

Block C, Plot 11 First Street

Date: 25 August 2026

To: Manchester City Council

From: Deloitte LLP on behalf of Downing Living (Manchester South) Limited Partnership Incorporated

Subject Block C, Plot 11 First Street (Application Ref. 138831/FO/2023) - 2026 NPPF Note

This Note has been prepared by Deloitte LLP in support of an application for Full Planning Permission relating to Plot 11 Block C, First Street South, Manchester City Centre (the "Site"). The Applicant is Downing Living (Manchester South) Limited Partnership Incorporated.

An application with reference 138831/FO/2023 was submitted to Manchester City Council (MCC) on 18 December 2023 for:

"Erection of a ground plus 28-storey building plus plant level, comprising purpose-built student accommodation (PBSA -Sui Generis) and other associated works including public realm, secure cycle parking and servicing arrangements.."

The Proposed Development would deliver 555 purpose-built student accommodation bedspaces together with associated amenity space, public realm improvements, landscaping, cycle facilities and servicing arrangements.

The Planning Application was assessed by Manchester City Council officers who recommended approval on 25 April 2024, subject to the completion of a Section 106 Agreement securing the provision of affordable accommodation, private waste collections in perpetuity and retention of the project architect.

The planning application is supported by a Planning and Tall Building Statement ("PTBS") which demonstrates that the Proposed Development accords with the Development Plan when read as a whole and delivers substantial economic, social and environmental benefits.

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In June 2026, an Addendum to the PTBS and a series of technical Addendum Notes were submitted to MCC. These addressed minor amendments to the approved scheme, principally relating to facade changes arising from the revised ventilation strategy and measures to mitigate solar glare. The Addendum also provided an updated assessment of the Proposed Development against the current planning policy context, confirming its continued compliance and addressing any relevant changes in circumstances prior to completion of the Section 106 Agreement.

Since then, a revised version of the National Planning Policy Framework (NPPF) was published on 17 August 2026. The new Framework replaces the December 2024 NPPF and introduces a more rules-based approach to decision-making, with a stronger emphasis on sustainable growth, efficient use of land, development within settlements, transport-oriented development, a more explicit policy framework for addressing accommodation needs and urban densification.

This note considers the implications of the new NPPF for the Proposed Development. It provides an overview of the relevant NPPF updates that specifically relate to the Proposed Development and provides a justification for the proposal's compliance.

Overview of NPPF

The Ministry of Housing, Communities and Local Government published the new NPPF on 17 August 2026. It represents a substantial restructuring of national planning policy, with separate policies for plan-making and national decision-making. The plan-making policies guide the preparation of development plans, whereas the national decision-making policies apply directly to the determination of development proposals and took effect from the date of publication.

The revised structure is intended to provide a clearer and more rules-based approach to planning, improve consistency and certainty in decision-making, standardise policies applying across England and reduce unnecessary duplication between national and local policy. It also seeks to support the Government's objectives of boosting housing delivery and sustainable economic growth through stronger support for housing development in sustainable locations, more efficient use of land, higher densities in accessible locations and a clearer presumption in favour of sustainable development.

Relevant NPPF Amendments

A series of changes have been made to national policy. Those most relevant to the Block C, Plot 11 First Street proposals are summarised below.

1. Presumption in favour of sustainable development

Policies S3 and S4 replace the previous presumption in favour of sustainable development contained within paragraphs 11 and 12 of the December 2024 NPPF. The updated NPPF retains

the principle that proposals which accord with an up-to-date Development Plan should be approved without delay. However, the previous paragraph 11(d) tilted balance has been replaced by Policies S3-S6, including Policy S4 which introduces a specific national decision-making policy for development within settlements.

Policy S3 (Presumption in favour of sustainable development) states:

1. Decisions on development proposals should apply a presumption in favour of sustainable development. This means:
 - a. Policy S4 in this Framework should be applied when considering development proposals within settlements;
 - b. Outside settlements, policy S5 should be applied; and
 - c. In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.
2. Where a development proposal falls partly within and partly outside a settlement, policies S4 and S5 should be applied to the relevant parts which are inside or outside of the settlement boundary (as appropriate), before coming to an overall view on the proposal.

Policy S4: Principle of development within settlements

1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.
2. In applying policy S4, the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to) situations where the development proposal would:
 - a. Have a substantial adverse impact in relation to:
 - i. The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or
 - ii. The application of the policies in this Framework for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular

importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)).

