

RIDGE

MARLSBRO HOUSE, MANCHESTER
ENERGY, CARBON &
ENVIRONMENTAL STANDARDS
STATEMENT
07/05/2026

MARLSBRO HOUSE, MANCHESTER
ENERGY, CARBON & ENVIRONMNETAL STANDARDS STATEMENT

May 2026

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1. INTRODUCTION

This Energy, Carbon and Environmental Standards Statement has been prepared by Ridge & Partners LLP on behalf of ACLO ('the Applicant') in support of a full planning application for Marlsbro House development in Manchester. The Statement demonstrates how the development of the proposed energy and sustainability strategy takes into consideration and responds to the requirements of local planning policy and the 2022 Building Regulations.

The primary objective of this report is to contribute to the development of a low carbon and sustainable strategy for the site which will be carried through to detailed design, construction, and operation.

2. DEVELOPMENT PROPOSALS

2.1. Site Overview and Development proposals

The proposed development at Marlsbro House, Manchester, involves the refurbishment of a grade II listed industrial building, including the façade. It will be transformed into high end office space, listening lounge, recording studios and a restaurant. The scheme will comprise a bar and recording studio in the basement, a restaurant on the ground floor, 3 storeys of office space, and event spaces on the fourth floor, including external roof areas.



Figure 1. Proposed Visual, from the Design & Access Statement

3. POLICY CONTEXT

3.1. National Planning Policy Framework

The Government's planning policies for England are set out in the National Planning Policy Framework (NPPF). Section 2 of the NPPF highlights sustainability as a critical issue which underpins all planning polices, stating that "the purpose of the planning system is to contribute to the achievement of sustainable development".

Aligning with the U.N. definition, the NPPF defines sustainable development as "meeting the needs of the present without compromising the ability of future generations to meet their own needs", and outlines the three pillars of sustainability which must be pursued in tandem to ensure developments are truly sustainable:

- An **economic objective**, to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places, and at

the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure.

- A **social objective**, to support strong, vibrant, and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.

- An **environmental objective**, to contribute to protecting and enhancing our natural, built, and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

3.2. Places For Everyone Joint Development Plan

The Places for Everyone Joint Development Plan (2024) of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, and Wigan Councils sits at the foundations of proposals to improve employment opportunities for local communities, build the right homes in the right places, rejuvenate green spaces and reshape town centres. As a long-term plan for jobs, new homes, and sustainable growth, it will enable the region to tackle the inequalities experienced by many communities.

This section of the report summarises the policies within the Plan relevant to climate change and environmental sustainability, and to the proposed development site.

Policy JP-S1: Sustainable Development

Development should aim to maximise economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives. In preparing plans, authorities should make as much use as possible of suitable previously developed (brownfield) land and vacant buildings to meet development needs. In bringing forward previously developed sites for development, particular attention will be paid to tackling land contamination and stability issues, ensuring that appropriate mitigation and remediation is implemented to enable sites to be brought back into use effectively.

Policy JP-S2: Carbon and Energy

The aim of Policy JP-S2 is to deliver a carbon neutral Greater Manchester no later than 2038, with a

dramatic reduction in greenhouse gas emissions. This will be supported through a range of measures, including:

- Promoting retrofitting of existing buildings with measures to improve energy efficiency and generating renewable and low carbon energy, heating and cooling.
- Promoting the use of life cycle cost and carbon assessment tools to ensure the long-term impacts from development can be captured.
- Taking a positive approach to renewable and low carbon energy schemes, particularly schemes that are led by, or meet, the needs of local communities.
- Increasing the range of nature-based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree-planting and natural flood management techniques.
- An expectation that new development will, unless it can be demonstrated that it is not practicable or financially viable:
    - Be net zero carbon which applies:
        - From adoption: to regulated operational carbon emissions
        - From 2028: to all emissions ‘in construction’.

    Starting from 2025, it will also be expected that carbon emissions from unregulated energy sources will be quantified and minimised. Reported through an energy statement, development proposals will be required to set out how this has been achieved in accordance with the energy hierarchy, which, in order of importance, seeks to:

        i. Minimise energy demand

        ii. Maximise energy efficiency

        iii. Use renewable energy

        iv. Use low carbon energy

        v. Utilise other energy sources

    Furthermore, from 2025, any residual carbon emissions that cannot be fully mitigated on-site should be offset, in agreement with the relevant local planning

authority through a financial contribution to a carbon offset fund. As an interim measure, development should be consistent with the 2022 Part L Building Regulations, unless superseded by changes to building regulations and/or national or local planning policies.

- Incorporate adequate electric vehicle charging points in line with Part S of the Building Regulations, unless superseded by relevant Local Plan policies, to future proof for the likely long-term demand, taking account of the potential maximum energy demand for the site.

- Where practicable, prioritise connection to a renewable energy/heating/cooling network or a low carbon energy/heating/cooling network that is adaptable to non-fossil fuels at a later date.

- In residential developments, achieve energy demand reductions in terms of space heat demand; hot water energy demand and the delivery of on-site renewable energy generation, in accordance with Table 5.1 of the Plan. In summary, this requires houses to meet the following best practice thresholds from 2025:
  - Space heating demand of 30kWh/m^2 (houses) or 25kWh/m^2 (flats)
  - At least 20% energy demand reduction in the total heat required for hot water heating
  - Photovoltaic installation to equal at least 40% of ground floorspace

  With regards to renewable energy generation, priority should be given to photovoltaic (PV) installation, where technically feasible. Alternative technologies will also be considered appropriate where the equivalent generation is evidenced.

