

06 May 2022

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

FAO Jennifer Atkinson

Dear Jennifer

**Viadux, Albion Street, Manchester – Application for Minor-Material Amendments to Planning Permission
Ref. 126868/JO/2020**

On behalf of our client, Salboy Central Ltd ('the Applicant'), we hereby submit an application under Section 73 (S73) of the Town and Country Planning Act 1990 (as amended) in order to make a Minor-Material Amendment (MMA) to Planning Permission 126868/JO/2020.

The Site

The Application Site (referred to as 'the Site') comprises the eastern-most section of the Grade II Listed Castlefield Viaduct. It is bounded by the Grade II* Manchester Central Conference Centre to the north, Albion Street to the east, the rear service courtyard to Beetham Tower to the west, and Deansgate Castlefield tram stop and Deansgate Locks to the south.

Planning History

Planning Permission (Ref 115871/FO/2017) was granted at the Site on 27 July 2017, for:

Erection of a 40 storey building to form 375 residential apartments (Use Class C3a) and the erection of a 14 storey building for form offices (Use Class B1) (31,756 sqm) together with ground floor commercial space (Use Class A1, A3 or A4) (1010 sqm) with associated enclosed service yard, public realm including staircase and lift to connect with viaduct, car and le parking, landscaping and other associated works.

On the same date, Listed Building Consent was granted at the Site (115872/LO/2017) for the following description of development:

Listed Building Consent for alterations to viaduct structure including insertion of columns and circulation cores, creation of shop fronts to Great Bridgewater Street, stair case to Great Bridgewater Street and alteration and removal of cast iron ribs to Great Bridgewater Street bridge in association with the erection of a 40 storey building to form 375 residential apartments (Use Class C3a) and the erection of a 14 storey

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 1 New Street Square, London, EC4A 3HQ, United Kingdom.

Deloitte LLP is the United Kingdom affiliate of Deloitte NSE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NSE LLP do not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms.

© 2022 Deloitte LLP. All rights reserved.

building for form offices (Use Class B1) (31,756 sqm) together with ground floor commercial space (Use Class A1, A3 or A4) (1010 sqm) with associated enclosed service yard, public realm including car and cycle parking, landscaping and other associated works.

These approvals were subsequently amended via the following consents.

A Minor Material Amendment ('MMA') application (Ref 126868/JO/2020) approved on 20 August 2020 for:

Variation of planning conditions 2, 3, 21, 24, 25, 29, 30, 31, 32, 36 and 38 of planning permission 115871/FO/2017 (amended by 126604/NMC/2020) to allow for a reduction in overall height of the building by 2.5 metres, changes to the number and type of structural interventions into the listed arches, modification and alteration to the bridge over Great Bridgewater Street, alterations to the ground floor layout including enlargement of residents lobby together with re-location of the cycle store and reduction in car parking, alterations to the upper floor layout to remove 3 bedroom apartments and elevational alterations to main facade of the residential tower to modify the fin arrangement together with alteration to the podium with the introduction of perforated panels.

An amendment under Section 19 (S19) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (Ref. 129168/JO/2021) approved on 4 March 2021 for:

Amendments under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to the approved drawings as detailed in Conditions 2, 5, 6, 8, 9 and 10 of Listed Building Consent Ref 127365/LO/2020.

In addition to these approvals, an application pursuant to the main consent (Ref. 127260/FO/2020) was submitted in relation to the north western corner of the Site for the erection of a staircase and lift linking Great Bridgewater Street to the Castlefield Viaduct; construction of a new residential entrance on Great Bridgewater Street; lobby and amenity space within the viaduct; landscaping and associated works. This application was approved on 28 October 2020.

Further Non-Material Amendments (NMA) were approved to the amended Planning Permission Ref. 127260/FO/2020 in 2021, as set out in the table below:

Application Reference	Description	Status
129153/NMC/2021	Alterations to the ground floor including enlargement of amenity area, reducing the size of the commercial floorspace, together with alterations to the cycle store and access, relocation and enlargement of residents lounge to level 1 together with alterations to boundary treatment and enlargement of gym floor spaces to podium together with associated alterations to public realm and elevational alterations.	Approved 4 March 2021
131326/NMC/2021	Facilitate elevational alterations to stair, planters and lift shaft including modifications to materials.	Approved 26 August 2021

Background

All amendments to-date have related to Phase 1 of the development, the residential tower. Detailed design work has also been undertaken on Phase 2, the office building, to respond to more detailed analysis and understanding of the Site, and anticipated occupier requirements. As a result further amendments are now sought to planning permission 126868/JO/2020 and LBC 129168/JO/2021.

