchester’s Green and Blue Infrastructure Strategy (2015) has the overall vision of:
- “By 2025 high quality, well maintained green and blue spaces will be an integral part of all neighbourhoods. The city’s communities will be living healthy, fulfilled lives, enjoying access to parks and greenspaces and safe green routes for walking, cycling and exercise throughout the city...”.
- 6.131. The Green and Blue Infrastructure Strategy also sets out a number of objectives to enable the vision to be achieved:
1. Improve the quality and function of existing green and blue Infrastructure, to maximise the benefits it delivers.
 2. Use appropriate green and blue infrastructure as a key component of new developments to help create successful neighbourhoods and support the City’s growth.
 3. Improve connectivity and accessibility to green and blue infrastructure within the City and beyond.
 4. Improve and promote a wider understanding and awareness of the benefits that green and blue infrastructure provides to residents, the economy and the local environment.
- 6.132. The *Places for Everyone JDP (Publication Plan)* is yet to be adopted, however it is at an advanced stage. Policies in the Submission Plan Draft (2021) that are considered relevant are set out below:
- *Draft Policy GM-G 2- Green Infrastructure Network:* the green infrastructure network will be designed, managed, protected, and enhanced to help deliver benefits which involve enhancing biodiversity, by expanding, improving, and connecting habitats.
 - *Draft Policy GM-G 7- Trees and Woodland:* in making planning decisions, Greater Manchester’s authorities will work to deliver the aims and objective of the GM Tree and Woodland Strategy, by encouraging habitat diversity through conserving and managing existing woodland, as well as targeting tree-planting at the areas of greatest need where the GI benefits can be maximised, whilst avoiding the loss or harm to other priority habitats.

- *Draft Policy GM-G 8 – Standards for a Greener Greater Manchester*: The GMSF indicates Standards for a Greener Greater Manchester including access to greenspace
- *Draft Policy GM-G 9 – A Net Enhancement of Biodiversity and Geodiversity*: The policy considers the requirement for Net Enhancement of Biodiversity and Geodiversity through following the mitigation hierarchy of avoiding harm, mitigating locally or otherwise compensating for loss.

Applicant's Response

- 6.133. An Ecological Assessment, including biodiversity net gain assessment has been undertaken by Penndy Anderson Associates in support of this application.
- 6.134. The ecology assessment concludes the following:
- The Site is of low ecological value. There are no designated wildlife sites on or within close proximity to the site and any proposed redevelopment would not threaten the integrity of notifiable features in the local area.
 - No birds' nests were recorded on the building or in the ornamental planting at the front of the building. There is some limited potential for nesting birds to use the street trees on site and trees/shrubs on the riverbank adjacent to the site. As such, it is recommended any tree works are completed outside of the bird nesting season.
 - No potential for roosting bats was identified at the site and no significant bat foraging areas occur on site. The self-seeded trees and shrubs along the riverbank adjacent to the site provides some limited foraging areas for bats and similar habitat is present further along the riverbank. Habitats on or adjacent to the site are unsuitable for other protected species such as otter, water vole or hedgehog. No further protected species surveys are considered necessary.
 - Two Schedule 9 plant species, giant hogweed and Himalayan balsam, are present on the paved area adjacent to the river, self-seeded from the adjacent riverbank which lies outside of the Site boundary. A potential problem arises when sites are disturbed as part of redevelopment. Any Schedule 9 plant material, or soil containing root or rhizome fragments should, therefore, be dealt with appropriately. It is recommended that specialist advice on the appropriate control and disposal of materials is sought⁵, and that suitable longer-term management measures are developed as part of any landscaping plan. Long-term management should be co-ordinated with adjacent landowners where possible for best effect.
- 6.135. Overall, the Proposed Development will generate a positive impact on the amenity value of the surrounding area, whilst delivering biodiversity and ecological enhancements, in compliance with Core Strategy Policy EN15.

Arboriculture

- 6.136. *Core Strategy Policy EN9 Green Infrastructure* highlights that new development will be expected to maintain existing green infrastructure in terms of its quantity, quality and multiple function. It continues by stating that the Council will seek to protect existing street trees and promote new planting.
- 6.137. Section 12 of NPPF also highlights the important contribution which trees make to the character and quality of urban environments. It goes on to state that decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

Applicant's Response

- 6.138. An Arboricultural Constraints Appraisal has been undertaken by Bowland Tree Consultancy Ltd in support of this application. The Tree Constraints Plan included within the appraisal identifies eight Category C trees and one Category U tree on the Site:
- The Category U tree (T2) is located at the north western corner of the Site, adjacent to the Trinity Bridge (located to the west) and the existing Alberton House (located to the east).

- One of the Category C trees (T1) is located within the existing public realm fronting St Mary's Parsonage, adjacent to the main entrance to the existing Alberton House building.
- Trees T1 and T2 are required to be removed to facilitate construction, given the footprint of the proposed new office building.
- Four of the remaining Category C trees, located along the western side of the Trinity Bridge walkway are also proposed to be removed to facilitate construction. Three of these trees will be replanted as part of the Proposed Development within the new public realm, along the Trinity Bridge footway (replanted in the same area of the Site, where the existing trees to be removed are located.). An additional street tree is proposed along St Mary's Parsonage.

- 6.139. The ground floor and surrounding public realm is highly constrained for additional tree planting. As part of the design development process an assessment of St Mary's Parsonage has been undertaken, considering both below ground services and above ground layout in relation to the loading bay – this exercise concludes that there is only space to provide one tree along St Mary's Parsonage. It should be noted that a number of multi-stem trees are being delivered at roof level.
- 6.140. For further details on the proposed landscaping, including tree planting please refer to the Landscaping Design and Access Statement prepared by Planit. Please also refer to the Ecology Report prepared by Penny Anderson Associates for details on biodiversity net gain.

Air Quality

- 6.141. The NPPG states that action to manage and improve air quality is largely driven by EU legislation, in particular the 2008 Ambient Air Quality Directive that sets legally binding limits for concentration in outdoor air of major air pollutants that impact public health.
- 6.142. The NPPG continues by highlighting that whether or not air quality is relevant to a planning decision depends on the Proposed Development and its location. When deciding whether air quality is relevant considerations could include whether the development would:
- Significantly affect traffic in the immediate vicinity of the Proposed Development Site or further afield;
 - Introduce a new point sources of air pollution;
 - Expose people to existing sources of air pollutants;
 - Give rise to potentially unacceptable impact during construction for nearby sensitive locations; and
 - Affect biodiversity.
- 6.143. *Core Strategy Policy EN16 Air Quality* states that “the Council will seek to improve the air quality within Manchester, and particularly within Air Quality Management Areas, located along Manchester's principal traffic routes and at Manchester Airport. Developers will be expected to take measures to minimise and mitigate the local impact of emissions from traffic generated by the development, as well as emissions created by the use of the development itself, including from Combined Heat and Power and biomass plant.”
- 6.144. Paragraph 12.81 continues, “other policies within the Core Strategy will guide the location of development in order to reduce the need for private transport and encourage the use of decentralised and renewable energy and green infrastructure to reduce both emissions and their impact still further.”
- 6.145. Developers will be expected to take measures to minimise and mitigate the local impact of emission from traffic generated by the development, as well as emissions created by the use of the development itself, including Combined Heat and Power and biomass plant.
- 6.146. When assessing the appropriateness of locations for new development the Council will consider the impacts on air quality, alongside other plan objectives. This includes cumulative impacts, particularly in Air Quality Management Areas.

Applicant's Response

- 6.147. An Air Quality Assessment has been undertaken by Hilson Moran. The Air Quality report presents the findings of the assessment, which addresses the potential air quality impacts during both the construction and operational stages of the Proposed Development.
- 6.148. A qualitative assessment of construction phase impacts has been carried out. This concludes that:
- There is a Medium risk of dust soiling during demolition, earthworks and construction activities, and Low risk during track out activities.
 - There is a Low risk to human health during all phases of construction activities. Through good site practice, the implementation of suitable mitigation measures, the impact of dust and PM10 releases will be minimised.
 - The residual effect of the construction phase on air quality is therefore not significant.
- 6.149. The proposals will be car free and will remove the 20 existing car park spaces. Within this context, the Air Quality Assessment also concludes that road traffic generated by the Proposed Development does not breach the threshold detailed in the IAQM and EPUK Air Quality Planning Guidance and notes that there is no proposed onsite combustion plant for the provision of heating and hot water. On this basis detailed dispersion modelling has been scoped out of the assessment and a qualitative assessment of likely current and future baseline concentrations based on local authority monitoring data has been undertaken. The findings of the assessment included:
- Local air quality monitoring indicates a statistically significant downward trend in annual mean NO₂ concentrations at two locations in the vicinity of the Application Site.
 - Local air quality monitoring indicates that PM₁₀ concentrations are well below the annual AQS objective (40µg/m³) and the daily PM₁₀ AQS objective was achieved at monitoring locations in the vicinity of the Site between 2016-2019.
 - Local air quality monitoring indicates that PM_{2.5} concentrations are well below the annual AQS objective (25µg/m³).
- 6.150. Based on the findings of the assessment site specific mitigation to protect existing receptors and future users of the Proposed Development from poor air quality are not considered to be required. The residual effect is not significant. Overall, the Proposed Development is considered to comply with legislation and planning policy.
- 6.151. For further details please refer to the Air Quality Assessment prepared by Hilson Moran and submitted as part of this application.

Ground Conditions

- 6.152. Core Strategy Policy EN18 Contaminated Land and Ground Stability sets out that the Council will give priority for the remediation of contaminated land to strategic locations.
- 6.153. Paragraph 183 of the NPPF (2021) requires that planning policies and decisions should ensure that Sites are suitable for any proposed use by taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses.

Applicant's Response

- 6.154. Curtins have carried out a Phase 1 Preliminary Risk Assessment and Phase 2 Ground Investigation Report. Ground conditions has been scoped into the Environmental Impact Assessment undertaken in support of this Application (ES Volume 1 Chapter 8). This provides an assessment of the significance of potential effects upon key receptors including human health, controlled waters and buildings/ infrastructure.
- 6.155. The ground conditions encountered is summarised below:
- Made Ground was encountered in all exploratory holes, from ground level to depths between 0.10m and 3.45m bgl. C

- Cohesive Made Ground was also encountered and deposits of indicative of Glaciofluvial Deposits were encountered below the Made Ground in two exploratory holes.
 - Indicative cohesive Glaciofluvial deposits were also encountered in two exploratory holes to depths between 2.00m and 4.45m bgl (31.61m to 28.27m AOD).
 - One exploratory hole encountered soft brown slightly sandy slightly gravelly silty clay, gravel of sandstone.
 - One exploratory hole recorded very stiff slightly gravelly sandy silty clay.
 - Indicative granular Glaciofluvial deposits was encountered in one exploratory hole between 2.00m and 9.50m bgl (31.61m and 24.11m AOD).
 - One exploratory hole recorded very clayey fine to medium sand underlying cohesive superficial deposits from 4.45m to 5.00m (28.27m to 27.72m AOD).
 - The Chester Formation bedrock was encountered in one exploratory hole (from 9.50m to 30.50m (24.11m to 3.11m AOD).
 - A groundwater table appears to be present at the top of the bedrock between 19.65m and 19.62m AOD.
- 6.156. The geotechnical assessment establishes that groundwater may be encountered during shallow excavations and any excavations for foundations and services are likely to require close side support in the short term. The inflow of water into excavations will likely be able to be managed by a standard water pump.
- 6.157. The ground gas monitoring undertaken as part of the assessment recorded no elevation carbon dioxide concentrations. The assessment indicates that the risk to site end users from ground gases is considered to be low based on the monitoring programme undertaken.
- 6.158. The geo-technical assessment set out in Chapter 8 of the Environmental Statement Volume 1 sets out a number of likely construction mitigation measures relating to the Proposed Development and further mitigation measures envisaged to reduce the impact of the Proposed Development on site end users and maintenance works, controlled waters from contamination, water supply pipes.
- 6.159. The Ground Conditions ES chapter concludes that, following the implementation of the outline mitigation measures the potential impacts have been identified as negligible (significance).
- 6.160. For further details please refer to Chapter 8 (Ground Conditions) of the Environmental Statement (Volume 1) and supporting appendices (Environmental Statement Volume 2 Appendices 8.1 – 8.2), prepared by Curtins.

Flooding and Drainage

- 6.161. Chapter 14 of the NPPF (2021) provides policy guidance on climate change, flooding, and coastal change. Paragraph 159 explains the basic principle that inappropriate development in the areas at risk of flooding should be avoided. This is achieved through applying a Sequential and Exception Test as governed by Paragraphs 161-165. This provides the tests that must be met to allow development on land at risk of flooding and is explained in detail further within this section.
- 6.162. *Core Strategy Policy EN14 Flood Risk* outlines that development should be directed away from Sites at the greatest risk of flooding, and towards Sites with little or no risk of flooding; this should take account of all sources of flooding identified in the Manchester- Salford- Trafford Strategic Flood Risk Assessment (SFRA).
- 6.163. In addition to the requirements for Site-specific Flood Risk Assessments (FRAs) set out in PPS25, an appropriate FRA will also be required for all development proposals, including changes of use, on Sites greater than 0.5ha within Critical Drainage Areas (CDAs) and Canal Hazard Zones identified in the SFRA.
- 6.164. All new development should minimise surface water run-off, including through Sustainable Drainage Systems (SUDS) and the appropriate use of Green Infrastructure. Developers should have regard to the surface water run-off rates in the SFRA User Guide. In CDAs, evidence to justify the surface water run-off approach / rates will be required.
- 6.165. *Core Strategy Policy EN17 Water Quality* sets out that following elements a development must consider in relation to water quality:

- Avoid any adverse impact on water quality, including during the construction phase.
- Minimise surface water run-off, maximise the use of appropriate sustainable drainage systems, and minimise groundwater contamination.
- If close to a watercourse the development should ensure waste and litter cannot enter the watercourse.

6.166. *Draft Policy JP-S 5 Flood Risk and the Water Environment* of the Places for Everyone JDP (Publication/ Submission Plan) outlines that an integrated catchment based approach will be taken to managing flood risk in a number of ways, including:

- Locating and designing development so as to minimise the impacts of current and future flood risk;
- Expecting developments to manage surface water runoff through sustainable drainage systems and as close to source as possible;
- Conserving water and maximising water efficiency in new development;
- Ensuring that sustainable drainage systems:
 - Are designed to provide multifunctional benefits wherever possible,
 - Are delivered in a holistic and integrated manner, including on larger sites split into different phases;
 - Are managed and maintained appropriately to ensure their proper functioning over the lifetime of the development.

Applicant's Response

- 6.167. The appropriate agencies have been consulted in producing the assessment, including United Utilities, the Environment Agency, the Canal & River Trust, and the Lead Local Flood Authority (LLFA).
- 6.168. A Flood Risk Assessment (FRA) and Drainage Strategy (DS) has been prepared by Curtins in support of this application. The FRA provides information on the nature of flood risk at the Site and outlines the drainage requirements. The assessment considers the risk from different types of flooding to the Proposed Development and the risk of flooding from the Proposed Development, taking into consideration climate change as well as how flood risks should be managed. This includes consideration of fluvial (rivers and streams), tidal, reservoir, canal, groundwater, public sewers or highway drainage flooding, as well as surface water flooding to the Site and from the Site.
- 6.169. The Site lies within the Manchester Conurbation Core Critical Drainage Area. The Site, for the majority, is located in Flood Zone 1, and so this portion of the Site is therefore of a low risk of flooding. The north western boundary of the Site is located within Flood Zone 3 as a result of the River Irwell forming this boundary and so is within an area with a high probability of flooding.
- 6.170. The risk of surface water flooding to the Site is considered low, and the area around the Site is also generally identified as being at very low risk from surface water flooding, whilst surface water run-off from the Site would follow the topography around the Site directing surface water towards the River Irwell. In summary, the main types of flooding that may apply to the Proposed Development are as follows:
- Fluvial flooding – isolated to the existing river banking
 - Surface water flooding to the site (residual risk); and
 - Surface water flooding to the site (potential).
- 6.171. Specific mitigation measures to mitigate against surface water flooding are set out in detail within Section 5 of the FRA and DS.

