Outlook

Planning application Ref. No. PLA- 2026-000312) and Planning application Ref. No. 144791-FO-2025

From [redacted]
Date Tue 11/08/2026 21:59
To Jennifer Atkinson [redacted]
Cc Jon-Connor Lyons [redacted] Sam Wheeler [redacted] Ross Steven [redacted]

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Dear Jennifer Atkinson

I write to you in relation to the above planning applications and the unacceptable impact this will have on my apartment, particularly with reference to loss of light as confirmed by the independent specialist sunlight, daylight and overshadowing consultant, Dan Wade. Dan was appointed by the Granby Village Management Company to provide an objective assessment of the impact that would be caused by these two developments and has over 25 years of experience/ expert knowledge of natural light assessments working on a range of projects including tall buildings throughout Manchester City Centre.

I therefore object strongly to this application as the owner of Apartment 56, Velvet Court, in Granby Village, one of the residential buildings that would be directly affected by the proposed development. I do not support a scheme of this height. A 38-storey tower would be entirely out of character with the surrounding building and features and would have an unacceptable effect on the living conditions of existing residents due to the loss of natural daylight and sunlight, greater overshadowing, and an overbearing outlook caused by the tower's size and close proximity.

The scheme would also negatively affect Granby Village's communal spaces and nearby public areas, in particular Sackville Gardens and Vimto Park. These are two of the limited green spaces available to residents in this part of the city centre, and the loss of sunlight would reduce their amenity and enjoyment along with having a negative affect on the grounds themselves due to a loss of light. Furthermore, the development would cause harm to the setting of the Whitworth Street Conservation Area and nearby heritage assets. A building of this excessive height would not reflect or respect the existing character, scale and townscape of the local area.

I respectfully request that the Council refuses planning permission and seeks a revised proposal that enables regeneration of the site while protecting the amenity of existing residents and respecting the character of the surrounding area.

Kindest regards,

[redacted]

Sent from my iPhone

This **Further Objection** is submitted by the Granby House RTM Company Limited on behalf of the 69 leaseholders that make up the residential properties in Granby House, Granby Row, Manchester M1 7AR. Granby House is a Grade II former textile warehouse converted in 1985 into flats and was the forerunner for all subsequent regeneration of former textile warehouses into residential properties in the Whitworth Street Conservation Area and The Village.

Re Planning application Ref. No. 144791/FO/2025. IQ proposal for the PBSA development of the site of Weston Student Halls and Pendulum Hotel, Manchester

In addition our comments and objections also apply to:
Sister proposal on the Charles Street Car Park site (Planning application Ref. No. PLA-2026-000312).

Granby House and neighbouring Granby Village have come together to instruct Dan Wade a light consultant given the highly limited and frankly misleading analysis by both developers from a light and overshadowing perspective. The updated Environmental Statement for IQ does nothing to correct these previously criticised and woeful levels of analysis. Meanwhile the Sister application massively plays down the impact of a chunky 38 storey tower immediately to the South of our homes. So at considerable expense residents have had to pay for professional analysis both applicants failed to provide in their applications. How the Planning Service can determine the impact of these developments without such analysis is highly questionable too given their duties in determining the impact of planning applications on behalf of the City.

It would be typical in past planning applications for straightforward shadowing modelling to form part of the application. For that to no longer be required or included in planning applications for what are often much larger and taller buildings than even 10 years ago across the City speaks volumes about developers having a free reign. Allowing massive overdevelopment of PBSA with huge impacts on residents that are simply dismissed in the developer's analysis.

Dan Wade's extensive work involved in this analysis isn't completed but what has been confirmed is that 26 homes are so severely impacted by loss of light for this to be considered **Unacceptable** according to BRE guidelines:

Flats 8, 11, 19, 21, 29, 31, 39, 41, 49, 51, 59, 61, 69 in Granby House are all affected in this way in addition to 13 homes in Granby Village opposite.

It is wholly unacceptable that any resident should experience such an extensive and excessive loss of light for any proposed development. The applicants we suspect fully realise this but argue an extremely cynical view that existing residents living in the city centre should expect and accept such harm as a part of the price of living in the city centre (p.85/6.242, Planning and Tall Building Statement). This has no basis and is a serious 'race to the bottom' in terms of city centre living if this is the approach for Manchester. It also underlines the approach of the applicants of having no concern or consideration for local residents or the environment around the application sites in a bid to maximise built form and profits.

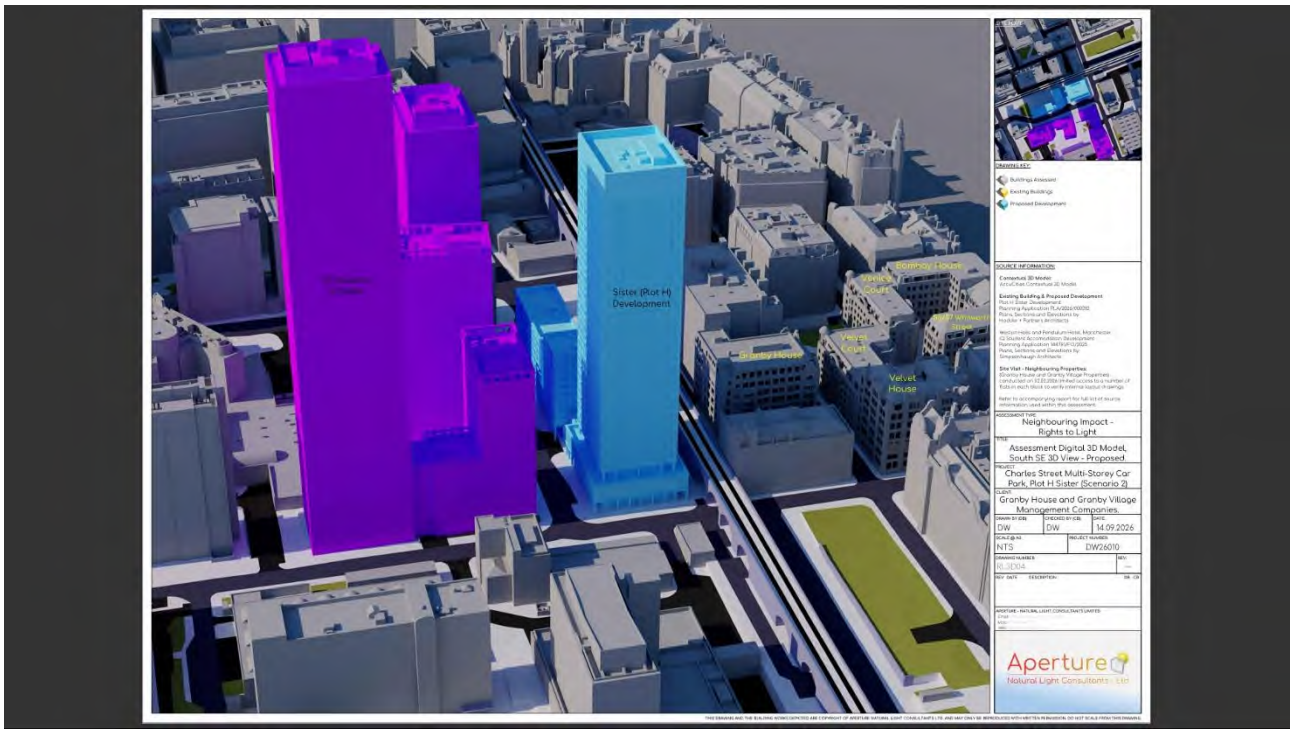
Please accept this BRE assessment of "unacceptable harm to light" on 26 homes as a further reason for objection in addition to objections previously raised on both applications. When reporting to committee we request that the practical reality of

the extent of this harm be identified so that the committee fully understand the implications of the phrase "unacceptable harm to light".

While not all flats will experience this extreme level of light loss, many more within the area will nevertheless suffer light loss as indicated by the information now submitted by iQ. **When reporting to committee we request the Planning Service identifies the full harm to light in the area as well as reporting the worst impacts.**

Granby House and surrounds would experience harm through the individual and cumulative impacts of the two proposals on sunlight, daylight and overshadowing. Wider harm would also be caused to the public realm of surrounding streets and Vimto Park and Sackville Gardens. This extensive harm is dismissed despite the combined impact of both schemes packing 5 huge towers on our doorstep and 3500 PBSA beds crowding in and towering over our Grade II building and ruining the setting of heritage assets and that of the Conservation Area we sit in.

See image below from modelling by Dan Wade to properly illustrate the huge impact and over shadowing of the conservation area to the right of the proposed 5 towers. Note how Granby House immediately right of the Sister tower is in immense shadow.



Environmental consequences ignored. The practical consequences for the loss of light for many will mean increased need to use artificial light for a longer period in any given day and, due to a loss of thermal gain, the need for greater use of heating. So our electricity bills will be higher adding to our cost of living crisis as well as the climate emergency. **Please accept this as an objection to both proposals (both individually and cumulatively) regarding the adverse impact on sunlight, daylight and overshadowing and impact on addressing sustainability, the climate emergency and cost of living crisis as both applicants ignore or dismiss any such aspects entirely.**

16th September 2026

[redacted]

6th September, 2026

Jennifer Atkinson,
Planning Service,
PO Box 532,
Manchester,
M60 2LA.

Dear Jennifer Atkinson,

Planning applications: iQ PBSA development on the nearby Weston Halls/Pendulum Hotel (Application Ref. No.144791/FO/2025) and the Sister PBSA proposal on the adjacent Charles Street car park site (Application Ref. No. PLA-2026-000312).

I refer to the consultation letter from Julie Roscoe dated 19th August 2026 regarding the iQ proposal above and the submission of two items of further information relating to the Environmental Statement.

Although this consultation relates to additional information submitted by the proposers of the iQ proposal, the information raises increased concern and strength of objection beyond that previously expressed on matters relevant to both the iQ and Sister proposals (both as above) as set out in my previous consultation responses. Please can you ensure that this letter be given consideration with respect to both the iQ and Sister applications.

ADDITIONAL INFORMATION ITEM 1
Report: 'Wind Microclimate - Impact of update to cumulative schemes' Dated 17/07/2026

My previous comments and objections relating to this issue remain, despite this additional information, not least as modelling presumably undertaken for tall building schemes elsewhere in the city centre has failed to successfully predict impacts on the wind microclimate resulting in a severe wind tunnel effect at certain times. From lived experience such locations include the Quay Street and Oxford Street areas.

In order to ensure a sustainable and liveable city into the future, the report should take full account of the more frequent and intense weather - including wind - predicted as a result of climate change which is already taking place.

ADDITIONAL INFORMATION ITEM 2
Report: 'Weston Halls and Pendulum Hotel - Plot H, Sister Cumulative Assessment'
Dated July 2026

My over-riding and previously expressed concern with the scoping report for the Environmental Statement (ES) agreed by the MCC Planning Service with the applicants was that it drew the area for the assessment of a number of key issues too tightly around the proposal site. This had the effect of excluding many properties that would be directly and adversely affected by various aspects of the proposal (including sunlight, daylight and overshadowing) from the assessment. This document does not address this basic failing of the scoping process and subsequent ES.

Using the section headings within the additional information I comment on this additional information as follows:

Provision of PBSA
The submitted information only serves to increase the strength of my previously stated objections to the number of existing and proposed PBSA bed-spaces in the area of the two application sites, with specific reference to the cumulative adverse impact on the local area and community.

Built Heritage
The information submitted with each application demonstrates the lack of meaningful regard they each give to the existing character of the area. **The cumulative impact of the two visually uncoordinated proposals will merely exacerbate these concerns and the strength of my previous objections.**

Townscape and visual
The current focus of attention of both applications remains the impact on non-residents merely visiting or passing through the area and the transient occupants of the proposed PBSA schemes themselves. Deserving of just as much (if not more) consideration is the impact on residents who will be forced to look at the harmful cumulative townscape and visual impact of the iQ and Sister developments from their own apartments as well as from various external public and private spaces. No such consideration is provided at present.

The combined physical impact of the two developments will be to form what would be perceived as a high and visually solid wall of development between Sackville Street and Princess Street. Any gaps between buildings in each development intended to give permeability of views and sunlight and daylight will be closed off by the other. While it is accepted that within the planning process there is no right to a view there is nonetheless a need for the planning process to consider amenity, including residential amenity. This cumulative impact of the proposals will be to create an oppressive built form when seen from many existing apartments and various external spaces and will give rise to extensive overshadowing. The combined impact on outlook and overshadowing will have a highly detrimental effect on amenity including residential amenity within the existing area.

Reference is still being made by the applicants to the evolving urban character of the area as if tall buildings are already a part of this character and are in someway inevitable on

these two sites. The report incorrectly advises that “the proposed tall buildings are part of an established pattern of regeneration of the area” (Para 25). My previously submitted comments and objections demonstrated how tall buildings are not an existing part of the character of this locality but are merely an aspiration of the developers and (some) people within the City Council organisation and based on other developments that have previously taken place at a distance from this area. The Sister Strategic Regeneration Framework (Sister SRF) indicates the possibility of taller buildings on the Sister Plot H site than currently exist (and was objected to by residents at that time), but the Planning Service has publicly confirmed at Committee that the SRF’s do not constitute planning policy and have a very low status in terms of material planning considerations. Councillor confirmation has been given that all relevant national and local plan policies - including those regarding amenity (including residential amenity), townscape, heritage and so on - would be material considerations to ensure new development would appropriately address the local setting and community.

The now submitted additional information only serves to confirm and strengthen my previous comments and objections on townscape issues including visual amenity and lack of regard to the urban context as it exists, rather than a non-existent townscape that is only an aspiration of the applicants.

Wind Microclimate
This is dealt with above under ‘Additional Information Item 1’.

Daylight, sunlight and overshadowing
With particular regard to the matter of sunlight, daylight and overshadowing my previously submitted objections noted (amongst other points) the following:

1. For the SISTER proposal:
The sunlight, daylight and overshadowing assessment submitted as a part of the Sister application has manipulated the British Research Establishment (BRE) assessment process and misrepresented the findings to downplay the harm that would be caused by the proposal within the local area:

(a) The submitted application is understood to advise that the assessment undertaken for the applicants has departed from the BRE light guidance as it was felt the existing light standards around the application site were too good for a city centre site and so over emphasised the harmful impact the proposal would have. This departure seems to have involved benchmarking to set a lower baseline light quality by taking the environment around recent “successful” developments elsewhere in the city centre rather than the actual environment around the application site. The applicants do not define how they measure ‘success’ and they openly confirm that many of these supposedly successful developments do not themselves meet the BRE light guidelines.

(b) Despite this ‘benchmarking’, the outcome of the applicants’ own assessment advises that the proposal would cause harm - including in some cases a “major impact” - on the light reaching a not insignificant number of existing homes.

(c) As a part of the assessment a large number of windows in Granby Village and elsewhere in the area were assessed by the applicants but there are no drawings showing which windows have been assessed. Any number of windows that could reasonably be expected not to be affected by the proposal could have been included as a means of downplaying the findings and consideration should be given to the actual number harmed rather than any

relative number harmed. Also, the outcome of the assessment for Granby Village is not disaggregated into the five constituent apartment buildings although it is readily apparent - even to a non-specialist in light matters - that some apartments in some of these buildings will be far more badly affected than others. In this way, although a considerable number of existing homes will experience a “major impact” on their light, the applicants average out their findings across the wider area (possibly including windows where there was never any likely harm) to reach an overall conclusion that the impact on surrounding properties is “negligible to minor adverse”. The major impact on a concentration of apartments nearest to, and northwards of, the tallest tower is lost in this average and the extreme harm caused to these homes is somehow, therefore, considered acceptable by the applicants.

(d) The applicants state their mitigation measures that concentrate the large majority of built form at the eastern end of the site and closest to the northern boundary of the site would address this harm. However, it is transparently obvious that these measures only benefit those existing homes (mostly in commercially operated residential rental developments) adjacent to the western end of the site. If anything, these measures make matters worse for those homes near to the eastern end of the site. But worse than what? The mitigation measures are suggested as an improvement over the three tower proposal indicated on the **illustrative** masterplan drawing in the Sister SRF. As noted already, the Planning Service has publicly confirmed that SRF’s do not constitute planning policy and are at a very low level in terms of being a material planning consideration. The Sister SRF three tower proposal has no particular status and is not an appropriate basis on which to evolve a proposal without also taking full account of national and local planning policy that does carry great weight as material planning considerations including, for example, those policies that aim to protect the existing amenity including residential amenity. Residents were advised through the Sister SRF consultation process that the subsequent planning application process would ensure any proposal complied with such policies. This does not seem to be happening given that this proposal and the iQ proposal have been evolved with active engagement with, and seemingly support from, the Planning Service.

2. For the iQ proposal:

The submitted scoping report for the Environmental Statement (ES) states that the Planning Service agreed that iQ did not have to assess impacts on light further northwards beyond those buildings on the south side of Granby Row. The area of the subsequent ES, therefore, excluded any need to consider the impacts of the proposed development on many residential properties in the area including all those in the five constituent buildings of Granby Village.

The information now submitted by the iQ applicants does not suggest that a more extensive area has now been assessed than was required by the originally agreed scoping so presumably the assessment area still stops short of anywhere north of Granby Row and so continues to omit, for example, the whole of Granby Village including Velvet House where I live. The additional iQ information now submitted does, however, confirm that the iQ assessment has the same failings as with points (a), (b) and (c) identified above for the Sister proposal. The information is provided using totals of windows but without identifying the location and numbers of windows assessed. The information advises on the cumulative impact of the two proposals and is clear on the large increase in the number of additional windows that would experience major magnitudes of harm but without stating in

addition to how many and giving overall totals. Even on this basis the suggestion in Paragraph 41 is that the harm identified is not as harmful if the baseline used is not the existing situation in the vicinity of the sites but is set to a lower standard, one that has emerged elsewhere in the city centre where the City Council would seem to have accepted sub-standard developments possibly due to the lack of expertise within the Council regarding this matter. There seems to be a suggestion in Paragraph 39 taken together with comments elsewhere in this report (as noted above regarding townscape) that this locality is already characterised by tall development which clearly is not the case and which my previously submitted consultation comments refute. Regarding Paragraph 38, I also note that the BRE guidelines are just that - guidelines - and are intended to be used as a tool to achieve good outcomes for all affected by new development and not as a means to justify harmful development as is the case regarding these two sites. **This lack of transparency and misuse of the BRE guidelines is a reason for my objection to both proposals and please can it be reported as such.**

It is of concern that overshadowing is dealt with by a dismissive single line in Paragraph 42 when it is clear that the development individually and cumulatively will have a significant and harmful impact on overshadowing.

The Head of Planning and her deputy confirmed at a Planning Committee meeting last November when it was considering a tall building application on the Stockton's site (Great Ancoats Street) that sunlight, daylight and overshadowing is a complex matter. Both the iQ and the Sister applications confirm that the City Council has no specialist in this matter which the Planning Service has not refuted and which is still understood to be the case.

As you are aware, on the basis of the above (including the lack of expertise in the City Council and its inability to independently and effectively assess and challenge the claims of the applicants), the Granby Village Management Company and Granby House Management Company have jointly commissioned a sunlight, daylight and overshadowing specialist, Dan Wade of Aperture Natural Light Consultants Limited, to provide them with independent advice on the impact of the proposals on light. This assessment will not only assist the management companies and their residents but should also assist the work of the Planning Service by providing it with a specialist critique of the assessments contained in the planning applications and the manner in which findings have been arrived at and interpreted/misinterpreted. It does, however, seem wholly unacceptable that residents are having to pay privately for an assessment that the City Council would reasonably be expected to undertake as a normal course of its duties including its statutory duties as the local planning authority.