Pre-application Consultation

The approved development at the Site was subject to a comprehensive process of public and stakeholder engagement, including engagement with Historic England, Places Matter!, the Environment Agency, Greater Manchester Police, local businesses and residents, and local Ward Councillors.

This application for an updated scheme is submitted following pre-application consultation with the Planning Authority. A meeting was held with the Local Planning Authority on 06 October 2021 in order to discuss the amendments and agree the scope of the application

A further meeting was held with the Local Planning Authority on 14 March 2022 in order to present the final proposed design of the scheme and agree that all of the changes proposed could be progressed as amendments to the planning permission and listed building consent.

Scope of Application

This application seeks planning approval for changes to the approved design of Phase 2 of the consented scheme. The development proposed remains very similar in nature to the planning permission granted by Manchester City Council (MCC) in August 2020 (Ref. 126868/JO/2020). Pre-application meetings have been held with planning officers at MCC who have confirmed that the changes proposed under this application constitute minor material amendments to the permitted scheme.

Whilst not changing the character of the approved scheme, the proposed amendments do deviate from the description of development on the original 2017 Decision Notice. It is noted that this description was not carried forward onto the 2020 MMA consent, which now forms the primary consent, which is currently under construction, and only refers to the amendments sought at that time.

Accordingly, a concurrent application has been submitted under Section 96A (S96A) of the 1990 TCP Act to regularise the description of development and ensure consistency between the description of the approved and amended development. As the change to the description of the development on the face of the permission will not in itself involve an amendment to the development, the City Council is entitled to consider that amendment to be “non-material”. The S96A application proposes an amended description to read:

“Erection of a 40 storey building to form 375 residential apartments (Use Class C3a) and the erection of a 15 storey building for form offices (Use Class B1) together with ground floor commercial space (Use Class A1, A3 or A4) with associated enclosed service yard, public realm including staircase and lift to connect with viaduct, car and le parking, landscaping and other associated works.”

This S73 application proposes amendments to conditions 2, 3, 18, 20, 21, 24, 25, 29, 30, 31, 32 and 36 attached to the consent.

Minor Material Amendments to the Approved Development

The siting and use of the development remain unchanged from that which was approved by the City Council on 20 August 2020, with minor changes proposed to the height and layout of the development.

In the context of the approved scheme on the Site, the principles of the development of the design and scale proposed is clearly established. The proposed changes are summarised below and also detailed within the enclosed summary document prepared by SimpsonHaugh & Partners.

Office core

- The office core has been rotated through 90 degrees and an additional passenger lift added to improve the performance / waiting times.
- The goods lift has been updated to include a double-sided opening car with direct access to back of house for servicing.
- The rotation of the core reduces the impact and demolition of the Grade II listed Castlefield Viaduct.

Servicing and substations

- The main servicing of the office has been moved from Level 01 (Manchester Central service yard) to Trafford Street.
- The refuse storage at Level 01 has been relocated underneath the existing servicing ramp to the Manchester Central service yard.
- The layby to Albion Street has been omitted and the full pavement width has been restored, improving the pedestrian environment.
- The lounge bar / coffee shop servicing remains from the loading area on Great Bridgewater Street.
- The substations have been relocated from Level 01 Manchester Central service yard to the ground floor with direct access from the service road to Albion Street.

Retail use

- Retail unit 2 has been combined into the adjacent residential lounge / bar fronting Great Bridgewater Street. This results in a change to the phasing at ground floor with the lounge bar being constructed as part of phase 2.
- An illuminated canopy has been incorporated to provide emphasis to the main lounge / bar entrance.
- Retail unit 3 has become a coffee shop serving the office as part of the amenity provision and public realm from Great Bridgewater Street.