- b. Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made that does not increase the risk of flooding either on or off-site); or
- c. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

2. Policy L2: Making effective use of land

Policy L2 replaces and develops the previous brownfield land and efficient use of land policies contained within Chapter 11 of the December 2024 NPPF, including paragraph 125(c).

Policy L2 (Making effective use of land)

1. Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following:
 - a. Remediating despoiled, degraded, derelict, contaminated or unstable land;
 - b. Making better use of vacant and underutilised land and buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure which are no longer required);
 - c. Making effective use of previously developed land and buildings through temporary uses, in situations where alternative development is anticipated within a reasonable period (including as a result of the land being allocated for an alternative purpose in the development plan); or
 - d. Creating additional homes or floorspace within settlements by using the airspace above existing residential and commercial premises, or through sensitive redevelopment or additional development within existing plots (including, but not limited to, the addition of mansard roofs, proposals to fill gaps in the existing roof line, the introduction of higher buildings at street corners and additional units within residential curtilages). Such proposals should:
 - i. Be consistent with the overall street scene, other than where: it is appropriate to have larger buildings (such as at street corners, or where building upwards would not cause substantial harm to the character of a building and its surroundings); the development would not be visible from

the street frontage; or where specific changes are provided for through a design code which forms part of the development plan;

- ii. Maintain safe access and egress for occupiers and users, and acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space; and
 - iii. Where the development would involve the use of residential curtilages, not occupy more than twice the footprint of all the existing buildings on the site, and, following development, would retain at least 50% of the non-developed area within the curtilage of the existing buildings³⁸; unless additional development can be accommodated without harm to the overall character of the area, and taking into account the availability of infrastructure and the importance of locating development in sustainable locations (in accordance with policy TR3).
2. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is a clear justification.

3. Policy L3: Achieving appropriate densities

Policy L3 replaces and expands upon the previous efficient use of land and residential density policies contained within Chapter 11 of the December 2024 NPPF, including Paragraph 129.

Policy L3 (Achieving appropriate densities)

1. Development proposals should make efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places.
2. To contribute to making efficient use of land:
 - a. Within settlements, development proposals for residential and mixed-use development should contribute to an increase in the density of the area in which they are situated. The only exception is where there is a clear justification that this is either inappropriate or not possible (for example, where the prevailing density is already very high, the nature of the accommodation required precludes higher densities, or where it would conflict with other policies in this Framework). In considering the potential to increase densities, the existing character of an area should be taken into account, in accordance with policy DP3, but should not preclude development which makes the most of an area's potential;

- b. Outside settlements, and on land at the edge of existing built-up areas which is allocated or has permission for development and so will form part of a settlement (as defined in the glossary at Annex B), development footprints should make the best use of a site's development potential, taking into account the policies in this Framework; and;
 - c. Where development proposals for residential or mixed-use schemes are within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B), a density of at least 35 dwellings per hectare should be achieved within the net developable area of the site. Higher densities – of at least 45 dwellings per hectare – should be achieved where the service frequency is at least twice that of the minimum required for a well-connected station. Exceptions to meeting these minimum standards should be made only in the case of:
 - i. Sites which fall below the threshold for major development where it can be demonstrated that meeting the standard is either inappropriate or not possible; or
 - ii. Development for traveller sites.
3. The minimum densities in paragraph 2(c) of this policy should be exceeded where possible, especially in areas of high connectivity, to optimise the efficient use of land. The Connectivity Tool (Connectivity Tool - GOV.UK) should be used alongside other relevant quantitative or qualitative evidence in assessing the connectivity of particular locations proposed for development.
4. Development proposals that do not make efficient use of land in accordance with paragraph 2 of this policy should be refused.

4. Policy HO1 – Assessing the Need for Homes

Policy HO1 replaces Paragraph 63 of the December 2024 NPPF. The policy carries forward the requirement to consider the accommodation needs of different groups, including students, within the new housing chapter of the Framework.