Drainage Strategy

- 6.172. The Drainage Strategy prepared by Curtins provides details of the separate foul and surface water system proposed. A number of sustainable drainage systems are also included as part of the Proposed Development.

Foul Water Drainage

- 6.173. Initially, the intention was to utilise the existing foul outfall from site, however based on the current basement extents, the existing outfall manhole clashes with the proposed pile positions. A new outfall is therefore proposed into the public sewer in St Marys Parsonage. It is proposed that:

- Discharge all foul drainage required at basement level to a pumping chamber and the discharged to a pump break chamber prior to discharging by gravity into the main public sewer.
- Discharge all foul drainage from ground floor level and above to a pipe system suspended below the ground floor slab and connected to the pump break chamber utilising the same gravity outfall noted above. The M&E Engineer has advised that the majority of ground floor level drainage and above is connected to the suspended pipe system, with the exception of the Kitchen facility at ground floor level, which will be discharged to the basement pumped system.

6.174. The proposed outfall flow rates are not yet confirmed, ground floor level total discharge is not yet confirmed, and pump inflow is not yet finalised. Flows will be agreed with United Utilities once known and final details are expected to be submitted to MCC through the inclusion of a planning condition on any decision notice.

Surface Water Drainage

6.175. The drainage strategy follows the standard hierarchy of drainage solutions, with consideration firstly given to the discharge of surface water runoff by sustainable modes, such as infiltration. The options process concludes that infiltration and utilising surface water public sewer is not possible for the following reasons:

- Infiltration: Made Ground is likely to be present to a significant depth, based on the historic use of the Site therefore, infiltration is not considered to be a viable solution.
- Surface Water Public Sewer: there are no surface water sewers identified within the vicinity of the Site.

6.176. On this basis surface water will discharge to the River Irwell subject to agreement with Peel (Manchester Ship Canal Company). Consultation has been undertaken with Peel as part of the pre-application process (for details please refer to Appendix J of the FRA and DS), where they set out the following requirements for discharging into the River Irwell:

- The discharge at the outlet must not interfere with the passage of vessels. The calculations must show that the transverse velocity from the discharge pipe is acceptable to MSCCL. The maximum velocity should be in the range 1.5 to 3.0 m/s (with a target of 2.0 m/s) for the 1 in 30-year event.
- Any pipe outlet through the canal wall, at or above water level, should be provided with a flap valve.

6.177. Taking the existing flows generated from the area of the Site and applying a reduced in flows in line with planning policy the proposed discharged rate for the Proposed Development has been calculated. Based on the low variance in flow rates a single flow control at each outfall is proposed to provide a benefit on attenuation.

6.178. As part of the pre-application engagement process Manchester LLFA have advised that discharge should be agreed with Peel and confirmed once known existing discharge rates are confirmed.

Sustainable Drainage Systems (SuDS)

6.179. A number of SuDS have been considered, including infiltration systems, green/ blue roofs, swales, wetlands and attenuation ponds, permeable paving, rain gardens and drained soft landscaping and greywater consultation. The options testing concluded that the following SuDS measures will be included as part of the Proposed Development:

- Blue roof with landscaped features at level 17.
- Greywater recycling
- Localised soft landscaping within the public realm.

6.180. A consultation meeting was held with Manchester LLFA on the 14th May to discuss the above SuDS approach and the proposals were positively received and concluded that the solutions presented a benefit in terms of discharge volume reduction and bio-diversity benefits.

6.181. In addition to the sustainable drainage features, attenuation measures will be required to accommodate the necessary volumes generated up to the 100 year +40%cc event.

6.182. Attenuation volumes are estimated at 50m³ in the building drainage system and 10m³ in the public realm drainage system which will be provided within a below ground tank and oversized pipework. The drainage

systems have currently been modelled excluding any provision of the blue roof and landscaping proposed at level 17 and therefore once designs are finalised the required below ground storage is likely to reduce. The drainage strategy notes that surface water run-off from hard paved areas at risk of contamination should receive water quality treatment.

Conclusion

- 6.183. On the basis of the above, the Proposed Development is considered to comply with local and national planning policy and guidance in that it will not increase the risk of flooding at the Site or elsewhere.
- 6.184. For further details please refer to the Flood Risk Assessment and Drainage Strategy, prepared by Curtins – please see Appendix K of the FRA and DS for the proposed Drainage Strategy plan.

Transport

- 6.185. *Core Strategy Policy T1 Sustainable Transport* sets out to deliver a sustainable, high quality, integrated transport system in order to encourage modal shift away from car travel to public transport, cycling and walking, to support the needs of residents and businesses and to prepare for carbon free modes of transport.
- 6.186. *Core Strategy Policy T2 accessible areas of opportunity and needs* sets out that developments should provide a level of car parking which reflects the realistic requirements of the users of the development. Regard should also be given to the need for disabled and cycle parking provision.
- 6.187. *Core Strategy Policy CC5 Transport* outlines that developers should work with public transport providers to ensure that all users are able to access development by sustainable means, especially taking account of times when developments are likely to be busiest.
- 6.188. Chapter 9 of the NPPF focuses on promoting sustainable transport. Paragraph 105 of the NPPF (2021) states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and health.
- 6.189. One of the key elements of national and local planning policy is to ensure that safe and suitable access to a development can be achieved by all users. *Paragraph 112 of the NPPF* (2021) states that applications for development should:
- Give priority first to pedestrian and cycle movements;
 - Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - Create places that are safe, secure and attractive;
 - Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - Be designed to enable charging plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Applicant's Response

- 6.190. A Transport Statement and an Interim Travel Plan have been prepared by Curtins. A review of baseline conditions and highway safety in the vicinity of the Site has been undertaken; there are no existing safety issues that are likely to be exacerbated by the Proposed Development.
- 6.191. The Proposed Development is traffic-free with no provision for car parking. The Proposed Development will result in a loss of existing car parking spaces (20 spaces) which will generate a net reduction in the number of vehicle movements accessing the Site daily, therefore representing a net benefit in traffic terms.
- 6.192. At present there are two Car Club pays located on St Mary's Parsonage, a c. 50m walk from the proposed Site entrance, with a number of additional locations also located across Manchester which are operated by Enterprise Car Club. Whilst it is acknowledged that many staff that do not own a car may require the use of a car on certain occasions and the Enterprise Car Club offers a cost-effective, hassle-free, and greener alternative to car ownership and traditional vehicle hire in Manchester. It is considered that the Car Club could therefore be a highly attractive facility for employees who require occasional private car use, therefore minimising the highway impact.

- 6.193. A new loading bay is proposed along St Mary's Parsonage, on the southern boundary of the Site, as part of the Proposed Development to support servicing activities.
- 6.194. To encourage sustainable modes of travel, the Proposed Development will provide an exemplar cycle hub with storage in the form of two-tier racks (providing 102 spaces) and Brompton lockers (18 spaces), showers, changing facilities, and drying rooms. There will also be short-stay cycle spaces for visitors, in the form of Sheffield stands (14 spaces) within the public realm along St Mary's Parsonage, adjacent to the building's primary entrance. It is considered that the cycle parking provided is in accordance with MCC standards and in compliance with Core Strategy Policy CC5 and T2.
- 6.195. A review of baseline conditions demonstrates that the Site is accessible by sustainable modes of transport. The surrounding area exhibits good levels of pedestrian and cycling infrastructure, with MCC cycle parking standards exceeded, and there are several public transport opportunities within acceptable walking distance of the Site.
- 6.196. Consideration has been given to the provision of disabled car parking as part of the Proposed Development design process. MCC Highways have requested that ideally, a disabled parking space should be provided nearby the Proposed Development. However, there are two existing disabled parking bays on Dunlop Street, a circa 70m walk from the proposed Site entrance. Additionally, there are many on-street pay-and-display bays along St Mary's Parsonage in the vicinity of the Site. Blue badge holders can benefit from these as there are also no parking restrictions for blue badge holders – therefore those with limited mobility could also utilise the on-street spaces listed above. As such, it is not envisaged that a disabled parking space would need to be provided alongside the Proposed Development.
- 6.197. The Interim Travel Plan contains appropriate measures to promote sustainable travel and includes an assessment of access over the wider area, the Travel Plan's objectives and associated measures and details on the implementation, administration and monitoring of the Travel Plan. The Plan concludes by providing an Action Plan that summarises the next steps.
- 6.198. Future employees at the Site are less likely to commute by their own cars due to proposed measures in the accompanying Interim Travel Plan to increase the level of walking, cycling and public transport use to and from the Site, and to reduce reliance on the private car.
- 6.199. It is considered that this parking provision is in accordance with the transport policies set out in the Manchester Core Strategy, with respect to the nature of the Site and realistic needs of the end users, and the proximity of the Site to sustainable modes of transport. In summary, a review of relevant local and national transport planning guidance has been undertaken and it is considered that the Proposed Development conforms to policy as set out above.

Noise and Vibration

- 6.200. Chapter 15 of the NPPF states that planning policies and decisions should prevent both new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution.
- 6.201. *UDP Policy DC26 Development and Noise* outlines the Council intends to use the Development Control process to reduce the impact of noise on people living and working in, or visiting, the City. In giving effect to this intention, the Council will consider both:
- a) the effect of new development proposals which are likely to be generators of noise; and
 - b) the implications of new development being exposed to existing noise sources which are effectively outside planning control.
- 6.202. In addition, *Core Strategy Policy DM1 Development Management* sets out that all development should have regard to effects on amenity, including noise.
- 6.203. *BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound (BS 4142)* provides a method for assessing noise from items such as building services plant against the existing background sound levels at nearby noise sensitive premises. BS 4142 suggests that if the noise level is 10 dB or more higher than the existing background sound level, it is likely to be an indication of a significant adverse impact. If the level is 5 dB above the existing background sound level, it is likely to be an indication of

an adverse impact. If the level does not exceed the background level, it is an indication of having a low impact.

- 6.204. MCC provides guidance in relation to plant noise emissions in their *Planning and Noise Technical Guidance* document dated December 2015. The following is stipulated: 'Externally mounted ancillary plant, equipment and servicing shall be selected and/or acoustically treated in accordance with a scheme designed so as to achieve a rating level of 5dB (LAeq) below the typical background (LA90) level at the nearest noise sensitive location.'

Applicant's Response

- 6.205. A Noise Report has been prepared by Sandy Brown. The noise and vibration report provides details of the following:
- Identifies key noises sources at the Site.
 - Measures ambient noise levels during the day and night.
 - Used noise data collected to determine plant noise limits
 - Set criteria for operational noise associated with use of the terrace spaces.
 - Identifies limits to amplified noise egress.
- 6.206. During the noise survey carried out on the Site it was determined that the dominant noise sources observed at the site during the survey were from road traffic, predominantly from Bridge Street, and to a lesser degree from St Mary's Parsonage. Less significant noise sources included faint plant noise, van loading from Alberton House and pedestrian conversation.
- 6.207. All building services plant will be designed to achieve the noise limits set out above, including any corrections for attention catching features. The mitigation strategy for the external plant proposed is being developed as part of the further detailed design development process however it should be noted that it will be designed to ensure that the limits outlined in the Noise Report are met.
- 6.208. An external terrace is proposed at the roof level of the Proposed Development; however the occupancy of this space is not yet known. MCC guidance does not stipulate any specific criteria in relation to noise egress associated with operational noise from the occupants of external amenity spaces. However the Planning & Noise Technical Guidance document dated December 2015 refers to the WHO Guidelines for Community Noise 1999, which is referenced within the Noise Report. The following is noted with regards to the external terrace within the Noise Report:
- The worst affected nearby residential premises to the proposed terrace are the apartments located at Century buildings
 - An external noise level of LAeq,1hr 55 dB between 07:00 – 20:00 hrs would be appropriate.
 - It is acknowledged that Manchester City Council do not typically permit the use of external terrace after 23:00, therefore use after 23:00 may not be possible, and do not typically permit any external amplified sound on the external terrace.
- 6.209. Noise modelling has been carried out to determine the potential impact of occupants of the roof terrace speaking upon the worst affected dwellings. Noise calculations have been carried out with a total of 587 people on the roof terrace and 53 people on the balcony:
- Predicted noise levels with all terraces in use at the nearest residential premises are well within the suggested criteria, with a worst-case level of LAeq 44 dB.
 - This is also below the existing daytime background noise levels measured during the survey.
 - Although there are no specific guidelines on operational noise to commercial/office spaces, the predicted from the ground level terrace to the Alberton House Building will be considered to inform the facade sound insulation strategy
- 6.210. Within the Noise Report, limits to amplified noise egress has been advised in octave bands based on the requirements of Manchester City Council - please refer to Section 6 of the report for details.
- 6.211. It is acknowledged that should any amplified sound be proposed for the retail unit, the amenity areas or on any of the external terrace, the cumulative egress level to the nearby noise sensitive receptors will need to

be controlled to meet with the limits identified. Similarly, if loud amplified sound is proposed within the retail unit, lobbied entrance door arrangements would typically be stipulated by Manchester City Council to help mitigate noise breakout.

- 6.212. For further details please refer to the Noise Report has been prepared by Sandy Brown and submitted as part of this application.

Sunlight, Daylight and Overshadowing

- 6.213. *Saved UDP Policy H2.1* states that the Council will not permit development which will have an unacceptable impact on residential areas.
- 6.214. *Core Strategy Policy DM1 Development Management* outlines that all development should have regard to effects of amenity including privacy and light.
- 6.215. Paragraph 125, part C of the NPPF (2021) stipulates that “...local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.”

Applicant's Response

- 6.216. A daylight and sunlight assessment has been prepared by GIA in support of this application. An overshadowing assessment of Parsonage Gardens has also been undertaken.
- 6.217. The following residential accommodation have been identified as relevant to the daylight and sunlight assessment:
- Century Buildings – located to the north east of the Site.
 - The Lowry Hotel – located to the north of the Site.
 - The Bridge – located to the north west of the Site.
- 6.218. The three buildings were assessed for Vertical Sky Component ('VSC') and No Sky Line (NSL') for daylight and Annual Probable Sunlight Hours (APSH) for sunlight within two buildings. This assessment highlights the following:
- With the Proposed Development in place, Century Buildings will fully accord with the BRE target criteria for VSC daylight, NSL daylight and APSH sunlight.
 - With the Proposed Development in place, The Lowry Hotel will fully accord with the BRE target criteria for VSC daylight and NSL daylight. As the assessment of sunlight is only required to living rooms, and there are no living rooms within the hotel, no APSH sunlight assessment is necessary.
 - With the Proposed Development in place, The Bridge will fully accord with the BRE target criteria for NSL daylight and APSH sunlight.
 - There are six windows on the eleventh floor of The Bridge which will be suffer a minor adverse impact. These windows are set beneath a deep canopy and reveal. This significantly impacts the ability for these windows to receive good daylight, evidenced by very low baseline daylight levels, despite being on the eleventh floor. The impacts are minor, and as such, they are not considered to be significant.
- 6.219. The overshadowing assessment has been undertaken to determine the levels of direct sunlight received to Parsonage Gardens. For this assessment the 'sun-on-ground indicator' (SHOG) method has been adopted, which applies to both new and existing gardens/amenity areas which are affected by new developments.
- 6.220. The BRE Guidelines suggest that the Spring Equinox (21 March) is a suitable date for the assessment as this is the Spring Equinox and the midpoint of the sun's position throughout the year. The BRE Guidelines recommend that at least half (50%) of a garden or amenity area should receive at least 2 hours of sunlight on 21 March or the area which receives 2 hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).