- An external seating area has been added underneath the tram bridge adjacent to the junction of Great Bridgewater Street and Albion Street.
- The combined width of the coffee shop service corridor and office escape and firefighting access route to Great Bridgewater Street will result in the need to increase the size of opening through the listed Viaduct arch.

Office foyer & entrance

- The pavilion building upper office floors and core (2 no. 250sqm floors) have been omitted to provide a triple height entrance foyer and a sense of arrival commensurate with an office development of this size.
- The office entrance has been moved further down Albion Street to remove internal level changes and increase the headroom available underneath the tram bridge. This enables the reception desk to be located under the bridge, closer to the main core which improves the sense of arrival, visibility and accessibility.
- The office cycle store, changing facilities and plant have been reconfigured to enable the cycles to be positioned within the historic arches and plant under the Metrolink bridge.
- The residential cycle store has also been repositioned into the same arch as the office cycle store which is located closer to the entrance from Albion Street. This enabled the swimming pool changing facilities and plant to be exchanged, repositioning the changing facilities closer to the main residential core.

Tram Encapsulation

- The tram has been encapsulated within a precast concrete tunnel which will be seen externally and from within the reception foyer. The sides of the encapsulation will feature a mural / relief providing visual interest.
- The encapsulation deals with issues of fire, acoustics, derailment and bomb blast and creates a safe zone for construction. It will also provide a safe landing zone for the BMU during the cleaning & maintenance of the building.
- Along with full height glazing edge protection, the encapsulation will also assist with the planning condition which requires a scheme to be presented to protect the Metrolink infrastructure from objects being able to be thrown from the adjacent roof gardens.

Office Amenity Space / Green rooms

- The office design has evolved considerably since the application was approved in 2017 and the provision of amenity space has become an important addition for users. Shared amenity space has therefore been added at level 02 with access to external terraces to the east and west.
- Amenity space for each office floorplate (level 03 upwards) has been added through the creation of a landscaped, naturally ventilated winter gardens which provides a focal point and visual interest to the floorplates.

- The winter gardens consist of double and single height spaces to allow for different scales of planting and provide a connection to nature through Biophilic design principles. The double height spaces have been designed as naturally ventilated wintergardens with a glass louvred façade. The position on the south-east façade assists with solar control and provides uninterrupted views to the surrounding streetscape.
- The winter gardens are naturally ventilated with a glass louvred façade and consist of double and single height spaces to allow for different scales of planting. They will provide a connection to nature through Biophilic design principles.
- The upper roof terrace has been increased in size and repositioned to the full length of the south-east façade, providing a 180 degree view across the city and assisting with solar control.

Changes to structure

- The two-storey structural transfer truss expressed at levels 02 and 03 has been developed, enabling all columns to be positioned adjacent to the façade providing a column free floorplate.
- The number of columns passing through the service yard at level 01 and the Grade II listed Castlefield Viaduct have been reduced and repositioned to improve the circulation and manoeuvrability within the Manchester Central service yard.

Change to floor-to-floor height and an additional floor

- The office floor-to-floor height has been reviewed following a review of the main structural beam depth and the client decision to have exposed soffits and services and no ceilings.

As a result, the floor-to-floor height has been revised from 4100mm to 3950mm with a 2900mm floor to underside of structure ('BCO Guide to Specification - Best practice for offices – 2019' recommends a clear height of 2.8 to 3.2m for spaces over 18m in depth).

This provides a saving of 150mm per floor which equates to 1800mm over the 12 office floors. The structural review also resulted in Level 02 being lowered by 100mm.

Further co-ordination of the distance required between the top of the Tram Encapsulation and the underside of the office level 02 structure slab also resulted in the need to raise the upper floors by 350mm. This ensures an adequate maintenance zone of 1200mm is maintained to allow for the inspection of the steelwork to the underside of level 02.

- A further office floor (3950mm) has been added. The additional floor offsets the omission of the pavilion building office floors, together with the provision of amenity space and wintergardens to the main office floors. The approved office building height is +108.300m AOD and the proposed office building height is +110.800mm AOD, a nett increase in height of 2500mm.
- The overall office Net Internal Area (NIA) has been increased by 1,125sqm from approved 23,355sqm to proposed 24,480sqm.
- The office floor NIA increase and resultant occupancy change has been reviewed in terms of the provision of WCs, cycle spaces and facilities.