- For non-residential developments, achieve at least BREEAM Excellent standard (or equivalent) for issue Energy 01 “Reduction of energy use and carbon emissions”, rising to ‘BREEAM Outstanding equivalent from 2028 (for issue Energy 01).

- Include a detailed energy statement to demonstrate via site relevant evidence how the development has sought to maximize reductions in carbon emissions in line with relevant policy targets, including the minimisation of overheating risks and appropriate measures for post occupancy evaluation. Whole life cycle emissions

should be considered where possible. Districts may set out specific carbon emission reduction and energy demand targets within Local Plans.

Please note that the June 2022 release revision of “Approved Building Regulations Part L 2021” will be referred to as “Part L 2022” throughout this report, in accordance with the naming convention used in Policy JP-S-2.

Policy JP-S3: Heat and Energy Networks

The provision of decentralised energy infrastructure is critical to the delivery of the objectives for low carbon growth, carbon reductions, and an increase in local energy generation. The following measures will assist in achieving this:

1. Delivery of renewable and low carbon energy schemes will be supported, with particular emphasis on the use of decentralised energy networks in areas identified as “Heat and Energy Network Opportunity Areas”. These have been identified where:
    a. Existing heat/energy networks are operational or have been commissioned;
    b. Proposals for new heat networks/energy networks are being progressed, or future opportunities have been identified in city-region master planning;
    c. Sufficient density of existing heat demand occurs; and
    d. Significant future development is proposed at the strategic development locations.
2. Within the identified “Heat and Energy Network Opportunity Areas”, unless it can be demonstrated that there are more effective alternatives for minimising carbon emissions or such connection is not practicable or financially viable, it is expected that:
    a. New residential developments that are '10 dwellings or more' or other developments over 1,000m^2 floorspace shall:
        i. Connect to an existing or planned heat/energy network or be designed to enable future connection (where within 500m of such a network); and/or
        ii. Install a site-wide or communal heat/energy network solution.
    b. An expectation that new industrial development will demonstrate that opportunities for using waste heat locally have been fully examined, and included in proposals;
    c. An expectation that where publicly owned buildings and assets adjoin new major development sites, opportunities for these buildings and assets to connect to site-wide proposals will be considered; and

d. An expectation that any site-wide networks will be designed so as to enable future expansion to adjoining buildings or assets as appropriate.

Policy JP-S4: Flood Risk and the Water Environment

An integrated catchment-based approach will be taken to protect the quantity and quality of water bodies with reference to the North West River Basin Management Plan and managing flood risk, by:

1. Returning rivers to a more natural state, where practicable;
2. Working with natural processes and adopting a natural flood management approach to slow the speed of water drainage and intercept water pollutants;
3. Locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding;
4. Expecting developments to manage surface water run-off through sustainable drainage systems and as close to source as possible. Development should achieve greenfield run-off rates unless it is demonstrated to be impracticable. District local plans should consider setting more detailed surface water drainage policies to reflect local circumstances, including alternative surface water discharge rates, such as in areas with critical drainage issues;
5. Ensuring that sustainable drainage systems:
    a. Are designed to provide multifunctional benefits wherever possible, including for water quality, nature conservation and recreation;
    b. Avoid adverse impacts on water quality and any possibility of discharging hazardous substances to ground;
    c. Are delivered in a holistic and integrated manner, including on larger sites split into different phases; and
    d. Are managed and maintained appropriately to ensure their proper functioning over the lifetime of the development.
6. Securing the remediation of contaminated land and the careful design of developments to minimise the potential for urban diffuse pollution to affect the water environment; and
7. As a minimum, residential development should meet the mandatory water efficiency standard of 125 litres/person/day as set out in Building Regulations. District local

plans may and should consider setting a tighter water efficiency standard of 110 litres/person/day where there is a clear local need with reference to national guidance on housing optional technical standards.

Policy JP-S5: Clean Air

A comprehensive range of measures will be taken to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green infrastructure network and where air quality targets are not being met, including:

- Locating and designing development, and focusing transport investment, so as to reduce reliance on forms of transport that generate air pollution;
- Determining planning applications having regard to the most recent development and planning control guidance published jointly by the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK), and the most recent IAQM Guidance on the Assessment of Dust from Demolition and Construction, or relevant successor guidance, including the requirement for developers to submit construction management plans as appropriate;
- Requiring applications for developments that could have an adverse impact on air quality to submit relevant air pollution data so that adverse impacts on air quality can be fully assessed and development only permitted where they are acceptable and/or suitable mitigation can be provided;
- Restricting developments that would generate significant point source pollution such as some types of industrial activity and energy generation;
- Significantly expanding the existing commercial network of electric vehicle charging points, both for public and private use, including as part of new developments;
- Implementing the Clean Air Plan and associated measures;
- Facilitating the more sustainable distribution of goods within the urban area, including through accommodating urban consolidation centres and urban distribution centres that use ultra-low-emission vehicles, and local delivery facilities to reduce repeat delivery attempts;
- Designing streets to avoid trapping air pollution at ground level, including through the appropriate location and scale of buildings and trees;
- Controlling traffic and parking within and around schools, early years sites and other locations that are particularly sensitive to air quality;

- Promoting actions that help remove pollutants from the air, such as enhancing the green infrastructure network and using innovative building materials that capture air pollutants; and
- Development should be located in areas that maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users.