- 6.221. Our overshadowing analysis indicates that Parsonage Gardens will receive two hours of direct sun to 38.8% of its area in the baseline scenario, and 34.5% in the proposed scenario. This represents a reduction of 0.89 or 11%. As such, Parsonage Gardens will fully comply with the BRE targets.
- 6.222. Overall, considering the city centre location, the impacts are considered negligible and wholly acceptable. On this basis the Proposed Development is considered to comply with legislation and planning policy.

Wind

- 6.223. *Core Strategy Policy EN2 Tall Buildings* states that, “by their very size tall buildings can have a significant impact on the local environment and its micro-climate. It is therefore expected that this impact be modelled and that submissions for tall buildings also include appropriate measures to create an attractive, pedestrian friendly local environment.”
- 6.224. Paragraph 12.14 goes on to state, “it is for these reasons that it is considered particularly important that they are designed to the highest quality, both in terms of appearance and their impact on the functioning of surrounding space.”
- 6.225. In addition, under Section 12 of the NPPF (2021) paragraph 130 it sets out the Proposed Development should create a place with a high standard of amenity for both existing and future residents.

Applicant's Response

- 6.226. A wind microclimate assessment has been undertaken by GIA. To identify the likely effect of the Proposed Development on the pedestrian level wind environment, a 3D CFD model of the Proposed Development and surrounding Site was created.
- 6.227. The wind assessment concludes the following:
- No potential wind safety or distress risks that have been identified around the Site.
 - Wind comfort conditions will be suitable for the intended use.
 - This applies to general thoroughfares, bus stops, existing off-site building entrances, proposed on-site building entrances, the existing amenity in Parsonage Gardens and proposed amenity spaces (for both level 17 and level 18 roof terraces).
 - Conditions with local cumulative schemes included are consistent as those with the existing surrounds.
- 6.228. In conclusion, there are no adverse wind effects anticipated relating to the Proposed Development. On this basis, in accordance with Core Strategy Policy EN3 the Proposed Development supports the creation of an attractive, pedestrian friendly local environment.
- 6.229. The Proposed Development is considered to comply with legislation and planning policy. For further details please refer to the Wind Microclimate Report prepared by GIA and submitted as part of this application

Safety and Security

- 6.230. *Core Strategy Policy DM1 Development Management* outlines that all development should have regard to the specific issues including community safety and crime prevention.

Applicant's Response

- 6.231. The Proposed Development will deliver high quality building with contemporary office space, with extensive amenity space. A key part of the Proposed Development is the opportunity to create an open and inviting ground floor entrance which enhances public realm and connectivity. To support this the ground floor will provide publicly accessible commercial uses along the key pedestrian route linking with Trinity Bridge and the River Irwell frontage, generating vitality and an active frontage along a largely underutilised, inactive route.
- 6.232. A Crime Impact Statement ('CIS') prepared by Greater Manchester Police (GMP) Design for Security in support of this application.
- 6.233. The CIS outlines a number of positive attributes of the scheme, including:
- The replacement of an existing building with a new office led scheme in an area of the City predominantly occupied by similar premises, is unlikely to have a detrimental effect on the existing community.

- The Proposed Development will provide additional activity, natural surveillance and overlooking to the area, at all times of the day and into the evening.
- The Proposed Development will present active frontages along St Mary's Parsonage and the pedestrian route leading to Trinity Bridge, to the west of the building – enlivening the street scene and helping to provide useful natural surveillance over the surrounding public realm.
- The glazed facades of the building offer both surveillance opportunities and a greater level of artificial light onto the street / public realm.
- The Proposed Development will include no deep or narrow recesses at ground level that would hide windows and doors, leaving them potentially vulnerable to attack.
- The external double height balcony area to the rear of the building should not be accessible from Trinity Bridge, the public realm route leading to it or the steeply sloping bankside along the river edge
- The office reception area will be clearly visible from the exterior of the building and all staff and visitors should pass through access-controlled turnstiles to access the upper floors of the building. Each floor plate will be capable of being individually secured, ensuring tenants cannot gain unauthorised access onto other floors / areas within the building.
- The Proposed Development provides the opportunity to include security features built into the design and construction of the building and avoids the need for obtrusive retrofitted security measure that can increase the fear of crime.

- 6.234. The CIS includes a number of measures that should be incorporated into the Proposed Development to achieve Secure by Design accreditation. These recommendations have been incorporated into the Proposed Development where appropriate and further consideration will be given to these at the detailed design stage to meet the policy requirements, and to achieve Secure by Design accreditation.
- 6.235. Overall, the Proposed Development will provide an investment into public realm which will encourage further investment into the area and its wider transformation, consistent with the St Mary's Parsonage SRF.
- 6.236. For further information please refer to the Crime Impact Statement prepared by GMP Design for Security and submitted in support of this Application.

Site Waste Management Strategy

- 6.237. *Core Strategy Policy EN19 Waste* requires all developers to demonstrate the proposals consistency with the principles of the waste hierarchy. All developers will be required to submit a waste management plan to demonstrate how both construction and demolition waste will be minimised and recycled wherever possible and how the sustainable waste management needs of the end user will be met.
- 6.238. MCC has prepared a Waste Storage and Collection Guidance Note (GD04) which contains minimum standards to be considered for the storage and collection of waste. This guidance follows the recommendations set on the Waste Management Plan for England, strongly encouraging and promoting high levels of quality recycling.
- 6.239. The note states that all planning applications for new developments and conversions must include a Waste Management Strategy that includes:
- An estimated storage area for the waste produced by the development, including residential, F&B and retail uses;
 - Details of internal and external stores for both waste and recycling; and
 - Location of the proposed collection point and details of the route the collection will take.

Applicant's Response

- 6.240. A Site Waste Management Strategy (WMS) has been prepared by Curtins which includes Manchester City Council's Waste Proforma. The Site WMS considers the potential refuse and recyclable waste volumes of the Proposed Development, including organic waste and for all uses of this development. It also provides details of the collection arrangements.

- 6.241. All uses at the development are anticipated to be served by three-times-a-week collections. The collection frequency is subject to be updated following occupation, as typically the waste generated by both the office and commercial uses varies significantly based on the final occupier. The Proposed Development includes a waste storage room at the ground floor level. The size of the bin store has been determined accordingly whilst consideration to segregation and recycling has been given.
- 6.242. It is envisaged that the refuse and servicing would predominantly take place from a new loading bay along the site frontage on St Mary's Parsonage. During pre-application discussions with MCC, two options were requested for servicing the Proposed Development:
- Option 1: Narrow the carriageway to 4.8m along St Marys Parsonage and a narrower section of 4.5m in front of the loading bay. This allows retention of the loading bay and a 2m footway behind it.
 - Option 2: Narrow the carriageway to 4.8m for the entire frontage of the site and the loading bay. This allows the retention of a 1.7m footway behind the loading bay.
- It should be noted that the preferred option is for the final servicing arrangement to be selected during the detailed design stage, secured through the condition discharge process.
- 6.243. Swept path analysis of a large refuse vehicle utilising the proposed loading bay has been undertaken with respect to both Option 1 and Option 2.
- 6.244. Cleaners would be appointed by the management company to transfer waste from the office floors and ground floor areas to the bin stores, whereas staff at the amenity / retail units would transfer waste from within their units to the main bin store after closing time at the end of each day. The management company / staff on-site would be responsible for moving the bins from the bin store to the collection point on collection day.
- 6.245. It is proposed that the waste operators will collect the bins and load them into the refuse vehicle. Once the bins have been emptied, containers would be wheeled immediately back to the bin stores by the management team. As a result, the bins will await collection along the public realm for a limited amount of time.
- 6.246. For further details please refer to Section 3.4 of the Transport Statement, and the Site Waste Management Strategy, both prepared by Curtins and submitted as part of this application.
- 6.247. In summary, the proposed Site Waste Management Strategy highlights that the provision complies with waste standards, in terms of storage, recycling and management.

Construction Management

- 6.248. *Core Strategy Policy DM1* states that development should have regard to effects on amenity, including noise, air quality, road safety and traffic generation. *Policy SP1 Spatial Principles*, states that developments should minimise emissions.

Applicant's Response

- 6.249. The Construction Methodology and Programme Chapter of the Environmental Statement (Volume 1 – Chapter 5) has been prepared by Sir Robert McAlpine, a Tier 1 contractor with significant experience delivering major developments within Manchester City Centre. Whilst some local impacts will, unfortunately, be unavoidable, the contractor will seek to minimise these as far as is practical. The Chapter outlines the demolition and construction process, including measures to minimise the impact on the environment and residential amenity and this has informed the assessments within the ES technical chapters. Continued engagement with the local community prior to and throughout construction will be a key component of the construction method and further details of the construction method and environmental management plan will be required to be submitted to and approved by the Local Planning Authority prior to the commencement of works on-site.
- 6.250. It is therefore considered that the Proposed Development complies with Core Strategy Policy DM1 with regards to effects on amenity and Policy SP1 on minimising emissions.

TV and Radio Reception

- 6.251. Under MCC planning guidance, any development over four storeys require a TV reception impact assessment. The report should assess the possible interference created by the Proposed Development on TV and radio reception within the area.

Applicant's Response

- 6.252. In accordance with MCC planning guidance, a Television and Radio Baseline Survey and Report has been undertaken by Pager Power, to determine the potential effects on the local reception of television broadcast services arising from the Proposed Development. As the Proposed Development will introduce a new tall structure into the area –these could interact with wireless terrestrial television signals and cause interference in the surrounding area.

- 6.253. The Survey concludes the following:

Television

- Residences in the area surrounding the Proposed Development receive television services from the Winter Hill transmitter. The strength and quality of the signal in the residential areas is generally good or very good.
- A large proportion of the shadow zone extends over non-residential areas, where the presence of television aerials is less likely. Low level receiving aerials in the Proposed Development's shadow, within approximately one kilometre, may experience degradation of terrestrial television reception quality.
- Residences where the aerials extend above the Proposed Development's shadow, or are at greater distances, are unlikely to experience noticeable impacts in practice.

Radio

- The area surrounding the Proposed Development receives radio services from the numerous transmitters, including Winter Hill. The strength and quality of the signal from Winter Hill near the proposed development is variable.
- Degradation of the radio signal at close range to the proposed development is likely. The effects are unlikely to be noticeable in practice due to the variability of services in an urban environment.

- 6.254. On the basis of the above no requirement for pre-emptive mitigation has been identified. However, in the event that effects are reported, it is recommended that a reception measurement is undertaken (post-construction) to investigate the likely cause of the interference. For further details please refer to the Television and Radio Baseline Survey and Report prepared by Pager Power and submitted as part of this application.

Aviation Consideration

- 6.255. Paragraph 20 of the National Planning Practice Guidance on Consultation and Pre-Decision Matters refers to the need for additional consultation to take place in specific local circumstances. This process, 'consultation direction' includes the consideration of Proposed Development in the vicinity of existing facilities, including airports.

Applicant's Response

- 6.256. An Aviation Safety Assessment has been prepared by Pager Power to investigate the potential impact of the Proposed Development upon aviation infrastructure in the surrounding area, namely operations at Manchester Airport.
- 6.257. The assessment concludes the following:
- No physical safeguarding concerns are predicted with respect to the Obstacle Limitation Surfaces (OLS) from the proposed building structure.
 - It is expected that many of the line-of-sight paths from the Manchester Airport SSR towards the Proposed Development will be blocked by intervening buildings and terrain. It is possible that no safeguarding concerns over radar impact will be raised; engagement with NATS is recommended to understand their position.

- The highest point of the proposed development is approximately 83m above ground level. This does not meet the height at which lighting is a requirement. Any cranes used on site are therefore very unlikely to meet the height at which lighting is a requirement.

6.258. For further details please refer to the Aviation Safety Assessment submitted as part of this application.

Local Labour Agreement

6.259. *Core Strategy Policy EC1 Employment and Economic Growth* in Manchester requires Local Employment Agreements to contain a commitment to work with the Work Skills Team to ensure that employment opportunities resulting from this development are made available to Manchester residents through existing recruitment offer and allow hard to reach groups equal opportunity to be successful in applying.

Applicant's Response

6.260. The Applicant is committed to a Local Labour Agreement as part of the proposed construction process for the Proposed Development. Further details are provided in the Local Labour Agreement submitted in support of the planning application.

Economic

6.261. *Core Strategy Policy CC1 Primary Development Focus: City Centre and Fringe* states that within the City Centre a variety of high quality accommodation types, sizes and foot-plates will be encouraged to boost investment by local, national and international businesses.

6.262. *Core Strategy Policy CC5 Transport* outlines that Proposed Development that improve pedestrian safety, improve air quality and increase the scope for accessible public realm improvements.

6.263. *Core Strategy Policy C10 A Place for Everyone* highlights that the City Centre will develop as a location which appeals to a wide range of residents and objectives, including through high standards of accessibility to buildings and across spaces.

6.264. *Core Strategy Policy EN1 Design Principles and Strategic Character Areas* identifies the City Centre Character Area. The policy states that within the Character Area there is the opportunity to create landmark buildings, developments should positively contribute to the experience of all at the street level and the opportunity to enhance existing and provide new areas of meaningful open space should be considered.

Applicant's Response

6.265. The Proposed Development benefits from a highly accessible location in the St. Mary's Parsonage Strategic Regeneration Framework (SRF) area, in Manchester City Centre, by the major commercial district Spinningfields and close to Deansgate and the City Centre Primary Shopping Area, within close proximity to Manchester Victoria train station.

6.266. The Proposed Development is well aligned to the economic, market and strategic context, in particular the proposals respond to:

- Manchester and the city centre's growing role as a nationally and internationally important employment and business location.
- Recent and forecast employment growth and evidence of a growing of financial, digital, tech and professional services base in Manchester.
- Evidence of high demand for commercial space in the city centre.
- Changing demands for workspace, including a greater focus on communal and amenity spaces, health and wellbeing and sustainability.
- Strategic ambitions for the city and plans for the area as set out in the St. Mary's Parsonage SRF.
- Manchester City Council's ambition to become a net zero carbon city by 2038 by proposing to deliver an operationally net zero carbon contemporary office building targeting NABERS accreditation, considerably improving on the sustainability of the existing building.

6.267. An Economic Impact Assessment has been prepared by Ekosgen in support of this application. The Proposed Development is expected to deliver significant economic benefits including:

- Supporting a temporary economic uplift during a 121 week construction phase, supporting 800 construction job years and a further 260 indirect and induced FTE job years, equivalent to an average of 460 FTEs being supported for a period of 2.3 years. The scheme is expected to deliver a total GVA contribution of circa. £78.5m through the direct, indirect and induced construction effects over the construction period.
- Accommodating around 1,960 FTEs once fully occupied, generating GVA worth £170.2m per year, with wages totalling £62.7m.
- A range of jobs, including highly-skilled roles, graduate-relevant opportunities, and entry-level roles will be accommodated helping to drive economic growth and productivity in the city and support inclusive growth objectives.
- Benefits to the public purse include £12.9m of national insurance and income tax each year and business rates of £23.5m over 10 years.

6.268. Overall, the Proposed Development is well aligned to the local, regional and national economic, market and strategic context, as well as complying with legislation and planning policy. For further details please refer to the Economic Impact Assessment prepared by Ekosgen.

