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08 September 2026

Manchester City Council – Planning Department
Town Hall Extension
Albert Square
Manchester
M60 2LA

FAO: Lucy Harrison

Dear Lucy,

One Castlefield – Updated Application Documents Following Publication of the 2026 NPPF

We write on behalf of Kirindolam 8 Limited in relation to the full planning application submitted to Manchester City Council on 4 August 2026 for One Castlefield, Thorncross Close off Ellesmere Street, Manchester. The application seeks permission for two residential buildings of 46 and 9 storeys, providing 592 homes (Use Class C3), supporting amenity space, a ground-floor cafe (Use Class E(b)), car and cycle parking, new access arrangements, landscaping and associated works.

The submission comprises the Planning and Tall Building Statement, Environmental Statement, application drawings, together with a comprehensive suite of supporting technical documents. Since submission of the application, the revised National Planning Policy Framework ("NPPF") was published on 17 August 2026. MCC subsequently requested, through its invalid application correspondence, that the submission be reviewed in light of the revised Framework.

In response, Deloitte and the relevant technical advisers have reviewed the application submission as a whole. The review identified each document containing references to the superseded NPPF and considered whether those references required amendment. It also considered whether the revised national policies affect the methodologies, assessments, identified effects or conclusions previously reported. Updated documents are enclosed with this letter where amendments are required; documents that do not require amendment remain as originally submitted.

The schedule at the end of this letter provides MCC with a consolidated checklist of the full application submission. It identifies the author and status of each document and distinguishes the updated documents enclosed with this response from those for which no update is required.

Purpose of this Response and Revised NPPF Context

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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

For completeness, the following section summarises the principal revised national decision-making policies relevant to the proposal and explains why the overarching planning assessment remains unchanged. It does not replace the submitted Planning and Tall Building Statement or supporting technical work; it should be read alongside the updated documents enclosed with this response and the remainder of the original application submission.

Policies S3 and S4: Presumption in favour of sustainable development and principle of development within settlements

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 and the decision-making policies in the Framework should be approved without delay. However, the previous paragraph 11(d) tilted balance has been replaced by Policies S3 to S6, with Policy S4 introducing a specific national decision-making policy for development within settlements.

Policy S3 establishes that decisions on development proposals should apply a presumption in favour of sustainable development and requires that proposals that accord with both an up-to-date development plan and the Framework's decision-making policies should be approved without delay. Policy S4 states that development proposals within settlements should be approved unless the benefits would be substantially outweighed by adverse effects when assessed against the national decision-making policies. In this context, the One Castlefield Site is within the Manchester urban area and therefore is to be considered against Policies S3 and S4.

Policy L2: Making effective use of land

Policy L2 replaces and develops the previous brownfield land and effective use of land provisions contained within Chapter 11 of the December 2024 NPPF, including paragraph 125(c). It gives substantial weight to the benefits of remediating degraded or contaminated land, making better use of vacant and underutilised land and buildings, and creating additional homes or floorspace within settlements through the effective use of previously developed land and buildings.

For One Castlefield, Policy L2 is directly relevant because the Proposed Development would bring a vacant and underutilised brownfield site within the Regional Centre back into productive residential-led use, supported by active ground-floor use, landscaping, public realm improvements and associated infrastructure.

Policy L3: Achieving appropriate densities

Policy L3 replaces and expands upon the previous efficient use of land and residential density provisions contained within Chapter 11 of the December 2024 NPPF, including paragraph 129. It requires development proposals to make efficient use of land, having regard to housing and development needs, local market conditions, infrastructure capacity, sustainable transport connectivity and the importance of securing well-designed, attractive and healthy places.

Policy L3 also introduces clearer expectations for residential and mixed-use development within settlements to contribute to increased density, subject to clear justification where this is inappropriate or not possible. It sets minimum density expectations for schemes within reasonable walking distance of a well-connected station, with higher densities expected where service frequency is particularly strong. This is relevant to One Castlefield given its highly accessible urban location close to Cornbrook Metrolink Station.