Policy JP-S6: Resource Efficiency

The achievement of a circular economy and a zero-waste economy will play a key role in meeting Greater Manchester's ambition of becoming a leading green city region by 2038. Application of the following measures will help achieve this:

- Development and implementation of the Zero Waste Strategy for Greater Manchester which promotes overall reduction in the levels of waste produced and supports resource efficiency within the Plan area in order to gain the maximum value from the things we produce;
- Recognition of the role of existing infrastructure in managing our waste and protecting such facilities to ensure adequate waste management capacity is maintained; and
- Using sustainable design and construction techniques to reduce carbon emissions, adapt and future proof to the impact of climate change, reduce and recycle waste and minimise water use.

Policy JP-G6: Urban Green Space

To ensure there is an appropriate scale, type, quality and distribution of accessible urban green space that can support a high quality of life and other important green infrastructure functions:

- Existing urban green space will be protected and enhanced in balance with other considerations;
- We will work with developers and other stakeholders to deliver new high quality urban green spaces.

Development should be designed to support the positive use of nearby green spaces, such as by offering a high-quality setting, providing natural surveillance, and facilitating easy access by walking and cycling.

Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity

Through local planning and associated activities, a net enhancement of biodiversity resources will be sought, including, where relevant, by:

1. Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and those that support priority species;
2. Improving connections between habitats, to protect and enhance the provision of corridors, ecological networks (including Nature Recovery Networks) and steppingstones that enable the movement of species, especially as the climate changes;
3. Enhancing the management of existing habitats, including through habitat restoration, avoiding habitat fragmentation and combating invasive species;
4. Protecting sites designated for their nature conservation and/or geological importance, with the highest level of protection given to international and then national designations;
5. Facilitating greater access to nature, particularly within urban areas;
6. Supporting the development and implementation of the Great Manchester Wetlands Nature Recovery Network; and
7. Safeguarding, restoring and sustainably managing our most valuable soil resources, tackling soil degradation/erosion and recovering soil fertility, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land.

Development will be expected to:

a. Follow the mitigation hierarchy of:

i. Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts, then

ii. Adequately mitigating any harm to biodiversity, then

iii. Adequately compensating for any remaining harm to biodiversity

b. Avoid fragmenting or severing connectivity between habitats;

c. Achieve a measurable net gain in biodiversity of no less than 10%

d. Make appropriate provision for long-term management of habitats and geological features connected to the development;

e. Where appropriate, development should: mitigate air pollution impacts on Manchester Mosses SAC; mitigate urban edge, functionally linked land and recreation disturbance impacts on the South Pennine Moors SAC/SPAs; and assess and potentially mitigate boat movement, water pollution, and light spillage and shading impacts on the Rochdale Canal SAC; and

f. Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s) in the PfE evidence base and/or any updated or appropriate biodiversity/ecological assessments submitted as part of the planning application process.

Policy JP-P1 Sustainable Places

Greater Manchester aims to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places, each having the following key attributes that all development, wherever appropriate, should be consistent with:

1. Distinctive, with a clear identity that:
    a. Conserves and enhances the natural environment, landscape features, historic environment and local history and culture;
    b. Enables a clear understanding of how the place has developed; and
    c. Respects and acknowledges the character and identity of the locality in terms of design, siting, size, scale and materials used
2. Visually stimulating, creating interesting and imaginative environments which raise the human spirit through the use of green space, public art and quality design
3. Socially inclusive:
    a. Responding to the needs of all parts of society;
    b. Enabling everyone to participate equally and independently;

   c. Providing opportunities for social contact and support; and
   d. Promoting a sense of community

4. Resilient, capable of dealing with major environmental events
5. Adaptable, able to respond easily to varied and changing needs and technologies
6. Durable, being built to last and using robust materials that reflect local character, weather well and are easily maintained
7. Resource-efficient with:
   a. A low carbon footprint;
   b. Efficient use of land;
   c. Minimised use of new materials;
   d. High levels of recycling
8. Safe, including by designing out crime and terrorism, reducing opportunities for anti-social behaviour and by ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster.
9. Supported by critical infrastructure, such as energy, water and drainage and green spaces
10. Functional and convenient, enabling people and uses to act efficiently with minimal effort, and responding to needs relating to servicing, recycling facilities, refuse collection and storage
11. Incorporating inclusive design within all spaces with support for tackling inequality and poverty to form part of creating sustainable places
12. Legible, being easy to understand and navigate, with the protection and enhancement of key views and new development well-integrated into the place
13. Easy to move around for those of all mobility levels, particularly by walking and cycling, with enjoyable routes free from obstacles and disorienting stimuli, and with places to rest
14. Well-connected to other places, particularly by public transport and digital infrastructure enabling everyone to take advantage of the employment, cultural and leisure opportunities across Greater Manchester and beyond
15. Comfortable and inviting, with indoor and outdoor environments:
   a. Offering a high level of amenity that minimises exposure to pollution; and
   b. Addressing microclimate issues such as sunlight, indoor air quality, overheating, shade, wind and shelter

16. Incorporating high quality and well managed green infrastructure and quality public realm, with:
    a. Opportunities for recreation and outdoor play for children, and interaction between the generations;
    b. Public and private spaces clearly distinguished;
    c. Development clearly defining, and promoting activity within, public spaces;
    d. High quality landscaping with schemes
17. Well-served by local shops, services and amenities, including education and health facilities.