I am aware that Dan Wade has already written to you by way of a letter dated 22nd June 2026 in which he highlights various issues - including deficiencies - with the submitted Sister sunlight, daylight and overshadowing report. A number of these are touched on above. The letter also had regard to the various scenarios considered including the added cumulative harm that would caused to the light of existing nearby residents if the iQ proposal was implemented as well as the Sister proposal. Dan Wade also noted the rejection for assessment of the scenario that would also take into account the even greater cumulative impact that would arise from the future development of other sites within the Sister SRF area at least on the basis of the illustrative masterplan. **Please accept this lack of assessment of other future Sister SRF developments as a further reason for objection in addition to those objections I have previously raised on both applications.**

While Dan Wade's final report is expected imminently, he has made the two management companies aware of his initial headline findings. These show that a total of 24 apartments in Velvet House, Velvet Court (both within Granby Village) and Granby House would suffer **unacceptable losses in light in terms of the BRE light guidelines** due to the Sister proposal. This number would increase by a further two apartments when considering the cumulative impact of the Sister proposal and iQ proposal. I live in one of the apartments where an unacceptable light loss has been identified.

It is wholly unacceptable that I or any other resident should experience such an extensive and excessive loss of light for any proposed development even if applying the applicants' own stated and extremely cynical view that existing residents living in the city centre should expect and accept such harm as a part of the price of living in the city centre (p.85/6.242, Planning and Tall Building Statement). This comment really underlines the approach of the applicants: a lack of any meaningful concern for, or consideration of, local residents or the environment around the application sites in a bid to maximise built form and profits. **Please accept this BRE assessment of "unacceptable harm to light" on my apartment and those of many neighbours as a further reason for objection in addition to those objections I have previously raised on both applications. When reporting to committee I request that the practical reality of the extent of this harm be identified so that the committee fully understand the implications of the phrase "unacceptable harm to light".**

While not all apartments will experience this extreme level of light loss, many more will nevertheless suffer light loss as indicated by the information now submitted by iQ. **When reporting to committee I request that the Planning Service identifies the full harm to light in the area as well as reporting the worst impacts.**

My apartment includes a roof terrace. This will be one of the private, communal and public external amenity spaces which would experience harm through the individual and cumulative impacts of the two proposals on sunlight, daylight and overshadowing. This is not addressed by the additional information now submitted. I would reiterate my previous objections regarding the harm the proposals would thereby cause to amenity including residential amenity to me personally, my neighbours, and more generally within the area. In my previous consultation comments I noted the harm that would be caused to sunlight and daylight within the public realm around the site and through overshadowing (including streets and publicly accessible spaces of Vimto Park and Sackville Gardens). I take this opportunity to reiterate the harm that would be caused by the proposals to health and well-being regarding good internal living conditions (including natural light levels) and access to high quality external space - private, communal and public. In this regard I also note the apparent lack of attention to lessons learnt from the recent Covid-19 pandemic. There is virtually no private outdoor space within the area and external communal space is limited (and largely confined to Granby Village) and so, for most people, the importance of the public realm and public or publicly accessible green spaces of Sackville Gardens and Vimto Gardens can not be over stressed. Maintaining the quality of the external space including in terms of the daylight and sunlight levels is, therefore, critical. **I continue to object to both proposals individually and cumulatively on these issues and the impact on amenity, including residential amenity, but also especially given the evidence from reputable sources identifying a direct link between the environment within which people live and their physical and mental health and well-being.**

The proposals will adversely impact on Granby Village Management Company's ability to install solar panels on Granby Village roofs which is currently being given active

consideration. Such installation would assist in addressing both the climate emergency and also reduce the communal electricity bill for Granby Village (which is one of our largest on-going costs) thereby reducing management fees to individual leaseholders and assisting to address the cost of living crisis. In addition, the assessment by Dan Wade makes it clear that the sunlight and daylight reaching a considerable number of apartments would be so significantly affected as to make it unacceptable in terms of the BRE guidance. The practical consequences on those living in these apartments would be the increased need to use artificial light for a longer period in any given day and, due to a loss of thermal gain, the need for greater use of heating. These residents - that include me - will see an increased use of electricity which will adversely impact our ability to contribute to addressing the climate emergency and raise our bills at a time of a cost of living crisis that affects city centre residents as much as many other people. **Please accept this as an objection to both proposals (both individually and cumulatively) regarding the adverse impact on sunlight, daylight and overshadowing and impact on addressing sustainability, the climate emergency and cost of living crisis.**

Climate Change
The applicants have no regard to the wider impact of their proposals as identified above on the ability of existing residents to assist in addressing issues around, sustainability, the climate crisis and cost of living crisis.

Noise and vibration
It is confirmed that the two proposals would create a greater combined level of noise if implemented at the same time. It is likely that noisy operations or those likely to cause vibration may well effectively extend the duration of such noise or vibration being experienced by those living nearby during any given day. For any development taking place on these sites individually or cumulatively I would stress the comments and objections I previously made on this issue remain all the more relevant. These sought a later weekday start time for noisy operations and reassurances on how times of working would be policed and how extensions to these periods would be approved and in what circumstances - these should be truly exceptional and rare (if at all).

Additional comment on overlooking and privacy
The issue of overlooking and privacy is not addressed by the submitted additional iQ information. It is evident that the Sister proposal (due to its proximity to my apartment and the scale, massing, orientation and arrangement of windows within elevations) will give rise to considerable number of windows providing the opportunity for views of and into my apartment and significant diminution of my sense of privacy in my own home. The iQ development, albeit further away from my apartment, would increase this opportunity for overlooking and highly intrusive sense of reduced privacy. **I put this forward to augment my previous comments and objections relating to overlooking and privacy relating individually to each proposal and to include a consideration of the cumulative impact.**

Conclusion
The additional information which is the basis of this consultation exercise does not meaningfully address the previous comments and objections raised by myself or, I expect, the Granby Village Management Company and other residents in the affected area. The information - as with the original application - only confirms that these previous comments and objections are well founded and not only continue to be relevant but are strengthened

by the cumulative impact now being described. I would be grateful if you would ensure that all my objections are given full and meaningful consideration during the application process and are reported to the Planning Committee. I stress that they apply to the individual proposals but even more so the cumulative harmful impact of the two proposals when considered together.

Yours sincerely,

[redacted]

cc. Piccadilly Ward councillors

Outlook

Objection to Planning Applications 144791-FO-2025 and PLA-2026-000312 – Apartment 226, 26 Velvet Court

From [redacted]
Date Tue 21/07/2026 22:19
To Jennifer Atkinson [redacted]
Cc Jon-Connor Lyons [redacted] Sam Wheeler [redacted] Ross Steven [redacted]

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Dear Ms Atkinson,

I am writing on behalf [redacted] regarding the following planning applications:

- **144791-FO-2025** – iQ Student Accommodation
- **PLA-2026-000312** – SISTER/RGRE Student Accommodation

[redacted]

We have recently been informed by the Granby Village Management Company that Apartment 226 has been identified by their independently commissioned daylight and sunlight consultant as one of the apartments that would experience **unacceptable losses of natural light**, both as a result of the proposed SISTER development and from the cumulative impact of both developments together.

This is extremely concerning.

[redacted]. One of the main reasons she chose this particular apartment was its natural light, open aspect and the small balcony, where she enjoys spending time, particularly during the warmer months.

[redacted] Access to good natural daylight is therefore not simply a matter of preference—it is an important part of her everyday quality of life and wellbeing. A significant reduction in daylight would have a real and lasting impact on her enjoyment of her home.

It is particularly upsetting that, after around twenty years of enjoying these conditions, they could now be substantially diminished by developments of this scale. Existing residents who have made their homes here for many years should, in my view, be afforded significant consideration alongside the benefits of new development.

I fully appreciate the need for Manchester to continue growing and I am not opposed to development in principle. However, that growth should be balanced with protecting the amenity and wellbeing of existing residents. In this case, an independent daylight consultant has identified Apartment 226 as suffering unacceptable losses of natural light, and I respectfully ask that this evidence is given significant weight when determining these applications. If these impacts cannot be satisfactorily addressed, I ask that planning permission is refused or that the schemes are redesigned to better protect neighbouring homes.

I would also ask our local ward councillors, who I have copied into this email, to carefully consider the impact these proposals would have on existing residents, particularly those who have lived in Granby Village for many years, and to support a solution that better protects the quality of life of those already living here.

Thank you for taking the time to consider these comments.

Yours sincerely,



Outlook

Application number is PLA-2026-000312

From [redacted]
Date Sun 19/07/2026 11:02
To Jennifer Atkinson [redacted]

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OBJECTION

Dear Jennifer,

I strongly object to this application as the owner of a flat in Granby Village, one of the residential buildings that will be directly affected by this proposal.

Whilst I support the redevelopment of this site in principle, I do not support a development of this excessive height, scale and massing. The proposed 38-storey tower is wholly out of keeping with its immediate surroundings and would have an unacceptable impact on the amenity of existing residents.

Having invested in my home in good faith, I could not reasonably have expected a building of this height and scale to be permitted less than 60 metres away. If approved, it would fundamentally change my living environment through a significant loss of natural daylight and sunlight, increased overshadowing, and an oppressive outlook created by the proximity and scale of the proposed tower.

The proposal would also have a harmful impact on the communal areas of Granby Village and on nearby public spaces, particularly Sackville Gardens and Vimto Park, reducing the sunlight available to two of the few green spaces serving this part of the city centre.

In addition, the development would harm the setting of the Whitworth Street Conservation Area and nearby heritage assets by introducing an excessively tall building that fails to respect the established character and scale of the surrounding townscape.

The application appears to rely heavily on the SISTER Strategic Regeneration Framework to justify the scale of development, despite this not being adopted planning policy. National and local planning policies require new development to protect residential amenity, respond positively to its context and achieve good design. In my view, this proposal fails to satisfy those requirements.

For these reasons, I respectfully ask the Council to refuse planning permission and require a revised proposal that delivers regeneration while respecting the amenity of existing residents and the character of the surrounding area.

Kind Regards

[redacted]

[redacted]

Outlook

Planning application Ref. No. PLA-2026-000312 & Planning application Ref. No. 144791-FO-2025 - OBJECTION

From [redacted]
Date Fri 10/07/2026 19:04
To Jennifer Atkinson [redacted]

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ALERT This message originated outside of the Manchester City Council network. **BE CAUTIOUS** before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

Dear Jennifer,

I am a leaseholder at [redacted] Granby House, Granby Row, Manchester, M1 7AR and my apartment will be directly impacted by these two planning applications.

My property is [redacted] of Granby House and is directly facing the proposed demolition of the multi-storey car park and the erection of the tower block student accommodation (including the 38-storey building).

I have recently been made aware of this by the Right To Manage (RTM) directors at Granby House. I was not able to monitor any previous correspondence from the last half of 2025 due to being a kidney patient on dialysis at MRI and having a kidney transplant followed by other related illnesses and lengthy recouperation.

I would like to express my deep concern for these proposals, with the following objections:

- The impact of sunlight and daylight into my flat - this would be severally reduced and affect my mental health, particularly in the winter months. An independent assessment carried out by Dan Wade (specialist adviser) has already established that by BRE standards we would have unacceptable losses of daylight and sunlight.
- The proposed tall buildings would definitely overshadow a considerable number of flats facing it in terms of it's mass and the multiple windows that would face the overlooked flats.
- The impact of the proposals would affect the local community with the intensification of yet more student accommodation in an already busy area.
- The applicants planning reports are very biased as their assessments downplay the impacts these tall buildings would have on the area. They also justify this by stating that only a very small number of apartments will be affected. This is untrue as it affects numerous apartments.

The design of the tower blocks for the two developments will have a cumulative impact and will be extremely negative for the Granby area and should be refused planning permission, or else a major proposal revision. For example, the existing surrounding buildings are all proportional as far as the eye can see from street level or at roughly 6/7 storey level. To thrust a 38-storey tower block in the middle of the Granby area would be an eyesore, not to mention the loss of light and resulting suffering that many of the apartment residents would inevitably experience.

I thought we were meant to be a fair and caring society - not just in pursuit of money and greed all the time, like developers have a propensity for.

Regards,
[redacted]

[redacted]

Outlook

Fwd: Objection to planning application PLA -2026-000312 Sister Plot H Charles Street M1

From [redacted]
Date Thu 09/07/2026 15:45
To Jennifer Atkinson [redacted]
Cc Jon-Connor Lyons [redacted] Sam Wheeler [redacted] Ross Steven [redacted]

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Dear Jennifer

Subject: Objection to planning application PLA -2026-000312 Sister Plot H Charles Street

I submitted the folllowing on the planning portal yesterday and received no email acknowledgement as would be expected. Given past issues of not receiving the planning notices on this developement, I therefore dont have faith in the new planning portal. Therefore I am emailing the same. Please acknolwedge safe receipt.

OBJECTION:
I have lived in Granby Village since 2002 and was drawn to live her as it is a sensitive conversion and redevelopment (undertaken from 1990-94) of former textile warehouses. The layout and design of Granby Village has much deference to the neighbouring Grade II listed Granby House and Orient House being lower in height and including set-backs, and is of a modest design to enhance the Whitworth St Conservation Area in general. It was also designed to offer high quality city centre homes to spearhead regeneration benefiting from several landscaped squares and outdoor spaces created when remodelling the site. This was to encourage urban living by offering a pleasant living environment which has stood the test of time.

A number of residents have lived here from the start 35 years ago or are long term residents or tenants of 20 or more years. I myself moved here in 2002 as I appreciated the large amounts of sunlight and daylight year round that my apartment benefits from and has been a major factor in me not moving on from Manchester CC or out to the suburbs. Granby Village is also a community. The now mature gardens between the buildings offer an oasis of calm and encourage wildlife. The gardens also offer residents outside space and the chance to socialise in what can be sunny parts of the gardens. We get multiple species of birds on our roof terrace and it is an oasis in the city.

To now face plans for Sister Plot H and those for the adjacent iQ Pendulum Hotel site which is awaiting a decision would destroy the quality of life and amenity I enjoy in my home and undermine the community I am also an active part of.

These aren't just moderate towers of PBSA seen at Circle Square at 15 or so storeys. These are Huge.

The Sister Tower T3 is more an 'obese' Tower of 38 storeys instead of the purported 'Slender' tower the developer describes it as. It proportions are more like Canary Wharf Tower (1 Canada Square, Canary Wharf) and not dissimilar in design as T3 is almost square in plan, similar rendering just minus the pyramid roofline. Unlike Canary Wharf Tower this T3 on the Sister site is being shoehorned up to the boundary of a conservation area and many Grade II and a Grade II* buildings and does nothing to 'preserve and enhance' its surroundings as required in planning requirements for listed buildings and development in or adjacent to a conservation area.

Instead T3 especially will be an oppressive and overbearing 'Watch tower' over the entire area and I will suffer considerable overlooking by hundreds of students with PBSA rooms facing North. All to give students an ariel view of Manchester and presumably more profit for the developer and operator and to hell with the local residents and longstanding local community including the LGBTQ+ community at Canal Street and Sackville Gardens (where I am a volunteer).

The T3 tower especially but also T2 and potentially T1 would be very visible from my apartment with T3 sticking up high above the roofline opposite blocking much daylight and sunlight especially in the winter months when the sun is low. The Sister Tower and iQ Pendulum Hotel site combined would shadow my home and all of Granby Village throughout the winter months. Particularly relevant as our management company were investigating solar panels on our 3 flat roofs. With such huge edifices in these proposed PBSA student blocks towering over us, solar panels will be much reduced in electricity they can generate and will undermine cost / benefit and payback we have been reliant on. Hardly assisting in Net Zero and reducing environmental impact.

The communal gardens of Granby Village will also be overshadowed and dark, trees and planting will suffer and die with the huge loss of daylight and sunlight, and the homes of many will be severely impacted by loss of light and amenity, loss of solar gain and all round overlooking from oppressive towers looming to the South of us. All for a mass of student accommodation that offers Nothing but takes away so much.

The area will also become a student ghetto with 3000+ PBSA rooms added from the Sister Plot H and adjacent iQ Pendulum Hotel proposal alone. On top of 1200 at the soon to be completed Echo Street iQ development and the m any more established or planned PBSA in the local area. This huge extra volume of what is a transient student population, here for only part the year and without any particular commitment to the area is far from welcomed especially given the impact on our long term homes from the buildings the developer see fit to house them in. Contrary to relevant policy and guidance, the proposal would not contribute to maintaining or creating a balanced and socially cohesive community. Quite the opposite.

This is why residents are vociferously objecting to these plans for Sister Plot H and the adjacent iQ Pendulum Hotel site should be rejected. I ask the planners to think again at approving this horrendous student tower and urge the Planning Committee to see through the developer rhetoric and refuse this application and the one for the similarly harmful iQ development Pendulum Hotel site the opposite side of Charles Street.



The following Objection is submitted by the **Granby Village (Manchester) Management Company Limited** on behalf of the 236 leaseholders that make up the residential properties known as Velvet House, Velvet Court, Venice Court, 55-57 Whitworth Street and Bombay House that together form Granby Village.

Granby Row, Sackville Street, Whitworth Street and Samuel Ogden Street, M1 are the bounds of Granby Village. We are therefore one of the closest neighbours to the development site and due North of it.

Granby Village was a sensitive conversion and redevelopment undertaken from 1990-94 of former textile warehouses. The layout and design of Granby Village has much deference to the neighbouring Grade II listed Granby House and Orient House being lower in height and including set-backs, and is of a modest design to enhance the Whitworth St Conservation Area in general. It was also designed to offer high quality city centre homes to spearhead regeneration benefiting from several landscaped squares and outdoor spaces created when remodelling the site. This was to encourage urban living by offering a pleasant living environment which has stood the test of time. A number of residents have lived here from the start 35 years ago or are long term residents or tenants of 20 or more years. It is a community. The now mature gardens between the buildings offer an oasis of calm and encourage wildlife. The gardens also offer residents outside space and the chance to socialise in what can be sunny parts of the gardens.

These plans for Sister Plot H and those for the adjacent Pendulum Hotel site which is awaiting a decision would destroy the carefully designed and then fostered community and living environment of Granby Village. The gardens will be overshadowed and dark, trees and planting will suffer and die with the huge loss of daylight and sunlight, and the homes of many will be severely impacted by loss of light and amenity, loss of solar gain and overlooking from oppressive towers looming to the South of us. All for a mass of student accommodation that offers Nothing but takes away so much. This is why residents are vociferously objecting to these plans:

Development proposals

(1) The site is within the SISTER (formerly I.D. Manchester) Strategic Regeneration Framework (SRF) area which, against local opposition, showed three new taller buildings on the application site when these could have been placed elsewhere in the wider SRF area (e.g. by the Mancunian Way) to avoid their harmful impacts on our homes and the Whitworth Street Conservation Area. Residents were assured that future planning applications for the site would protect our amenity. We are now faced with an application - evolved with the support of the City Council's Planning Service, that flies in the face of that.

(2) The proposal will also cause harm - often great harm - to amenity (including residential amenity), the environment (including townscape and heritage), health and well-being of what is a long established community. These harmful impacts are very much related to the height, massing, siting and orientation of the proposed buildings and the location within the application site.