Planning Assessment Summary

6.269. This section of the Planning Statement provides a summary of how the Proposed Development has been comprehensively assessed in relation to the Development Plan and other material considerations. This has taken place during an extensive process of pre-application consultation and technical due diligence including the preparation of an Environmental Impact Assessment and other technical reports. The conclusion of that process is that the proposals are in accordance with the Development Plan when taken as a whole and positively address the material planning considerations such that they merit the support of the Local Planning Authority.

7. Tall Building Evaluation

- 7.1. This chapter contains justification against relevant policies and guidance contained in Manchester's Core Strategy and Historic England Guidance on Tall Buildings.

Introduction

- 7.2. The Manchester Guide to Development SPD states that *"it will always be important for the City to be able to accommodate new interest and activity in its different forms, including tall buildings"* (p.46).
- 7.3. Manchester's Guide to Development SPD states that the Council *"would require any such Proposed Development to be presented in context of the joint guidance produced by CABE and English Heritage for assessing tall buildings"* (p.50).
- 7.4. On 10 December 2015, Historic England published Advice Note 4, Tall Buildings which represents an update to the CABE and English Heritage Guidance published in 2007, responding to the requirements of the NPPF and the marked increase in Proposed Development for new tall buildings.
- 7.5. Historic England subsequently published the second edition of Historic England Advice Note 4: Tall Buildings on 4 March 2022 which takes into consideration the changes to national planning policy and guidance, as well as recent experience of planning for tall buildings in the historic environment.
- 7.6. Therefore, the evaluation of this element of the Proposed Development as set out below is based on the 2022 guidance.
- 7.7. The Proposed Development is also assessed against the Core Strategy Policy EN2 (2012) on Tall Buildings.
- 7.8. The Proposed Development is tested separately against planning policy at all levels within other planning documents accompanying this application. In addition, consideration has also been given to Manchester City Council's Guide to Development Supplementary Planning Document, in understanding this assessment.

Pre-Application Consultation

- 7.9. Historic England Advice Note 4 (2022) identifies a series of steps that should be undertaken pre-application in close consultation with the LPA and Historic England. These are as follows:
- 7.10. Advice Note 4 identifies a series of steps that should be undertaken pre-application for proposals involving tall buildings.
- Understand the policy position of the LPA including which areas are suitable for tall buildings and where there are historic environment considerations.
 - Agree what illustrative material and digital models are available and likely to be needed, so that the impact of a tall building on the historic environment can be fully assessed by the LPA.
 - Verify the zone of visual influence of a proposal, utilising digital tools, to agree the extent and type of impact assessment required
 - Understand the local character of areas that may be affected by the proposal.
 - Determine which heritage assets are likely to be impacted by development proposals.
 - Gain an early understanding of the significance of these heritage assets, including the contribution made by their setting. This will mean the impact of the proposal on significance, and the ability to appreciate that significance, can be adequately assessed.
 - Agree an approach for design review – a design review panel is one established tool to assess design proposals at the pre-application and application stages.
 - Identify what supporting information may be required, for example, heritage impact assessment
 - Explore ways to positively respond to the historic environment.
- 7.11. The remainder of this section will consider the Proposed Development against the Historic England guidance recommended design criteria in the following order:

- **Quality of places:** the distinctive qualities and values of a place including historic character and context;
- **Heritage:** understanding the significance of the historic environment and the potential impact on this significance;
- **Visual:** the impact on the streetscape, town or cityscape and wider urban and rural landscapes, and views. This includes the setting of heritage assets;
- **Functional:** the design, embodied carbon and carbon cost, construction and operation;
- **Environmental:** the influence on local micro-climates such as creation of wind tunnels, canyon effect, over-shadowing, glare, and air quality and effect on heritage assets in terms of the impact these micro-climatic changes could have upon their fabric, and how they are experienced; and
- **Cumulative:** the combined impacts on heritage assets from existing, consented and proposed tall buildings.

7.12. Please note for additional commentary and further details, please refer to Section 6 of this Statement, as referenced below.

Quality of Place

- 7.13. Advice Note 4 states that ‘quality of places’ is a factor that needs to be considered to determine the impact of a tall building could have upon the historic environment, namely *“the distinctive qualities and values of a place including historic character and context.”*
- 7.14. The Proposed Development will make a major positive contribution to its surrounding context by redeveloping a vacant under-utilised office building and delivering enhanced quality of public realm. The Proposed Development directly respond to the objectives of the SRF and seek to improve connections to and from adjacent areas comprising Spinningfields and Parsonage Gardens, as well as improving the environment between the city centres of Salford and Manchester via the Trinity Bridge walkway.
- 7.15. The Proposed Development will therefore support the delivery of a strengthened network between these existing and emerging civic spaces will be crucial to their success and the health and vitality of the city centre and its residents. The Proposed Development will directly support this initiative, reducing vehicular traffic, and the delivery of enhanced quality and connectivity of local public realm and through provision of facilities that support sustainable modes of transport. The Proposed will positively contribute to the variety of spaces that are found in Manchester and will create a richer environment that promotes positive interaction between citizens and encourages people to think of their city centre as a place for all people.
- 7.16. The Proposed Development will improve the pedestrian, cyclist and city user experience, particularly along St Mary’s Parsonage and Trinity Bridge walkway and create a unique place identity, embracing the Site’s potential as a key regeneration site. This helps to develop a better sense of place and raises the standards of the quality of development across the city centre.
- 7.17. Food and beverage floorspace is proposed at the ground floor level, activating the street scene and enabling the creation of an improved relationship with the street by offering spill out external seating on the terrace fronting Trinity Bridge walkway, whilst leaving sufficient space for access by pedestrians and cyclists.
- 7.18. As a result of the Proposed Development, the ground floor office entrances and food and beverage floorspace will create more active frontages and provide place-making benefits. The public realm and landscaping enhancements will provide opportunities for greater natural surveillance, thereby improving local safety and security. In turn, this will create a more attractive environment for the local community and visitors with spaces to dwell, play and enjoy.
- 7.19. The SRF sets out an overarching vision for the regeneration area, which underpins the regeneration opportunity sites, locate within the SRF area, including Alberton House. The Proposed Development has been designed to suitably consider and respond to the key principles underpinning the overarching vision which are summarised below (please refer to Section 4 ‘Design Brief’ for further details):
- A place where people live, work, relax and socialise
 - Thriving and sustainable neighbourhood
 - Host an eco-system of best-in-class employment
 - Fully integrated and connected into the wider city

- Conserve and promote the area's qualities and characteristics
- Retention and celebration of the area's special qualities and assets
- Focus on maintaining and enhancing the quality of the environment

7.20. The design of the Proposed Development has been interrogated through extensive pre-application consultation with MCC officers, Places Matter! Design Review Panel, statutory consultees and through public consultation. The St Mary's Parsonage SRF was also subject to extensive consultation, including from Historic England. The design of the Proposed Development has been subject to an iterative design process in order to deliver a high quality development that secures a viable long-term future for the Site, but also delivers demonstrable enhancements and regeneration benefits to the surrounding area.

Heritage

- 7.21. Advice Note 4 states that 'heritage' is a factor that needs to be considered to determine the impact of a tall building could have upon the historic environment, namely *"understanding the significance of the historic environment and the potential impact on this significance."*
- 7.22. A full heritage assessment, prepared in-line with national and local planning legislation, policy and guidance, is submitted as part of the Environmental Statement. This assessment first details the baseline heritage significance of the Site and its surrounds, and details key views from which the heritage impact of development should be assessed. This baseline significance and these key views were agreed with the LPA via the formal Scoping Opinion.
- 7.23. Having established the baseline heritage significance of the Site and its surrounds, the Design Team undertook an iterative design process informed by options appraisal to reach the optimum design solution for the Site. This was undertaken in close consultation with the LPA, together with wider technical and non-technical stakeholders.
- 7.24. The conclusions of the heritage assessment are detailed in the previous chapter of this Statement, demonstrating the Proposed Development is consistent with national and local policy. Where the Proposed Development is considered to result in instances of adverse impacts upon the built historic environment, any perceived harm is limited and will be outweighed by the public benefits brought about by the Proposed Development, in accordance with NPPF paragraph 202. A summary of the key benefits is set out below - for further details please refer to chapter 8 of this Statement.
- The Proposed Development will deliver a positive contribution to surrounding streets, enhancements to the City's built environment.
 - The Proposed Development will provide a strategic contribution to the objectives of the City Council, the Greater Manchester Region and the Northern Powerhouse agenda.
 - The Proposed Development contributes to the SRF's vision through providing significant reinvestment into the Alberton House Site, which is identified as an opportunity Site within the SRF.
 - The proposals will also deepen the labour market pool, increase the number of higher skilled and higher paid jobs, based on high productivity employment.
 - During the operational phase, the scale of commercial space will support around 1,880 jobs, and up to 80 in the ground floor flexible commercial (F&B) space.
 - The provision of a high quality office development in a highly accessible location will meet an identified demand for such space.
 - The Proposed Development will generate job opportunities locally during both the construction and operational phases.
 - The high-quality architectural design will make a positive contribution to the appearance, vitality and vibrancy of this part of the city centre.

- The unique contemporary warehouse aesthetic, will also harness the Proposed Development as a key landmark building which will aid legibility within the area.
- The introduction of ground floor active uses and frontages will bring much needed animation to surrounding routes, aid passive surveillance. This will create a more attractive environment for pedestrians, helping to increase the permeability and connectivity within the city centre and beyond.
- Ecological and landscaping enhancements will be delivered to the public realm through new surfaces, improved public realm, soft landscaping and active frontages.
- Deliver a highly energy efficient building with the Proposed Development targeting NABERS 5.5* and achieving a minimum of a 24% improvement on Part L 2013.

7.25. These include a number of social, economic and heritage benefits which have been outlined in Chapter 8 of this Statement. Full details on heritage considerations can be found within Chapter 7 of the Environmental Statement Volume 1, and Appendix 7.1 (Heritage Statement) of Environmental Statement Volume 2, prepared by Stephen Levrant Heritage Architecture and submitted as part of this application.

Visual

- 7.26. Advice Note 4 states that applications need to consider visual factors which includes *“the impact on the streetscape, town or cityscape and wider urban and rural landscapes, and views. This includes the setting of heritage assets”*.
- 7.27. A Townscape and Visual Impact Assessment has been prepared as part of the Environmental Statement submitted with this application. This identifies and assesses the impact of Proposed Development on potentially affected character areas and key views around the Site.
- 7.28. In terms of visual impact, a total of 16 representative views within the established Zone of Theoretical Visibility (ZTV) have been selected for the analysis of visual effects. A study area radius of 1km from the centre point of the Site has been defined. This is based upon the ZTV, which has identified the likely (or theoretical) extent of visibility of the Proposed Development.
- 7.29. Of the 16 representative viewpoints there are only five views that are assessed as ‘significant’ with regards to townscape and visual impact, as well as one additional view (Viewpoint 4 Trinity Bridge) assessed as ‘significant’ with regards to visual impact only. These include three Moderate Beneficial effects and two Minor Beneficial effects. At Viewpoint 4, the additional significant visual impact is considered to have Minor Beneficial effects.
- 7.30. The design principles embedded into the Proposed Development have ensured that, wherever possible, adverse effects on the townscape and visual amenity have been designed out and the opportunity for beneficial effects has been maximised. The conclusions of the TVIA assessment are detailed in the previous chapter of this Statement, demonstrating the Proposed Development is consistent with national and local policy.
- 7.31. For further details please refer to Chapter 6 (Townscape and Visual Impact) of the Environmental Statement Volume 1 and accompanying appendices (ES Volume 2 Appendix 7.1 – 7.3) prepared by Chris Burnett Associates and submitted as part of this Application.

Functional

- 7.32. The Advice Note 4 sets out that consideration needs to be given to functional factors to determine the impact a tall building could have upon the historic environment: *“functional: the design, embodied carbon and carbon cost, construction and operation”*.

Design

- 7.33. Functional ‘design’ factors are not explored in-depth within the Advice Note 4, and therefore the NPPF provides the principal guidance on how the proposal accords with high quality design. Chapter 12 of the NPPF (2021) emphasises the great importance placed on the creation of high-quality buildings and places;

good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- 7.34. The quality of the design is detailed in Chapter 6 of this Statement and in detail within the submitted Design and Access Statement, prepared by EPR.
- 7.35. The Site has been identified as one of the seven active landowner sites within the 2020 St Mary's Parsonage SRF, which includes the potential opportunity for redevelopment and increase in height.
- 7.36. The Applicant has appointed a highly experienced design team, led by EPR (Architect) and Planit-ie (Landscape Architects), with a track record in delivering high quality buildings and public spaces, including in Manchester City Centre.
- 7.37. The evolution of the design has been through a rigorous design process and has been shaped by consultation with statutory and non-statutory consultees, including Manchester City Council, Places Matter Design Review, and the local community.
- 7.38. Townscape and Visual Impact and Built Heritage have been scoped in to the submitted Environmental Impact Assessment, with both Environmental Statement Chapters considering the impact of the Proposed Development on local townscape, the nearby conservation area and nearby listed heritage assets. Details of these assessments are set out in Chapter 6 of this Statement; for full details please refer to Chapter 6 (Townscape and Visual Impact) and Chapter 7 (Built Heritage) of the Environmental Statement Volume 1, submitted as part of this Application.
- 7.39. The quality of the proposed design and how this has responded to the local and city-wide context is summarised in Chapter 6, and in explained in detail in the submitted Design and Access Statement prepared by EPR and the Landscape Strategy prepared by Planit-ie.

Embodied Carbon, Carbon Cost (and Operation)

- 7.40. Functional 'Embodied Carbon and Carbon Cost' factors are not explored in-depth within the Advice Note 4. Paragraph 152 of the NPPF (2021) advises that the planning system should support the transition to a low carbon future in a changing, taking full account of flood risk and coastal change.
- 7.41. Paragraph 155 of the NPPF goes on to state that to help increase the use and supply of renewable and low carbon energy and heat.
- 7.42. The Proposed Development's approach and performance with regards to embodied carbon, carbon cost and supporting the City Council's response to the climate change emergency is detailed in Section 6. This summarises how the Proposed Development will contribute to securing sustainable development and regeneration in the City. For full details please refer to the Energy Strategy and Environmental Standards Statement (ESS) prepared by Hilson Moran.
- 7.43. An (interim stage 3) embodied carbon assessment has been undertaken by Hilson Moran in support of this application which has been used to inform the Climate Change ES chapter, prepared by Ramboll. For details please refer to Chapter 9 (Climate Change) of the Environmental Statement Volume 1.

Construction

- 7.44. Functional 'construction' factors are not explored in-depth within the Advice Note 4.
- 7.45. A demolition and construction methodology and programme has been prepared in support of this Application. For further details please refer to Chapter 5 of the Environmental Statement (ES) Volume 1, prepared by Sir Robert McAlpine Ltd and PP O'Connor. The Chapter outlines the demolition and construction process, including measures to minimise the impact on the environment and residential amenity and this has informed the assessments within the ES technical chapters.