Façade changes

- Glass louvres have been introduced to naturally ventilate the green rooms / winter gardens.
- The repositioned upper roof terrace is fronted by a full height clear balustrade as a continuation of the façade. This runs the full length of the east façade, reduces the area of opaque glazing and provides more visual interest to the top of the building.
- The façade has been modelled and tested within its context to understand the solar radiation and inform the solar control coating and density of fritting to provide shading. This has informed the percentage of ceramic fritting applied to the glass to control the level of shading and subsequent reduction in heat gain. Rather than remaining constant, the level of opacity has been amended to respond to orientation; the south elevation employs 66% fritted panels, the east & west 33% and the north remains clear. This reduces overheating, cooling costs and saves heating energy.
- The fritting fenestration changes at Levels 02 & 03 to respond to the two-storey transfer truss, amenity provision and access to roof terraces.

Amendments to Phase 1 Building 2 (Residential) (Following Phase 2 Building 3 (Office) Coordination)

- Phase 1 Ground Floor residential cycle store, plant and swimming pool changing area have been interchanged. The swimming facilities have moved nearer to the residents' reception and main core and the cycles towards the entrance from Albion Street.
- Following further design development, the 3 gates into the service yard have been designed to slide behind the façade (internally rather than externally). This has enabled us to retain the residential façade fins which had been omitted to allow for the main service yard gate.
- The residential terrace at Level 02 has been amended to include a defensible landscape strip for privacy and to prevent overlooking into apartments from the terrace.

Changes to Supporting Documents

The following supporting documents have been updated to reflect the changes to the approved scheme sought as part of this S73 application:

Energy Statement

The Energy Strategy Statement prepared by Ridge has been updated to evaluate the technical and economic feasibility of low and zero carbon technologies in light of the proposed amendments.

Waste and Servicing Strategy

The Waste and Servicing Strategy prepared by Vectos has been updated to reflect the revised proposals to ensure they reflect the proposed amendments and meet MCC's latest waste guidelines. The Strategy states that the most notable change is an increase in the office floor area and relocation of the office waste collection to Trafford Street, permitting the removal of the layby on Albion Street. This results in only a marginal change in service vehicle activity and a small increase in waste generation and bin storage

which can be easily accommodated. The waste strategy for the residential and retail uses that form part of the development remains unchanged.

Ventilation Strategy

The Ventilation Strategy prepared by Ridge has been updated. For the main office areas, a mechanical ventilation air handling plant will be located at roof level with the ductwork dropping vertically down the central core risers. From the risers, horizontal ductwork will serve each floor with supply and extract ventilation. The air handling plant will draw in fresh air 10 metres from sources of pollution, such as exhaust louvres, in order to increase the BREEAM opportunity for the development. The roof top located standby generator will have its exhaust suitable located away from any fresh air intakes. All ventilation systems to the office will be in accordance with the BCO Guide for Offices.

For food and beverage areas, high level strip louvres and a soft spot have been allowed for future tenant to fit out accordingly. Grease Destruction odour control systems will be imposed on future tenants installing kitchen ventilation systems, in accordance with the DEFRA Guidance Document "Guidance on the Control of odour and Noise for Commercial Exhaust Systems".

Although natural ventilation can be used to good effect in spring and summer, a mixed mode system will be used whereby mechanical ventilation is used in winter to minimise heat loss and reduce overall CO2 emissions. A mechanical ventilation with heat recovery unit (MVHR) will be used to reduce the amount of heat needed to be added to the supply and, at times, can lead to no additional heat being required thus minimising CO2 emissions.

Environmental Impact Assessment ("EIA") Screening

The approved development at the Site was subject to an EIA assessing the entire development in 2017. An Environmental Statement ("ES") was submitted with the application.

Due to the limited nature and scale of the changes to the development proposed by the previous S73 application (126868/JO/2020), it was deemed that the conclusions of the 2017 ES were unchanged by the proposals and the accompanying cover letter set out the rationale for screening out any updates to the approved ES. The analysis was supported by technical notes pertaining to each of the EIA technical chapters.