(3) The impact on sunlight and daylight will be very considerable and harmful. The application site is immediately to the south of the railway viaduct and Granby Village and the proposal would overshadow large parts of the area around it in an arc on the north side of the railway viaduct.

Impacts:

- All parts of Granby Village will be affected during the day as the sun moves around impacting the amount and quality of sunlight and daylight - including reflected light - in our homes and our outside private and communal green spaces as well as adjacent streets. Some residents will experience, in the words of the applicant, a "major impact" in terms of their daylight and sunlight.

- The tallest tower (T3) will close the gap between existing buildings on Sackville Street that has always allowed direct sunlight to reach Sackville Gardens especially during Winter months. It will also greatly overshadow the closer Vimto Park in the afternoon and evening. These are our only two nearby public, green, open spaces serving many 1000's of people every year - both residents, other city centre users and the LGBTQ+ community.

- The applicants have manipulated their assessment of daylight, sunlight and overshadowing so the impact appears less than it will be in reality. They variously claim these harmful impacts do not exist, are negligible or, where harmful, only affect a smaller number of residents so don't matter. No wonder residents are appalled.

(4) The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are using policy and guidance selectively and partially to support their proposal at the expense of the local area and the community surrounding the application site.

(5) The SRF is being used to justify the quantum (or amount) and height of the proposed development. The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process. Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with all relevant policy and guidance objectives intended to protect the local area, individual residents and communities.

(6) The site is currently occupied by a low density development: a multi-storey car park and small piece of incidental, left over land which the applicants own specialists confirm is of little biodiversity value. Planning policy seeks to achieve greater density in the city centre, but there is no acknowledgement by the applicants or planners that a significant increase in development density would be achieved on the site even if it were just developed with buildings of the same height as our own, especially if the whole site was used rather than leaving a large proportion of the site (but small in real terms) as open space which will never meet the needs of 1,041 students plus staff, visitors and public. Instead greedy landowners, national PBSA developers and international investors see the site as a cash-cow and pile the development far higher than anything around creating immense overshadowing and a visually overbearing building where almost 300 bedrooms and communal living rooms will directly overlook our area from its two tallest towers.

(7) Our area is an early example of successful urban regeneration that reinvigorated the city centre. It is long established and stable with a mixed population including a small proportion of students. Existing nearby PBSA developments already cater for 1000's of

students. The iQ Echo Street scheme opening this year and will add over 1000 more. The iQ proposal for the Pendulum Hotel site proposes a further 2,500 spaces. Our community is now being overwhelmed by a transient student population, here for only part the year and without any particular commitment to the area. Contrary to relevant policy and guidance, the proposal would not contribute to maintaining or creating a balanced and socially cohesive community. It will be a student ghetto.

(8) This SISTER Plot H proposal needs to be seen in the context of an equally inappropriate and harmful planning application on the adjacent iQ Weston Halls/Pendulum Hotel site which is awaiting a decision. Both proposals need to be considered on their own merits but also in terms of the cumulative impact that they would cause in conjunction with each other. The cumulative harm regarding the preceding points would be all the greater if both proposals were to be approved and built. A wall of very tall structures along Charles Street will create a huge shadowing and overbearing impact on the entire Whitworth Street Conservation Area and especially Granby Village given we are due North.

(9) Taking into account the above, this application - and the application for adjacent iQ Weston Halls/Pendulum Hotel site - should be refused planning permission.

Overarching comment

The applicants claim in their Planning and Tall Building Statement (Paragraph 1.8) that "The Proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre." This note will show this is clearly not true on any level let alone in terms of the impact on the surrounding area including Granby Village.

Misrepresentation of the public consultation exercise

OBJECTION

The submitted 'Statement of Consultation' is selective and biased in its reporting of comments made by residents to date and actions taken to mitigate concerns. It does not acknowledge the strong objections raised by local people on both the SISTER (formerly I. D. Manchester) Strategic Regeneration Framework (SRF) and on the application proposal in consultation exercises and prior to its formal submission. In support of this objection the following points are particularly noted:

(a) Objection was raised again to the SISTER SRF 'illustrative' proposal for the application site, Plot H, particularly regarding the height and massing, by resident representatives in a meeting with SISTER on 10th October 2024.

(b) The application proposal was presented to resident representatives in a meeting with SISTER on 26th November 2025. Objections were raised to the height, massing and Purpose Built Student Accommodation (PBSA) use. Despite this and the subsequent developer-led public consultation process the actual proposed design has not evolved in any discernible way to take concerns into account.

(c) The applicants note the various reasons for objection and state mitigation they consider necessary and/or have actioned. For the key issue of overshadowing the applicants openly state that by lowering the height of built form on the western half of the site they have mitigated against the impacts on sufficient residents to make the proposal acceptable while not admitting that a not insignificant number of residents suffer increased harm by a 38+ storey tower of considerable width and depth too that has now appeared at the eastern end of the site. Containing 750 student bedrooms – this tower is colossal and will entirely dominate the area including the Whitworth Street Conservation Area and many Grade II or Grade II* listed properties nearby.

Additional background information:

Two Granby Village residents sit on the SISTER Community Panel ostensibly to have an input into the SISTER SRF proposals as they are brought forward. However, it is becoming apparent that the Panel is used by SISTER to communicate their proposals and identify matters of concern or objection so that any proposal can be better presented to justify rather than amend their approach. One of these Granby Village residents is on the Panel to represent the views of local residents in the nearby principally residential area that includes Granby Village just to the north of the railway viaduct while the other is on the Panel primarily as a representative of the Friends of Sackville Gardens.

These two residents - referred to in the Statement of Consultation - have consistently objected on behalf of the wider resident community to this proposal for the SISTER Plot H (Charles Street Multi-storey Car Park) site both at the Panel and:

(1) At a separate meeting on 10th October 2024 with Ian Thompson of Counter Culture acting for SISTER prior to the selection of a development partner for the application

site. The residents were subsequently advised in November 2025 of the selection of RG Real Estate to deliver PBSA within a tall building proposal.

(2) A presentation of the proposal to these two residents by the design team for the development occurred on 26th November 2026 and the two residents immediately pointed out the plans were even more harmful than the outline SRF given the location, and scale of the T3 38 storey tower. This was not part of evolving the design but purely one of presenting the proposal that was already cemented in the developer's plans and any further 'consultation' is just a tick box exercise.

Planning policy and guidance

OBJECTION

The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are incorrectly and inappropriately using policy and guidance selectively and partially to support their proposal at the expense of the area and community outside the site. In support of this objection the following points are particularly noted:

(a) The following objections will assist to demonstrate this to be the case.

(b) The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process.

(c) Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area, people and community. The National Planning Policy Guidance (NPPG) explicitly states that it should be read holistically. This approach should be taken more broadly when applying relevant policies and guidance with their due weight as 'material planning considerations'.

Strategic Regeneration Frameworks (SRF's)

OBJECTION

Objection continues to be raised to the SISTER (formerly I. D. Manchester) SRF. Those people living in and using the existing locality around the application site foresaw the inevitable harm that would be caused to amenity (including residential amenity) and the environment (including townscape and historic environment) by the SISTER SRF proposing to site three taller buildings on the northern boundary of the SRF area. This is where this harm would be most keenly felt by those northwards of the site. Objection is also raised to the reliance by the applicants on the SRF to justify a particular quantum of development within the site and the continued inclusion of tall built form within the proposal when considerable harm has been identified. It has also been established that SRF's do not constitute planning policy and are a very low level of material consideration subservient to national and local planning policy which includes policy or caveats within policies

intended to protect amenity, communities and the environment. In support of this objection the following points are particularly noted:

(a) SRF is not planning policy but only a form of guidance. The Planning Service has confirmed it carries very low weight as a 'material planning consideration' unlike national and local planning policy.

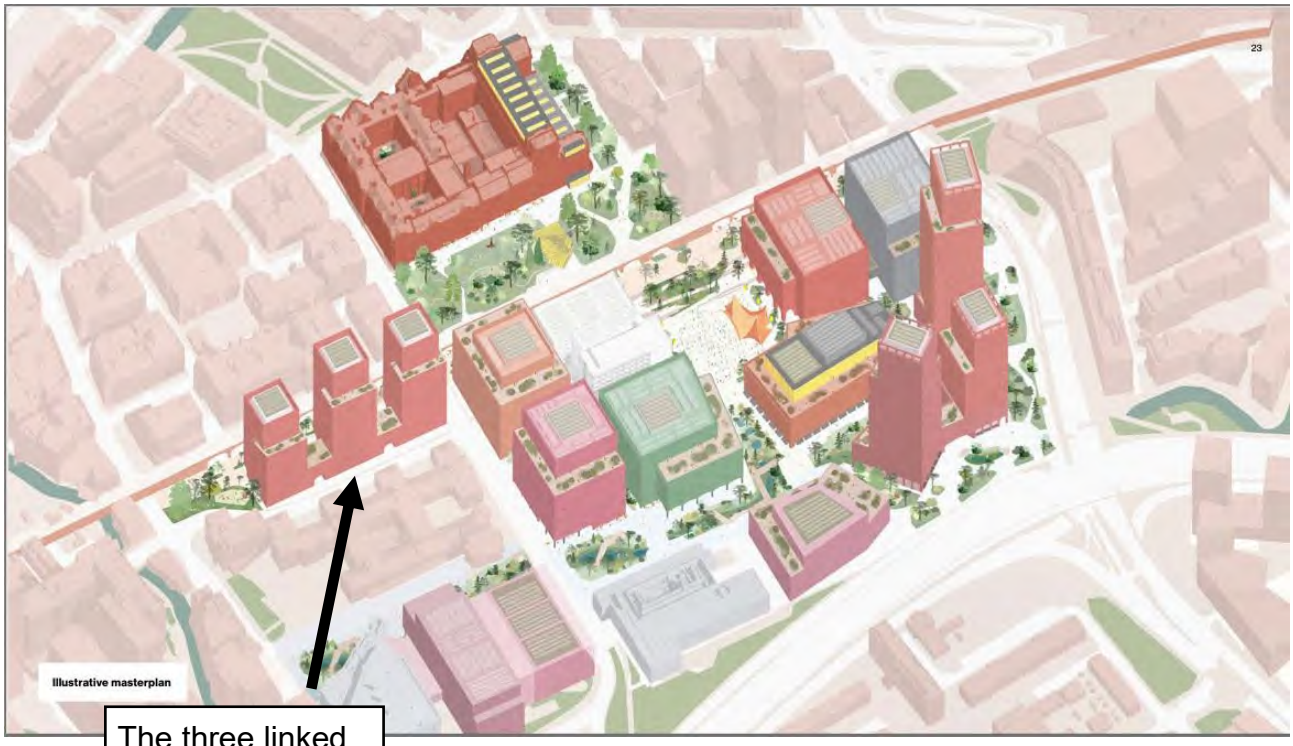
(b) The three taller buildings were only shown on an "illustrative masterplan" drawing without any storey heights or floorspace measurements but clearly were not the very tall towers illustrated elsewhere on the plan next to the Mancunian Way. It has been confirmed this was only intended to be indicative and existing local residents were assured that any planning application process for the site would address the planning issues to avoid harm to the amenity (including residential amenity), local environment (including townscape and heritage), health and well-being, and community within the adjacent area. This should be achieved by having full regard to all relevant national and local planning policy and guidance with their due weight as 'material planning considerations'. The planning application does not meaningfully achieve this and the SRF should not be driving any need or desire to achieve a particular quantum (or amount) of development or design outcome on this site particularly when Sister is a very large site with ample opportunity to position taller buildings and great massing fronting London Road and the Mancunian Way where the impact to residents is much reduced. On this basis the application should be refused planning permission.

Additional background information:

A Strategic Regeneration Framework (SRF) is the means by which a landowner and/or developer can identify an area (which may be one site or a larger area containing a number of sites) and set out a masterplan for its future redevelopment. This is invariably a process undertaken with the support and involvement of the City Council as the Council needs to approve the SRF for it to become a 'material planning consideration' and carry weight in the Council's future decision-making such as on planning applications. The SRF process is accompanied by limited public consultation carried out for the most part by the proposer.

The Planning Committee considered a planning application for the proposed 'Oxygen Towers' tall building scheme at 140 Great Ancoats Street (at the junction with Store Street and near Piccadilly Village) at its meeting last November (25th November 2025). During the meeting the Deputy Head of the Planning Service usefully confirmed that SRF is **not** planning policy and is only guidance, is subordinate to policy, and is of relatively low status as a material planning consideration. Government policy is preeminent followed by the Council's own local policy which should accord with Government policy. Unusually for such a proposal, the Oxygen Towers scheme was refused planning permission very much due to the impact on the amenity of existing nearby residents.

A video recording of the November 2025 Planning Committee meeting can be viewed at https://player.vimeo.com/video/1129898464?badge=0&autopause=0&player_id=0&app_id=58479
with the relevant case being from 1:07:15 to 1:30:00 in the video.



The three linked taller buildings being suggested by the SISTER SRF on the application site looming over Granby Village behind.

The original “Illustrative masterplan” drawing in the SISTER SRF document.

The SISTER (formerly I.D. Manchester) SRF:

The application site is within this SRF area against its northern boundary with the railway viaduct. This SRF covers an extensive area and includes a long southern boundary to Mancunian Way. At the time the SRF was being proposed, local residents took every opportunity to object to the locating of taller buildings being proposed by the SRF against the northern boundary of the application site. It was obvious that locating three buildings that are notably taller than nearby buildings in this location would inevitably cause disamenity especially through overshadowing to the existing residential community directly north of the site. Other sites within the SRF area - such as alongside Mancunian Way - could have been identified instead for such tall buildings. However, it is apparent that, while the SRF proposers wanted tall buildings within their development they wanted to create the best environment for new occupants within the SRF area. By placing the taller buildings against the norther boundary they intentionally aimed to minimise any adverse impacts within the SRF area by ensuring these were inflicted outside the SRF boundary.

Despite these objections the City Council approved the SRF with three taller buildings on the application site. In an email with a local resident the Chair of Planning Committee has, however, confirmed that the placement of tall buildings and wider impacts would be addressed as a part of any subsequent planning application for the site suggesting an acknowledgement that SRF may need to be revised. Indeed, the proposal as now shown

in the submitted application includes three taller buildings but not of broadly equal height shown by the SRF which the applicants claim is to mitigate against issues of overshadowing, daylight and sunlight on residential properties to the north of the development. It is evident, however, that their redistribution of the proposed SRF massing within the application site may improved matters for some existing residents but further exacerbates the harm that would be caused to others and considerably so.

Existing urban townscape context

OBJECTION

The siting, height (or 'scale') and massing of the proposal fails to appropriately and meaningfully respond to the existing urban townscape context but instead inappropriately responds to the character of more distant parts of the Southern Arc. The proposal, therefore, fails to have appropriate regard to relevant national and local policy, guidance and best practice relating to urban design and conservation principles and how new development should respond to context. In support of this objection the following points are particularly noted:

(a) The site contains a low level multi-storey car park and a small landscaped area of incidental, land that was left-over once the car park had been sited on an irregular shaped site. This open space has been poorly used/mis-used and maintained over many years and not perceived as a leisure space. This development does not make a positive contribution to the local townscape other than, possibly, part of the grouping of modernist buildings associated with the rest of the SISTER SRF area.

(b) The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent, taller built form down in order to respond to this change in scale and character.

(c) The 'Southern Arc' is the name that has been given to an area of land sweeping around the southern side of the city centre along Mancunian Way. It is not a formal designation. It is an area that has seen incremental redevelopment often with tall buildings. The applicant wants to associate the application site and rest of the SISTER SRF with the Southern Gateway to suggest the character of the area is one of modern tall buildings. While this may be their aspiration it is not the reality of the existing urban context of the site. We are located much further North of the Mancunian Way whereas towers at New Jackson Street and now Mayfield are essentially built very close to the Mancunian Way where there was lots of open and unencumber land for such tall towers to site in without causing to neighbouring areas.

(d) Contrary to statements made in the application, the proposal has failed to have meaningful regard to all relevant planning policy and guidance and has failed to show meaningful regard to, and respect for existing urban context. The proposal is contrary to planning policy and guidance.

Additional background information:

Policy in the National Planning Policy Framework (NPPF) and the government's 'National Design Guide '(NDG) of 2021 set down basic principles to achieve good (if not excellent) design in new development. The application appears not to even acknowledge the NDG and certainly fails to have any regard to it. Both the NPPF and NDG identify the importance of understanding and appropriately responding to the local landscape context and creating welcoming places in which to live, work and visit. Creating such places is not just about the new development itself and meeting the needs of new residents but the impact this development has on the surrounding area and existing users and community.

The City Council's statutory local development plan reflects this policy and guidance including in its Core Strategy Policy H12, specifically on Purpose Built Student Accommodation (PBSA). Policy H12 confirms that the design and layout of such development should ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise or disturbance, or impact on the streetscene either from the proposed development itself or when combined with existing accommodation. Various paragraphs of the supplementary planning document (SPD) section of the City Council's 'Guide to Development' all stress the need for new development to respect and be informed by their settings and to be of an appropriate height having regard to location, character of the area and specific site circumstances and local effects, such as microclimatic ones. The guidance section of the 'Guide to Development' also confirms in Paragraph 11.45 that new developments in conservation areas or elsewhere should not be designed in isolation; and considerations of design and layout must be informed by the wider context including both immediate neighbouring buildings, and the townscape of the wider locality. Paragraph 3 explicitly confirms that the Guide "sets the context within which developers and architects will have to work".

The application site and its actual existing urban landscape context

The majority of the application site is broadly rectangular but narrows at its western end as a consequence of the realignment of Charles Street in the 1950's/60's to accommodate the existing multi-storey car park than now occupies the rectangular part of the site. As was typical and problematic with many such much post-war schemes, the left-over area ('site left over after planning' known as SLOAP) was merely landscaped in a rudimentary manner - hence the existing trees and grass - and remained as a small, incidental and poorly maintained area used by rough sleepers and for fly-tipping rather than recreation. The proposal is effectively replicating this approach which the City Council's Guide to Development in Manchester was intended to prevent.

It is accepted the existing car park structure itself does not make an obvious positive contribution to the local townscape (although it could be seen as contributing to the modernist character of the 1950's/60's university development of which it formed a part) and an appropriately designed replacement development could make a greater contribution. The car park is lower than most of the surrounding buildings which contributes to the historic pattern of development visible at this boundary of the conservation area where the redevelopment of the Victorian city by the Edwardians for new and often larger textile warehouses abruptly stops as the City lost its domination of the world textile market. The existing car park does not dominate the listed railway viaduct or the adjacent taller buildings just inside the conservation area and so has a minimal impact on the setting of the conservation area. The proposed development will remove such historic views from the south and dwarf the nearby historic built form.

The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent, taller built form down in order to respond to this change in scale and character with the tallest new buildings kept towards London Road and Oxford Street. The applicant's own Design and Access Statement (p.18) shows the area characterised by "20 - 40m" high buildings mostly historic and mostly in the conservation area and where the soon to be demolished Faraday Tower is a 1960's anomaly. This is evident by a simple analysis of this surrounding context which identifies several component parts:

(1) The area to the north of the nearby railway viaduct - from the Oxford Street in the west to London Road in the east - is covered by the Whitworth Street Conservation Area with its particular high quality townscape. This is derived principally from 6 - 7

storey former Victorian and Edwardian warehouses with some elements of lower built form on a series of colliding grids of streets. This is the character of that part of the conservation area closest to and just to the north of the application site. The streets and spaces within the area all benefit from direct sunlight and good levels of natural daylight as the built form defines but does not overly enclose them. This quality of light is an intrinsic part of the historic character of the area in which work within the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Just to the north is the modestly scaled Sackville Gardens - the only public (i.e. Council controlled) open space in this part of the city centre dating from the early 1900's.