Policy HO7: Meeting the need for homes

Policy HO7 replaces and strengthens the previous housing delivery provisions contained within Chapter 5 of the December 2024 NPPF, including paragraphs 61 to 71. In applying the policies in this Framework, substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence. This includes, but is not limited to, homes needed for different groups assessed under policy HO1.

Policy HO8: Affordable housing

Policy HO8 replaces and consolidates the previous national policy approach to affordable housing delivery. The policy confirms that planning applications should contribute towards meeting identified affordable housing needs where this is consistent with the development plan and supported by evidence. It also recognises that viability may be a material consideration where

relevant evidence demonstrates that policy-compliant affordable housing provision would threaten the deliverability of development.

The updated Financial Viability Assessment concludes that a policy-compliant affordable housing and planning obligations scenario would not be viable. The application therefore proposes an alternative position supported by viability evidence. The approach remains consistent with the principles of Policy HO8, which recognises that viability may be a material consideration where policy-compliant affordable housing provision would threaten the deliverability of development.

Policies TR1–TR3: Sustainable transport, accessibility and connected places

Policies TR1 to TR3 replace and restructure the previous transport-related guidance and requirements contained within Chapter 9 of the December 2024 NPPF, including the provisions relating to sustainable transport, safe and suitable access, active travel, public transport opportunities, transport assessment and the test for refusing development on highway safety or severe residual cumulative transport impact grounds.

The Transport Statement and Framework Travel Plan have been updated to reflect the August 2026 NPPF. These documents confirm that the Site is highly accessible by walking, cycling, bus, rail and Metrolink; that the Proposed Development incorporates limited car parking, secure cycle parking and Travel Plan measures; and that forecast vehicle trips would not materially affect highway safety or the operation of the surrounding highway network. The updated reports therefore remain consistent with the revised national transport policy framework.

Policy DP3: Key principles for well-designed places

Policy DP3 replaces and consolidates the previous national design guidance and requirements contained within Chapter 12 of the December 2024 NPPF, including paragraph-based provisions relating to well-designed places, local character, public realm, inclusive access, safety, climate resilience, green infrastructure, movement and liveability.

The Planning and Tall Building Statement and Design and Access Statement assess the design response in detail, including the tower and mid-rise composition, active frontages, landscaped courtyard, public realm improvements, inclusive access, natural surveillance and safety. The Planning and Tall Building Statement has been updated to replace superseded NPPF references with the relevant 2026 policies. The underlying design assessment and conclusions remain unchanged.

Policies N2 and N6: Natural environment, biodiversity and geodiversity

Policies N2 and N6 replace and restructure the previous natural environment and biodiversity guidance and requirements contained within Chapter 15 of the December 2024 NPPF, including paragraph-based provisions relating to the mitigation hierarchy, biodiversity enhancement, protection of designated sites, irreplaceable habitats and the integration of nature within development.

The updated Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment have been issued to reflect the 2026 NPPF. They confirm that the Site has low ecological interest, no further surveys are required, no impacts on designated sites are anticipated, the mitigation hierarchy has been applied, and the statutory 10% Biodiversity Net Gain requirement will be achieved through a combination of on-site habitat creation and enhancement and the purchase of off-site biodiversity units.

Policy HC4: Healthy places

Policy HC4 replaces and consolidates previous paragraph-based national policy support for healthy, inclusive communities, access to open space, social interaction, active travel and health and wellbeing outcomes.

The updated EIA Chapter 11 – Human Health confirms that its methodology, assessment and conclusions remain valid in the context of Policy HC4. The Proposed Development supports healthy place-making through the delivery of new homes in a walkable and public transport-accessible location, improved routes towards Cornbrook Metrolink Station, landscaped amenity space, active travel measures and proximity to services, employment opportunities and public open space.

Policies P1, P3 and P4: Pollution, living conditions and existing activities

Policies P1, P3 and P4 replace and restructure previous paragraph-based provisions relating to pollution, amenity, noise, air quality, healthy living conditions and the agent of change principle. They continue to require development to be appropriate for its location, to avoid unacceptable adverse effects on health or living conditions, and to take account of existing activities and infrastructure.