It was noted that the previous Environmental Statement was prepared under The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended). Since the previous application was approved, more recent EIA legislation has since been made - The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Despite the change in legislation, it is not considered that this alone necessitates a resubmission of the ES as the 2017 Regulations are not fundamentally different to the 2011 Regulations. The amendments proposed do not impact upon the assessments carried in the approved ES with regards to climate change or human health.

The same rationale is proposed for this application due to the limited nature and scale of the proposed amendments. The following commentary provides rationale for screening out updates to the relevant technical chapters of the March 2017 ES:

Air Quality

There are no changes to the original report produced by RPS in support of the original 2017 application. The minor nature of the changes do not impact the conclusions of EIA deliverables in the original application and so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Archaeology

There are no changes to the original report produced by Salford Archaeology in support of the original 2017 application. The minor nature of the changes do not impact the conclusions of EIA deliverables in the original application and so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Construction Management and Phasing

There are no changes to the original report produced by Deloitte in support of the original 2017 application. The minor nature of the changes do not impact the conclusions of EIA deliverables in the original application and so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Daylight, Sunlight and Solar Glare Assessment

There are no changes to the original report produced by Gray Scanlan Hill in 2017. The minor nature of the changes proposed will not cause any additional significant effects and, as a result, the conclusions of EIA deliverables in the original application remain the same so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Ground Conditions

There are no changes to the original report produced by Renaissance in support of the original 2017 application. The minor nature of the changes do not impact the conclusions of EIA deliverables in the original application and so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Heritage Impact

Stephen Levrant Heritage Architecture (SLHA) has produced a Heritage Note to evaluate the proposed amendments. The initial Heritage Impact Assessment submitted in 2017 concluded that the development would result in localised instances of minor adverse impact upon the Grade II listed Castlefield Viaduct. The 2022 Note states that the revised proposals to the office core will amount to a reduction in direct heritage impact from the consented scheme, thereby resulting in a more sustainable and beneficial approach regarding heritage impact.

The proposed changes to the height and façade will not incur significant additional visual impacts on the settings of designated heritage assets in the surrounding area and so the conclusions summarised within the 2017 Heritage Visual Impact Assessment remain unchanged.

The national policy context has evolved since the original consent was granted (principally an update to the NPPF, 2021), however these changes will not result in any material change to the conclusions outlined within the original statement and so do not necessitate an update to the Environmental Statement chapter.

In summary, the nature of the changes will not cause any additional significant effects upon the Grade II listed viaduct and wider historic environment.

Noise and Vibration

A Noise and Vibration Chapter was prepared as part of the approved Environmental Statement. Hann Tucker have prepared a technical memorandum which assesses the proposed amendments against the approved Chapter, including the changes to the retail units and addition of an external seating area to Retail Unit 3 (the coffee shop).

Noise levels from the coffee shop are significantly below the acceptable noise limits and the operation of the outdoor seating area would constitute a negligible risk of noise impact.

The proposed amendments will therefore not impact the conclusions of the Noise and Vibration Chapter in the Environmental Statement and as such will not affect the conclusions of the Noise and Vibration Assessment in the Environmental Statement. Changes to this chapter have therefore been screened out of the assessment.

The technical memorandum serves as an addendum to the Environmental Statement and so the conclusions of the Statement can be considered to remain valid in light of the proposed amendments when taking the memorandum into account.

Socio-Economic

There are no changes to the original report produced by Deloitte in support of the original 2017 application. The minor nature of the changes do not impact the conclusions of EIA deliverables in the original application and so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Television Impact

There are no changes to the original report produced by Pager Power in 2017. The minor nature of the changes do not impact the conclusions of EIA deliverables in the original application and so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Townscape and Visual Impact

There are no changes to the original report produced by Planit-IE in support of the original 2017 application. The minor nature of the changes do not impact the conclusions of EIA deliverables in the original application and so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Traffic and Transport

Vectos has prepared a technical memorandum which assesses the proposed amendments against the approved Chapter.

The memorandum concludes that the main changes to the scheme are relatively minor in highways and transport terms. The service activity is to be located off Trafford Street and the layby on Albion Street is to be removed, allowing for an improved public realm, entrance and external seating.

In addition, there is now a larger cycle store accessible from Albion Street with some visitor cycle parking spaces located to the south of the entrance in between trees located there.