(2) The landscaped area of the existing application site is on the north-eastern corner of the Princess Street/Charles Street junction. On the north-western and south-western corners of the junction are modest, two-storey Victorian buildings which (along with the Grade II listed red brick railway viaduct crossing Princess Street) provide a characterful gateway to the conservation area and the context for the two-storey, Grade II listed Lass O'Gowrie public house and several small scale Edwardian former warehouses behind along the north side of Charles Street. The modern eight storey IBIS hotel stands on the south-eastern corner of the junction directly opposite the site without visually over-powering the nearby historic buildings. The historic buildings are red brick (some with terracotta) and slate and the hotel is red brick with lead-like elements.

(3) Moving southwards along Princess Street away from the conservation area and the Princess Street/Charles Street junction, the built form on the west side steps up in height to c.13 storey modern buildings next to the recent Circle Square development and then to a c.15-storey building immediately next to Mancunian Way. The height of built form markedly steps down moving eastwards across Princess Street to the 5-storey University Life Sciences building, a small surface car park and hard landscaped area associated with the River Medlock culvert. The part 8/part 5 storey Pendulum Hotel Weston Halls building (in mostly yellow brick with pitched tile roof) extends along Charles Street opposite the application site to abut the IBIS Hotel in the west and Sackville Street in the east.

(4) Elsewhere around the application site is the former University North Campus. The applicant fails to note this was identified by the 20th Century Society in its 'Potential Conservation Areas Scoping Report' (December 2017, funded by Historic England) as one of only its two potential conservation areas with a predominant twentieth century character in Greater Manchester. It is characterised by well spaced white painted or exposed concrete modernist education buildings arranged around a series of privately controlled but publicly accessible soft landscaped open spaces including the Vimto Park. These buildings are mostly relatively low in height in a mix of 1, 2, 5 and 6 storeys but interspersed with moderately high buildings such as the recently listed Renold Building but includes the tallest building near the application site, the University's Faraday Tower. This in height terms (c.14 storeys) stands in isolation and has a slender rectangular floorplan on a north-south axis minimising the shadow it casts to the north. The various spaces including Sackville Street and Charles Street in the vicinity of the site are full of sunlight and daylight.

Southern Arc

The application refers to the Southern Arc as if it were an established designation but no such reference or boundary can be found in the City Council's statutory development plan. It is understood to refer to an area of land, stretching from Mayfield to Great Jackson Street, arising principally from the building of Mancunian Way in the 1960's and other postwar clearance. To the east of London Road and west of Cambridge Street land

remained vacant or was put into low density industrial/commercial uses but the central section was predominantly developed in the 1950's and 1960's with education buildings whose character has largely been retained to date around the application site. In more recent years different sites within the Southern Arc area have been brought forward with a developer expectation (encouraged by the City Council and its developer-led Strategic Regeneration Frameworks) that high rise/high density development would be acceptable. Policy and guidance, however, makes it clear that such a one-size-fits-all approach cannot be assumed across such an expansive area which abuts a variety of other townscapes.

The application contains information assessing the local townscape context around the site - including some specifically on the conservation area - but this has not been used to inform the evolution of a design that actually responds meaningfully to this context in terms of the siting, scale and massing of the proposed built form. Instead the proposed design is responding to the emerging high density/high-rise townscape in more distant parts of the expansive Southern Arc area which is seemingly the actual design intent as the submitted Environmental Statement (ES Vol 1, Paragraph 3.8) identifies "SISTER as the 'final piece in the regeneration jigsaw 'within the southern arc of Manchester that stretches from Great Jackson Street in the west through to Mayfield." The proposed use of elevation features and materiality to respond visually to nearby 1950's/60's buildings is tokenistic given that this treatment is dressing up a 38+ storey tower in an area characterised by relatively much lower built form. This is not the approach for achieving good design set out in national and local policy and guidance. The proposed development is not innovative in design and does not fit into the overall form and layout of its surroundings as required by the NPPF.

Heritage

OBJECTION

The application fails to appropriately respond to the heritage significance of the Whitworth Street Conservation Area or the settings of nearby listed buildings and non-designated heritage assets so as to avoid harm or keep such harm to the minimum that could be considered appropriate in heritage terms. In this regard the proposal has not had due regard to legislative requirements or to national and local policy, guidance and best practice. In support of this objection the following points are particularly noted:

(a) The application site is outside but immediately adjacent to the conservation area. There remains a need to ensure development within this setting assists to preserve or enhance the character and appearance of the conservation area. The proposed development adversely affects the settings of a number of listed buildings but the application uses an assessment methodology to arrive at a conclusion that the harm it causes to the historic environment is acceptable. This is not the approach sought by policy and guidance which should be to assess the historic environment and then evolve a proposal to avoid harm to it.

(b) The application fails to acknowledge that the character of the conservation area partly derives from the quality and quantity of sunlight and daylight reaching the buildings and spaces between them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Similarly for the nearby Sackville Gardens as an intentionally laid out public space at the heart of the conservation area.

(c) The application is restrictive in its identification of non-designated heritage assets. These should have included several buildings in the area including, for example, Velvet House and 55 - 57 Whitworth Street.
(d) The proposal fails to give the great weight required to the conservation of the historic environment. It does not accord with relevant local and national policies and guidance.

Additional background information:

The Whitworth Street Conservation Area was designated by the City Council in recognition of the area's high quality historic townscape which is one of the most concentrated historic environments within the city centre and of very considerable heritage significance. The character and appearance of the area is derived principally from 6 - 7 storey former Victorian and Edwardian warehouses with some elements of lower built form on a series of colliding grids of streets. Where Sackville Street, Princess Street and Oxford Street pierce the southern boundary of the area the scale of older built form reduces in height which is a visible reminder of where the redevelopment of the Victorian city by the Edwardians in the early 1900's for new and often larger textile warehouses abruptly stops as the City lost its domination of the world textile market. The character of the conservation area also derives from the streets and spaces which all benefit from direct sunlight and good levels of natural daylight as the built form defines but does not overly enclose them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including the inspection and sale of textiles. Just to the north is the modestly scaled Sackville Gardens - the only public (i.e. Council controlled) open space in this part of the city centre dating from the early 1900's.

Paragraph 69(1) of The Planning (Conservation Areas and Listed Buildings) Act 1990 states that conservation areas are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. This is a statutory duty placed on the City Council and refers to the area as designated not the character/appearance as proposers would like to see it in the future. This duty does not stop at the boundary but should also have regard to development within the setting of the area that affects the character within.

The application site is not within the Whitworth Street Conservation Area but is immediately adjacent to it and within its setting. The proposed development would form a highly prominent and alien feature in views into and out of the conservation area. The proposed development would be highly prominent on Sackville Street which is a busy gateway route serving the conservation area. The proposed development would harm the ability to appreciate the character and appearance of the conservation area and would not preserve or enhance the special architectural or historic character or appearance of the conservation area including through the impacts on the quality of light within the public realm and other external spaces and reaching internal spaces of buildings.

The proposed built form would also be a highly intrusive and harmful feature within the settings of a number of listed buildings and a wider number of non-designated heritage assets than have been identified in the application.

The application has downplayed these impacts and the design process resulted in considerable harm to the culturally significant heritage on Manchester and its past status as 'Cottonopolis'. This, and the failure to identify all potential non-designated heritage assets in the locality, is indicative of the general disregard in the application of the existing townscape in order to generate a proposed design that meets a different narrative around

the quantum of development so as to arrive at a design that responds to tall building development elsewhere than in the existing local built context.

The detrimental impact on the settings of heritage assets would be contrary to various national and local policies and not have appropriate regard to national or local guidance or best practice. There is an expectation (including in terms of policy) that new development within the settings of conservation areas and heritage assets (whether or not designated) would respond positively and meaningfully to their heritage significance. The NPPF advises that where development would achieve this it should be treated favourably with the implied message that, where it does not, it should not be treated favourably.

The optimum viable use for the site in heritage terms is the use that achieves the best outcome for conserving heritage assets and their settings which is not necessarily the most economically viable use. The proposal does not represent the optimum viable use for this site in terms of conservation.

That Historic England have not raised objection to the proposal does not mean that the City Council, as the Local Planning Authority, can set aside national and local heritage policies. The City Council should fully recognise that heritage assets are an irreplaceable resource that should be conserved so that they can contribute to the quality of life of existing and future generations. Great weight should be given to their conservation.

The almost complete iQ development at Echo Street within the Whitworth Street Conservation Area is an example of inappropriate development that can take place when heritage and townscape policies are not given sufficient weight when determining planning applications and unfortunately this is more of the same but arguably even more damaging.

Proposed design and impact on amenity

OVERARCHING OBJECTION

Following recognised principles of good design (including regard to the existing context) rather than an apparent expectation of achieving a pre-determined quantum of development within the site (driven by the SRF) should have led to an appropriate design of development for this site. The predetermined quantum of development, the lack of appropriate or meaningful consideration given by the applicants to the existing urban townscape once they had assessed it, the adverse impacts caused over much of the local area affected by the proposal, and lack of regard to policy, guidance and best practice regarding good design have led to a wholly inappropriate and discordant proposed design. This design results in a built form that gives rise to a range of harmful (including exceptionally harmful) impacts on amenity within the surrounding area. The proposed design is contrary to a wide range of national, local policies, guidance and best practice and certainly does not represent good or exceptional design in terms of policy. In support of this objection the following points are particularly noted:

(a) The application has selective and partial regard to planning policy and guidance and fails to have regard to the National Design Guide (NDG) as required by the National Planning Policy Framework (NPPF), and particular regard, has for example, to NDG Paragraphs 42, 43, 48, 67 and 71.

(b) There is failure to appreciate that policy documents including the NPPF need to be treated holistically rather than cherry picking policies to support a desired outcome.

(c) NPPF (Paragraph 135) requires developments that "are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change" but the latter is not expected to be at the expense of the former. In any event, the proposal is not innovative nor does it represent "appropriate change".
(d) The proposal inappropriately refers to unadopted, draft policy to support their application.
(e) The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

Additional background information:

To achieve an appropriate design outcome for this site (including in terms of impacts on residential amenity and the environment within the surrounding area) there is no requirement in the statutory development plan to provide the quantum of development now being proposed. The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

It is unacceptable that the applicants fail to have regard to the National Design Guide (NDG) as required by the NPPF (Paragraph 134) and uses unadopted draft policy such as that relating to tall buildings (Planning and Tall Buildings Statement, Paragraph 6.30) in their attempt to justify the proposal. The proposal clearly would not accord with various parts of the NDG including those referring to new developments having a meaningful response to context (such as, for example, in Paragraphs 42, 43 and 48) and identity (for example, Paragraphs 67 and 71).

Irrespective of the comments made by the applicants, the proposal does not represent good design as is generally sought by planning policy and guidance, nor does it represent exceptional design in policy/guidance terms that could overcome certain other departures from policy. It is noted that NPPF (Paragraph 135) requires developments that "are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change" but the latter is not expected to be at the expense of the former given that the NPPF policies are meant to be read holistically.

The applicants state in the Environmental Statement (ES Vol 1, Paragraph 11.59) that it is unrealistic for existing surrounding residential properties to maintain similar levels of daylight to those currently experienced. However this is perfectly achievable with a full site redevelopment at a moderate height making use of the incidental landscaping and poor quality open space at the westerly end of the application site. And furthermore respecting existing gaps between buildings along Granby Row particularly between Granby House and rear of Fairburn House, 72 Sackville Street. Residents don't suggest there should be no redevelopment of the site but that such development should appropriately respond to the existing character of the area especially regarding height and massing in order to avoid harm and be compatible with the character of the area.

- **<u>Height, massing, siting and orientation: The impact on sunlight, daylight and overshadowing.</u>**

  ### OBJECTION 1

  The proposed incorporation of a tower (tower T3) of 38 storeys (plus rooftop plant) results in a proposed design which is not just uncharacteristic of the surrounding townscape context but would be overwhelming within this context and give rise to significant disamenity to residents and other users of the

surrounding area. A particular impact is the loss of daylight and of direct and reflected sunlight within the adjacent area due to overshadowing and which will be particularly excessive in some homes. This impact would be all the greater when combined with the siting and orientation of the proposed built form. It will give rise to excessive, adverse impacts on amenity within buildings including the homes of many people, within private external amenity spaces, the public/publicly accessible Sackville Gardens and Vimto Park, and within the public realm more generally including through the visually overbearing nature of tower T3. On this basis the proposal would be contrary to a wide range of national and local policies and guidance. In support of this objection the following points are particularly noted:

(a) The proposal has taken the SISTER SRF suggested approach of three linked towers of approximately equal height and size and redistributed the floor space so that one tower, tower T3, now contains some 75% of the floorspace. In terms of height the impact of towers T1 and T2 are more acceptable in terms of the existing urban context than tower T3 which is wholly out of context and unacceptable. The applicants claim this arrangement mitigates against the impact of the proposal on sunlight, daylight and overshadowing but without clearly stating that the mitigation only benefits a proportion of the area north of the viaduct but makes it much worse for the area around tower T3.

(b) Given its footprint and height, tower T3 has significant mass - it is not the “slender” tower the applicants describe. A better description would be ‘Obese’. It is sited close to the northern site boundary. The combination of height, massing, siting, orientation give rise to extreme harm to the amenity (including residential amenity) and environment within the nearby area on the northern side of the viaduct. It will not only affect daylight and sunlight (including reflected sunlight) through overshadowing but will give an oppressive outlook for many nearby homes and give rise to considerable overlooking.

(c) In relative terms tower T2 may be far more acceptable than T3 in terms of height but it is sited even closer to the railway viaduct than T3. This will exacerbate the harmful impacts it has on the neighbouring area. However, the cumulative impact of towers T2 and T3 will be all the greater.

(d) It is evident that placing a large scale development including a massive 38+ storey tower against the south side of the railway viaduct will bring harmful - often extremely harmful - impacts on amenity (including residential amenity) within the primarily residential area immediately to the north of the railway viaduct. Within Granby Village this impact will be to internal living environments and private external amenity spaces (including our own Orient Square, courtyards, balconies and roof terraces) which help provide light to internal spaces. In the wider area it will similarly affect homes and also streets and other open spaces including the nearby Sackville Gardens and Vimto Park.

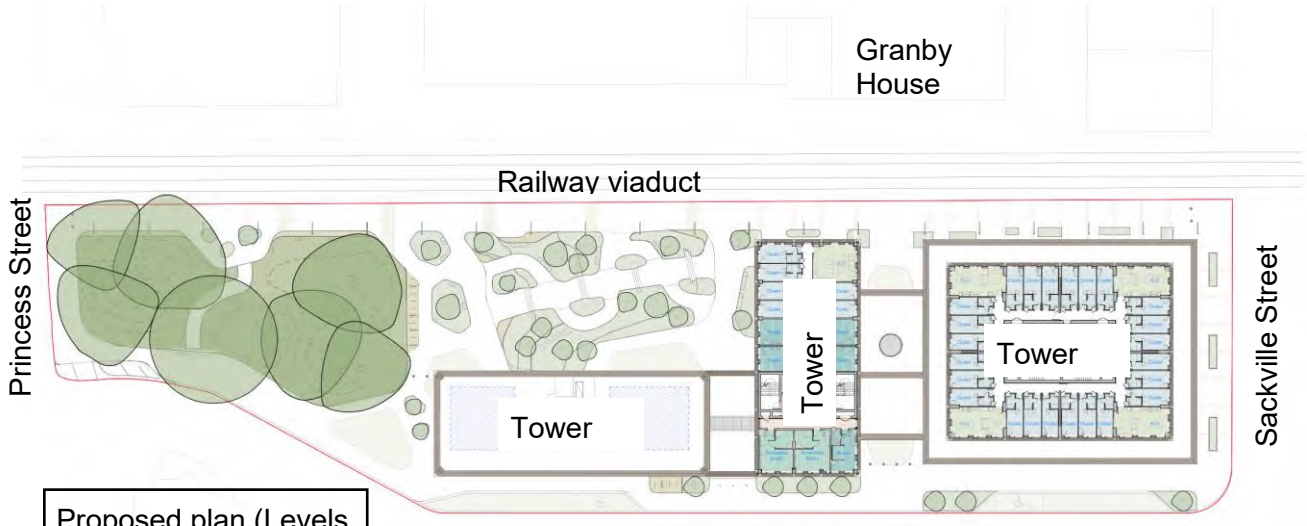
(e) Sackville Gardens and Vimto Park are the two small public/publicly accessible green open spaces serving this locality and a wide area of the city centre and the applicants claim these spaces will not be affected to any notable extent by the proposal. However, common sense and the daily experience of residents and users suggest that (1) the March SHOG Assessment Results for Vimto Park (Table 11.19 of the Environment Statement) showing a less than 1% reduction in 2 hours of Sun Hours on Ground is misleading for the effects at other times of year; and (2) the prediction of a “negligible” increase in shadow over the park (Table 17.8) is simply not credible for the winter months. It is clear that the applicant’s assertions are incorrect and the proposal will cause significant harm to these open spaces. By failing to acknowledge this harm the

proposal will radically diminish the quality of Sackville Gardens and Vimto Park despite recognition in policy and guidance that access to good quality open space and nature is vital to physical and mental health and well-being.

(f) The narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. If there are any areas in the city centre where this would apply it is here.

Additional background information:

The applicants have detailed how the three taller buildings of broadly equal height, massing and footprint originally shown for this site in the SISTER SRF have been reinterpreted to reduce the heights, massing and footprint of two (towers T1 and T2) while increasing the height and massing of the third (tower T3). Tower T3 will contain some 75% of the total floorspace.



Proposed plan (Levels 8 & 9) to differentiate the three towers

The development as now proposed consists of three linked towers: T1 of 8-storeys, T2 of 10 storeys and T3 of 38 storeys each with the additional height of a rooftop plant (building services) structure taking them to stated heights of 62.25m, 67.95m and 148.75m respectively. In terms of height alone towers T1 could be seen to be akin - and to respond appropriately to both the existing adjacent historic built form such as Orient House and Granby House and the more recent IBIS Hotel. Tower T2 begins to exceed the height that has this obvious relationship with the adjacent built form but could be considered as not excessive in this regard in townscape terms. Tower T3, however, is wholly out of context due to colossal height and massing.