Operation: A Well-designed, Inclusive Environment

- 7.46. Advice Note 4 sets out the following, *"A well-designed inclusive environment: the way tall buildings are experienced at ground level is an important consideration as tall buildings can have a significant impact on the historic streetscape and public realm. In some cases, redevelopments may create opportunities to enhance elements of the significance of heritage assets by opening lost views or revealing historic street patterns."*

- 7.47. Care has been taken to ensure that the design contributes to and enhances the quality of life for workers, local residents, the wider community and visitors.
- 7.48. The Proposed Development is to provide office-led development with ground floor food and beverage space and high-quality public realm enhancements. This is in line with the development principles identified within the St Mary's Parsonage SRF.
- 7.49. Altogether, the final design has been able to create a 'unique sense of place' in this part of the City Centre and will make a significant contribution to the St Mary's Parsonage SRF area. Further information can be found within the Design and Access Statement prepared by EPR and the Landscape Strategy prepared by Planit-ie, both submitted as part of this application.
- 7.50. The DAS prepared by EPR comprehensively sets out a strong and detailed narrative which fully justifies the design intent, including how the scheme contributes enhances permeability and legibility. The DAS sets out the ways in which good design has been applied throughout, in line within paragraph 130 of the NPPF.
- 7.51. Regarding physical security, the ground floor layout has been designed to maximise opportunities for passive surveillance of the public realm and will also incorporate CCTV. Building entrance lobbies are situated adjacent to the public realm, which will be well lit and visible. The development will also benefit from on-site concierge/management staff during operational hours. On this basis, the Proposed Development accord with Advice Note 4 and will deliver a credible design which accords with 'good design' as set out in the NPPF.
- 7.52. Overall, the Proposed Development comply with Advice Note 4 and provide a well-designed environment. For further details please also refer to Chapter 6 of this Statement.

Street-based Urban Design Qualities

- 7.53. Advice Note 4 states that *"the design of tall buildings should reflect or reference local street-based qualities, such as active frontages and human scaled design at street level."*
- 7.54. This can also be read alongside paragraph 130 of the NPPF, it is stated that Proposed Development should use effective landscaping and sustain an appropriate amount of development such as public space as part of the Proposed Development.
- 7.55. As summarised in Chapters 4 and 6 of this Statement and explained in detail in the submitted Design and Access Statement prepared by EPR and the Landscaping DAS prepared by Planit-ie, the Proposed Development will redevelop an existing low-grade, office building to create a Grade A office building with extensive amenity facilities, ground floor commercial floorspace for public use, and public realm enhancements. A summary of the key enhancements is set out below:
- Enhance the surrounding streetscape and aids legibility through the delivery of a high sustainable, distinctive landmark building with a unique identity that uses high quality materials. The introduction of ground floor active uses to animate the local street scene - the ground floor includes a food and beverage offering, animating the Trinity Bridge footway and St Mary's Parsonage. The offering will serve existing communities including local residents, as well users/ officer occupiers within the Proposed Development.
 - The proposed location of the food and beverage space on the ground floor seeks to utilise the key riverfront location, harnessing views across the river towards Salford. with river at ground floor is key requirement.
 - Enhancing pedestrian and cycle connectivity around the perimeter of the Site, including improving pedestrian access along the approach to Trinity Bridge, and future proofing the design to deliver additional improvements when proposals for Albert Bridge House come forward.
 - Deliver a high quality contextual facade design, creating a unique identity.
 - Appropriately balancing servicing requirements for the Proposed Development whilst maintaining high quality pedestrian routes, particularly along St Mary's Parsonage.

- Landscaping and public realm enhancements that create a more attractive environment for the local community and visitors with spaces to dwell.

Environmental

- 7.56. The Advice Note 4 sets out that consideration needs to be given to environmental factors to determine the impact a tall building could have upon the historic environment: *“Environmental: the influence on local micro-climates such as creation of wind tunnels, canyon effect, over-shadowing, glare, and air quality and effect on heritage assets in terms of the impact these micro-climatic changes could have upon their fabric, and how they are experienced.”*
- 7.57. A comprehensive suite of environmental technical analysis has been undertaken to assess the potential impacts of the Proposed Development. These technical reports together consider the impact of the Proposed Development on the local environment, and specifically the application is supported by the submission of an Environmental Statement (ES), the scope of which was formally confirmed by the LPA via the EIA Scoping Opinion issued on 20 May 2022. The environmental effects of the development are summarised in Chapter 6 of this Statement.

Cumulative

- 7.58. The Advice Note 4 sets out that consideration needs to be given to cumulative factors to determine the impact a tall building could have upon the historic environment: *“Cumulative: the combined impacts on heritage assets from existing, consented and proposed tall buildings.”*
- 7.59. As set out above, this Application is supported by a comprehensive suite of environmental technical analysis has been undertaken to assess the potential impacts of the Proposed Development. Consideration is given within this analysis the cumulative impact of the Proposed Development. The submission is supported by an Environmental Statement (ES), with both Heritage and Townscape and Visual Impact (TVIA) scoped into the ES. The combined effects of the Proposed Development are considered within the TVIA and heritage analysis, which is summarised in Chapter 6 of this Statement. For further details please also refer to Chapter 6 (TVIA) and Chapter 7 (Built Heritage) of the ES Volume 1, and the accompanying appendices submitted as part of ES Volume 2 (Appendices 6.1 – 6.3 and Appendix 7.1).

Accordance with Manchester’s Core Strategy Tall Buildings Policy

- 7.60. Policy EN2 of the adopted Core Strategy (July 2012) states that: *“Tall buildings are defined as buildings which are substantially taller than their neighbourhood and/or which significantly change the skyline.”* As the Proposed Development meets this criterion as a tall building it is required to meet Policy EN2 and which has been addressed above, and within Chapter 6 of this Statement.
- 7.61. In summary, the Proposed Development positively contributes and fully complies with the policy and guidance set out in regard to tall buildings.

8. Public Benefits of the Proposed Development

- 8.1. The purpose of this Section is to provide a detailed assessment of the economic, social, and environmental benefits associated with the proposals. Importantly, these benefits are explained with reference to Manchester's overall strategic policy and economic context, which has been set out in Section 3 of this Statement.

Economic Benefits

- 8.2. As demonstrated through the Strategic Context, there is a clear requirement for economic benefits to be maximised by the future proposals through major reinvestment into Alberton House to drive forward the regeneration objectives of the St Mary's Parsonage SRF and support the wider strategic objectives of Manchester City Council and the Greater Manchester region.

Direct Investment and Benefits

Construction

- 8.3. The delivery of the project has an estimated construction costs of £94.4m across the Proposed Development's build period. It is anticipated that around 800 FTE job years will be supported over the construction period, with these jobs generating a total GVA of £61.9m across the period.
- 8.4. Much of the economic benefit associated with the direct investment will impact the local region through the supply of local labour. To this effect, the Applicant is entering an agreement with Manchester's Work and Skills team to maximise social value by ensuring contractors draw on the local labour pool. Local expenditure during the construction phase will increase local expenditure of those working onsite over the course of construction period. Where possible, local supply chains will be utilised by the appointed contractor to strengthen the commitment to local jobs and skills.
- 8.5. Beyond the immediate economic impact of construction activity, and by taking multiplier effects into account, the amount of jobs supported by the development during the construction phase is anticipated to support a further 260 FTEs and generate GVA of £16.6m. This accounts for the supply chain jobs that will be supported by the Proposed Development, including the sourcing and production of all building materials for installation on Site during the construction phase. Other costs incurred during this phase of the Proposed Development would support new and existing roles across a range of grades and industries within the construction sector.
- 8.6. The construction activity generated by the Proposed Development will provide a significant boost to the regional economy, whilst utilising the strength and resilience of the construction industry.

Operation

- 8.7. In order to continue to grow the economic output of the Greater Manchester Region, it is considered essential for the City Centre to keep ahead of changes in demand from occupiers for new workspace and new working environments. Examples of these changes include the growing dominance of flexible workspaces. The delivery of a best in class, largescale city centre office campus will therefore positively contribute towards the ongoing regeneration of Manchester City Centre and the region.
- 8.8. The Proposed Development is delivering ground floor retail / restaurant / café floorspace, which will increase the amount of active frontage, thereby making a positive contribution to public realm. The proposed food and beverage space provided will support an estimated 80 FTE jobs once operational. Local retail expenditure is also anticipated to increase due to spending by employees and visitors at the Proposed Development. This benefit would be twofold, from both incomes generated by money being spent at the

Proposed Development's ground floor offerings, and expenditure generated by the Proposed Development's employees.

- 8.9. As a direct benefit of the employment generating proposals, there will be pathways for young adults to be given the opportunity to encourage and develop skills, internships and apprenticeships among the varied and specialised employment roles in any medium to large scale businesses and organisations.
- 8.10. During the operational phase the scale of commercial space will support almost 1,900 FTE jobs. The Proposed Development would also provide a range of opportunities for local residents across a variety of skills levels and occupations, contributing to the inclusive growth ambitions in the Our Manchester Industrial Strategy, as well as potentially reducing the average distance travelled to work.
- 8.11. For the Proposed Development, the occupier target audience is to be kept open, as demand will come from a diverse range of customers from all sectors and scales of business. The Proposed Development is likely to accommodate high productivity businesses across a range of sectors including financial, digital, tech and professional services businesses, key growth sectors for Manchester. Businesses such as these not only help to create high value, high growth operations within the city, but also help to coordinate and radically improve the productivity across all business sectors by increasing innovation and raising levels of export and investment. In turn, the region strengthens its position as a UK leader of business growth in specific sectors to help encourage further businesses to locate here.
- 8.12. The employment accommodated in the office space is expected to generate a direct GVA impact of almost £170m per annum, while the flexible commercial (F&B) will support almost £3m of GVA per annum. The operational employment and GVA benefits are of a significant benefit to the economic growth of the city.
- 8.13. Given that the Proposed Development is anticipated to accommodate a range of sectors and skill levels, a further 1,760 FTEs are also expected to be supported in the wider economy as a result of the proposed Development.

Catalytic Benefits

- 8.14. The SRF highlights the opportunity for future investment and development to maximise catalytic effects brought about by the Proposed Development, leading to further investment in the area and Manchester as a whole. The momentum of Parsonage Gardens becoming a mixed-use community was established by the refurbishment of Arkwright house in 2015 and further investment of a significant quantum of floorspace is needed to further the ambitions of the area and allow it to economically contribute to the city region.
- 8.15. The Proposed Development will support the SRF's objective to deliver a more pedestrian friendly environment that enhances connections with other regeneration areas, such as Spinningfields to the south, the Ramada Hotel Strategic Regeneration site and the wider retail core to the north, as well as linkages to Greengate and Salford.
- 8.16. The quantum of proposed new Grade A commercial office floorspace will also help to bring about agglomeration benefits by proximity to other commercial areas, as well as future office developments that are brought forward within the SRF area. The Proposed Development will help to create a clustering effect in this part of the city and connect with other nearby business clusters as Spinningfields, Salford Central and the Civic Quarter.
- 8.17. The Proposed Development will therefore make best use of the locational characteristics of the Site to deliver a best-in-class commercial development that will attract occupiers and drive growth in sustainable and skilled jobs. Economic productivity will be enhanced further through associated training, education and vocational opportunities that will be required through the supply chain. The number of new jobs that will be accommodated by the Proposed Development during operation will contribute to both economic growth and inclusive growth ambitions of the City.
- 8.18. The investment into the area will reinforce the core of the city centre as the strongest and most sustainable employment growth centre in the GM conurbation and add to the attractiveness of the area for new and existing businesses or government departments as a prime location to grow their operations.

Revenue Generation

- 8.19. The creation of high quality and numerous employment opportunities at the Site will complement the on-going delivery of large numbers of new homes within the city centre, thereby attracting people to live and work in the city centre and make a positive contribution to the creation of a sustainable city.
- 8.20. To match this ambitious residential growth the city centre requires new employment space to diversify and increase the opportunities for both city centre residents and the wider economy. The attraction of living in the city centre is also driven by the accessibility of a range of activities, shops, bars, restaurants, and cultural and tourist activities. The creation of place in the city centre that is supported by the Proposed Development helps increase time spent, known as dwell time, and helps to drive revenue generation in the city through expenditure.
- 8.21. Local retail expenditure is anticipated to increase due to spending by employees that work from or in connection with the Proposed Development and is expected to generate annual wages of almost £58m. Assuming employees spend a considerable proportion of their incomes locally, this would result in an additional spending in the local area and benefit local businesses, support jobs, and bringing positive supply chain effects.
- 8.22. Added benefits of wages generated include local expenditure, increase in income tax revenues and contribution of business rates, which will allow for more public services to be paid as a direct consequence of the regeneration of this Site. The number of office and flexible commercial (F&B) jobs will generate GVA worth over £170m per year, with wages totalling almost £60m, a considerable proportion of which will be spent locally, due to Manchester's growing population, particularly in the city centre.
- 8.23. Each year, almost £13m of national insurance and income tax will be contributed to the public purse, while business rates from the offices and retail/ restaurant/ café space will generate £2.4m a year. Furthermore, the associated increase in city centre living by future employees will also drive Council Tax receipts.

Social Benefits

Connecting the City

- 8.24. The active ground floor use of the Proposed Development aid the legibility of the area, with the proposed ground floor food and beverage offer creating a nodal point. The footfall generated by the Proposed Development, from office users and the ground floor active uses active uses, will signpost routes and aid passive surveillance. The active frontage and increased footfall will bring the animation to St Mary's Parsonage and Trinity Bridge walkway which is currently lacking.
- 8.25. The Proposed Development has the opportunity to increase the permeability of the area and respond to the ongoing regeneration ambitions of the St Mary's Parsonage SRF. Key movement patters around the Site include along Deansgate running north-south to the east of the Site and Bridge Street to the south facilitating east-west movement. The Proposed Development will seek to enhance the existing connections around the Site by improve the streetscape along St Mary's Parsonage and the Trinity Bridge walkway.
- 8.26. The Proposed Development will create a more attractive environment leading up to Trinity Bridge, increasing permeability between Manchester and Salford. The Proposed Development will leverage the Site's full potential in a gateway location along the River Irwell and between Central Salford and Manchester City Centre. The whole environmental improvement along St Mary's Parsonage with landscaping and public realm enhancements and the erection of a high-quality landmark building will enhance the northeast-southwest movement along St Mary's Parsonage; St Mary's Parsonage provides pedestrian connections to Spinningfields, Central Salford and the Trinity Riverside and so the Proposed Development will enhance permeability within the SRF area and beyond.
- 8.27. The enhanced connectivity delivered by the Proposed Development will strengthen the network of a number of important public areas that exist, including:
- **Parsonage Gardens:** to the northeast of the Site, along St Marys Parsonage is Parsonage Gardens which acts as a relatively tranquil space within the City Centre that was created as result of the former college land associate with Cheetham's and the former Parsonage that existed on site. This space is bordered by a number of high quality and historic buildings that add to the character of the area and comprises residential to the western edge and commercial offices like Arkwright House that borders Parsonage Gardens on the southern edge.

- **Hardman Square and the Avenue:** Spinningfields is located along St Mary's Parsonage to the southwest of the Site. Spinningfields is now considered to be Manchester's premier business hub and is the product of a 20-year masterplan being realised. Key to its success is the excellent quality of public spaces that support this economic function, including Hardman Square, the Avenue and the areas around the Oast House. This part of the city centre exists to the south of the Proposed Development and therefore the Site provides the opportunity to enhance connections between these two areas.

8.28. The Proposed Development is designed to be accessible to all users including those whose mobility is impaired, including level and lift access in all areas, with improved public realm. Through giving the area a strong sense of identity, walking and cycling between key areas of the City will also be encouraged, therefore leading to potential wider health benefits.

Creation of 'Place'

8.29. The city-region seeks to take an integrated and proactive place-based approach to bringing forward strategic regeneration proposals in town centres and strategic sites, which integrate investment in development, housing, transport and other infrastructure to create sustainable employment locations. The Site is well capitalised to support this overall place-based approach to regeneration given the existing quality and opportunity presented by the Proposed Development.