Policy HO1- Assessing the Need for Homes

1. The preparation of spatial development strategies, and local plans where a spatial development strategy is not in place, should be based upon:
 - a. A housing need assessment that establishes the overall number of homes needed in the area as a minimum over the plan period, using the standard method in Annex D;
 - b. An assessment of the permanent and transit site accommodation needs of travellers in the area as a minimum over the plan period; and

- c. An understanding of any accommodation needs that cannot be met within neighbouring areas.
- 2. At the most appropriate level, development plans should also take into account an assessment of the size, type and tenure of housing or other accommodation needed for different groups. These groups include, but are not limited to:
 - a. Those who require affordable housing (including Social Rent) as defined in the glossary at Annex B;
 - b. Older people (including those who require retirement housing, housing-with-care and care homes);
 - c. Disabled people;
 - d. People who rent their homes;
 - e. Families with children;
 - f. Looked after children (evidence of need for which can be found in the relevant local authority's Children's Social Care Sufficiency Strategy) and those who require other specialist community-based accommodation (where evidence of need is available for the relevant local authority);
 - g. Students;
 - h. Travellers; and
 - i. People wishing to commission or build their own homes.

5. Policy HO5 – Meeting the Needs of Different Groups

Policy HO5 introduces specific national policy support for development that addresses the accommodation needs of particular groups, including students.

Policy HO5- Meeting the Needs of Different Groups

- 1. The development plan should, at the most appropriate level, set out policies to address the housing needs of different groups (including, but not limited to, those assessed under policy HO1). This should include:
 - a. In relation to affordable housing:
 - i. Setting requirements for the type and mix of affordable housing (applying the definition in the glossary at Annex B) required to meet identified local needs, including the minimum proportion of Social Rent homes required as part of major development. In Designated Rural Areas development plans may set affordable housing requirements for residential developments which are not major development; and
 - ii. Setting a specific affordable housing requirement (or requirements) for major development involving the provision of housing on land which is

proposed to be released from the Green Belt, or which may be approved on land within the Green Belt²⁹.

- b. Setting out the proportion of housing on major developments to be delivered to requirements M4(2) and M4(3) of the Building Regulations. Requirements should meet or exceed local levels of need, and should ensure that no less than 40% of homes on major developments are delivered to M4(2) standards (subject to any appropriate exemptions set out in the development plan);
- c. Identifying sites which can provide specific types of accommodation where there is an identified need, including (but not limited to):
 - i. Specialist housing for older people;
 - ii. Purpose-built accommodation for students
 - iii. Plots for self and custom build housing and community-led development; and
 - iv. Sites suitable for gypsies and travellers and travelling showpeople, including sites suitable for mixed residential and business uses, having regard to the safety and
 - v. amenity of the occupants and neighbouring residents. Sites identified for travelling showpeople should have regard to their need for mixed-use yards with both residential accommodation and space for storage of equipment.
- d. Setting expectations for an appropriate mix of tenures to be provided on allocated sites where this would be appropriate and deliverable, taking into account the needs of different groups including those assessed under policy HO1.

6. Policy HO9 – Specialist Forms of Accommodation

Policy HO9 introduces, for the first time, a specific national decision-making policy relating to specialist forms of accommodation, including purpose-built student accommodation.

Policy HO9 (Specialist Forms of Accommodation)

1. Development proposals to address specialist housing needs should provide living conditions and access to services which are appropriate to the needs of their residents and users. This includes:

- a. Specialist housing for older or disabled people:
 - i. Being located where residents will be able to access frequently-used services easily and safely by walking, wheeling (including mobility scooters) and by public or on-site transport services; including through facilities provided as part of the scheme; and
 - ii. Being delivered to M4(2) or M4(3) accessibility standards.
- b. Specialist community-based accommodation:
 - i. Being supported by a management plan or other supporting evidence which shows how the development will provide a safe and secure environment for residents; and
 - ii. Being located where residents will be able to access frequently-used services easily and safely.
- c. Purpose-built student and large-scale shared living accommodation:
 - i. Being located where residents will be able to access frequently-used services (and, for student accommodation, relevant education facilities) easily and safely by walking, wheeling, cycling and public transport;
 - ii. Providing adequate living and storage space and sufficient shared cooking, laundry and amenity areas (other than where cooking and laundry facilities are provided within student rooms, in which case these do not need to be available on a shared basis); and
 - iii. Being supported by a management plan which shows how the development will be managed and maintained to ensure the continued quality of the accommodation, communal facilities and services.