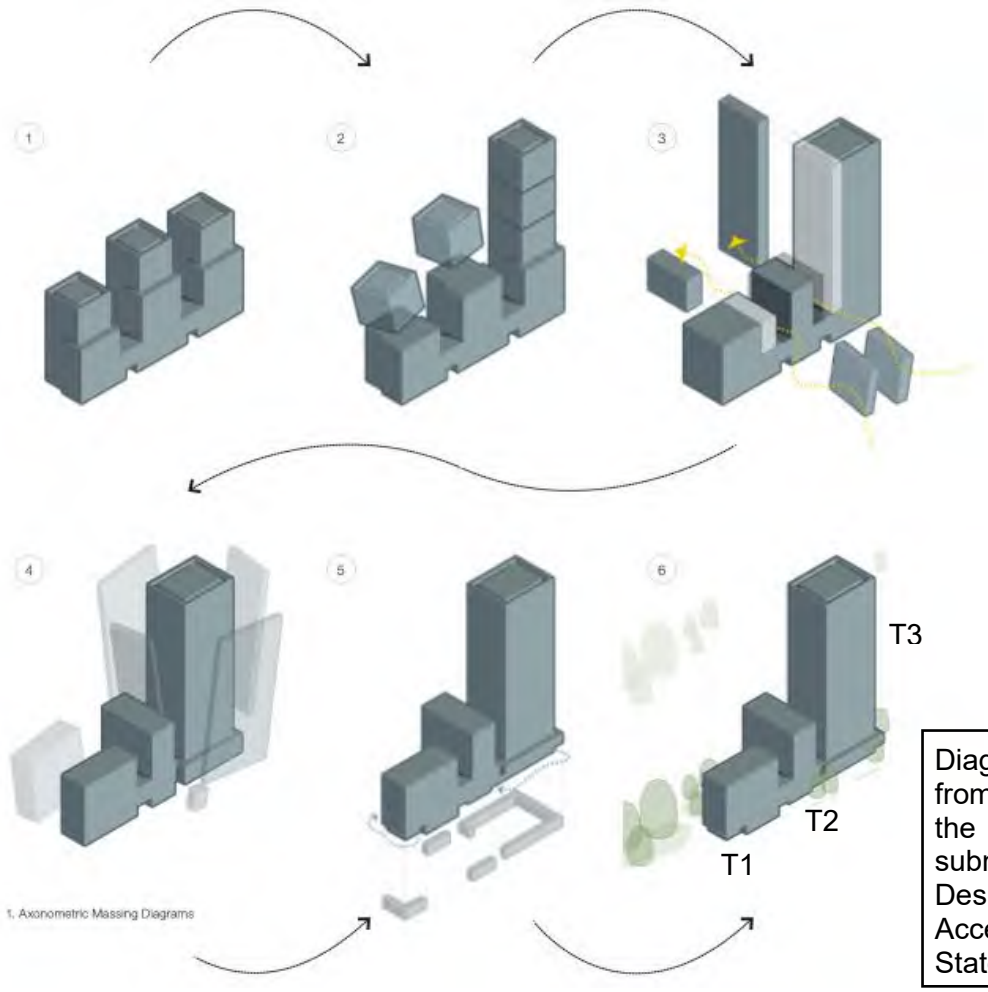


Diagram from p.26 of the submitted Design and Access Statement

The applicants claim the concentrating of massing stacked up at the easterly end of the site is to mitigate against issues of overshadowing, daylight and sunlight on residential properties to the north of the development but this is selective and only applies to the westerly end of the site and 'Princess Square' they are attempting to sell the benefits of. Their redistribution of the proposed SRF massing may improve matters for some existing residents (notably in the Corporate owned fully rented blocks of Orient House and Salisbury House), but further exacerbates the harm caused to individually owned leasehold apartments including many long-standing owner occupiers in Granby House and Granby Village who have lived here for 20, 30 even 40 years. We are very early examples of Manchester's urban regeneration that has proven popular and sustainable as a community for a long period. But we are now at the mercy of developers expecting to build huge towers of student accommodation for short term gain regardless of the impact to our' homes. If PBSA towers are to be part of the Sister redevelopment then as stated by residents in many consultation exercise – place them on the Southern boundary against the Mancunian Way to reduce harm on the Whitworth Street Conservation Area and our homes. As the Sister site is wholly owned by Bruntwood and the University this redistribution is perfectly possible.

The developer redesign compared to the SRF leaves a large area around tower T3 that becomes extremely harmed - more than the SRF envisaged development to which residents raised considerable objection. It is unclear why the applicants consider residents in neighbouring buildings towards the western end of the site require a good standard of residential amenity (by avoiding/minimising overshadowing and the harmful impact on daylight and sunlight) whereas a large number of other neighbouring residents towards the eastern end of the site do not. It is suggested that maybe the corporate ownership and threat of large scale claims or injunctions for right to light claims by the corporate landlords of Orient House and Salisbury House may have influenced these design changes.

The applicants constantly and incorrectly stress the 'slender' nature of tower T3 to somehow suggest a reduced visual impact and impact in the local area on overshadowing, daylight and sunlight. Tower T3 is not slender. It should be more accurately described as 'Obese' given the considerable width and depth with the widest elevations running east-west (parallel to Charles Street) thus overshadowing much more than any slender tower would running north south. It is also close to the northern site boundary all of which maximises this overshadowing on the area northwards. The scale, massing and siting will give rise to an overbearing presence both for those using the area but also in the outlook of many homes in Granby Village.

As with all these daylight, sunlight and overshadowing issues, it is unclear why the applicants consider residents at the western end of the site deserve a more open aspect by proposing lower built form sited almost as far as possible away from the existing residential buildings to the north. In terms of siting in general it is noted that the site boundary follows the existing kerb line along Charles Street and that all three

towers have all been stepped back from this boundary to provide not only a generous footway but also servicing lay-bys.

The area on the northern side of the railway viaduct that would remain extremely harmed by towers T2 and T3 contains many homes and private external amenity spaces including within Granby Village which alone contains over 200 apartments with a variety of communal external spaces (including the green Orient Square at the corner of Granby Row and Samual Ogden Street) and private balconies and roof terraces. The area currently enjoys a good level of sunlight and daylight partly as a consequence of the height of the historic built form, the historic layout of the area designed to facilitate working with textiles in the many (now converted) textile warehouses, and a sensitive approach to planning when regeneration took place in the late 1980's/early 1990's that sought infill development of a corresponding height and massing. This means good levels of not only direct sunlight (including for some facing into courtyards as well as streets) and daylight light but also light percolating into spaces between buildings and reflected light leading to desirable homes that people enjoy living in and an area others enjoy visiting and using. A separate consultants report commissioned by the management companies of Granby Village and Granby House will detail these impacts on them but it is evident that an overly tall and massive building placed immediately southwards of such an area will have a devastating impact on amenity especially of those living closest to tower T3.

The affected area also contains Sackville Gardens (the only nearby public open space apart from the highways) and Vimto Park as a private but publicly accessible space shown as retained by the SISTER SRF proposal. Sackville Gardens is a relatively small public open space but is well used throughout the year by people who live in, visit and use the city centre including a variety of community events. The applicants have discounted the impact on this space although the impact will be considerable by reducing the direct sunlight particularly in the winter months when the sun is low even at midday as shown in the following photographs. This not only impacts on amenity within this important open space and the ability for thousands of

people to enjoy it, but also on the ability for the existing plants to survive let alone thrive.



Photo taken at midday in early January 2025 looking down Sackville Street towards the site of the proposed tower T3. Note how the low Wintertime sun sits low in the sky but manages to illuminate the Gardens through the existing gap in buildings. Compare this with the following image



Image in the submitted Design and Access Statement. View from Sackville Gardens looking down Sackville Street towards the site with the proposed tower T3 as it would be seen. Note how the proposed tower T3 would fill much of the existing gap between the Sackville Building and Whitworth House through which Sackville Gardens currently receives most of its direct sunlight especially the low sun experienced in Wintertime.

The affected area also includes Vimto Park which, like Sackville Gardens, is also north but also east of the proposed tallest tower, tower T3 and is an intensively used green open space especially popular on sunny Summer afternoons. However, Vimto Park is much closer and with their nearest points being only some 25m (about twice the width of Sackville Street) and the impact on sunlight and daylight levels within this space will be considerably affected by overshadowing for much of the later part of the day. The application documentation appears to suggest that Vimto Park will not be overshadowed by the proposed development which is nonsense.

The submitted application includes a document that looks at the impact on health of the proposed development without much regard to the adverse impacts being caused to the area outside the proposal. It does confirm, however, under the heading "Access to open space and nature" that open space helps reduce physical health issues including those associated with sedentary occupations and stressful lifestyles and growing evidence they help to maintain or improve mental health. It seems obvious, therefore, that the limited open spaces that exist within the area and amenity within them should be protected for people in the area including residents and the new occupants of any proposed development on the application site. The current proposal clearly will not achieve this.

The applicants seem to suggest (Planning and tall Buildings Statement, Paragraph 6.242) that residents have bought into an area they knew was next to an SRF and so should have expected their sunlight and daylight levels to be harmed at some point. This misses the point that many residents were in the area before - often a long time before - the SRF and also that there are many planning policies and much guidance that address the need for proposed developments to have meaningful regard to the local urban context to avoid harmful impacts. In this regard it is also noted that the narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. **If there are any areas where this should apply it is here.**

OBJECTION 2

The assessment of the impact of the proposal on sunlight, daylight and overshadowing and the manner in which this has been used and communicated has not assisted to provide an accurate understanding of the real impacts of the proposal to decision-makers and other non-specialists including existing local residents and others who will be affected by the proposal. These impacts include excessive negative impacts especially in the area affected by tower T3. In support of this objection the following points are particularly noted:

(a) The Head and Deputy of the City Council's Planning Service has noted that the assessment of sunlight, daylight and overshadowing is a complex matter and it has been confirmed that there are no specialists within the City Council in this matter. This can only mean the Planning Service has been taking the assessments made by applicants/developers at face value.

(b) The submitted information contains no readily understood visual information that would show the development and the overshadowing it would cause on key dates of the year (Summer and Winter Solstices and Spring and Autumn Equinoxes) and at one hourly intervals throughout these days to track the change during the hours of daylight. These were typically included in past planning applications but developers now get away with omitting these.

(c) The submitted application advises that its assessment has departed from the British Research Establishment (BRE) standards normally used as they felt the existing light standards around the application site were too good and overly emphasised the harmful impact the proposal would have. This seems to have involved benchmarking to set a lower baseline light quality by taking instead the environment around recent "successful" developments elsewhere in the city centre. The applicants do not define how they measure success and they openly confirm that many of these supposedly successful developments do not meet BRE standards. This approach is unacceptable.

(d) The outcome of the assessment is to suggest that the proposal causes harm - including in some cases a “major impact” - on the quality of light reaching a not insignificant number of homes in the area. The applicants merely state that the change in design from the SRF illustration to their proposal has mitigated against this harm although clearly this mitigation has only been to a proportion of the windows. The homes closest to towers T2 and especially T3 continue to be harmed in a major way. This is unacceptable and appropriate mitigation should benefit all the residents which would be expected to involve decreasing the height and massing of built form and to revise siting and height to something more akin to tower T1.

(e) Granby Village should be disaggregated into its five consistent buildings to more clearly show that certain parts will be far more affected than others especially by tower T3.

(f) Having shown that a not insignificant number of existing homes will experience a “major impact” on their sunlight and daylight due to overshadowing the applicants average out their findings across the wider area to reach an overall conclusion that the impact on surrounding properties is“ negligible to minor adverse”. This suggests that the extreme harm caused to some homes is somehow, therefore, considered acceptable.

(g) The assessment unbelievably determines that for surrounding areas of amenity space (by which it must means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) the impacts would be “negligible and considered non-significant requiring no mitigation measures”.

(h) It is unacceptable that the local residents have had to employ their own daylight, sunlight and overshadowing specialist to counter the application assessment. The citizens of Manchester should be able to depend on the City Council to check submitted information with appropriate independent expertise and for there to be accurate and transparent planning applications – not the works of fiction we seem to be presented with all too often.

Additional background information:

A specialist report has been commissioned by the directors of the Granby Village and Granby House management companies to assess the issue of sunlight, daylight and overshadowing which will challenge and counter the information contained in the application. This report is awaited and the following comments are mostly on a non-specialist basis having reviewed the submitted application information.

It seems common sense that a wide footprint, 38+ storey tower sited immediately south of a relatively densely laid out area of much lower (in relative terms) buildings of broadly homogenous height with pockets of open space will cause considerable harm to amenity through overshadowing across much of the area and with a consequential impact on sunlight and daylight (including through reflected light). The planning application, however, requires a specialist report that can confirm the acceptability of a proposal in a more robust manner to allow the Local Planning Authority to show the matter has been fully considered and allow a box to be ticked. Such a process requires a transparent, honest and independent assessment with results that are accurately presented. This has not happened in this instance, and the applicants are being allowed to mark their own homework and determine their proposal to be acceptable not only against all common sense but also against the spun analysis of their own specialist assessment.

In the separate planning application by iQ for the neighbouring Weston Halls/Pendulum Hotel site (still to be decided by the Planning Committee), the specialist daylight, sunlight and overshadowing report openly advises that “There are no specialists within MCC or other statutory consultees relevant to the area of daylight and sunlight” (p.209, Chapter 10, Environmental Statement). The planning application for the SISTER Plot H site covered by this note has now similarly confirmed this lack of expertise.

The Planning Committee considered a planning application for the proposed ‘Oxygen Towers’ tall building scheme at 140 Great Ancoats Street (at the junction with Store Street and near Piccadilly Village) at its meeting last November (25th November 2025). When councillors raised questions and queries about sunlight/ daylight and overshadowing both the Head of the Planning Service, Julie Roscoe, and her deputy, David Roscoe, appeared to allude to this lack of specialists when confirming that this is a highly complex issue. It seems that the Planning Service merely accept the specialist sunlight, daylight and overshadowing reports submitted as a part of planning applications at face value. A video recording of the November 2025 Planning Committee meeting can be viewed at https://player.vimeo.com/video/1129898464?badge=0&autopause=0&player_id=0&app_id=58479
with the relevant case being from 1:07:15 to 1:30:00 in the video.

The specialist report submitted as a part of this application does not include any readily understood illustrative material that would, for example, show the area affected by overshadowing on key dates of the year (Summer solstice, Winter solstice and Spring/Autumn equinoxes) and at hourly intervals throughout these days. The assessment, instead, is made and presented through a series of calculated figures requiring various assumptions including through a lack of information on the internal layouts of existing apartment buildings. The most appropriate assessment would seem to require knowledge of internal layouts of the homes affected but developers claim they are not available when in Granby Village, for example, these exist including in the archived building control records at the Central Reference Library. Alternatively ask the relevant managing agents for surrounding residential buildings for sight of necessary for fire plans that will show apartment layouts and the configuration of spaces in the affected buildings.

The application assessment has allegedly followed the British Research Establishment (BRE) guidelines. However the applicants decided their assessment results showed too great an impact on daylight, sunlight through overshadowing because the existing conditions within the area are too good. On this basis the applicants have manipulated their findings to reduce this adverse impact. In order to make this adjustment the applicants selected a number of recent developments in the city centre they consider “successful” despite many not meeting the BRE standards and without defining how ‘success’ was being measured and by/for whom. In this way, the impacts of the current proposal are being played down by using sub-standard developments that presumably had been approved due to the inability of the Planning Service to understand or interrogate the daylight, sunlight and overshadowing reports submitted as part of the associated previous planning applications.

A further means of presenting the impacts in as positive a light as possible has been to treat Granby Village as a single entity whereas in fact it is a group of five buildings

which would be harmed to different extents by the proposal. Without disaggregating the buildings the harm appears to be to a limited number of apartments across Granby Village whereas, in fact, the greatest harm is concentrated on Velvet House and Velvet Court which due to their location close to tower T3. While the harm may be more concentrated in some parts of Granby Village and the wider area than in others, there will be widely felt adverse impacts as, for example, all five Granby Village buildings have south facing windows and many apartments rely on light (including reflected light) from streets and external amenity areas within the complex including courtyards. The application documentation does not appear to give any consideration to the impacts on these public and private external spaces where achieving a high quality environment makes a significant contribution to the amenity, health and well-being of people using the area including the existing residents.

Nevertheless, the impacts are difficult to hide and Table 11.10 of the application report on sunlight, daylight and overshadowing shows a sizeable proportion of windows (even discounting Weston Hall which is planned to be demolished) will experience a “major impact." In stark terms this would mean a considerable number of residents being permanently, adversely impacted for any new development let alone student accommodation for a transient student population. That this is thought overall to be acceptable is appalling but this decision only seems to be reached by couching these major impacts as only affecting a limited number of apartments of the total considered by the assessment. In this way the report draws the overall - and unbelievable - conclusion (in paragraph 11.172) that that daylight and sunlight impacts to surrounding properties are “negligible to minor adverse” and that no mitigation is required, and for surrounding areas of amenity space (by which is means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) impacts are “negligible and considered non-significant requiring no mitigation measures”.

OBJECTION 3

The proposal would result in a decrease in the amount of sunlight and daylight reaching Granby House and Granby Village, and so would increase the need for internal heating and lighting at times when this is not currently required. This will increase energy usage and costs associated with communal areas and particularly within individual apartments. At the same time this decrease in sunlight and daylight would also remove the physical and financial viability of the use of the Granby Village roofs for the generation of solar power. This is presently being considered as a means of contributing to other proposals already voluntarily implemented and being progressed within Granby Village to reduce energy use and to increase energy generated within Granby Village from sustainable sources. This is seen as means of reducing energy costs (especially given the on-going cost of living crisis) and assisting to meet wider national and local ‘net zero’ aims. In support of this objection the following points are particularly noted:

(a) Granby Village is owned by the apartment owners as shared freehold. The Granby Village Management Company consists of the apartment owners who elect one director for each of the five buildings. The day-to-day management is undertaken

by Scanlans as an appointed specialist property management company with their work overseen by the directors.
(b) All costs within Granby Village are met by through the service charge levied on the individual apartments. One of the largest contributing costs is that of electricity. In order to achieve 'best value' and keep services charges affordable this unfortunately does mean that electricity is from the grid and not self-generated.
(c) The management company has already voluntarily undertaken works to reduce energy use in communal areas by rationalising light fittings, changing to energy efficient light bulbs and installing motion detectors so most lights are only when a space is in use. A heat pump has recently been installed to provide the energy for our communal leisure centre. Proposals are being considered to install charging points within the basement car parking area with spaces for over 200 cars. The possible installation of solar panels - with a focus on the 3 modern flat-roofed buildings within Granby Village - is already being considered as a 'next step' but these plans would hamper the viability given the immense shadowing T3 particularly will cause to Granby Village.

- **Height, massing, siting and orientation: Efficient use of the site, demarcation of gateways to the SISTER SRF area and landmark development**

OBJECTION

The retention of an existing soft landscaped area at the Princess Street end of the site and its extension to create what is still a relatively small open space ("Princess Square") that nevertheless takes a significant proportion of the overall area of the site does not achieve the efficient use of land. It also results in a built form that fails to accord with the Guide to Development in Manchester regarding the demarcation of street corners and frontages with built form. Why this corner should not be 'back of pavement line' redevelopment is no clear.
In support of this objection the following points are particularly noted:

(a) The existing site includes a small incidental landscaped area. This resulted from the placing of the multi-storey car park with it s regular footprint on an irregularly shaped site. This open space only exists due to poor 1960's planning and has been poorly maintained and misused over time. The submitted Ecological Impact Statement rightly describes the "Princess Square" location as it is now as "a small area of poor condition … heavily shaded"; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little.

(b) The existing incidental landscaped area contains seven Category B trees which means they are of moderate value. The Planning Service has previously given planning permission on city centre development sites for schemes that require the removal of trees (subject to replacement trees being planted elsewhere) to ensure both the efficient use of the site and an appropriately designed built form (including the response to adjacent streets) to accord with policies and guidance including in The Guide to Development in Manchester. Planning Permission was recently granted for a development site elsewhere in the SISTER SRF boundary (Plot C) that will involve the removal of 21 Category B trees. The need to retain trees on the application site is inconsistent with an approach of making efficient use of land and achieving a built form that would appropriately respond to the visually important Princess Street/Charles Street junction. In this way the proposed development leaves this visually prominent corner area undeveloped and fails in its aim of creating a notable gateway from

Princess Street into the SISTER SRF area and does not accord with policy and guidance.