8.30. Currently, the pedestrian and city centre user experience along St Mary's Parsonage and the Trinity Bridge walkway is relatively poor. The Proposed Development will improve this experience and create a unique place identity, embracing the Site's potential as a key regeneration site. This helps to develop a better sense of place and raises the standards of the quality of development across the city centre. In order to support the investment made in the public spaces surrounding the Proposed Development, the sense of place is also driven by ground floor activity and publicly accessible food and beverage space. The external terrace at the ground floor level offers spill out external seating areas fronting Trinity Bridge walkway, whilst retaining sufficient space for pedestrian and cycle movement.

8.31. The public realm and landscaping enhancements will provide opportunities for greater natural surveillance, thereby improving local safety and security. In turn, this will create a more attractive environment for the local community and visitors with spaces to dwell, play and enjoy.

8.32. The ongoing and future investment and delivery of new office space in St Mary's Parsonage provides fresh opportunities for a range of different commercial businesses that can add to the formation of a business community. A critical mass of businesses, coupled with the existing residential community, provides opportunities for Parsonage Gardens to reassert itself as the vibrant centrepiece of this area.

Environmental Benefits

8.33. Manchester City Centre has gone through significant change over the past twenty years, as a result of transformative investment and regeneration. The need for investment to lead to the creation of a high-quality built environment and contribute to a strategic approach to place-making has been a priority throughout this period and continues to be essential for emerging development proposals.

8.34. In addition, the Council has also declared a Climate Emergency, requiring all development proposals to support the Council in achieving its 2038 Net Zero Carbon target, as well as seek to increase green and blue infrastructure where feasible. Against this context, the environmental benefits of the Proposed Development are set out below.

Architecture and High-Quality Design

8.35. There is a need for good quality modern architecture to continue to define Manchester's recent and projected progress to establish itself as a world-leading, 21st century city. This is particularly important for the development proposals, considering the heritage assets in the surrounding area. The Site is visually sensitive as a result, so of the very highest quality of architectural design is required and has been a priority consideration throughout the design development and consultation stages of bringing forward the Proposed Development

8.36. There is a need for schemes to contribute to their overall placemaking objectives to allow Manchester to continue to be architecturally distinctive. This is achieved through appropriately balancing its historic

buildings and areas with new high-quality development and public spaces. This architectural language across the city should align with the high standards of cultural heritage that Manchester already has to offer.

- 8.37. Architectural distinctiveness has always been a part of Manchester's fabric, with excellent examples of Gothic, Georgian, and Victorian design located across the city centre that chart its path to the city that we see today. Notable buildings include the Manchester Town Hall, John Rylands Library, the Manchester Cathedral, and Cheetham's Library, through to more modern heritage buildings like the Victorian architecture found on the length of Deansgate, and Art-Deco style buildings such as Kendals and Sunlight House, to name a few. Indeed, designated Conservation Areas that spread across the City Centre are varied due to being defined by their typical and notable built heritage and townscape.
- 8.38. The Site is currently occupied by a vacant office, which the St Mary's Parsonage SRF recognises as not fully utilised due to its dated internal configuration. The SRF acknowledges that Alberton House is in need of major reinvestment including a wholesale environmental improvement through to the mechanical and engineering services and visual quality.
- 8.39. The architects, EPR is an esteemed and award-winning architectural practice which is extremely experienced in designing and delivering high quality buildings in city centre locations and has a track record and capability to deliver a project of exceptional quality. The design of the Proposed Development has been interrogated through extensive pre-application consultation with MCC officers, Places Matter! Design Review Panel, statutory consultees and through public consultation.
- 8.40. The design has also been subject to TVIA and heritage assessments undertaken by Chris Burnett Associates and Stephen Levrant Heritage architecture respectively, both having vast experience in providing specialist input on a range of projects within the historical cultural environment, these assessments and ongoing feedback during the design development process has fed into the design of the Proposed Development in order to deliver an optimum, high quality design which respects the existing townscape and built environment, whilst balancing this with the Site's regeneration ambitions and the project brief.
- 8.41. The benefits of good design are evidenced in the aesthetics of the surrounding townscape and has wider environmental benefits linked to this. The overall conclusion of a RIBA report 'Good Design: It All Adds UP' (2011) is that good design generally costs more, but the implication of poor design holds a much greater cost. The report also notes that property agents find it easier to let buildings and units with a high-quality design standards. Units and buildings that remain unlet reduce the overall vibrancy and demonstrate a lack of vitality of our urban centres, which is essential to attracting new residents, employees and businesses to the city centre.
- 8.42. The redevelopment of the Site will strengthen local streetscape, enhancing local character and sense of place through the delivery of a distinctive, high quality building. It will generate vitality and animation making a further positive contribution to local streetscape and aid legibility. The Proposed Development will deliver a high sustainable, landmark building with a unique identity that uses high quality materials.

Improving the Quality of Workspaces

- 8.43. The benefits of good design are also keenly felt within the commercial sector as well, the importance of well-designed workspaces is critical as this setting is where people spend the majority of their time, whilst the workplace needs to provide added benefits compared to those offered by working from home.
- 8.44. The future office space should be a space to collaborate, share ideas, learn and provide all the convenience of the elements of working from home when needed, which can happen through good quality interior design and space planning.
- 8.45. Indeed, forward-thinking businesses are realising the asset value of commercial properties with higher exchange or rental values; recognising good design can create offices that employees want to work in. Without the office, companies reduce face to face interaction, stifle innovation, limit learning opportunities and consequentially are unable to properly invest in their business' social capital.

- 8.46. There is comprehensive evidence of user centred workplaces contributing to the recruitment and retention of staff, productivity and well-being. Simply getting elements such as layouts, space allocations, air quality, acoustics and lighting right can make the difference between a highly productive, collaborative, convenient and innovative workspace and the traditional workspaces that we have become accustomed to during the 20th and 21st century. The Proposed Development promotes the importance of high quality, modern workspaces that will deliver innovative, engaging, flexible offices that are more likely to encourage forward thinking and fresh ideas.
- 8.47. The creation of buildings that are designed to a high architectural standard add positively to the urban fabric, and can respond to social, economic and environmental changes. Much can be read into a brand not just from the way its employees are accommodated, but also from how issues such as sustainability are addressed through its buildings.
- 8.48. The Site is currently occupied by a vacant office, which the St Mary's Parsonage SRF recognises as being not fully utilised due to its dated internal configuration and inability to compete with newer Grade A commercial office spaces being brought forward in the city centre. As set out above SRF highlights that Alberton House is in need of major reinvestment and the Proposed Development seeks to respond to this by delivering new, high quality Grade A office space, flexible commercial space (F&B) and amenity/ wellness facilities.
- 8.49. The Applicant, Bruntwood is a leading office provider, is firmly embedded in towns and cities, with a strong presence in the North West, Yorkshire and the Midlands. It's workspace, retail and leisure is people driven, design led and socially responsible. Bruntwood delivers exceptional office spaces for which there is consistent pent-up demand from the full range of office occupiers, ranging from SMEs to large corporate organisations.

Sustainable Construction and Operation

- 8.50. The Proposed Development also seeks to become an exemplar in sustainable design and construction. In doing so, the proposals will directly support the Council's 2038 Net Zero Carbon target. The Proposed Development is of the highest quality of design, which will support the creation of an adaptable, sustainable and innovative office development. The Proposed Development is progressing that net zero carbon agenda through its own low carbon qualities and sustainability.
- 8.51. Noting that comprehensive demolition and reconstruction is required for the Proposed Development, building materials will be sourced in a manner that both reduces its embodied carbon (e.g. local sourcing, where possible) and recyclable when the building reaches its end of life. Open floorplates of the building allow the building to be adaptable in the future, which is critical given the constant evolution of our workplaces in terms of form, function and layout.
- 8.52. The operational sustainability credentials have also been central to design development of the Proposed Development, with a number of targets being set in order to allow the Proposed Development to comply with the City's ambition to achieve Net Zero Carbon status by 2038. The Proposed Development makes a 24% improvement on Building Regulations Part L (2013) against the current industry standard and far exceeds the requirements set by the LPA that requires a minimum of a 6% improvement on Part L to comply with planning policy.
- 8.53. The Proposed Development will adopt an all-electric approach that includes air source heat pumps as heat source and a low carbon energy system.
- 8.54. The removal of 20 car parking spaces will likely improve the air quality indicators within the surrounding area and support the use of sustainable transport modes to gain access to the well-connected Site. An extensive amount of cycle parking and changing facilities with storage is included within the Proposed Development, with 120 secure spaces provided within the building a further 14 short-stay cycle spaces within the public realm; this will support travel to and from the office being made by bicycle, e-bike or similar. Improving pedestrian and cycling linkages around the Site and within the surrounding St Mary's Parsonage area will also encourage sustainable modes of travel in to and out of the city centre.

Conclusion

- 8.55. In summary, the Proposed Development will deliver an exceptional range of short and long-term economic, environmental and social benefits that are significant at the local and regional scale, in terms of the positive contribution to surrounding streets, enhancements to the City's built environment and the strategic

contribution to the objectives of the City Council, the Greater Manchester Region and the Northern Powerhouse agenda.

9. Conclusion

- 9.1. This Planning Statement accompanies a Full Planning Application for the full demolition and redevelopment of Alberton House in Manchester City Centre.
- 9.2. The Proposed Development seeks to bring forward a high quality office-led mixed-use scheme, comprising the full demolition and redevelopment of Alberton House to deliver a new Grade A office building with supporting ground floor commercial uses and office-related amenity space ('the Proposed Development').
- 9.3. The 0.26 hectare Site is within the St Mary's Parsonage area, in Manchester City Centre. The Site is bounded by Cardinal House to the east, St Mary's Parsonage to the south, Alberton Bridge House (car park) to the west and the River Irwell to the north.
- 9.4. The Site lies within the St Mary's Parsonage SRF area which has been identified as a priority regeneration area of the City Centre. The Proposed Development will form part of the St Mary's Parsonage SRF and contributes to the SRF's vision through the delivery of a high-quality office-led mixed-use scheme, which suitably responds to the key contextual considerations and supports the objectives and ambitions of the SRF.
- 9.5. The Applicant, Bruntwood RB Ltd, is an entity of Bruntwood Works. Bruntwood Works blends work and lifestyle to create spaces that encourage interaction and create communities. They are firmly embedded in towns and cities, with a strong presence in the North West, Yorkshire and the Midlands. It's workspace, retail and leisure is people driven, design led and socially responsible.
- 9.6. Bruntwood Works create, own and manage over 5m sq ft of inspiring workspace environments, offering everything from individual coworking desks and meeting rooms to fully managed offices and retail spaces, all in superb locations across Manchester, Cheshire, Leeds, Liverpool and Birmingham, to help businesses thrive and grow.
- 9.7. Bruntwood Works promotes a better work-life balance with access to a range of wellness, retail and leisure facilities within its buildings, and it owns, operates and manages Affleck's and Hatch, along with 1m sq ft of retail and leisure space.
- 9.8. Bruntwood is already a key landowner and commercial office landlord within the SRF area, due to owning the recently refurbished and fully let 'Blackfriars House' and Kings House. The Applicant has also been a long term owner of Alberton House and recognises the substantial cross-sector market demand for the proposed type and quality of office space in this part of the city centre.

Summary

- 9.9. The Proposed Development will provide Grade A office floorspace, new high quality publicly accessible ground floor, which will include food and beverage provision and enhancements to the quality and accessibility of adjacent pedestrian and vehicular routes. The Proposed Development is underpinned by ambitious net zero carbon targets and will create new office floorspace for existing and new business to relocate to the area. In turn, this will make a positive contribution to the local economy and vibrancy of the local area.
- 9.10. The Site is located in an area identified for additional height with the SRF, transitioning away from the Conservation Area, towards the greatest height in the southwest corner. The Proposed Development represents a design, height and quantum of development that optimises the Site's potential and enables the delivery of a contextually appropriate and high quality architectural design, including careful consideration of the nearby conservation area and listed buildings.
- 9.11. The Site's regeneration context has provided an important guide, which underpins the final design of the Proposed Development.
- 9.12. The design development process has also been informed by discussions, including comments and concerns raised by MCC officers and local Ward Councillors, raised as part of the pre-application engagement process.
- 9.13. The Proposed Development is summarised below:

- Demolition of the existing Alberton House and erection of a c. 32,260 sqm (GEA) highly sustainable 19-storey office-led building;
- The office reception, including a double height entrance space is located at the ground floor along St Mary's Parsonage, as well as back of house areas including the bin store;
- Food and beverage floorspace at the ground floor level fronting the river, with an external terrace activating the Trinity Bridge walkway;
- Mezzanine with co-working space such and amenity features;
- Basement includes a cycle hub (with 120 secure cycle parking spaces), a gym, changing and showering facilities, back of house areas and plant areas;
- Floors 1 – 16 provide office accommodation, with floors 1-2 providing serviced accommodation fit out by Bruntwood Works;
- A rooftop amenity and wellness space on 17th and 18th floors, including a leisure and fitness offering with a swimming pool and associated facilities;
- A panoramic landscaped, external rooftop terrace on 17th floor.
- Tree planting and public realm enhancements along St Mary's Parsonage and Trinity Bridge walkway
- Highways works and servicing arrangements including a loading bay along St Mary's Parsonage;
- Drainage and ecological works, including the installation of blue roof; and
- Other associated works.

9.14. The Design and Access Statement prepared by EPR submitted in support of this application contains more information on the design of the Proposed Development.

9.15. The Proposed Development will deliver a number of economic, social and environmental benefits, including:

- The Proposed Development will deliver an exceptional range of short and long-term benefits that are significant at the local and regional scale, in terms of the positive contribution to surrounding streets, enhancements to the City's built environment and the strategic contribution to the objectives of the City Council, the Greater Manchester Region and the Northern Powerhouse agenda. The Proposed Development also aligns with the overarching S Mary's Parsoange SRF objectives and site specific guiding principles, as set out in Chapters 4 and 6.
- The Proposed Development contributes to the SRF's vision through providing significant reinvestment into the Alberton House Site, which is identified as an opportunity Site within the SRF. The Proposed Development responds to the key principles underpinning the overarching vision of the St Mary's Parsonage SRF and has sought to address the site-specific guiding design principles for Alberton House.
- As outlined above in Chapter 3 of this Statement, there continues to be a strong demand for office floorspace within Manchester City Centre. In particular, there is a demand for buildings which promote agility and cater to needs of hybrid occupiers. Bruntwood apart as a leading office provider, who delivers exceptional office spaces for which there is consistent pent up demand from the full range of office occupiers, ranging from SMEs to large corporate organisations.
- The proposals will also deepen the labour market pool, increase the number of higher skilled and higher paid jobs, based on high productivity employment, make a significant contribution to accelerated economic growth and the re-balancing of the national economy, increasing Greater Manchester's share of high value-added service jobs.
- From an economic perspective, the Proposed Development will likely support a number of construction-based jobs during this phase of development, before having the capacity to accommodate up to 800 workers, support staff and indirect employees.
- During the operational phase, the scale of commercial space will support around 1,880 jobs, and up to 80 in the ground floor retail/ café / restaurant space. This includes more graduate level jobs in the conurbation's economy, with companies able to provide more apprenticeships, work placements, and

internships, taking advantage of the sectoral makeup of the new employment and industry recruitment, and training approaches.