The highway layout on Albion Street and Great Bridgewater Street is being developed as part of the Section 278 design process and presents improved pedestrian crossing facilities and traffic movement.

These amendments result in changes in traffic implications and road safety that are only marginal and would not affect the conclusions made in the original Transport and Environmental Impact Assessments. Changes to this chapter have therefore been screened out of the assessment.

Water Resources

There are no changes to the original report produced by Renaissance in support of the original 2017 application. The minor nature of the changes do not impact the conclusions of EIA deliverables in the original application and so no further work is required. Changes to this chapter have therefore been screened out of the assessment.

Wind Microclimate

ArcAero undertook the technical assessment in relation to the Proposed Development. ArcAero have confirmed that the proposed changes are negligible in terms of wind and will have no impact in terms of wind conditions with respect to pedestrian comfort or safety.

The updated scheme will be tested to confirm whether any further enhancements to the landscaping scheme are required. It is proposed that this testing will take place once the final landscaping scheme is confirmed and ready to be submitted to the Council for approval. This could be a condition attached to the amendment consent. Correspondence from ArcAero is submitted with this application. Changes to this chapter have therefore been screened out of the assessment.

Planning Policy Framework

The Planning Policy Framework relevant to the proposed development has changed slightly since the approval of the previous MMA (126868/JO/2020).

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

In terms of other Material Considerations in the determination of this application. Notably, the National Planning Policy Framework was revised on 20 July 2021 to replace the previous National Policy Framework published in March 2021, revised in July 2018 and updated in February 2019.

However, there have been no changes to the Framework or online Planning Policy Guidance which would affect consideration of the application. Manchester City Council planning guidance documents remain unchanged.

Full consideration of the proposed development against the planning policy framework is considered within the original 2017 Viadux Planning and Tall Building Statement.

Application Submission

This application comprises this Covering Letter and the following documentation:

- Application Form and Notice Certificates, dated 06 May 2022;
- Site Location Plan;
- Application Drawings prepared by SimpsonHaugh & Partners;
- Schedule of Updated Plans prepared by SimpsonHaugh & Partners;
- Planning Amendments Design Document prepared SimpsonHaugh & Partners;
- Updated Energy Strategy Statement prepared by Ridge, dated March 2022;
- Updated Waste Management Strategy prepared by Vectos, dated April 2022;
- Updated Ventilation Strategy prepared by Ridge, dated March 2022
- Heritage Impact Assessment technical note prepared by Stephen Levrant Heritage Architecture, dated March 2022;
- Noise Impact Assessment technical note prepared by Hann Tucker, dated March 2022;
- Wind Microclimate technical note prepared by ArcAero, dated March 2022;
- Transport technical note prepared by Vectos, dated April 2022

Summary and Conclusion

The Site is located in the south of the City Centre and forms an important part of the entry sequence into the City Centre from South Manchester. It provides a remarkable opportunity to deliver a very high quality mixed-use residential and office development that will add value to the City Centre's housing offer and Grade A office space and secure the high quality regeneration of this site in a way that enhances the character and appearance of the Civic Quarter Area.

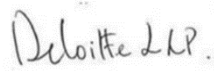
Since securing planning permission, the Applicant has been working to deliver this transformational project. The amendments are proposed for the betterment of the scheme and will result in an enhanced scheme to that approved.

The amendments result in a development that is substantively unchanged from the approved development on-site. They will have no effect on the character, siting or density of development. All the changes proposed in this application have been discussed and agreed in principle with the Planning Authority during pre-application consultations.

The planning policy assessment undertaken from the original application remains valid. Taking all of this into account, it can be concluded that the Proposed Development is consistent with the aims and objectives of the Development Plan taken as a whole. It is further supported by the assessment of other material considerations including the NPPF and it has been demonstrated that the Proposed Development will deliver the overarching economic, social and overarching objectives of sustainable development as a whole. As such, the proposed amendments therefore merit the support of the local planning authority.

We would be grateful if you could notify us of validation of the Application and please do not hesitate to contact my colleague Joe McElhone (joemcelhone@deloitte.co.uk / 0161 455 6994).

Yours sincerely

A handwritten signature in dark ink that reads "Deloitte LLP." The signature is written in a cursive, slightly stylized font.

Deloitte LLP

Enc.