(c) Contrary to the claim by the proposers, in a skyline already crowded by tall buildings of questionable design quality, the proposed development can surely not be thought of as a landmark.

Additional background information:

The majority of the application site is broadly rectangular but narrows at its western end as a consequence of the realignment of Charles Street in the 1950's/60's to accommodate the existing multi-storey car park than now occupies the rectangular part of the site. As was typical and problematic with many such post-war schemes the left-over area ('site left over after planning', known as SLOAP) was merely landscaped in a rudimentary manner - hence the existing trees and grass at the Princess Street/Charles Street corner of the site. This has since remained as a small, incidental and poorly maintained area used by rough sleepers and for fly-tipping rather than recreation. The proposal is effectively replicating this approach which the City Council's Guide to Development in Manchester was intended to prevent.

It is accepted that the loss of good quality trees is generally to be avoided. However, such loss has routinely been accepted by the Planning Service where trees are within an identified development site and would prevent the efficient use of the site to achieve other policy objectives. This is usually on the basis that three new trees are planted by the developer for each tree removed in an appropriate, alternative location. This would include, for example, street tree planting around the site. It is noted that a development was recently granted planning permission on SISTER's Plot C site (fronting London Road) which will involve the loss of 28 trees including 21 moderate-value Category B trees in order to accommodate the proposed development. The proposal which is the subject of this note is using the existence of 7 Category B trees as a justification for a scheme that proposes no built form on this SLOAP area. If this argument is accepted there is an obvious contradiction at play within the SISTER SRF area and the wider city.

The provision of publicly accessible open space within this application is well intended but takes a significant proportion of this site which is nevertheless relatively small in area, amounts to no more than a small 'pocket park', and could in no way expect to meet the needs of a fraction of the proposed 1,041 students plus visitors, staff and public. A more effective approach would be for the developer to contribute towards the provision of a more meaningfully sized public open space on nearby land - perhaps as a part of a re-imagined SISTER SRF masterplan - that could begin to address the deficiency of such space for the existing city centre population as augmented by their new residents. Pocket parks will not achieve this.

Effectively sterilising the western end of the application site from built form has resulted in this current SISTER Plot H proposal failing to provide a built form that either appropriately responds to/demarcates the lost building line to the principal Princess Street highway frontage or demarcates the Princess Street/Charles Street corner. Without such built form the proposal does not accord with the Guide to Development in Manchester and references made in the application to the development providing a gateway from Princess Street into the SRF area is largely meaningless especially as the tallest element of built form is at the far eastern end of the site. Most critically, however, the exclusion of this part of the site from built development also means that it cannot make a contribution to achieving a more

lower built form that responds appropriately to the surrounding urban context while maximising the quantum of new development to make efficient use of the site. This would not preclude the provision of some open space between built form and access through to the proposed Altrincham Street route behind street frontage development.

The application makes reference to the proposal being a 'landmark' development. However, it is commonplace for proposers of tall buildings to make this claim which become meaningless given the number of tall buildings already in Manchester vying with each other but crowding each other out in a cluttered skyline. Other than having an overly tall element (tower T3) there is nothing in the quality of design that would suggest this development would be a landmark. Regarding this site, it would seem more appropriate to create a design that better celebrates the Princess Street/Charles Street corner with a gateway built form that could be considered a true landmark without relying on inappropriate height midway across the Sister site.

- **Height, massing, siting, orientation: Overbearing presence**

OBJECTION

The proposal, through a combination of height, massing, siting and orientation will have cause significant disamenity by creating a visually oppressive and perceived enclosing built form within the outlook from various nearby properties.

Additional background information:

Under planning there is no right to a view. However, the proposal will have an impact on amenity due to the oppressive intrusion of the development into the townscape and outlook from peoples homes.

- **Height, massing, siting and orientation: Overlooking**

OBJECTION

A degree of overlooking is expected within the city centre. Within the nearby existing, principally residential, area to the north of the railway viaduct residents and other building users do experience overlooking but from a number of potential sources that are not excessive and are proportionate to the human scale of the existing buildings. The height, massing, siting and orientation of the proposed T3 would dramatically and unacceptably increase this potential for overlooking and from a vast number of anonymous windows. This will be particularly the case from towers T3 but also T3, both of which are close to the northern boundary of the site.

Additional background information:

The north elevation of tower T3 directly facing existing residential properties will alone contain windows serving 156 student rooms, 48 studio apartments and 52 communal living spaces. All these communal living spaces are located on the corners of the building and also have windows to the east and west elevations allowing oblique views northwards. The north elevation of T2 which is even closer to the site boundary will contain windows serving an additional 9 student rooms, 9 communal living spaces and 9 communal corridors. All windows are full length and fill a large part of the elevation so looking out is not a case of making a conscious effort

of walking up to a raised window cill but having an expansive view from anywhere within the internal space. Tower T1 is lower in height and further away from existing buildings but with a long north elevation facing these neighbouring existing buildings will only exacerbate the extent of overlooking.

The applicants state (Planning and Tall Buildings Statement, Paragraph 6.246) advises that "privacy" will not be negatively impacted due to building separation and careful window placement. However, it is unclear how this conclusion is reached given the close proximity and orientation of the proposed built form, especially Towers 2 and 3, to existing residential windows and that 100's of new windows in the proposed north elevations that will face directly into those of existing apartments.

- **Height, massing, siting and orientation: Impact on wind.**

OBJECTION

The application has predicted that there will be some impact on wind patterns/strength in the area but suggests it will not cause a safety issue. It is unclear, however, what impact people using the area can actually expect to experience or the consequences for the increased deterioration of/damage to nearby buildings including historic buildings.

- **Height, massing, siting and orientation: Impact on reflected railway noise.**

OBJECTION

The close proximity and design of towers T1 and T2 to the railway viaduct carrying the North-West main railway line and used by countless trains throughout the 24 hour day will give rise to the reflection northwards of railway related noise to the detriment of the amenity of users of the area including existing residents. The elevations are primarily in reflective glazing without any apparent design measures to acoustically attenuate such noise.

- **Servicing**

OBJECTION 1

The proposed development can expect a high level of servicing. This will arise, for example, from the operational needs of the student accommodation and ground floor retail uses, and the various deliveries expected with a student population of 1,041 (plus staff and visitors). This servicing is proposed to be from two lay-bys on the highway and will cause inconvenience and safety concerns for pedestrians using the adjacent footways and particularly in the vicinity of the two lay-bys. This will be exacerbated at the times of student move-in/departure which will exceed the capacity of the two lay-bys with adverse consequences for the safe and convenient use of the surrounding highway network and the likely generation of traffic noise and congestion.

Additional background information:

All servicing would be from two lay-bys on the Charles Street highway. The capacity of two lay-bys to meet the needs of the likely high number of vehicle arrivals/departures including for postal and food deliveries (including online purchases), taxis, and for more general operational needs. It seems that the loading

bays are not expected to cope with the significant vehicle movements associated with student move-in/move-out. The proposed on-street servicing would cause inconvenience and safety issues for those using the highway including pedestrians and cyclists. Both the site and amount of development is large enough to warrant the provision of a dedicated on-site vehicle area for deliveries/loading/unloading. This could take the form of a basement space or well designed, appropriately located and landscaped area within the site that could also be used by taxis and assist with student move-in/move-out.

- **Elevation design considerations**

OBJECTION

The proposed elevation design (including materials with an emphasis on light coloured concrete and finishes) has no resonance with the character of the immediately adjacent Whitworth Street Conservation Area but is intended to respond to the nearby modernist 1950's/60's university architecture elsewhere in the wider SISTER site. However, this is merely a means of window dressing a development that in every other regard such as height, massing and siting fails to have any regard to the existing character of either of these areas and fails to acknowledge decisions already made within the area. In support of this objection the following points are particularly noted:

(a) The proposal fails to acknowledge that many of the existing former university buildings within the SISTER SRF site including those along the east side of Sackville Street are proposed to be demolished as a part of the SRF masterplan.

(b) The proposal fails to acknowledge that the University already has planning approval for the demolition of the modernist Faraday Tower and the future of other modernist buildings around it on the west side of Sackville Street is uncertain.

(c) It is likely that a lighter elevation finish has been selected in the knowledge it can reduce the adverse impact on daylight of the proposed built form and its overly dominant height and massing.

(d) The separate planning application (awaiting a decision) for the iQ development on the Weston hall/Pendulum Hotel site proposes a brick elevation as a means of relating to the conservation area but this site is more distant from the conservation area than this SISTER Plot H proposal so undermining the developer argument of a lighter palette to correspond to neighbouring buildings. While both proposals are out of context and unacceptable due to height, massing and siting, an argument could be made for either approach to elevation design including materials for a more appropriate built form. However, any developments on these two sites should have a coordinated approach towards their context and materiality and currently most obviously Don't !

(e) A high quality elevation design could be achieved with a scale, massing and siting of built form that more appropriately and meaningfully responds to the townscape context with the necessary regard to national and local policy and guidance.

(f) If an out-of-context, overly tall building continues to be proposed on the SISTER Plot H site, a lighter finish to elevation materials (together with appropriate articulation) has the potential to reduce the overbearing visual impact and a lighter finish would provide some reflection of daylight.

- **External on-site open space**

OBJECTION 1

The proposed external on-site open space occupies a relatively large proportion of the site but is in reality a small area for its intended purpose of serving the 1,041 student bedrooms plus staff and visitors and the general public. This area should instead be used to better accommodate a more appropriate built form and quantum of development in order to begin to address the identified adverse impacts of the currently proposed design.

Additional background information:

Somewhat cynically, the application concentrated the proposed built form at the eastern end of the site to maximise the amount of sunlight and daylight reaching its own on-site landscaped external area at the western end of the site.

OBJECTION 2

Any external space should not be used for refuse storage even on a temporary basis and especially not on a prominent street frontage as is being shown on the drawing on p.107 of the submitted Design and Access Statement. All refuse storage should be within the building until collection.

Additional background information:

The Design and Access Statement (p.107) contains a drawing showing a large "external refuse holding area" proposed within this external area and located on the bend in the Charles Street boundary - a prominent focal point on the street frontage and when approaching the site from Princess Street. It is unclear if containerised bins would stand here while awaiting refuse collection or if is would be screened in any way. However, it should be clear that no part of the limited external space or adjacent highway should be lost to such an ancillary use (even on a temporary basis) which would be unsightly and may give rise to odours and misuse. It would be particularly inappropriate on this visually prominent part of the site and would adversely impact on visual amenity within both the site and the adjacent public realm.

Instead, sufficient on-site storage should be provided within the footprint of the building with collection taken from these spaces without the need for any external storage even on collection days. Unsightly containerised bins already plague the City Centre and new development should be designed and managed to avoid contributing to unsightly streetscenes and external spaces.

OBJECTION 3

The use of the proposed external open space for events if these would cause disamenity outside the application site.

Additional background information:

The applicant advises that the external space is proposed to be used for external events. This would give rise to an objection unless a planning condition is attached to control the time and duration of such events and preventing the use of external sources of amplified noise at any time.

- **Design and health**

OBJECTION

The inappropriate design of the development would have a harmful impact on the health and well-being. This would affect not only residents but all those who use the area that would be adversely impacted by the proposal. In support of this objection the following points are particularly noted:

(a) The design of development has been shown to have a link to physical and mental health and a sense of well-being.

(b) A range of Planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF (Paragraph 135) and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2.

(c) The recent pandemic taught us lessons that have soon been forgotten as with the proposed application given the harmful impacts it would have on both the internal environmental quality of people's homes and the quality of external spaces and the way they would be experienced and used.

Additional background information:

The design of development has been shown to have a link to health and a sense of well-being. The submitted information acknowledges this but focuses on the health benefits the proposal would bring to those within the development without addressing the harm caused to the health and well-being of those outside the site through the inappropriate design with its significant effect on amenity both during construction and once the building is in operation. A range of planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF (Paragraph 135) which aims to "create places that …. promote health and well-being, with a high standard of amenity for existing and future users" and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2 refers to a need for development to respond to a sense of place and contribute to well-being.

Regarding health, a lesson learned from the recent pandemic is the importance of the quality of residential amenity within and immediately around homes to maintain health and well-being. This lesson appears to have been soon forgotten by developers and, seemingly, the Planning Service as this proposal will adversely impact residential amenity and amenity within a range of external spaces to the detriment of the health and well-being of many permanent local residents at the expense of accommodating an excessive number of transient students (a description used in Paragraph 6.231 of the submitted Planning and Tall Buildings Statement) in accommodation only designed for short-term occupancy.

- **Design and lessons learned**

OBJECTION

The City Council would seem not to have assessed the impacts of already implemented tall building schemes to learn any lessons for future decision making.

Additional background information:

The adverse impacts of the many similar tall buildings on that have already been implemented within the City Centre are apparent. The City Council should assess these and find an alternative approach before approving any further such developments. The overshadowing and harm to sunlight and daylight levels and wind tunnel effects (and consequential harm to amenity and well-being) will be long-lasting. Managers of the Castlefield Viaduct - a major ongoing regeneration scheme and visitor destination - have confirmed, for example, that they are now having to replace their sun-loving planting scheme to a shade-tolerant scheme due to the excessively tall buildings to the south in the Owen Street/Great Jackson Street area some 250 metres away from the National Trust scheme at their closest point.

Several tall building developments have caused periodic excessive wind tunnel effects - notably on Oxford Road next to Circle Square and on Quay Street next to Spinningfields - and it is assumed that these adverse impacts were not foreseen by similar modelling as has now been undertaken for this application.

The strategic decision on the PSBA use, density of development and quantum of PBSA on this site

OBJECTION 1

There have been various reports to the City Council's Executive Committee in recent years specifically regarding the provision of PBSA and how Policy H12 in the statutory development plan should be interpreted in order to facilitate PBSA being brought forward to meet an identified demand. It is clear, however, from these reports that Policy H12 remains the relevant policy specifically relating to PBSA provision in the statutory development plan. The policy retains primacy over guidance contained in the Committee reports or SRF's. In its current form the proposed PBSA development would be contrary to:

(a) Policy requirement No. 3 of H12 that requires any new development to be sited where this is compatible with existing developments. There is no suggestion that this requirement does not include existing developments such as Granby Village and the proposal would clearly be contrary to this policy due to the harm it would cause to amenity, including residential amenity of those within these existing developments.

(b) Policy requirement No.6 of H12 that aims to ensure there is no unacceptable impact on residential amenity from the proposed development through increased noise, disturbance or impact on the streetscene. The proposed development would have an unacceptable impact on the streetscene through excessive overshadowing and the consequential impact this would have on residential amenity.

PBSA could be acceptable on this site under Policy H12 if the proposed design avoided the harm caused to amenity and the streetscene.

Additional background information:

Policy H12 includes a number of requirements which should all be applied rather than applied selectively. These include requirements 3 and 6 as follows:

"3. High density developments should be sited in locations where this is compatible with existing developments and initiatives, and where retail facilities are within

walking distance. Proposals should not lead to an increase in on-street parking in the surrounding area." and
"6. Consideration should be given to the design and layout of the student accommodation and siting of individual uses within the overall development in relation to adjacent neighbouring uses. The aim is to ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the streetscene either from the proposed development itself or when combined with existing accommodation."

The statutory local development plan makes no specific land-use allocation for this site or quantum of development. The policies within this plan, together with relevant national policies and guidance, should be fully informing the approach that is taken to the site with full regard not only to the site itself but also, as seen above, to its existing wider townscape context.

The City Council's Executive Committee has adopted a report setting out an approach for providing for Purpose Built Student Accommodation (PBSA) within the City. This includes the effective relocation of a transient student population from existing poor quality private sector housing in the suburbs to new high quality accommodation within or adjacent to the City Centre and near higher education establishments. The poor quality housing then becomes available for use as permanent homes for the wider resident community. This also relieves these suburban areas from disbenefits such as the destabilising impact of a constantly changing and significant proportion of the local population, traffic and parking issues and anti-social behaviour which all contribute to a sense of poor community cohesion.

The Committee report identified a large number of potential sites for PSBA to meet the identified demand as augmented by the relocation process. The report acknowledged that not all the identified sites would necessarily be brought forward or with the suggested quantum of development and that other sites not on the list could be brought forward. This application site was not amongst the sites identified by the table in Paragraph 3.9 of the Executive Committee report of 31st May 2023. The application site is effectively a windfall site and will make a contribution to PBSA above that of the sites identified in the table. This is possibly a reflection of the SISTER SRF not originally proposing PBSA for this site and later, in the approved SRF, identifying PBSA only as one of a range of possible uses.

The proposed development accommodates 1,041 PBSA bed spaces by failing to comply with relevant policy or to respond appropriately to relevant guidance. The proposed design demonstrates that it is unlikely any appropriate design would achieve both this compliance and quantum of accommodation. There is nothing exceptional in planning terms about the current proposed use or quantum of development for this particular site that would provide a basis for disregarding other relevant policy and guidance irrelevant. The proposal does not comply with relevant planning policy or accord with guidance.

OBJECTION 2

This proposal uses national and local planning policy and guidance that seeks an increased density of new development as a part of achieving the more efficient use of land without fully acknowledging the caveats and other policies that aim to balance this approach with the impacts on the existing environment and community. There is no acknowledgement in the application that the decision on the proposed quantum of development is driving the need for a design of

development which would be incompatible with, and cause great harm to, the surrounding environment and community. That harm should be avoided through due regard to all planning policies and guidance. The decisions behind the proposal leading to the proposed quantum of development is being incorrectly determined by an illustrative axonometric drawing in the SISTER SRF that showed three taller built forms on this site but the SRF does not constitute planning policy. In support of this objection the following points are particularly noted:

(a) The Deputy Head of the Planning Service, David Roscoe, has publicly confirmed during a recent Planning Committee meeting in November 2025 that SRF's are not planning policy and have a very low status in terms of being a material planning consideration in decision-making, and that planning policy, locally, is contained in the statutory development plan. On this basis the SISTER SRF need not drive a particular quantum of development or built form.

(b) Attention should be placed on adopted planning policy to achieve an appropriate increased density of development on the site. Planning policy does not state what this increase should be presumably to allow local context for any site to be taken fully into account as expected under national and local planning policy and guidance.

(c) In this instance the site is currently occupied by a now closed multi-storey car park and some incidental soft landscaping. This represents a relatively low density of development in the context of the locality around the site. However, neither the application nor SRF give any acknowledgement that even the provision of a built form consistent with the height of existing residential buildings to the north of the site would represent a significant increase in the density of development within the site. There is no need to have three towers of up to 38+ storeys to achieve a considerable increase in density.

(d) The excessive increase in density proposed by the application is presumably driven by land value that has seen a rise in 'expectation value' due to the inappropriate SRF assumption for the site and commercial investment decisions devoid of an appreciation of the unacceptable real-world implications of the proposal.

Additional background information:

The submitted Environmental Statement (ES Vol 1, Paragraph 3.3) states that "The design and planning team has engaged closely with MCC and other key stakeholders throughout this period to ensure that the optimum development proposal was produced for the Site" but without identifying how this optimum has been determined and by who for whom - clearly not the existing local community. This statement is refuted as part of this objection.