- The Proposed Development represents an office development of exceptional quality, with generous floor to ceiling heights, conscious environmental design and high quality tenant amenity spaces. This type of office space will help to entice the best possible private and public sector organisations who will, in turn, support the economic and employment growth. The space will provide organisations with accommodation operating in key growth sectors that will help to transform the northern economy, attracted by connectivity and labour sources.
- The provision of a high quality office development in a highly accessible location will meet an identified demand for such space, as identified in Section 3 of this Statement helping to support the post pandemic recovery of Manchester
- As companies are increasing environmental awareness and corporate social responsibility it is anticipated that the sustainability credentials of the building and flexible space provided will meet operator demand, making it an attractive space to occupy. The Proposed Development is targeting NABERS 5.5* and will achieve a minimum of a 24% improvement on Part L 2013, whilst employing an all-electric approach that includes air source heat pumps as heat source and a low carbon energy system.
- The number of construction workers onsite will vary across the construction phase dependent on workforce requirements at each stage. While national and regional construction companies often use their own workers, a proportion is expected to be drawn from the local area. In addition, following Manchester City Council policy requirements, a Local Labour Agreement submitted with the application supports the capture of local benefits.
- The high-quality architectural design will make a positive contribution to the appearance, vitality and vibrancy of this part of the city centre. It is in keeping with its historic surroundings but also adds to the juxtaposition of architectural styles that is typical of Manchester City Centre, composing a positive street scene whilst aligning with the improving standards of design. The proposed 19 storey (plus ground, including mezzanine) massing of the development is respectful to the adjacent conservation areas and nearby designated heritage assets, whilst suitably responding to the design principles set out within the St Mary's Parsonage SRF. The unique contemporary warehouse aesthetic, will also harness the Proposed Development as a key landmark building which will aid legibility within the area.
- The introduction of ground floor F&B space and the introduction of a new entrances off of St Mary's Parsonage and the Trinity Bridge walkway will bring much needed animation to surrounding routes. Alongside this the footfall from the occupied office floorplates will bring newfound animation to the area and aid passive surveillance. This will create a more attractive environment for pedestrians and help to increase the permeability of the north-south connections. Increasing the permeability will knit the St Mary's Parsonage area into the urban fabric and act as a link between Salford, Spinningfields, the King Street area and the CBD.
- Enhancements will be delivered to the public realm through new surfaces, improved public realm, soft landscaping and active frontages. Ecological and landscaping enhancements will be delivered through urban greening at street level and terrace levels, which helps the scheme contribute Manchester's Green and Blue Strategy It is envisaged that a majority of the individuals that will benefit from this improved environment include local office workers that are seeking an attractive space to have lunch but also those that simply want to pass through.
- Once operational, the Proposed Development will deliver a highly energy efficient building with sustainability at the heart of the scheme. A blue roof and greywater harvesting will be incorporated to align with the on-going need to combat issues surrounding climate change.

Conclusion

- 9.16. The Proposed Development has been developed in consultation with Manchester City Council Planning Officers, Environmental Health Officers, Highways Officers and a range of technical stakeholders, as well as Local Ward councillors, surrounding residents and local businesses.

- 9.17. This Planning Statement has assessed all applicable planning policies, guidance and other material considerations and provides full and robust justification for the Proposed Development, alongside supporting technical assessments that are submitted with the application.
- 9.18. It has been demonstrated that the Proposed Development complies with the Development Plan as a whole and properly addresses the relevant Material Considerations and we therefore consider that the planning application merits the full support of the Local Planning Authority.

Appendix A – Green and Blue Infrastructure Statement

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Appendix B – MCC EIA Scoping Opinion



MANCHESTER CITY COUNCIL

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19th May 2022

FAO Ed Britton
Deloitte LLP
The Hanover Building,
Corporation Street,
Manchester,
M4 4AH

Dear Sir / Madam

**Environmental Impact Assessment Regulations, the Town and Country
Planning (EIA) (England) Regulations 2017 (as amended) (the "EIA Regulations").**

Scoping Request Under Part 4 Regulation 15(1)

**Site bounded by Cardinal House, St Mary's Parsonage , Albert Bridge House (car
park) and the River Irwell.**

Scoping Opinion of Manchester City Council Pursuant to Regulation 15

Further to your request in respect of the above dated 25th February 2022 and your
subsequent e-mail dated 21st April 2022 (Highways) and your agreement of an extension
of time to issue this Scoping Opinion.

In coming to a formal opinion on the scope of the Environmental Statement ("ES") ,
Manchester City Council, as Local Planning Authority, has considered the supporting
information contained within your " *Alberton House, 30 St Mary's Parsonage, Manchester
Environmental Impact Assessment (EIA) Screening and Scoping Report
February 2022*" prepared and submitted by yourselves on behalf of the Applicant
Bruntwood RB Ltd and comments from statutory consultees.

I have now had a chance to consider your scoping request and I outline my response
below.

The Proposed Development is considered an EIA development as it falls within the description and thresholds in Schedule 2 10(b) of the EIA Regulations as an 'Infrastructure Project - Urban Development Project' which has the potential to have significant effects on the environment. In accordance with Schedule 2, Categories 10(b) (urban development projects) of the EIA Regulations and owing to the location, scale and nature and of the Proposed Development, I note that you recognise the need for an EIA and have therefore submitted the scoping report for consideration to the City Council, as Local Planning Authority.

Before adopting a Scoping Opinion the City Council, as Local Planning Authority, must take into account the information specified in Regulation 15(6) of the EIA Regulations.

- (a) any information provided by the applicant about the proposed development;
- (b) the specific characteristics of the particular development;
- (c) the specific characteristics of development of the type concerned; and
- (d) the environmental features likely to be significantly affected by the development.

This Scoping Opinion sets out the information that the City Council, as Local Planning Authority, considers should be included in the ES that the applicant intends to submit with the planning application in respect of the Proposed Development.

In formulating this Scoping Opinion the City Council, as Local Planning Authority, has taken account of, the requirements of the EIA Regulations, the nature and scale of the Proposed Development, the nature of the receiving environment, current best practice in the preparation of environmental statements, and the views expressed by the organizations and bodies that responded to consultation on the Scope of the proposed ES.

This Scoping Opinion should not be construed as implying that the City Council, as Local Planning Authority, agrees with the conclusions set out in the Scoping Request regarding impacts of the proposal. This Scoping Opinion is without prejudice to any decisions subsequently taken in respect of any planning application submitted in respect of the Proposed Development.

Your report of February 2022 sets out the proposed chapters that the ES will cover, and the disciplines which you believe should be scoped out of the EIA.

These are as follows:

Scoped In

Townscape and Visual;
Heritage;
Ground Conditions;

Scoped out

- *Agricultural circumstances;*
- *Aviation*
- *Air quality and dust;*

- *Archaeology;*
- *Daylight and Sunlight;*
- *Ecology and nature conservation;*
- *Electronic Interference;*
- *Noise and Vibration;*
- *Transport and Access;*
- *Flood Risk and Drainage;*
- *Wind Microclimate;*
- *Socio-Economic;*
- *Human Health; and*
- *Climate Change.*

Below is a consideration of the scoping report for the Proposed Development and comments on the approach which you have outlined.

CONSULTATIONS

Regulation 15 (4) of the EIA Regulations require the City Council, as Local Planning Authority, to consult appropriate bodies prior to adopting a Scoping Opinion.

Having regard to Regulation 2 of the EIA Regulations, the following consultees were consulted who have specific environmental responsibilities and which the City Council, as Local Planning Authority, considers are likely to have an interest in the development proposal.

- Historic England;
- Natural England;
- Environment Agency;
- Greater Manchester Ecology Unit (GMEU);
- Greater Manchester Archeology Advisory Service (GMAAS);
- Transport for Greater Manchester (TfGM);
- City Council Highway Services;
- City Council Environmental Health;
- City Council Flood Risk Management;
- Manchester Airport Group Safeguarding.

All responses of the consultees contacted by the City Council, as Local Planning Authority, during the EIA scoping process are appended to this letter.

You are strongly recommended to consult further with consultees as appropriate throughout the planning application process as the development proposal evolves. It is thereby recommended all consultee responses are reviewed by the applicant in full.

Any subsequent ES submitted with a planning application should reflect the points raised by the consultation bodies where this reflects the requirements of the Regulations. It is recommended that the ES summarises the scoping responses from the consultation bodies and how they are, or are not, addressed in this regard. Any consultation responses received after the date of this letter, that have not been taken into account within this Scoping Opinion, will be forwarded to the applicant and should be given due consideration in the planning application process EIA process.

CONTEXT

The site is approximately 0.298ha and is part occupied by a building known as Alberton House a partially vacant office building, part 12, part 4 storey office building, which has an L-shaped footprint with its main entrance set back from the street edge of St Mary's Parsonage. The 12 storey part of the building abuts the River Irwell on its north western edge and back of house servicing access is provided off St Mary's Parsonage along the Site's south western edge where there are areas of hard and soft landscaping adjacent to the River Irwell.

The Site is identified for redevelopment within the endorsed St Mary's Parsonage Strategic Regeneration Framework ('the SRF') (August 2020). Immediately adjacent to the service access route, to the west of the existing building, is the access to the pedestrian footbridge (Trinity Bridge), which provides a key connection between Salford and Manchester City Centre. The existing footbridge access off St Mary's Parsonage is positioned between the Albert Bridge House car park and the Alberton House service road.

To the south of the Trinity Bridge pedestrian access is Albert Bridge House, an 18 storey 1950's commercial office building. To the south east is 3 St Mary's Parsonage and Reedham House, which are each four storey Grade II listed buildings. To the north of the Site is Cardinal House, which is a ten storey commercial office building, built in the 1970's. All three of these neighbouring sites are identified within the SRF as having potential for complete or partial redevelopment, although no formal proposals have been submitted for the sites to date

The area which is the subject of this Scoping Opinion is located in the south eastern portion of the SRF Area. The Site is not located within a Conservation Area, although it is situated just outside of the boundary of the Parsonage Gardens Conservation Area within the setting of a number of listed buildings (as identified below as sensitive receptors).

The site lies within a highly accessible City Centre location accessible by a variety of public transport including Metrolink, bus and rail.

SENSITIVE RECEPTORS

The site is located within the Greater Manchester Combined Authority Air Quality Management Area (AQMA). The site is not within, nor does it contain, any ecological designations including sites of specific interest (SSSI), sites of biological importance (SB1) or special protection areas (SPA). The site is not located in an Area of Outstanding Natural Beauty (AONB) or any other area designated for its landscape value. The closest watercourse to the site is the River Irwell located adjacent to the sites northern border.

The Site, is mainly located in Flood Zone 1 and this portion of the Site is of a low risk of flooding (indicating a less than 1 in 1,000 annual probability of flooding). The north western boundary of the Site is located within Flood Zone 3 (indicating a high probability of flooding of 1 in 100 or greater, this part of the Site is within an area with a high probability of flooding. The site is situated within the Manchester, Salford and Trafford Critical Drainage Area (CDA).

There are no designated heritage assets (Scheduled Monuments, Grade I, II* and II Listed Buildings, Conservation Areas, Registered Parks and Gardens or Registered Battlefields) within the site boundary. There are 15 built heritage assets within a 250m radius of the site. The closest heritage assets to the site are:

- Grade II Listed Century Buildings, located to the north east of the site;
- Grade II Listed 3 St Mary's Parsonage, located adjacent to the east of the site;
- Grade II Listed 31 & 33 King Street West located to the south east of the site;
- Deansgate/ Peter Street Conservation Area located to the south east of the site; and
- St Mary's Parsonage Gardens Conservation Area, located adjacent to the sites eastern border.

Due to the high level of built form around the Site it is considered this radius is proportionate for the purposes of this assessment.

Century Buildings to the north east of the site is a residential building.

PROPOSED DEVELOPMENT

The Proposed Development would involve the demolition of existing building and erection of a new 20 storey building (approx. 117 AOD) comprising 16 floors of office (Class E), 2 floors of retail (Class E) and a two storey rooftop pavilion comprising an ancillary wellness centre to directly serve the commercial office tenants (Sui Generis) with landscaping and public realm; and other associated works

ASSESSMENT OF THE SCOPING REPORT

I have now had a chance to consider your scoping request alongside the consultation responses received and I outline my response below.

Overall I can confirm that the content of the submitted 'Formal Scoping Opinion Request' is considered to be appropriate and will form a generally appropriate structure for the Environmental Statement. This is also reflected in the nature of the consultation responses issued with this letter. You should note the specific points I have made below within the

specific discipline areas which reflect the comments of the consultees and particularly regard must be given to these and those of the City Council, as Local Planning Authority.

These matters should also be included and addressed within the relevant chapters of ES.

Discussion of alternatives

Paragraph (3)(d) of Regulation 18, and paragraph 2 of Schedule 4 of the EIA Regulations, require that environmental statements include discussion description of the reasonable alternatives to the Proposed Development and an indication of the main reasons for the option chosen, that have been considered by the applicant.

The alternatives detailed within the scoping report are considered to be acceptable. The ES should include an indication of the main reasons for the option chosen, including a comparison of the environmental effects.

Presentation and content of the Environmental Statement

The purpose of an ES is to enable significant environmental impacts of a proposed development to be fully considered before an application for planning consent is determined.

The ES provides environmental information to aid the decision making process. The ES should be laid out clearly, with minimum use of technical terms (where appropriate) and should provide an objective and realistic description of the likely significant impacts of the proposed development.

The information should be presented in a manner which is comprehensible to the specialist and non-specialist alike. The ES should be concise with supporting technical information placed in appendices

Mitigation

Mitigation measures may fall into a range of categories namely:

- avoidance of impacts;
- reduction in the magnitude of impacts; or
- compensation for losses incurred through unavoidable impacts;

These should identified in this manner within each of the technical chapters of the ES.

Mitigation measures should not be developed in isolation, as they may relate to more than one aspect of the environment (e.g. mitigation to address issues of landscaping, surface water management, air quality and biodiversity).

The ES should set out the mitigation measures required to prevent, reduce and where possible offset any significant adverse effects. The ES should also identify any residual effects that could be expected to persist even with mitigation in place.

The anticipated effectiveness of any mitigation measures proposed should be addressed within the ES. Only mitigation measures that can be shown to be deliverable (i.e. technically and financially viable), and which the applicant can deliver and implement as

part of any planning permission granted, should be taken into account as part of the assessment.

It is further recommended that a section is included in the ES in which the mitigation measures proposed across all the technical chapters are collated and presented as an integrated package.

It is considered best practice to outline in the ES, the structure of the environmental management and monitoring plan.

Cross references and summarising of the findings

All specialist chapters should be cross-referenced to other relevant disciplines (for example air quality impacts on ecology, traffic impacts on air quality). Consideration of the potential for interactions between the different aspects of the environment is essential to the production of a robust assessment.

The ES should not just be a collection of separate specialist chapters, but a comprehensive assessment of the environmental impacts of the proposed components of the wider scheme, and should account for how the identified impacts could be mitigated or avoided, or how suitable compensation could be provided to offset those effects.

In accordance with the requirements of paragraph 6 of Schedule 4 of the EIA Regulations, each technical chapter should include a description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of any difficulties (e.g. technical deficiencies, lack of know-how, etc.) encountered by the applicant during the preparation of the ES and the main uncertainties involved.

ENVIRONMENTAL MATTERS TO BE SCOPED OUT OF THE ES

The City Council comments as follows, based on the information provided, on the matters proposed to be scoped out of the ES.

Agricultural Circumstances

The scoping report states the site is on brownfield land in an urban environment. There will be no likely significant effects on agriculture and therefore this topic area can be scoped out of the EIA.

Aviation

The overall scale of the Proposed Development does not exceed the aviation safeguarding threshold resulting in no significant effects on the aviation environment. I therefore accept that aviation can be scoped out of the ES.

Air Quality

The comments within your scoping report are noted. It is accepted that subject to an Air Quality Assessment being submitted as part of the supporting documents to the planning application to include the following details:

- An assessment for future receptors (ground floor receptors and upper floor residential) and include PM10 and PM2.5 as well as NO2.

- Assessment of fugitive dust emissions and mitigation measures during the demolition and construction phase. Reference to IAQM best practice measures shall be made and adopted through the development. Details of clean air filters should be provided where required along with their location on the building and maintenance / replacement requirements.

that Air Quality can be scoped out of the ES.