3.3. Manchester Core Strategy (2012 – 2027)

Adopted in 2012, the Manchester Core Strategy is a key document within the wider Manchester Local Plan. It sets the out the long-term strategic policies for Manchester's future development forms the framework that planning applications are assessed against. A summary of key policies relevant to the development are provided within this section.

Policy EN4: Reducing CO2 Emissions by Enabling Low and Zero Carbon Development

It must be demonstrated that the energy hierarchy has been applied to:

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

(Note: That the above section of Policy EN 4 is now replaced by Places for Everyone (PfE) Policy JP-S2)

Furthermore, the following is also required:

- Wherever possible, new development and retrofit projects, including energy generation plant, must be located, and designed in a manner that allows advantage to be taken of opportunities for low and zero carbon energy supplies.
- Where possible, new development and retrofit projects will be used as a mechanism to help improve energy efficiency and provide low and zero carbon energy supplies to existing buildings.
- Where appropriate, new development and retrofit projects will be required to connect to and/or make contributions to low or zero carbon energy schemes and/or to incorporate provision to enable future connection to any existing / potential decentralised energy schemes.
- The use of building materials with low embodied carbon in new development and refurbishment schemes must be considered.

Policy EN5: Strategic Areas for Low and Zero Carbon Decentralised Energy Infrastructure

This policy sets a requirement for key developments to consider being part of or providing an anchor to a new local energy network.

Within specific strategic areas (including the Oxford Street corridor) new development, regeneration and retrofit projects, will be expected to take place in the context of more detailed proposals for decentralised low and zero carbon energy infrastructure in the form of energy proposals plans. The Council will work with all relevant stakeholders, which may include developers, landowners, residents, community groups, private sector partners, utilities companies, neighbouring authorities, and other public sector bodies, as appropriate, to bring forward such plans.

Where investment or development is being undertaken into or adjacent to a public building/asset or district heating network, full consideration shall be given to the potential role that these can have in providing an anchor load within a decentralised energy network or in creating opportunities for CO2 reduction funded by contributions.

Policy EN 6: Target Framework for CO2 Reductions from Low or Zero Carbon Energy Supplies

Developments over 1,000 sqm will be expected to achieve a minimum performance target as shown in the table below, unless this can be shown not to be viable. This should be demonstrated through an energy statement, submitted as part of the Design and Access

Statement. Such a statement will be expected to set out the projected regulated energy demand and associated CO_2 emissions for all phases of the development'.

Target	% Minimum requirement
Target 1: Network development area	CHP/district heating anchor or connection or where not feasible, a 15% increase on Part L 2010
Target 2: Electricity intense buildings (Applies to commercial uses with high proportion of emissions from electricity use (>45 kg CO2/m2)	+10%increase on Part L 2010
Target 3: Micro generation area	+15% increase on Part L 2010

(Note: Most of Policy EN 6 is now replaced by PfE Policy JP-S2)

Policy EN 8 Adaptation to Climate Change

All new development will be expected to be adaptable to climate change in terms of the design, layout, siting and function of both buildings and associated external spaces. In achieving developments which are adaptable to climate change developers should have regard to the following, although this is not an exhaustive list:

- Minimisation of flood risk by appropriate siting, drainage, and treatment of surface areas to ensure rainwater permeability.
- Reduction in urban heat island effect through the use of Green Infrastructure such as green roofs, green walls, increased tree cover and waterways.
- The need to control overheating of buildings through passive design.
- The opportunity to provide linked and diverse green space to enhance natural habitats which will assist species adaptation.

Developers will be permitted to use green infrastructure elements such as green roofs, green walls, street trees and waterways to contribute to compliance with CO2 mitigation under Policy EN6, subject to sufficient evidence to quantify their contribution to compliance.

(Note: The first and fourth bullet points of Policy EN 8 are now replaced by PfE Policies JP-S2, JP-S4 and JP-G8)

Policy EN 14 Flood Risk

The following requirements are stated within Policy EN 14:

- In line with the risk-based sequential approach contained within PPS25, 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).
- 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.
- 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.
- 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.
- The City of Manchester contains many sections of rivers which are culverted or 'hidden'; where these are indicated in the SFRA beneath the proposed development site, further investigation will be required and the development proposal should take this into account; where feasible and appropriate development should seek to open up culverted/hidden rivers to reduce the associated flood risk and danger of collapse, taking advantage of opportunities to enhance biodiversity and Green Infrastructure.

(Note: The third bullet point of Policy EN 14 is now replaced by PfE Policy JP-S4)

Policy EN 15 Biodiversity and Geological Conservation

The Council will seek to maintain or enhance sites of biodiversity and geological value throughout the City. Particular consideration will be given to:

- sites with international or national designations for their biodiversity value. Manchester contains one Site of Special Scientific Interest (SSSI) (Cotteril Clough); there is a

Special Area of Conservation (SAC) and an SSSI just over the border in Oldham (both on the Rochdale Canal within Oldham).