The narrative to Core Strategy Policy CC6 specifically regarding the issue of development density confirms that high density development will not always be appropriate in the city centre.

In their Planning and Tall Buildings Statement (Paragraph 6.236) the applicants quote the government's Planning Policy Guidance on 'Making Effective Use of Land' to support their proposed increase in density:

> "All developments should maintain acceptable living standards".
>
> What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high-density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings."

However, in this instance the particular density and good light quality arises from an historic layout and built form and is not a location where tall modern buildings predominate. The proposed development would not be 'in keeping' with the general form of their surroundings which does not include tall buildings such as those being proposed on this or the neighbouring iQ site. The proposal would not maintain 'acceptable' living standards.

The proposed PBSA use including social cohesion and community stability

OBJECTION

The proposed PBSA represents an unacceptably large addition to the numbers of PBSA bedrooms in the locality in terms of both existing developments and those currently being built within a short distance of the application site. This will significantly and unacceptably alter further the demography of the local area and provide a concentration of PBSA that far outweighs the number of other types of residential accommodation. Such unbalanced communities skewed towards students have already been experienced in those suburban areas within the City that previously became the focus for student accommodation. In those cases, the imbalance led to less stable and cohesive communities as students are transient in nature and so less likely to have any particular commitment to a local area. As a cohort they give rise to other disbenefits around anti-social behaviour and impacts on local services that adversely affect the more permanent local community. This would be inconsistent with a range of national and local policies and guidance regarding achieving balanced, stable and cohesive communities. In support of this objection the following points are particularly noted:

(a) Based on the submitted 'Student Need Assessment', by the end of this year there will be over 4,700 in PBSA developments around the immediate periphery of the SISTER SRF area. This application alone would bring a further 1,041 into this area (a 22% rise) and with the neighbouring iQ proposal on the Weston Halls/Pendulum Hotel site would see a total of over 3,000 beds (a 64% rise). This does not take into account other nearby existing, approved but not built or proposed PBSA developments.

(b) The student population is transient and, perhaps understandably, have no particular commitment to the more stable host community. Concentrations of large numbers of students, as found over the years in suburban locations, bring particular issues which do not assist with community or social cohesion. That students do not contribute in terms of Council Tax to the local area and public services weakens any local connection further.

(c) The existing area around Granby Village is a well established, principally residential area seen as a successful example of early regeneration within the city centre. This character partly arises from a proportion of students within the area, However, the influx of students arising from a development about to be completed plus that on the application site will inevitably alter the demographic mix and character of the area considerably. This impact would only be all the greater factor in the iQ Weston Halls/Pendulum Hotel proposal.

(d) Experience within the Granby Village area has shown that students can bring life and vitality, mostly during term times. However, also during term times, anti-social behaviour increases. While the proposed development may be well run and controlled this does not extend to the behaviour of students once outside the development.

(e) The application makes assumptions around the ability of existing local services to cope with this increased and concentrated local student population. Some of these assumptions are based on students being willing/able, for example, to travel to more distant GPs and dentists and do not sit comfortably with the lived experience of existing residents who already struggle to get to see a GP or NHS dentist.

(f) The applicants also make claims about economic benefits to the area, mainly through an uplift in spending. There are three points here. Firstly, the local area is already well served by a wide range of retail and hospitality venues, and an increase in the transient student population living within the area is not required to support these. Secondly, many of these students would leave the area semi-deserted in university vacation time, calling into question the claims for the creation of a newly vibrant neighbourhood which could sustain local businesses all year round. The third point is that part of any uplift in spending in the local area will largely be a transfer of the same spending away from the suburban areas currently being emptied of student population. The submitted Environment Statement (Paragraph 5.119) advises that "Data from the University of Manchester estimates that first year undergraduate students spend £13,685 per annum." But the same data (for 2026-27), excluding rent and mobile phone contracts, gives a spend of only £5,480 (https://www.manchester.ac.uk/study/undergraduate/fees-and-funding/cost-of-living/). This would give a much lower Total Net Expenditure figure than shown so the economic benefit to the city is more limited than is being suggested.

(g) The City Council's Guide to Development in Manchester acknowledges that successful neighbourhoods are partly achieved by a balance of housing types and mix of uses. The proposal will not enable the balance sought by local policy and guidance to achieve this balance.

(h) The applicant's own Planning and Tall Buildings Statement (Paragraph 3.11) acknowledges the need to provide balanced neighbourhoods when considering new PBSA. More importantly Policy CC10 of the Core Strategy aims to ensure the city centre attracts and retains a wide range of residents including through new development with a particular emphasis on creating a family friendly environment. This proposal will clearly exaggerate an already considerable student population living in PBSA developments in this part of the city centre where, as confirmed by the submitted Environmental Statement (Paragraph 15.59), "the Piccadilly Ward has a much higher concentration of students compared to Manchester as a whole". As has repeatedly been said during the consultation process, residents would favour a development (of equal density) which included a mix of homes for young professionals and families, with appropriate accompanying services and local shops. It seems naive in the extreme to suppose (as does the submitted Planning Statement) that the mere proximity of students would "facilitate informal interactions, knowledge exchange, and the spontaneous formation of collaborative ventures" with those based around SISTER more than would, say, the presence of actual researchers and entrepreneurs living in the neighbourhood over a period of years with their families.

(i) On this basis the proposal does not accord with Policy CC10 or other policy intentions to create a sustainable, stable and cohesive local community.

Additional background information:

The submitted 'Student Need Assessment' (p.24) shows there are already 8 large PBSA developments with a total of 3,496 beds immediately around the periphery of the SISTER SRF area (including those located at the east end of Granby Row (Lambert, Fairfield and Fletcher Houses), those in the Berry Street/Buxton Street area and at Vita Student at Circle Square. There are far more in developments just a little further away.

These will be augmented later this year with the opening of the iQ Echo Street development with 1,224 bedrooms. This will bring the total for the SISTER SRF periphery area to 4,720 by the end of the year.

In addition 2,500 beds are proposed by the current planning application by iQ on the Weston Halls/Pendulum Hotel immediately opposite this SISTER Plot H application on Charles Street. This would require the demolition of the existing building with the loss of 528 beds making a net gain of 1,972 beds.The SISTER Plot H planning application proposes a further 1,041 beds. This makes a total of 3,013 additional beds.

Moving from 4,720 beds to 7,733 is 64% increase in student bed in the immediate locality of the site. This does not take into account the various other PBSA developments existing, approved or proposed in easy reach. The character of the area is already changing with this increase in student accommodation and this change will only become more noticeable as more students move in.

Policy CC3 of the Core Strategy - part of the City Councils statutory development plan - expects the City Centre to have a minimum of 16,500 new housing “units” by 2027 but it is unclear if it expected such a significant proportion to be in PBSA.

Other considerations

- ## Traffic including cycling

OBJECTION 1
While the Highway Authority may consider that the existing highway network can accommodate the traffic movements forecast by the applicants, it is unclear if they agreed with the forecast itself. The applicants appear to downplay the implications for traffic movements within the area and common sense would suggest that some of the forecast figures and expectations around being able to control student move-in and move-out are optimistic.

Additional background information:

The applicants appear to down-play the number and impacts of traffic movements serving the development and their ability to control move-in/move-out days especially as there is reliance on the use of the public highway for all these traffic movements including on the busy Sackville Street. The likely number of assumed car and taxi movements is particularly low. The applicants appear to under-estimate the number of vehicle movements likely to be associated with a student population of 1,041 both now and into the future and it is the local community that will pay the price in congestion, inconvenience, pollution and highway maintenance. We only have to look further down Charles Street at Circle Square to see a constant presence of taxis day and night pulling over and blocking the highway plus delivery vehicles clogging that stretch of Charles Street due to the volume of PBSA and other accommodation at Circle Square.

OBJECTION 2
The proposed 6% secure on-site cycle provision is insufficient provision to meet the future needs of the proposed development and fails to adequately contribute to sustainability and meeting the goal of net zero carbon emissions. Any additional provision should be made within the footprint of the building and not within any proposed external spaces within or adjacent to the site to avoid physical and visual clutter.

Additional background information:

The proposed 6% proposed parking cycle provision appears exceptionally low given the number of residents, staff and visitors and the effort being made to encourage the use of sustainable and healthy forms of travel. It is understood that the highway authority would ordinarily seek 25% provision and even this seems short-sighted and unhelpful in assisting to achieve the goal of net zero carbon emissions.

- ## Biodiversity

OBJECTION

The height and massing does not have a positive ecological impact.
A "comprehensive review" by the applicants led to the development of an alternative massing strategy, moving from the three broadly uniform-height blocks shown in an illustrative SISTER SRF image to the current proposal. However, there is no indication that the review properly considered a modestly greener four-block solution, abandoning the "Princess Square" concept, using that land to build on, and distributing the proposed planting elsewhere (for example along the Altrincham Street walkway and up and down Sackville Street) or utilizing green roof top gardens possible on lower rise blocks such as T1 thus adding amenity space for the PBSA and improved ecology.
In support of this objection the following points are particularly noted:

(a) The submitted Ecological Impact Statement rightly describes the "Princess Square" location as it is now as "a small area of poor condition … heavily shaded"; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little.

(b) The review of the height and massing has focussed most hope of ecological enhancements on a highly inappropriate spot, partly due to the chimerical idea of this being a favoured future route across to Oxford Road from the SISTER SRF area (the western stretch of Charles Street being notoriously uninviting, because so overshadowed by Circle Square).

- ## Construction phase

OBJECTION 1

The hours for working are inconsistently described within the application and are considered excessive for a site in such close proximity to existing residential buildings and for a construction period of an extended period of time. As a minimum, the hours for working should be reduced to start at 8:30am (rather than the stated 7:30am) on weekdays and still finish at 6:00pm. It should be confirmed that working would not take place on a on a Saturday outside the proposed 8:30am - 2:00pm or at any time on a Sunday, Bank Holiday or Public Holiday (the latter being omitted from all consideration). The application advises that the City Council will need to agree any working

outside these hours but gives no information on how this process works. This process should be confirmed as a part of the application and, in any event, any request for additional working should require the sign-off by the three ward councillors and the notification of those people outside the site likely to be affected in advance of the works.

OBJECTION 2

The application contains no information regarding the illumination of the site outside the hours of working which should be designed and operated to provide anything other than minimal security lighting and avoid general illumination and glare outside the site to protect residential amenity and natural environment. An objection would also be raised if the illumination of the site during working hours were to result in excessive light and glare into nearby homes.

- **Operational noise**

OBJECTION

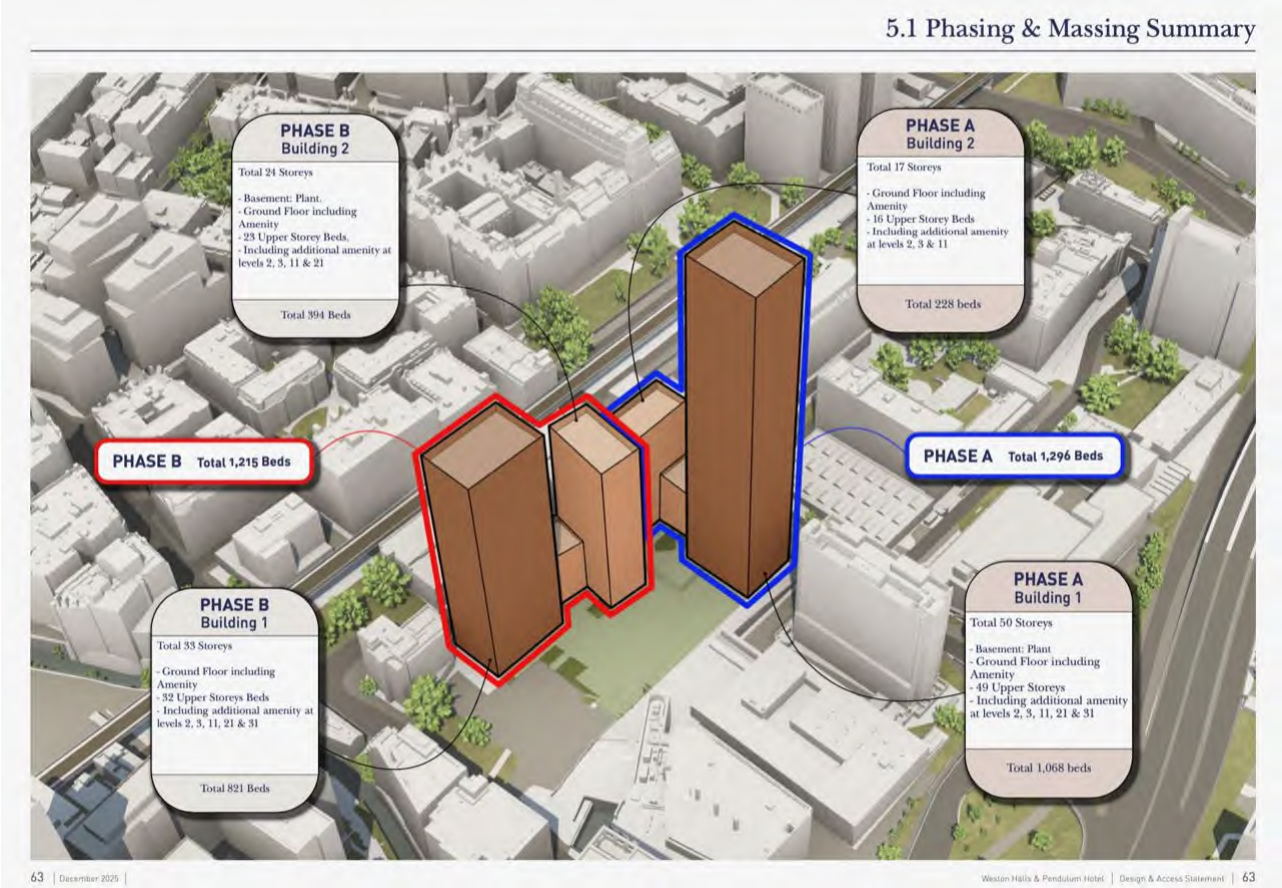
A development not designed and managed to prevent noise disturbance would be unacceptable. Planning conditions should be applied regarding appropriate measures to prevent intermittent or on-going levels of noise outside the built form that would cause disturbance to local residents including noisy uses of external and internal spaces, mechanical equipment (such as ventilation), and so on. The use of the on-site external area for events should not be permitted and there should be no amplified sound allowed within external spaces.

Cumulative impact of this proposal and the iQ PBSA proposal on the adjacent Weston Halls/Pendulum Hotel site and precedent

OBJECTION 1

Neither this proposal nor the iQ proposal on the adjacent Weston Halls/Pendulum Hotel site are acceptable on their own merits. Both individually raise significant objection given the adverse impacts (in some cases exceptionally harmful impacts) they will have on the range of issues covered by this objection including, for example, height and massing, amenity (including residential amenity), the local environment (including streetscape and heritage), health and well-being, and the community. When taken together the cumulative impact of these neighbouring proposals - particularly on the primarily residential area to their north - will be all the greater. Neither proposal takes the other into account, nor do they give meaningful regard to the implications on the future proposals elsewhere in the area.

As a reminder this image from the iQ planning application illustrates their 4 huge towers. Add to this the Sister tower T3 proposed to that is a no way slender 5th tower to block sunlight and daylight to the North. This would be situated in this image immediately above Phase A Building 2 of iQ on the opposite corner of Charles Street / Sackville Street.



In support of this objection and just by way of example the following points are particularly noted:

(a) The proposal for a 2,500 room PBSA development by iQ on the Weston Halls/Pendulum Hotel site consists of four towers of 50, 33, 24 and 17 storeys with linking built form which would effectively form a wall of development along Charles Street between Sackville Street and Princess Street when seen in any oblique view. The tallest 50 storey tower would stand at the eastern end of the site in line with the 38+ storey SISTER Plot H tower visually combining to give a huge and overwhelmingly harmful visual impact both generally and on the amenity of existing residents particularly those immediately northwards of them. Ironically, the taller iQ development would overshadow the SISTER Plot H proposal including the proposed on-site external area within the SISTER Plot H scheme as well as the area north of the railway viaduct. The SISTER Plot H proposal would increase the visual solidity of the iQ wall of development that would be presented to existing residents north of the viaduct by visually obstructing any particular sense of the minimal gaps between the iQ towers. The proposals have not been designed in a coordinated manner to be viewed together and the overall visual impression when viewed from the area north of the viaduct - including the outlook from many existing homes - will be of a bleak shaded wall of nondescript anywhere PBSA built form.

(b) The two proposals will swamp the existing primarily residential community with a further 3,541 students in additional to those already existing and soon to be completed in the area. Charles Street and limited local streets would be expected to cope with the concentrated move in/move out period for many of these students and it is difficult to see how this can be managed in a manner that will not cause excessive disruption and inconvenience for other users of the area including existing local residents.

OBJECTION 2

While each application should be treated on its own merits, within planning there is an acknowledgement of setting a precedent. Granting planning permission for one of these unacceptable proposals is a precedent for the other to be approved too.

Additional background information:

Cynically, on the basis of the SRF process and machinations within the City Council regarding PBSA and policy (including Policy H12 of the Core Strategy of the statutory development plan), it seems that at least parts of the City Council would support this precedent being set on these sites close to existing residents with the adverse impacts on their amenity and health/well-being, the environment and the community being accepted as collateral damage.

Concluding comment

A different approach to the application site should required to overcome the identified policy failings of this proposal. If this is not possible the proposal should be refused planning permission in accordance with Paragraph 139 of the NPPF.

In support of this concluding comment the following points are particularly noted:

(a) A PBSA development on this site gives rise to strong objection.

(b) Paragraph 139 of the NPPF is clear that development that is not well designed should be refused. 'Well designed' is not just about the intrinsic quality of the design of the development but about achieving an appropriate response to other matters. These should include, for example, amenity (including residential amenity) of existing residents and others in the area, the existing townscape context (including heritage), health and well-being and the impact on the local community. This is reflected by national and local policies and guidance including Policy H12 of the Core Strategy.

(c) If a PBSA development on this site is considered to be acceptable in principle by the City Council, the Council should require a comprehensive redesign of the current proposal that ensures it complies with all relevant policy and accords with relevant guidance to achieve a design that responds appropriately to the existing townscape context (including heritage), avoids harm to amenity, health and well-being of existing residents and others in the area (now and future), and supports the local community.

(d) To accept the currently proposed PBSA development on this site would be to accept the harm - Very considerable harm in some instances - that would be caused within the affected area. This harm to local people and environment would be immense collateral damage just to achieve a tall building townscape in this locality at any cost.

(e) The Planning Service and Planning Committee should recognise that opportunities for tall buildings - including for PBSA - exist elsewhere and this is one city centre location where 'good planning 'would expect adherence to national and local policy intended to protect against inappropriate development and secure a more balanced approach between redevelopment/regeneration and a local community and existing high quality environment.

(f) So, to return to the opening part of this note: The applicants claim in their Planning and Tall Building Statement (paragraph 1.8) that "The proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre.". Clearly this is not true on any level let alone in terms of the impact on the surrounding area and the application should be refused planning permission.