The Air Quality Assessment and Noise Impact Assessment have been updated to reference the latest NPPF. The Air Quality Assessment concludes that construction dust can be appropriately mitigated, operational impacts are negligible and air quality is not a constraint to development. The Noise Impact Assessment confirms that suitable glazing, ventilation, plant noise limits and mitigation can provide an acceptable acoustic environment for future residents, including in the context of nearby road, rail, Metrolink and commercial noise sources.

Policy CO1 and CO2: Digital connectivity and electronic communications

Policy CO1 and CO2 replace and restructure the previous paragraph-based national policy support for high-quality electronic communications infrastructure, alongside provisions relating to potential impacts on electronic communications networks and broadcast reception.

The Broadband Connectivity Assessment and Television and Radio Reception Impact Assessment have been updated with minor editing in response to the new NPPF. The Broadband Connectivity Assessment confirms that existing fibre infrastructure is available in the area and that the Proposed Development will support robust, gigabit-ready connectivity. The Television and Radio Reception Impact Assessment confirms that widespread interference is not expected and that any localised broadcast reception effects can be addressed through proportionate mitigation.

Policy DM5: Development viability

Policy DM5 replaces previous paragraph-based national viability guidance. It confirms the circumstances in which viability evidence may be submitted and the basis on which viability can justify a non-policy-compliant affordable housing or planning obligations position.

The updated Financial Viability Assessment has been issued and expressly identifies Policy DM5 as replacing the previous NPPF viability paragraph. The assessment retains the conclusion that a policy-compliant affordable housing and Section 106 scenario is unviable, while the proposed private rented and market sale scenario remains below the benchmark return but capable of delivery. The proposed viability review mechanism therefore remains an appropriate means of capturing any future improvement in viability.

Policies F1–F3: Flood risk, sustainable drainage and water management

Policies F1 to F3 replace and restructure previous paragraph-based national provisions relating to flood risk, sustainable drainage, the sequential approach and the need to ensure that development remains safe for its lifetime without increasing flood risk elsewhere.

The updated Flood Risk Assessment and Outline Drainage Strategy is enclosed with this response and reflects the 2026 NPPF. It confirms that the Site is located in Flood Zone 1, that surface water will be controlled through the drainage strategy, and that SuDS and attenuation measures will be confirmed through detailed design. The assessment conclusions remain unchanged.

Justification of Proposed Development Against Updated Policies

The starting point is the Development Plan. As set out in the submitted Planning and Tall Building Statement, the Applicant considers that the Proposed Development accords with the Development Plan when read as a whole, having regard to the principle of residential-led development, the efficient use of this accessible brownfield site, design, townscape and heritage, transport, amenity, environmental matters and viability. The national decision-making policies in

the 2026 NPPF are a material consideration. They do not alter the conclusions reached against the Development Plan and provide stronger and more explicit support for housing delivery, sustainable growth, effective use of previously developed land and higher densities in accessible urban locations.

One Castlefield lies within the Manchester urban area and is development within a settlement. In applying Policy S4, the broader planning balance under Policy S4(1) has been considered first: the benefits include the delivery of 592 homes, regeneration of a vacant brownfield site, more efficient use of land in a highly accessible location, active ground-floor use, public realm and landscaping improvements, sustainable travel opportunities, biodiversity net gain and wider socio-economic benefits. The identified adverse effects include effects relating to heritage setting, townscape and visual impact, daylight, sunlight and overshadowing, wind microclimate, construction activity, traffic, noise, air quality and residential amenity. Those effects have been assessed in the submitted and updated technical work and are capable of mitigation where required.

The revised Framework does not change the weight attributed to the effects identified in the application documents. On that basis, the Applicant considers that the adverse effects do not substantially outweigh the benefits when assessed against the national decision-making policies. The proposal therefore satisfies the Policy S4(1) balance without reliance on any separate route under Policy S4(2), and no national decision-making policy directs refusal.

The Site is a cleared and underutilised brownfield site of approximately 0.72 hectares within the Regional Centre. The Proposed Development would return the land to productive use through a high-density residential-led scheme, active ground-floor use, landscaping and public realm improvements. Substantial weight should therefore be given to the benefits of making better use of vacant and previously developed land. The scheme accords with Policy L2.