- other sites of biodiversity value, including Sites of Biological Importance (SBIs) and Local Nature Reserves (LNRs); Manchester currently has 35 SBIs (including the Rochdale and Ashton Canals) and 7 LNRs; priority habitats found within Manchester, as listed in the Manchester Biodiversity Strategy, and included in the Greater Manchester Biodiversity Action Plan (GM BAP).
- protected and priority species, as listed in the Manchester Biodiversity Strategy and included in the Greater Manchester Biodiversity Action Plan (GM BAP).
- sites that are recognised for their geological importance;
- the Council's objective to protect and conserve the City's existing trees and woodlands and the aim for a net increase in trees across the City.

Developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to linkages between valuable or potentially valuable habitat areas where appropriate, with reference to:

- the Manchester Biodiversity Strategy, which provides further details of priority habitats within Manchester and opportunities for biodiversity enhancement including corridors such as the Mersey, Medlock and Irk River valleys, the canals and disused railway lines and areas of managed greenspace particularly in parks.
- the Green Infrastructure Framework for Greater Manchester, which encompasses an ecological framework that seeks to guide and inform habitat creation and repair, including identifying large 'biodiversity opportunity areas' including the Moston Brook Corridor and Knutsford Vale;
- the Open Space, Sport & Recreation Study, which identifies areas where there is a deficit of natural and semi-natural greenspace, opportunities for green corridors and other linkages.
- Manchester's Climate Change Action Plan.
- the Strategic Flood Risk Assessment (SFRA) for Manchester.
- the Habitats Regulations Assessment (HRA) for Manchester, which gives detailed consideration to Special Areas of Conservation (SACs), including the Rochdale Canal SAC just outside the district boundary.
- the River Basin Management Plan for the Northwest.

- the Manchester Tree Strategy.

Any adverse impacts on biodiversity will need to be justified against the wider benefits of the proposal, assessed against other LDF policies. Where adverse impacts are unavoidable, developers will be required to provide appropriate mitigation and/or compensation.

Development should wherever possible seek to maintain, enhance, or restore existing geology.

(Note: “Either on-site or adjacent to the site” in the second paragraph and the last sentence of Policy EN 15 are now replaced by PfE Policy JP-G8)

Policy EN 16 Air Quality

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.

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.

(Note: “and particularly within Air Quality Management Areas, located along Manchester’s principal traffic routes and at Manchester Airport” from first sentence of Policy EN 16 is now replaced by PfE Policy JP-S5)

Policy EN 19 Waste

The Council will:

- Require all developers, including those of new waste management facilities within the District, to demonstrate the proposal's consistency with the principles of the waste hierarchy (prevention, reduction, re-use, recycling/composting, energy recovery, final disposal)
- Require all developers to submit a waste management plan to demonstrate how both construction and demolition waste will be minimised and recycled on site wherever possible and how the sustainable waste management needs of the end user will be met.
- Promote the development of innovation and technological advancement within the sustainable waste management industry, aiming to achieve a closed-loop waste management system.
- Require waste management practices to have full regard to the environmental, social & economic impacts of such development and encourage long-term benefits in improving the environment, the regeneration of areas in need of investment and co-location with other employment uses where appropriate.
- Encourage communities to take responsibility for the waste created by provision of accessible facilities.

3.4. Guide to Development in Manchester Supplementary Planning Document

Adopted in 2017, the Guide to Development in Manchester Supplementary Planning Document (SPD) is a material planning consideration for applications. That said, it is not part of the Development Plan. Whilst it references policies from the old Local Plan (UDP), which have been superseded, it is still useful as a general guide to development. It includes a section on environmental standards, with sub sections on energy efficiency, renewable energy, environmental design, water management and weather resilience, waste management, construction management, biodiversity, and waterways.

3.5. Greater Manchester Combined Authority Net Zero Design Guidance

Following the publication of the Places for Everyone Plan, the Greater Manchester Combined Authority (GMCA) have produced a suite of Net Zero guidance documents, dated March 2026. This includes design guidance for net zero, design guidance for low

carbon heat and planning submission guidance, including details on the expected contents of an Energy & Carbon Statement and the Energy and Carbon Proforma.

4. ENERGY & CARBON

4.1. Introduction

This section of the report summarises the response of the proposed development to carbon reduction, in line with Manchester City Council's policies identified in Chapter 3, notably the Places for Everyone Plan policy JP-S2 and Manchester Core Strategy policies EN4, EN6 and EN8 as well as the GMCA Net Zero Design Guidance. The contents have been aligned with the requirements set out by GMCA for an Energy and Carbon Statement. The GMCA Energy & Carbon Proforma is provided separately (screenshot overleaf) and this report gives further detail on this.