Archaeology It is noted that there are no designated heritage assets, such as listed buildings, within the Site and there are no below-ground archaeological remains that are afforded statutory protection as designated heritage assets that would require preservation in-situ. The Scoping Report observes that Salford Archaeology, has concluded that the archaeological interest in the Site dates primarily to the eighteenth and nineteenth centuries. Any such remains are likely to be of High Local / Borough significance, pending the extent to which buried physical remains survive in-situ. It is noted that further investigation to confirm the presence, extent and significance of the archaeological resource across the Site has been agreed and will be implemented prior to any development works.

It is accepted that Archaeology can be scoped out of the ES provided the planning application is supported by a comprehensive archaeological desk-based assessment to assess the potential impact of the Proposed Development on the sub-surface archaeological resource.

Climate Change

I consider climate change (with the exception of social value) cannot be scoped out of the ES for the reasons set out below.

Daylight, Sunlight and Overshadowing

Due to the scale of the Proposed Development, the preliminary review of the likely effects relating to daylight, sunlight and overshadowing has revealed that due to the distance and orientation of the Proposed Development from any existing surrounding residential receptors, it is considered that there is no potential for significant environmental impacts. The closest residential receptor, Century Buildings, only has very limited windows overlooking the Proposed Development, and research indicates that these windows serve a dual aspect room, with an alternative window facing away from the Proposed Development.

I accept that a daylight, sunlight and overshadowing assessment is capable of being scoped out of the ES provided an appropriate report, including mitigation should this be required, accompanies any future planning application. On this basis, a Daylight and Sunlight chapter is not considered necessary, and will be scoped out of the EIA.

Ecology and nature conservation

The comments within your scoping report are noted. The site currently comprises an office building Alberton House which fronts onto St. Mary's Parsonage in central Manchester and the rear of the building looks out onto the River Irwell close to Spinningfields and Deansgate. There are two building blocks forming an 'L'-shape of five and eleven storeys

faced with red brick and flat roof. There are areas of formal planting at the front of the building and, at the back, a balcony over slabbed sloping ground that runs down to a narrow wooded corridor on the banks of the River Irwell which are of limited ecological value and any potential impact on ecology is considered to be of no more than local significance. There is negligible potential for roosting bats to be present within the building, and no evidence of roosting was found during the building inspection. The habitats on Site were of low value to foraging and commuting bats, although the woodland area next to the River Irwell corridor offered some forage habitat. No evidence of other protected species was found during the survey. Potential for nesting birds is identified within the denser shrub planting and within trees/woodland areas. The ecological value of the development site is low with the main potential impact being on the River Irwell and it is noted that there is the potential to enhance ecology and biodiversity in this area.

Demolition is recommended to be outside the bird breeding season (March – August inclusive). If this is not the case then a pre commencement survey should be included and should encompass an assessment for breeding black redstart (Schedule 1 Wildlife & Countryside Act 1981).

Given the number and proximity of black redstart records (GMLRC), it is recommended that enhancement measures are included for this species (Greater Manchester Biodiversity Action Plan Species). This could include consideration of construction of a green or brown roof.

On this basis I accept that an ecological assessment can be scoped out of the ES and can instead form part of the supporting documents to the planning application.

Notwithstanding this the following should be submitted to support the application:

- A Phase 1 Habitat Survey, which may help to inform any proposals to improve the nature conservation value of the site / area.
- A Bat survey
- Details of measures to be taken to prevent any potential impacts of the development proposal on the adjacent River Irwell.
- The Ecology Report should use an appropriate biodiversity metric such as Biodiversity Metric 3.0 together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
 - calculate the losses and gains in biodiversity unit value resulting from proposed development
 - demonstrate that the required percentage biodiversity net gain will be achieved
- Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

It should be noted should the planning submission be delayed beyond survey season 2022 then the survey would need to be revisited.

Electronic Interference / TV and Telecommunications

The comments within your scoping report are noted. It is accepted that subject to a television, FM Radio and DAB radio reception assessment being submitted as part of the supporting documents Electronic Interference / TV and Telecommunications that Air Quality can be scoped out of the ES.

Human Health

The comments within your scoping report and e-mail of 21st April 2022 are noted. On the basis that any impacts associated with Human Health will be considered within the Climate Change and that any mitigation is captured within that Chapter it is agreed that Human Health can be scoped out of the ES.

Noise and Vibration

The comments within your scoping report are noted. The Report indicates that the proposed development is to be office accommodation.

The submitted Acoustic Assessment will need to include the following details and considerations:

- I. Internal noise levels need to meet the criteria set out in MCC's Planning Noise Guidance document (included in the link below) and consider details of the maximum internal noise level permissible to not exceed the external levels recommended, details of façade / glazing / door performance, details of any lobbied door system and performance / specification.
- II. In terms of noise from the external terrace the assessment should confirm the distance to the receptors. It will need to confirm and agree the proposed number of patrons / terrace capacity and hours of use for the external areas, especially as the assessment refers to over 600 people using the external roof terrace which would be far too excessive with residential nearby. The assessment can be based on 50% of people talking as included in the scoping report. The use of external speakers or music of any kind in the external terraces would not be supported and the use would not be supported beyond 23:00 (shorter hours may be recommended once the full details are known).
- III. Any plant to be installed will need to be selected and designed and subsequently be assessed against MCC's Planning Noise Guidance document (including kitchen extraction). The representative background noise has been provided which is accepted (North and East Elevation 54dB day and 51dB Night, and South and West elevations 51dB and 48dB night). However, the proposed limits do not seem to correspond to the background noise levels and the 5dB below criteria as they appear to be higher than the criteria and this needs to be reviewed.

- IV. Construction noise impacts will be assessed and managed through measures in the CEMP and noise and vibration control measures including site noise and vibration levels will need to be agreed by MCC .

See link to Guidance below:

http://www.manchester.gov.uk/info/500207/planning_and_regeneration/1962/additional_planning_guidance/3

On the above basis I agree that Noise and Vibration can be scoped out of the ES.

Transport and Access

The comments within your scoping report are noted. I consider that Transport and Access does not need to be included as part of the EIA and on the basis of these it is agreed that Transport and Access can be scoped out of the ES. The application should however be supported by a Transport Assessment (TA). The TA should consider the impact of the development on the existing public transport networks in terms of extension of bus services, additional person trips. Mitigation measures should be considered where appropriate. (further guidance on the content of the TA is given in the attached comments from MCC Highways and TFGM)

You should note that Highways and Curtins have discussed the proposed loading bay design. Two options are proposed (Drawing 80058-CUR-XX-00-D-TP-75002-P01_Loading Bay Option1 and Drawing 80058-CUR-XX-00-D-TP-75003-P01 Loading Bay Option2). Both these options have been subject to an independent road safety audit which found no concerns with the design but detailed concerns of the lack of traffic calming proposed on St. Marys Parsonage southbound.

Highways would accept either Option 1 or Option 2, but on the condition that traffic calming is proposed on St. Marys Parsonage southbound.

A Framework Travel Plan for the development should accompany any future planning application.

In relation to bus infrastructure, for example relocation of existing bus stops or the creation of new bus parking areas, TfGM would request that the developer liaise directly with TfGM's bus infrastructure which can be contacted at Shelters@tfgm.com

Water Resources (including Drainage and Flood Risk)

The comments within your scoping report are noted and are generally however the following should be noted:

The proposed development is situated within Flood Zone 1&3 low - high probability from the River Irwell. The Flood Map for Rivers and Sea can be viewed at: <http://maps.environment-agency.gov.uk/>.

The proposed development is generally within an area at very low risk of surface water flooding. The Flood Map for Surface Water can be viewed at: <http://maps.environment-agency.gov.uk/>.

The proposed development is within an area at low susceptibility to groundwater flooding.

MCC does not hold any recorded incidents of flooding within the site.

The area is situated within the Conurbation Core Critical Drainage Area and in accordance with the Manchester City Council SFRA at least a 50% reduction in surface water runoff should be provided through SUDS as part of any development which is situated on a brownfield site.

Surface water management for the site needs to follow the drainage hierarchy:

- Infiltration into ground
- Connection to the watercourse
- Connection to discharge water sewer and as a last resort;
- Connection to the combined sewer.

Surface water should be managed to ensure there is no increased surface water from the proposed development and runoff from extreme events should be retained within the site such that the adjacent third party land is not affected.

The Government has strengthened planning policy on the provision of sustainable drainage systems (SuDS) for 'major' planning applications which was introduced on 6 April 2015 (Paragraph 103 of National Planning Policy Framework and Ministerial Statement on SuDS). As per the guidance issued by the Department of Communities and Local Government (DCLG), all 'major' planning applications being determined from 6 April 2015, must consider sustainable drainage systems. Due to the size of the development the restriction for implementing SuDS within the site layout is minimal. We would also recommend that SuDS are drawn up within the site layout at the early stages of design.

The suitability of sustainable drainage systems should be assessed in accordance with paragraphs 051, 079 and 080 of the revised NPPF Planning Practice Guidance for Flood Risk and Coastal Change (<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>).

Sustainable drainage systems should be designed in line with national Non-Statutory Technical Standards for SuDS (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf) and local policies EN08, EN14 and EN17 of the Core Strategy.

Hydraulic calculations and drawings to support the design need to be provided and updated along with proposed standards of operation and maintenance in accordance with paragraph 081 of NPPF Planning Practice Guidance.

On the basis that the above and any mitigation is captured within the Flood Risk Assessment and Drainage Strategy it is agreed that Water Resources (including Drainage and Flood Risk) can be scoped out of the ES.

Lighting

There are no comments within your scoping report in relation to lighting however it is accepted that Lighting is capable of being scoped out of the ES but information on this should form part of the supporting documents to the planning application.

Socio-economic impacts

The comments within your scoping report and e-mail of 21st April 2022 are noted. On the basis that any Socio Economic Impacts associated with the development will be considered within a supporting Economic Statement (and that any mitigation is captured within that Report) and that impact on the economy and job creation and the contribution that this will make to the ongoing regeneration within this part of the City will be addressed within the Planning Statement it is agreed that Human Health can be scoped out of the ES.

Wind Microclimate

The comments within your scoping report in relation to this topic area are noted. On the basis that a Wind Report is to be submitted with the application and that any mitigation is captured within that Report it is agreed that Wind Microclimate can be scoped out of the ES.

Waste

There are no comments on this within your scoping report. The approach to waste management should cover management of commercial waste with a waste assessment and a completed waste proforma will need to be provided with the application to demonstrate that the commercial waste storage and collection regime will comply with the requirements of GD04. Subject to this detail and a Site Waste Management Plan ('SWMP') forming part of the supporting documents to the planning application, Waste can be scoped out of the ES.

Accidents and disasters

There are no comments on this within your scoping report however it is considered that the nature of the proposed development is such that it not considered to pose risk of major accidents and/or disasters. As such, accidents and disasters can be scoped out of the ES.

Summary

I agree that some of the matters you have identified to be scoped out of the ES are appropriate with the addition of Accidents and Disasters, Lighting and Waste. I am of the opinion, however, that Climate Change Impacts (with the exception of social value) (further details provided below) should be part of the ES.

The planning application must be supported by appropriate documentation, including any mitigation, to minimise any effects as a result of the Proposed Development from the matters capable of being scoped out. The City Council reserves the right to re-consider this position following a more detailed consideration of the reports which will accompany the planning application.

ENVIRONMENTAL STATEMENT CHAPTERS - SPECIFIC COMMENTS ON THE TECHNICAL CONTENTS

The ES should be proportionate in its consideration of the aspects of the environment listed under Paragraph 2 of Regulation 4 of the EIA Regulations. Those aspects of the

environment that are subject to the most significant impacts from the Proposed Development should be the primary focus of the ES.

Your scoping report advises that the ES will cover the following topic areas.

- Townscape and Visual Impact;
- Heritage
- Ground conditions

As highlighted above, you should also include Climate Change, Human Health and Socio-Economic Impacts within relevant chapters within the ES.

General Comments

The scoping report identifies the development site as being located within Manchester City Centre. For planning purposes, the development site is located in the Regional Centre (policy EC3) as defined within the Manchester Core Strategy (2012).

The significance of the site in regional terms should be reflected throughout the ES. The Environmental Chapters must therefore consider the impacts of the Proposed Development on the local context 'Regional Centre' together with Manchester City Centre, the North West Region and the national context (where appropriate) in order to determine any wider significant environmental impacts.

Ground conditions

The comments within your scoping report are noted and are acceptable in terms of their consideration in the ES subject to a Phase 1 Preliminary Site Assessment (PRA) being submitted as part of the supporting documents to the planning application.

Townscape and Visual Impact

The comments within your scoping report including the Receptors and Key views within Appendix II LVIA Figures are noted and are acceptable in terms of their consideration in the ES.

It is essential that the ES considers the cumulative impacts of other developments in order to full understand the likely impacts of the Proposed Development.

Heritage

The comments within your scoping report (including the intention for consultation to be undertaken with MCC and Historic England to agree the scope of the Chapter) are noted and on this basis are acceptable in terms of their consideration in the ES.

Climate Change

It is considered that the climate change impacts of the Proposed Development are significant (including the need to evaluate and consider the whole life cycle carbon implications of the sites redevelopment) and require assessment through the EIA process.

The Proposed Development is likely to give rise to significant environmental impacts on the climate which should be considered and evaluated through the ES. The ES should

consider the impact of the Proposed Development on climate change both through the construction and operational phases of the development and the significance of these impacts needs to be considered.

A broad approach and methodology for assessing the impact on climate change should be considered. Impacts and potential mitigation from the other technical chapters should feed into this assessment particularly around management of surface water, waste management, green and blue infrastructure, biodiversity and ecology, travel planning and efficiency of the building fabric, an assessment of the lifecycle of the building (including management of embodied carbon) and use of renewable energy as part of promoting a low carbon development and reducing emissions and the likely environmental impacts of this. It is however agreed that social value can be scoped out on the basis that this is to be addressed elsewhere in the application as detailed in your e-mail of 21st April 2022.

Cumulative impacts

The list of cumulative sites for assessment has been considered in order to assess any cumulative impacts of developments in this part of the City Centre is acceptable in terms of consideration in the ES with the addition of the following:

App ref no 132429/FO/2021: Two Parcels Of Land Known As "Trinity Islands" Bounded By The River Irwell, Regent Road, Water Street, Trinity Way And The Railway, Manchester M3 4JW

Erection of four towers ranging from 39, 48, 55 and 60 storeys to form a mixed use development comprising 1950 residential apartments (Use Class C3a) and commercial uses (Use Classes E and Sui Generis: Drinking Establishment) (361 sqm) within the podium level together with public realm, car and cycle parking, access arrangements and highway works, and other associated works; and

132199/FO/2021: Plot F, Great Jackson Street, Manchester

Full planning permission for the demolition of existing structures and the erection of two 51-storey residential buildings (Use Class C3) across two phases, including residential amenity facilities, basement car parking, landscaping and public realm, servicing and access arrangements, highways alterations, and associated works.

FURTHER INFORMATION

The City Council, as Local Planning Authority, has undertaken a thorough consideration of the information contained within your scoping report together with providing comments from relevant statutory consultees. The issuing of this Scoping Opinion does not preclude the City Council, as Local Planning Authority, from requesting further information at a later stage as the development proposals evolve or whilst a future planning application is being formally considered.

This letter also confirms the matters within part I of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that need to be covered within the Environmental Statement.

If you wish to discuss the above please contact Angela Leckie on the above number.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Julie Roscoe', enclosed within a thin black rectangular border.

Julie Roscoe

Head of Planning (attachments sent by e-mail)



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