One Castlefield would provide 592 homes in a highly accessible location close to Cornbrook Metrolink Station and established walking, cycling and bus routes. Its density makes efficient use of a constrained urban site, while the submitted application documents assess design, townscape, heritage, daylight, wind and amenity effects. The scheme responds positively to Policy L3 by optimising the use of accessible urban land at a density supported by its location, public transport connectivity and design evidence.

Policy HO7 requires substantial weight to be given to the benefits of homes that contribute to evidenced accommodation needs. The delivery of 592 homes within Manchester's Regional Centre would make a significant contribution to housing supply in a sustainable location. The housing benefit should therefore attract substantial weight in the planning balance.

The Planning and Tall Building Statement and Design and Access Statement explain how the scheme responds to its context through a high-quality tower and mid-rise composition, active

frontages, a landscaped central garden, public realm improvements, inclusive access and natural surveillance. Wind, daylight and sunlight, heritage, townscape, crime prevention and fire safety have been assessed. The scheme provides a coherent design response that supports liveability, character, public space, accessibility and safety, consistent with Policy DP3.

Policy HO8 supports the delivery of affordable housing to meet identified needs but recognises that viability evidence may be relevant in determining the appropriate level of provision. The updated Financial Viability Assessment demonstrates that a policy-compliant affordable housing and planning obligations scenario would not be viable. The application therefore adopts a viability-led approach supported by robust evidence, enabling the delivery of 592 homes on a vacant brownfield site in a highly sustainable location. In these circumstances, the proposed approach represents a proportionate and policy-compliant response to the requirements of Policy HO8.

The updated Transport Statement and Framework Travel Plan have expressly considered the August 2026 NPPF and retain their conclusions. The Site is highly accessible by public transport, walking and cycling. The scheme limits car parking, provides secure cycle parking, and incorporates Travel Plan measures. The forecast development traffic is not expected to materially affect the operation or safety of the surrounding network. The proposal therefore supports sustainable travel and accords with the relevant transport policies.

- Natural environment and biodiversity: The updated Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment confirm that the Site has a low level of ecological interest, and no further surveys are required. The landscape design applies the mitigation hierarchy and incorporates practicable on-site habitat creation and enhancement. The remaining biodiversity requirement will be secured through off-site units so that statutory 10% Biodiversity Net Gain is achieved.

- Healthy places: One Castlefield would provide new homes in a walkable, public transport-accessible location, improve the safety and attractiveness of routes towards Cornbrook, create landscaped amenity space and support active travel. The Human Health ES methodology and conclusions remain valid under the revised policy framework.

- Historic environment: The Site contains no designated heritage assets and is not within a conservation area. The submitted assessment identifies effects arising principally through changes to the setting of nearby assets and assesses those effects as minor adverse or negligible and not significant in EIA terms. This EIA conclusion is distinct from the assessment of effect on heritage significance required by the Planning (Listed Buildings and Conservation Areas) Act 1990 and national policy. The statutory duty under section 66 remains applicable to the setting of listed buildings, and effects on the significance of nearby conservation areas through changes to their setting remain material

considerations. The updated Heritage Assessment and EIA Chapter 13 – Heritage have reviewed the revised 2026 NPPF and confirm that it does not alter the identified level of heritage effect, the assessment conclusions or the weight attributed to heritage effects in the planning balance.

- Viability and affordable housing: The updated Financial Viability Assessment has reviewed the revised national policy context and maintains the conclusion that a policy-compliant affordable housing and Section 106 scenario is not viable on the current evidence. The proposed review mechanism provides a route to capture future improvement in viability.

Schedule of Application Documents

The schedule below records the outcome of the submission-wide review. Documents marked "Updated" are enclosed with this response. Documents marked "No update required" have been reviewed and remain as submitted because the revised NPPF does not require amendment to their content or conclusions. Where an Environmental Statement topic chapter has been updated solely to reflect the revised policy context, the review has confirmed that no consequential amendment is required to the introductory chapters, summary of residual effects or cumulative assessment because the assessed effects and conclusions are unchanged.