Energy and Carbon Proforma

Non-residential

Major development *(+1,000m²)*

Version 1.0

GMCA GREATER MANCHESTER COMBINED AUTHORITY

Project Name: Marlsbro House

Application ref:

Date: 06.05.2026

		Ref. name	
		Area (m² GIA)	2921.8
		Target values	**Building 1**
Minimise energy demand	**Space heating demand (kWh/m²GIA/yr)**	***≤ 15***	186.4
	Space cooling demand (kWh/m²GIA/yr)	***≤ 15***	68
	Calculation methodology used to calculate space heating demand and confirmation that this covers all homes/blocks	*Predictive energy model*	Notional bay heat loss calc applied
	Form factor per building	*≤ 2*	
	Average external wall U-value (W/m²K)	*≤ 0.15*	1.41
	Average window U-value (W/m²K)	*≤ 1 (triple)*	1.4
	Air permeability rate (m³/h/m² @ 50 Pa)	*≤ 1*	
Maximise energy efficiency	**BREEAM Ene 01 rating**	***Excellent***	N/A
	Energy use intensity (kWh/m²GIA/yr)	-	
	Calculation methodology used to calculate energy use intensity and confirmation that this covers all homes/blocks	*Predictive energy model*	
Use renewable energy	**PV footprint area (% of ground floor space)**	-	N/A
	Annual renewable energy generation (kWh/m² building footprint/yr)	-	
	Renewable energy balance (%)	-	
	Total energy used (kWh/yr)	-	
	Total energy generated on-site (kWh/yr)	-	
Use low carbon energy	**Fossil fuel free (yes/no)**	***Yes***	Yes
	Heat source	*Electric*	Electric/ASHP
	Low Carbon Heat Appraisal completed	*Yes*	
	Heat network suitability	-	
	Exemption requested	-	
	Efficiency of heating system (SCOP)	*≥ 3.5*	3.2
	Carbon content of heat (gCO_2/kWh)	*≤ 100*	
Reduce overheating risk	**Has CIBSE TM52 been used to calculate overheating and does the building pass?**	***Yes***	No
	What percentage of spaces are cooled? (% of GIA)	-	100
	Has a CIBSE TM52 assessment been carried out using DSY2 and DSY3 weather files? Have any additional passive measures been included as a result?	*Yes*	No
Minimise embodied carbon	**Upfront embodied carbon ($kgCO_2e/m^2GIA$)**	-	n/a
	List top three materials with the highest upfront embodied carbon emissions ($kgCO_2e/m^2GIA$): Material 1	-	n/a
	Material 2	-	n/a
	Material 3		n/a
	Lifecycle embodied carbon ($kgCO_2e/m^2GIA$) - *for large major developments only*	-	n/a
Offsets	**Offset contribution (£)**	-	n/a

Operational CO_2 emissions associated with the day-to-day running of the development will be minimised in line with the energy hierarchy, thus conforming to the requirements of Manchester Core Strategy Policy EN 4 “Reducing CO2 Emissions by Enabling Low & Zero Carbon Development” and the Places for Everyone Framework Policy JP-S2 (summarised in Sections 3.2 and 3.3). Please note that the June 2022 release revision of “Approved Building Regulations Part L 2021” will be referred to as “Part L 2022” throughout this report in accordance with the naming convention used in Policy JP-S-2.

This design strategy has been developed in line with the energy hierarchy, as outlined below:

- Building Fabric and Ventilation: Reduce energy demand through passive measures and construction techniques
- Maximise Energy Efficiency: Supply energy cleaning and efficiently through the incorporation of high efficiency systems and effective controls.
- Renewable Energy Generation: Incorporate renewable and low carbon energy sources to meet any residual energy demand.

Further details are provided in the following sections.

4.2. Building Fabric & Ventilation

Given the scheme is a refurbishment of a grade II listed building, there are limited measures available to reduce the energy demand associated with the development. However, where possible, passive design measures have been incorporated to optimise the building envelope.

The following have been considered to reduce the energy use and carbon emission associated with the building occupation:

- Thermal Insulation
- Air tightness
- Natural daylight
- Thermal mass

These can be considered through the measures detailed below.

Thermal Insulation

The development will improve on the limiting efficiencies U-values set out in the Part L building regulations (see below). Improvements will include new glass windows and roof. These measures will limit the heat transfer between the outside and the inside of the building, reducing the energy demand associated with heating or cooling the building. The use of high G-value windows proposed for the refurbishment of the building will improve the control of heat loss and solar gain, reduce noise, and allows natural light to enter, creating an energy-efficient, comfortable, and sustainable building.

BUILDING FABRIC ELEMENT	PART L NOTIONAL U-VALUE (W/M^2K)	PROPOSED TARGET U-VALUE (W/M^2K)	% BETTERMENT
External Walls	0.26	0.18	30.8%
Windows	1.6	1.2	25%

Air Tightness

The development will target an air tightness that exceeds the minimum requirements of Part L 2021 building regulations to reduce air infiltration and draughts. This will also lower the energy demand to heat or cool the building.

Natural Daylight

The natural daylight entering occupied spaces will be maximised, especially within the fourth floor by optimising new rooflights. This will reduce the energy used for artificial lighting. Dimmable lighting with photocells will sense if the illuminance level of the space has been met and reduce lighting levels as required. North facing windows are particularly effective at providing useful daylight and will be incorporated on the building.

Thermal mass

As a heavy, dense material, brick absorbs, stores, and slowly releases heat, which helps regulate indoor temperatures by slowing the transfer of heat (thermal lag). This reduces temperature swings between day and night, improving comfort in both summer and winter.

4.3. Maximise Energy Efficiency

The following energy efficiency measures have been considered to meet the energy demand of the building.