Justification of Proposed Development Against Updated Policies

The amendments to the NPPF have been introduced as part of the Government's objective to boost housing delivery, support sustainable growth and make more efficient use of land in appropriate locations. The updated policies provide stronger and more explicit support for development within settlements, the redevelopment of previously developed land, efficient use of land, and the delivery of accommodation to meet identified needs, including the needs of students. The updated Framework also introduces, for the first time, specific national policies relating to purpose-built student accommodation and other specialist forms of accommodation.

There has been no change to the fundamental principle of Paragraph 11 (c) of the 2024 NPPF that proposals which accord an up-to-date Development Plan should be approved without delay. The submitted PTBS provides a comprehensive assessment of the Proposed Development and concludes that it accords with the Development Plan when read as a whole. That conclusion remains unchanged following publication of the 2026 NPPF.

The Site is located within Manchester City Centre and therefore within a settlement for the purposes of the 2026 NPPF. Policies S3 and S4 establishes a clear presumption in favour of development within settlements unless the benefits of the proposal are substantially outweighed by any adverse effects. None of the circumstances identified within Policy S4(2) arise in this case. The Proposed Development would not conflict with any allocation or safeguarding within the Development Plan, nor would it result in the loss of any of the assets or designations identified within Policy S4(2). Accordingly, the Proposed Development aligns with the objectives of Policies S3 and S4.

Policy L2 replaces and expands upon the previous support for brownfield redevelopment contained within paragraph 125(c) of the 2024 NPPF. The Site comprises a vacant and underutilised brownfield plot within the First Street Development Framework (FSDF) Area. The Proposed Development would bring the Site into productive use through the delivery of 555 purpose-built student bedspaces, public realm enhancements, landscaping improvements and biodiversity benefits. The updated policy therefore provides stronger support for the redevelopment of the Site.

Policy L3 places increased emphasis on achieving appropriate densities and making efficient use of land, particularly in locations with strong public transport connectivity. The Site is located within Manchester City Centre and therefore within a settlement. The Proposed Development would deliver 555 student bedspaces on a highly sustainable city centre site located in close proximity to Manchester Metropolitan University and the University of Manchester. The Site benefits from excellent accessibility by walking, cycling and public transport and represents the type of high-density urban development that Policy L3 seeks to encourage.

Policy HO1 recognises the importance of addressing accommodation needs arising from different groups within society, including students. The Proposed Development would deliver 555 purpose-built student bedspaces and would therefore make a significant contribution towards meeting the accommodation needs of Manchester's growing student population. The proposal is therefore consistent with the objectives of Policy HO1.

Policies HO5 and HO9 provide specific national policy support for purpose-built student accommodation and other specialist forms of accommodation. The Proposed Development accords with these policies by delivering 555 purpose-built student bedspaces in a highly accessible location close to Manchester Metropolitan University and the University of Manchester, with

communal amenity space, study and wellness facilities, external terraces and a Student Management Strategy to support the ongoing quality and management of the accommodation.

There are no instances of substantial harm identified, and the Proposed Development will result in a number of economic, environmental, social and cultural benefits, as outlined within the originally submitted PTBS and the Council's officer report. These include:

- **A viable use of an underutilised brownfield site:** The proposal would redevelop a vacant and underutilised site within First Street South and support the continued regeneration of this part of Manchester City Centre.
- **Provision of purpose-built student accommodation:** The proposal would deliver 555 purpose-built student bedspaces, including 20% affordable accommodation secured through nomination arrangements, helping to address identified accommodation needs and affordability challenges.
- **Support for Manchester's higher education sector:** The Site is located in close proximity to Manchester Metropolitan University and the University of Manchester and would provide accommodation in a location specifically supported by Policy H12 of the Manchester Core Strategy.
- **Economic and regeneration benefits:** The proposal would support continued investment within First Street South, contribute to the local economy during both construction and operation, and assist in delivering Manchester City Council's wider regeneration objectives for the area.

The national decision-making policies introduced by the August 2026 NPPF are material considerations in the determination of planning applications and must therefore be taken into account in the assessment of the Proposed Development. Overall, the amendments introduced through the updated Framework strengthen policy support for the proposal. In particular, the NPPF now provides clearer and more explicit support for the redevelopment of brownfield land, efficient use of land, development within settlements and, importantly, the delivery of purpose-built student accommodation through Policies HO1, HO5 and HO9. The Applicant therefore considers that the updated NPPF further strengthens the positive planning balance in favour of the Proposed Development and reinforces the resolution to grant planning permission.