Document	Author	Status
Application form, Ownership Certificates and Notices	Deloitte	No update required
Planning Application Fee	Kirindolam 8 Limited	No update required
Application Site Boundary and Location Plan	Denton Corker Marshall	No update required
Application Drawings	Denton Corker Marshall / Re-Form Landscape	No update required
Planning and Tall Building Statement (inc. Green & Blue Infrastructure Statement)	Deloitte	Updated
Statement of Consultation	Deloitte	Updated
Design and Access Statement (inc. landscaping)	Denton Corker Marshall and Re-Form	No update required
Transport Statement	Rappor	Updated
Holcroft Moss Technical Note	Rappor	No update required
Framework Travel Plan	Rappor	Updated
Waste Management Strategy	Rappor	No update required
Archaeological Desk Based Assessment	Paul Butler Associates	No update required
Flood Risk Assessment and Outline Drainage Strategy	De Simone	Updated
Phase 1 Geo-Technical Report and UXO Survey	E3P	No update required
Biodiversity Net Gain Metric and Ecological Assessment	Rachel Hacking Ecology	Updated

Document	Author	Status
Ventilation Strategy	CWC	No update required
Safety Assessment (Manchester Airport)	G Tech Surveys	No update required
Broadband Connectivity Assessment	G Tech Surveys	Updated
Television and Radio Reception Impact Assessment	G Tech Surveys	Updated
Energy and Carbon Statement and inc. Energy Pro Forma	CWC	No update required
Sustainability Statement	CWC	No update required
Upfront and Life Cycle Embodied Carbon Report	Complete Sustainability	Updated
Noise Impact Assessment	AEC	Updated
Crime Impact Statement	Greater Manchester Police	No update required
Financial Viability Assessment	Roger Hannah	Updated
Residential Management Strategy	Centrick	Updated
Fire Statement (Gateway One)	BB7	No update required
Air Quality Assessment	Redmore Environmental	Updated
Environmental Impact Assessment: Chapters 1–5, Appendix 2.1 and Appendix 5.1	Deloitte	No update required
EIA Chapter 6 – Greenhouse Gas and Climate Change Resilience and Appendices 6.1-6.4	CWC	Updated
EIA Chapter 7 – Daylight, Sunlight and Overshadowing and Appendices 7.1-7.12	Proximity	Updated
EIA Chapter 8 – Solar Glare and Appendices 8.1-8.2	Proximity	No update required
EIA Chapter 9 – Townscape and Visual Impact Assessment and Appendices 9.1-9.4	Re-Form Landscape	Updated
EIA Chapter 10 – Wind Microclimate and Appendix 10.1	Arcaero	Updated
EIA Chapter 11 – Human Health	Enfusion	Updated
EIA Chapter 12 – Socio-economic	GC Insights	Updated
EIA Chapter 13 – Heritage and Appendix 13.1	Civic Heritage	Updated
Summary of Residual Impacts	Deloitte & EIA Consultants	No update required
Type 1 Cumulative Impacts	Deloitte & EIA Consultants	No update required

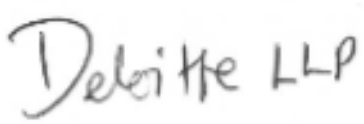
Conclusion and Request for Validation

The review undertaken by Deloitte and the relevant technical advisers has considered all national decision-making policies relevant to the Proposed Development against the submitted application and supporting technical work. Where references to the superseded NPPF required amendment, revised documents have been prepared and are enclosed. The advisers' reviews do

not identify any new or materially different adverse effect, change to the assessment methodology or requirement for additional technical work arising from the revised Framework. The effects and conclusions reported in the application therefore remain unchanged.

The revised NPPF does not alter the overarching planning assessment and, in relation to housing delivery, redevelopment of previously developed land, efficient use of land and density in an accessible location, provides additional support for the proposal. The Policy S4(1) planning balance has been applied directly: the identified adverse effects do not substantially outweigh the scheme's benefits, and no national decision-making policy directs refusal. We therefore request that MCC accepts the enclosed updated documents, treats this letter and its schedule as the consolidated response to the invalid application correspondence, and proceeds to validate the application.

Yours faithfully,



Deloitte LLP
For and on behalf of Kirindolam 8 Limited