- All areas will have Mechanical Ventilation with Heat Recovery (MVHR).
- Demand operator systems will be implemented. For instance, the use of passive infra-red (PIR) for lighting, heating, ventilation will be adopted where feasible. Typically, this will be in the form of PIR sensors in small spaces and microwave sensors in larger areas.
- Variable speed drives can be adopted on all fan and pump motors where possible to reduce energy consumption. These can be used in conjunction with the demand operated systems to reduce the speed of pumps and fan motors to a minimum to conserve energy.
- Extensively adopted LED fittings will be used throughout the scheme to limit the energy associated with internal and external lighting.
- The building may be provided with an intelligent building management system that will learn how the building operates and optimise the function of the ventilation, heating, and cooling systems within the amenity areas to minimise energy use.
- The introduction of highly energy efficient appliances will reduce the overall energy demand.
- Power, lighting, major plant and separate tenancy areas will be metered to allow energy consumption to be pinpointed and reviewed if it is excessive. Baselines and targets will also be set to help reduce energy use.
- Air Source Heat Pumps (ASHP) will be used to generate hot water to the kitchen and to provide space heating and cooling to the offices, restaurant, live band area, bar and restaurant areas of the proposed development via a Variable Refrigerant Flow (VRF) system.

There are currently insufficient details to undertake an assessment of the energy use intensity of the scheme.

4.4. Renewable Energy Generation

PV panels are not proposed to be installed on this development as the building passes Part L 2021 Building Regulations without them but are considered possible.

4.5. Low Carbon Heating

The development is fossil fuel free, i.e. it does not rely on burning fossil fuels (e.g. gas) on-site for heating, hot water, cooking or back up-generation. Air Source Heat Pumps (ASHP) will be used to generate hot water to the kitchen and to provide space heating and cooling to the offices, restaurant, live band area, bar and restaurant areas of the proposed development via a Variable Refrigerant Flow (VRF) system.

One of priorities for reducing CO_2 emissions is to reduce the city's reliance on centralised power stations. This means increasing the use of local, low-carbon energy supplies through de- centralised energy systems.

Decentralised plant generally means any heating and hot water and/or electricity generation provided on a site or district wide basis. District heating is generally provided from Combined Heat and Power equipment (CHP). CHP is an engine which, when running, generates electricity and heats water which can then be distributed around a development.

Manchester City Council have been working in partnership with Vital Energi to create the Manchester Civic Quarter Heat Network. However, as this is over 2 miles form the site, it is too far to be economically viable and has therefore been discounted.

4.5.1.1.Overheating Risk

The site is in the northwest of England, which has a low-risk rating of overheating, though given it is in central Manchester it may be subject to the urban heat effect. A mechanical ventilation strategy has been chosen for the development, with cooling to be provided to occupied areas using Air Source Heat Pumps. This will minimise the risk of overheating.

4.5.1.2.Materials

Upfront embodied carbon refers to the carbon emissions associated with buildings products, procurement transportation and site works associated with the construction of buildings. Of a building's whole life carbon emissions, upfront embodied carbon constitutes approximately 35-50%[1], all of which is incurred prior to practical completion of the project.

[1] RICS Whole life carbon assessment for the built environment (2017), page 3

There are currently insufficient details to undertake an assessment of the upfront embodied carbon emissions, However, due to the refurbishment strategy taken on Marlsbro House, it is expected that the upfront embodied carbon emissions from redevelopment will be vastly reduced when compared to a new build scheme, as materials are retained and therefore emissions associated with new materials are predominantly avoided.

The scheme is proposing to re-use all of the existing substructure and superstructure, including removal of the façade render and retention / repointing of the brickwork underneath. Across the retained substructure, superstructure and façade, these elements equate to around 81%[2] of the total embodied carbon emissions from the scheme.

As a result of the retention strategy, the upfront embodied emissions associated with Marlsbro House will be significantly reduced over a comparative new build project.

[2] LETI Climate Emergency Design Guide (2020), Commercial Offices, Page 30

5. OTHER SUSTAINABILITY FEATURES OF THE PROPOSED DEVELOPMENT

5.1. Transport

The Transport Statement and Framework Travel Plan, prepared by SK Transport (document references 260409/SK22608/TS01(-00) and 260409/SK22608/FTP01(-00) respectively, both dated April 2026) and submitted as part of this planning application, provide an overview of the existing transport conditions associated with the site, and outline the sustainable transport measures considered to reduce transport-related emissions associated with the new development.

Public Transport

The nearest bus stops to the site are located Lever Street (110m away), Great Ancoats Street (240m away), Oldham Street (250m away), and Piccadilly (350m away). Access can be gained to the Free Bus Routes 1 and 2 from Piccadilly. These services provide frequent access to the rest of city centre and the wider Greater Manchester area. The site is also located only 500m away from Piccadilly Gardens Interchange (trams and buses), 550m away from Shudehill Interchange (buses and trams) and 650m away from Piccadilly Station (trams and trains).

The site is well located for active and sustainable trip making, both for staff travelling to/from work and for the hospitality uses at the site to serve people working and living in and visiting the city centre. The site is accessible by multiple sustainable modes of transport, which are also usable by those with limited mobility and are wheelchair accessible.

The site achieves a Greater Manchester Accessibility Level (GMAL) score of 8. The GMAL score is calculated using an interactive tool managed and maintained by Transport for Greater Manchester (TfGM). The tool measures accessibility by public transport of a point of interest and provides a score between 1 and 8, where 1 is a low level of accessibility and 8 is the highest level of accessibility. As such, the site is considered to have an exceptional level of accessibility within an urban area.

Amenities

Due to the central location of the development, there are numerous amenities available near the site. A few examples are shown below.

AMENITY	TYPE	DISTANCE (M)
Arndale Shopping Centre	Commercial	550m
Car Park Manchester Northern Quarter | APCOA	Parking	300m
Aldi – Great Ancoats Road	Supermarket	350m

Active Travel and Pedestrian and Cyclist Networks

The pedestrian infrastructure around the site is well lit and contains wide footways with a number of controlled crossing points across key roads. The site is situated within a highly accessible area and benefits from strong connections within the city centre and to numerous travel hubs and interchanges.

The site is also located within the Cycle Hire Scheme Zone. Bikes are operated by Beryl and are available to hire via a dedicated phone app. The scheme provides pedal bikes and e-bikes across Manchester, Salford, and Trafford. The nearest bike docks to the site are located on Great Ancoats Street, Church Street and Dale Street.

The existing walking and cycling infrastructure provide opportunities for active trips, due to its central urban location.

25 secure cycle parking spaces will be provided for staff in for form of a cycle store, located in the courtyard. This number is in line with MCC's requirements:

- Office: 1 per 200sqm = 11 spaces
- Bar/Restaurant: 1 per 50sqm = 14 spaces

Private Car Parking

No site car parking is proposed to serve the development. This is in line with Policy T2 of MCC's Core Strategy which states that developments in the city centre should 'provide a level of car parking which reflects the highly accessible nature of the location'.

Travel Plan

A Framework Travel Plan has been prepared by SK Transport (document references 260409/SK22608/FTP01 (-00), dated April 2026) to support the planning application, and

also to encourage sustainable transport practices and reduce transport emissions associated with the development. As confirmed in the report, the objectives of this document are:

- To increase the level of active travel walking to and from the site
- To increase the level of public transport use to and from the site
- To encourage car sharing and shared transport to and from the site

The plan proposes a number of further measures to be implemented after handover.

5.2. Waste Reduction

To encourage the recycling of operational waste, the development will be provided with appropriately sized and segregated recycling bins within a bin store in the courtyard. The number of bins is based on MCC's GD04 guidance and BS5906. As a commercial use, bins will be collected by private contract. Refuse vehicles will use the existing loading bay on Port Street (25m from the courtyard).

5.3. Biodiversity

The site is a former warehouse which has not been used for several years. It has no ecological features, for instance the bat surveys undertaken by Collington Winter Environment (Report reference CW20-3408 RPT 001, dated 29.09.2025) did not identify any roost locations. Therefore, no adverse ecological impacts are anticipated. As such, a biodiversity net gain report and associated assessment will not be required. This supports compliance with Policies EN 15 and JP-G8.

5.4. Noise Pollution

Noise pollution can adversely affect wildlife and the physical and mental wellbeing of residents and building users. To ensure the proposed development does not significantly contribute to noise impacts, a Noise Impact Assessment (NIA) was undertaken by Atelier Crescendo (Report Ref: 00130-NIA-XX, dated 5 March 2026). The assessment identified the sources of noise coming from the proposed development as the music studio, bar, restaurant and plant noises.

The background sound level was measured at a lowest of 46dB, which constitute the benchmark to determine the required acoustic measures.

The mitigation measures are detailed below:

- The music studio will be made of isolated box-in-box structures ensuring negligible external noise breakout.
- The noise from the basement bar will be controlled through limiting internal music levels and installing secondary glazing. Breakout noise would be 38dB(A), which is below background levels.
- Noise from the ground floor restaurant will be reduced by implementing glazing achieving at least Rw 30dB. The predicted external noise levels (approximately 35 dB(A)) would then remain substantially below night-time background levels.
- Mechanical plant installations have been assessed against local authority requirements. With appropriate acoustic enclosures, screening, and propagation distances accounted for, predicted noise levels meet Manchester City Council's 5 dB below background criterion.

If the above recommendations are to be adhered to then the noise levels coming from the development shall satisfy the assessment criteria contained within the recommended standards and Manchester City council requirements.

6. CONCLUSION

Sustainability is a key driver for the design and delivery of the Marlsbro House development, with consideration given to national and local planning policy throughout all stages.

Energy and carbon

- The development is designed to be highly energy-efficient, using a fabric-first approach with insulation, airtightness and glazing standards that exceed Building Regulations Part L requirements.
- The scheme is fully electric with no gas, supporting Manchester's ambition to phase out fossil fuels and transition towards a zero-carbon future.
- Air Source Heat Pumps will provide hot water to the kitchen and heating and cooling to the building.

- The proposals follow the Energy Hierarchy: first reducing energy demand through high-performance building design, then meeting demand efficiently, and finally incorporating low-carbon and renewable energy technologies.
- The overall strategy ensures the development delivers a highly energy-efficient scheme with significantly reduced energy demand and substantial reductions in operational carbon emissions.
- The refurbishment of the building will have significantly lower embodied carbon emissions when compared to a typical new build development.

Transport

- A Framework Travel Plan has been produced to support the provision of sustainable transport measures and reduce transport-related carbon emissions.
- The site is well connected to public transport links and local amenities, and active travel will be encouraged through communication measures and cycle storage provisions. The lack of parking spaces allocated for the development (due to its highly accessible location) further encourages users to use active and sustainable transport measures.

Waste:

- The development will be provided with adequate bin stores.

Noise Pollution:

- With the proposed mitigation, noise levels will meet the required standards, and the development will comply with Manchester City Council requirements.



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