9th July 2026

Outlook

OBJECTION – Planning Application Ref. PLA-2026-000312

From [redacted]
Date Thu 09/07/2026 22:39
To Jennifer Atkinson [redacted]

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

ALERT This message originated outside of the Manchester City Council network. BE CAUTIOUS before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

Dear Jennifer,

Please find below my objection to the proposed development (also submitted online):

I am writing as a resident of Granby Village to object in the strongest terms to this planning application. My objection covers the following areas.

1. The overbearing scale, massing and visual dominance of the proposed development.
2. Loss of daylight, sunlight and overshadowing to homes including my own.
3. Harm to the setting of the Whitworth Street Conservation Area.
4. Overlooking and loss of privacy.
5. The community balance implications of concentrating more PBSA in this locality.
6. The cumulative impact when read alongside the iQ Weston Halls / Pendulum Hotel proposal.

I object to the overbearing scale, massing, siting and orientation of the proposal.

The proposal comprises three linked towers, dominated by Tower T3 at 38 storeys plus rooftop plant (148.75m), which alone contains around 75% of the proposed floorspace. Tower T3 is sited close to the northern site boundary, immediately against the railway viaduct and directly facing the primarily residential area to the north. Its widest elevations run east–west, parallel to Charles Street, which maximises the overshadowing it casts northwards.

The applicants' repeated description of Tower T3 as "slender" is not accurate. Given its footprint, height and orientation, it is a wide-fronted, massive tower placed in the worst possible position within the site for the amenity of existing residents in Granby Village. The redistribution of massing from the SISTER SRF "illustrative masterplan" (which showed three broadly equal towers) into one dominant 38-storey block and two shorter blocks does not mitigate the overall harm — it simply concentrates that harm on a different group of neighbours, of which I am one.

The proposal fails to have meaningful regard to the existing urban townscape context, which the

applicant's own Design and Access Statement characterises as predominantly 20-40 high buildings. Tower T3 at 148.75m is completely out of scale with that context. It does not comply with the requirement in the National Planning Policy Framework (paragraph 135) for development to be sympathetic to local character, nor with the National Design Guide (particularly paragraphs 42, 43 and 48 on context), nor with the City Council's Guide to Development in Manchester which requires new development to be informed by its wider context and to be of an appropriate height having regard to location and character.

I note that the narrative to Core Strategy Policy EN2 explicitly acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. This location — directly adjoining a conservation area, a listed viaduct and a long established, moderately scaled residential community, is one of those places.

I object to the loss of daylight, sunlight and overshadowing.

This is the issue that affects me most directly. A preliminary specialist lighting report has identified my flat as being severely affected by the SISTER Plot H proposal alone, with daylight falling below British Research Establishment (BRE) standards. I expect to be able to view this report in detail in the coming days, and will likely submit an additional objection based off this detail.

This preliminary finding is entirely consistent with common sense - placing a 38 tower immediately to the south of a densely laid out area of smaller buildings will cause considerable and lasting harm to daylight, sunlight and reflected light within homes, private amenity spaces and the public realm.

I would like to draw the Planning Service's attention to serious concerns with the applicant's own assessment:

The applicants have departed from standard BRE methodology on the basis that existing light conditions in the area are "too good," and have instead benchmarked against unnamed "successful" developments elsewhere in the city — many of which the applicants concede do not themselves meet BRE standards. This is not an acceptable methodology and effectively lowers the bar to fit the proposal.

The assessment averages results across a wide area to arrive at an overall conclusion of "negligible to minor adverse" impacts, while their own Table 11.10 shows a significant proportion of windows experiencing a "major impact." Averaging away extreme harm to a subset of residents does not make that harm acceptable to those residents.

Granby Village is treated as a single entity rather than being disaggregated into its five constituent buildings, which conceals the fact that Velvet House and Velvet Court are far more severely affected than other parts of the complex.

The conclusion that Sackville Gardens and Vimto Park will experience only "negligible" impacts is also not credible. Sackville Gardens is the only public open space in this area and currently receives its winter sunlight through the very gap between the Sackville Building and Whitworth House that Tower T3 will fill.

I note the Head and Deputy Head of the Planning Service have publicly confirmed that daylight, sunlight and overshadowing is a complex matter and that the Council has no in-house specialist expertise in this area. It is unacceptable that residents have had to fund an independent specialist to counter the applicant's assessment.

I object to the application not keeping in line with the area's heritage — the Whitworth Street Conservation Area and listed buildings.

The character of the Whitworth Street Conservation Area derives not only from its 6–7 storey Victorian and Edwardian former warehouses, but from the quality and quantity of light reaching the streets and spaces between them. That light quality is intrinsic to the historic character of the area — the warehouses were originally designed to be well-lit to allow the inspection and sale of textiles, and Sackville Gardens was intentionally laid out as a public space at the heart of the conservation area. The proposed Tower T3 would form a highly prominent feature in views into and out of the conservation area, particularly from Sackville Street. It would harm the ability to appreciate the character and appearance of the conservation area, would materially reduce sunlight reaching the historic streetscape and Sackville Gardens, and would not adhere to the statutory duty under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve or enhance the character or appearance of the area.

I also note the application's restrictive identification of non-designated heritage assets — buildings such as Velvet House and 55–57 Whitworth Street should have been included. The NPPF (paragraphs 207 and 208) requires that great weight be given to the conservation of heritage assets. The fact that Historic England has raised no objection does not discharge the Council's statutory duty - it remains for the local planning authority to give heritage its proper weight.

I object to overlooking and loss of privacy.

The north elevations of Towers T2 and T3, directly facing existing residential properties, would together contain windows serving over 150 student rooms, dozens of studio apartments and dozens of communal living spaces. These are full-length windows filling most of the elevation, not conventional raised sills. The applicant's claim (Planning and Tall Buildings Statement paragraph 6.246) that privacy will not be negatively impacted "due to building separation and careful window placement" is simply not credible given the close proximity, the orientation and the sheer number of new windows involved. A degree of overlooking is expected in the city centre, but what is proposed here goes far beyond that.

I object to the impact on community balance and concentration of PBSA.

The Piccadilly Ward already has a much higher concentration of students than Manchester as a whole (as the applicant's own Environmental Statement confirms at paragraph 15.59). The submitted Student Need Assessment shows approximately 4,720 PBSA beds around the periphery of the SISTER SRF area by the end of this year. This application would add 1,041 more, and the neighbouring iQ Weston Halls proposal would add a net 1,972. That is a 64% increase in PBSA capacity in an area already carrying a disproportionate student population.

Core Strategy Policy H12 requires that PBSA be sited where it is compatible with existing developments and that it should not have an unacceptable effect on residential amenity through noise, disturbance or impact on the streetscene. Both requirements are failed by this proposal. Policy CC10 requires that the city centre attract and retain a wide range of residents, including through a family friendly environment. Overwhelming an established mixed residential neighbourhood with transient student accommodation is contrary to both policies.

Residents have consistently indicated that we would not object to a development of comparable density comprising a mix of homes for young professionals and families, with appropriate local services. The claim that the mere physical proximity of PBSA residents will foster innovation or

"spontaneous collaborative ventures" with the SISTER innovation district is not a serious planning argument - actual researchers and entrepreneurs living in the area over a period of years with their families would achieve that outcome, a transient student population will not.

I object to the cumulative impact of this proposal with the iQ Weston Halls / Pendulum Hotel proposal.

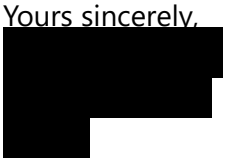
The iQ proposal directly opposite comprises four towers of 50, 33, 24 and 17 storeys. Its tallest 50 storey tower would stand at the eastern end of that site immediately adjacent to Tower T3 of this proposal. In views from the north, the two schemes would combine to form an effective wall of anonymous PBSA development along Charles Street between Sackville Street and Princess Street.

Neither application meaningfully assesses this cumulative impact. As I have noted above, the preliminary independent daylight assessment indicates that the number of Granby Village flats brought into scope of significant harm rises when the two schemes are considered together. This is a material planning consideration that the Council must weigh, and it points strongly to refusal of both schemes as currently proposed.

The applicant also relies heavily on the Strategic Regeneration Framework to justify the size of development on this site. The Deputy Head of the Planning Service confirmed at the November 2025 Planning Committee meeting that SRFs are not planning policy and carry very low weight as a material planning consideration.

I request that:
(a) Planning permission for this application be refused.
(b) The Planning Service commission a genuinely independent specialist review of the daylight, sunlight and overshadowing evidence, including cumulative assessment with the iQ Weston Halls proposal, before determination.
(c) any future scheme on this site respond to the existing townscape context in scale, massing, siting and orientation, and demonstrate compliance with relevant policy, rather than relying on the SRF.

Yours sincerely,



The following is an objection to application **PLA-2026-000312**

By: [redacted]
Address: [redacted]
Email: [redacted]

I am a longstanding resident of Velvet House that forms part of Granby Village and I am also a [redacted]. I was contacted by Sister as part of community engagement in 2024 and have been active member of their Sister Community Panel representing local resident in and around Granby Row.

Myself and others regularly raised issues with the SISTER (formerly I.D. Manchester) Strategic Regeneration Framework (SRF) concerning this Plot H given the proximity and shadowing affects of any towers on that site on Granby Village. We received various acknowledgments from members of staff and consultants involved in Sister of these issues and concerns and even reassurances that the height would be removed or reduced as there was scope for more volume and height on the opposite side of Sister site near the Mancunian Way.

This community engagement has in reality entirely fell on deaf ears. In fact compared to the SRF with 3 moderate towers on some sort of podium, we instead have a colossal edifice of a tower (T3) that maximises the harm North of the railway viaduct with colossal dominance and overshadowing particularly to Granby Village and our neighbours at Granby House.

The fact that the corporate owned Salsbury House and Orient House apartments adjacent have been spared from huge towers so close to them is of particular note compared to the SRF. It is assumed some sort of deal concerning right to light and development restrictions or possible injunctions have become a factor and the developer and architects have determined individual leaseholder apartments as we are in Granby Village and also Granby House are a far easier target to bear the brunt of this excessive and totally unjustified PBSA development.

Context:
The layout and design of Granby Village has much deference to the neighbouring Grade II listed Granby House (converted to flats in 1985) and Orient House (converted in 1990s) being lower in height and including set-backs, and is of a modest design to enhance the Whitworth St Conservation Area in general. It was also designed to offer high quality city centre homes to spearhead regeneration benefiting from several landscaped squares and outdoor spaces created when remodelling the site. This was to encourage urban living by offering a pleasant living environment which has stood the test of time. A number of residents have lived here from the start 35 years ago or are long term residents or tenants of 20 or more years. It is a community. The now mature gardens between the buildings offer an oasis of calm and encourage wildlife. The gardens also offer residents outside space and the chance to socialise in what can be sunny parts of the gardens.

These plans for Sister Plot H and those for the adjacent Pendulum Hotel site which is awaiting a decision would destroy the carefully designed and then fostered community and living environment of Granby Village. Our landscaped garden squares between our 5 buildings will be overshadowed and dark, trees and planting will suffer and die with the

huge loss of daylight and sunlight, and the homes of many will be severely impacted by loss of light and amenity, loss of solar gain and overlooking from oppressive towers looming to the South of us. All for a mass of student accommodation that offers Nothing but takes away so much. This is why residents are vociferously objecting to these plans:

Development proposals

(1) The site is within the SISTER (formerly I.D. Manchester) Strategic Regeneration Framework (SRF) area which, against local opposition, showed three new taller buildings on the application site when these could have been placed elsewhere in the wider SRF area (e.g. by the Mancunian Way) to avoid their harmful impacts on our homes and the Whitworth Street Conservation Area. Residents were assured that future planning applications for the site would protect our amenity. We are now faced with an application - evolved with the support of the City Council's Planning Service, that flies in the face of that.

(2) The proposal will also cause harm - often great harm - to amenity (including residential amenity), the environment (including townscape and heritage), health and well-being of what is a long established community. These harmful impacts are very much related to the height, massing, siting and orientation of the proposed buildings and the location within the application site.

(3) The impact on sunlight and daylight will be very considerable and harmful. The application site is immediately to the south of the railway viaduct and Granby Village and the proposal would overshadow large parts of the area around it in an arc on the north side of the railway viaduct.

Impacts:

- All parts of Granby Village will be affected during the day as the sun moves around impacting the amount and quality of sunlight and daylight - including reflected light - in our homes and our outside private and communal green spaces as well as adjacent streets. Some residents will experience, in the words of the applicant, a "major impact" in terms of their daylight and sunlight.
- The tallest tower (T3) will close the gap between existing buildings on Sackville Street that has always allowed direct sunlight to reach Sackville Gardens especially during Winter months. It will also greatly overshadow the closer Vimto Park in the afternoon and evening. These are our only two nearby public, green, open spaces serving many 1000's of people every year - both residents, other city centre users and the LGBTQ+ community.
- The applicants have manipulated their assessment of daylight, sunlight and overshadowing so the impact appears less than it will be in reality. They variously claim these harmful impacts do not exist, are negligible or, where harmful, only affect a smaller number of residents so don't matter. No wonder residents are appalled.

(4) The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are using policy and guidance selectively and partially to support their proposal at the expense of the local area and the community surrounding the application site.

(5) The SRF is being used to justify the quantum (or amount) and height of the proposed development. The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process. Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with all relevant policy and guidance objectives intended to protect the local area, individual residents and communities.

(6) The site is currently occupied by a low density development: a multi-storey car park and small piece of incidental, left over land which the applicants own specialists confirm is of little biodiversity value. Planning policy seeks to achieve greater density in the city centre, but there is no acknowledgement by the applicants or planners that a significant increase in development density would be achieved on the site even if it were just developed with buildings of the same height as our own, especially if the whole site was used rather than leaving a large proportion of the site (but small in real terms) as open space which will never meet the needs of 1,041 students plus staff, visitors and public. Instead greedy landowners, national PBSA developers and international investors see the site as a cash-cow and pile the development far higher than anything around creating immense overshadowing and a visually overbearing building where almost 300 bedrooms and communal living rooms will directly overlook our area from its two tallest towers.

(7) Our area is an early example of successful urban regeneration that reinvigorated the city centre. It is long established and stable with a mixed population including a small proportion of students. Existing nearby PBSA developments already cater for 1000's of students. The iQ Echo Street scheme opening this year and will add over 1000 more. The iQ proposal for the Pendulum Hotel site proposes a further 2,500 spaces. Our community is now being overwhelmed by a transient student population, here for only part the year and without any particular commitment to the area. Contrary to relevant policy and guidance, the proposal would not contribute to maintaining or creating a balanced and socially cohesive community. It will be a student ghetto.

(8) This SISTER Plot H proposal needs to be seen in the context of an equally inappropriate and harmful planning application on the adjacent iQ Weston Halls/Pendulum Hotel site which is awaiting a decision. Both proposals need to be considered on their own merits but also in terms of the cumulative impact that they would cause in conjunction with each other. The cumulative harm regarding the preceding points would be all the greater if both proposals were to be approved and built. A wall of very tall structures along Charles Street will create a huge shadowing and overbearing impact on the entire Whitworth Street Conservation Area and especially Granby Village given we are due North.

(9) Taking into account the above, this application - and the application for adjacent iQ Weston Halls/Pendulum Hotel site - should be refused planning permission.

Overarching comment

The applicants claim in their Planning and Tall Building Statement (Paragraph 1.8) that "The Proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre." This note will show this is clearly not true on any level let alone in terms of the impact on the surrounding area including Granby Village.

Misrepresentation of the public consultation exercise

OBJECTION

The submitted 'Statement of Consultation' is selective and biased in its reporting of comments made by residents to date and actions taken to mitigate concerns. It does not acknowledge the strong objections raised by local people on both the SISTER (formerly I. D. Manchester) Strategic Regeneration Framework (SRF) and on the application proposal in consultation exercises and prior to its formal submission. In support of this objection the following points are particularly noted:

(a) Objection was raised again to the SISTER SRF 'illustrative' proposal for the application site, Plot H, particularly regarding the height and massing, by resident representatives in a meeting with SISTER on 10th October 2024.

(b) The application proposal was presented to resident representatives in a meeting with SISTER on 26th November 2025. Objections were raised to the height, massing and Purpose Built Student Accommodation (PBSA) use. Despite this and the subsequent developer-led public consultation process the actual proposed design has not evolved in any discernible way to take concerns into account.

(c) The applicants note the various reasons for objection and state mitigation they consider necessary and/or have actioned. For the key issue of overshadowing the applicants openly state that by lowering the height of built form on the western half of the site they have mitigated against the impacts on sufficient residents to make the proposal acceptable while not admitting that a not insignificant number of residents suffer increased harm by a 38+ storey tower of considerable width and depth too that has now appeared at the eastern end of the site. Containing 750 student bedrooms – this tower is colossal and will entirely dominate the area including the Whitworth Street Conservation Area and many Grade II or Grade II* listed properties nearby.

Additional background information:

Two Granby Village residents sit on the SISTER Community Panel ostensibly to have an input into the SISTER SRF proposals as they are brought forward. However, it is becoming apparent that the Panel is used by SISTER to communicate their proposals and identify matters of concern or objection so that any proposal can be better presented to justify rather than amend their approach. One of these Granby Village residents is on the Panel to represent the views of local residents in the nearby principally residential area that includes Granby Village just to the north of the railway viaduct while the other is on the Panel primarily as a representative of the Friends of Sackville Gardens.

These two residents - referred to in the Statement of Consultation - have consistently objected on behalf of the wider resident community to this proposal for the SISTER Plot H (Charles Street Multi-storey Car Park) site both at the Panel and:

(1) At a separate meeting on 10th October 2024 with Ian Thompson of Counter Culture acting for SISTER prior to the selection of a development partner for the application

site. The residents were subsequently advised in November 2025 of the selection of RG Real Estate to deliver PBSA within a tall building proposal.

(2) A presentation of the proposal to these two residents by the design team for the development occurred on 26th November 2026 and the two residents immediately pointed out the plans were even more harmful than the outline SRF given the location, and scale of the T3 38 storey tower. This was not part of evolving the design but purely one of presenting the proposal that was already cemented in the developer's plans and any further 'consultation' is just a tick box exercise.

Planning policy and guidance

OBJECTION

The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are incorrectly and inappropriately using policy and guidance selectively and partially to support their proposal at the expense of the area and community outside the site. In support of this objection the following points are particularly noted:

(a) The following objections will assist to demonstrate this to be the case.

(b) The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process.

(c) Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area, people and community. The National Planning Policy Guidance (NPPG) explicitly states that it should be read holistically. This approach should be taken more broadly when applying relevant policies and guidance with their due weight as 'material planning considerations'.

Strategic Regeneration Frameworks (SRF's)

OBJECTION

Objection continues to be raised to the SISTER (formerly I. D. Manchester) SRF. Those people living in and using the existing locality around the application site foresaw the inevitable harm that would be caused to amenity (including residential amenity) and the environment (including townscape and historic environment) by the SISTER SRF proposing to site three taller buildings on the northern boundary of the SRF area. This is where this harm would be most keenly felt by those northwards of the site. Objection is also raised to the reliance by the applicants on the SRF to justify a particular quantum of development within the site and the continued inclusion of tall built form within the proposal when considerable harm has been identified. It has also been established that SRF's do not constitute planning policy and are a very low level of material consideration subservient to national and local planning policy which includes policy or caveats within policies

intended to protect amenity, communities and the environment. In support of this objection the following points are particularly noted:

(a) SRF is not planning policy but only a form of guidance. The Planning Service has confirmed it carries very low weight as a 'material planning consideration' unlike national and local planning policy.

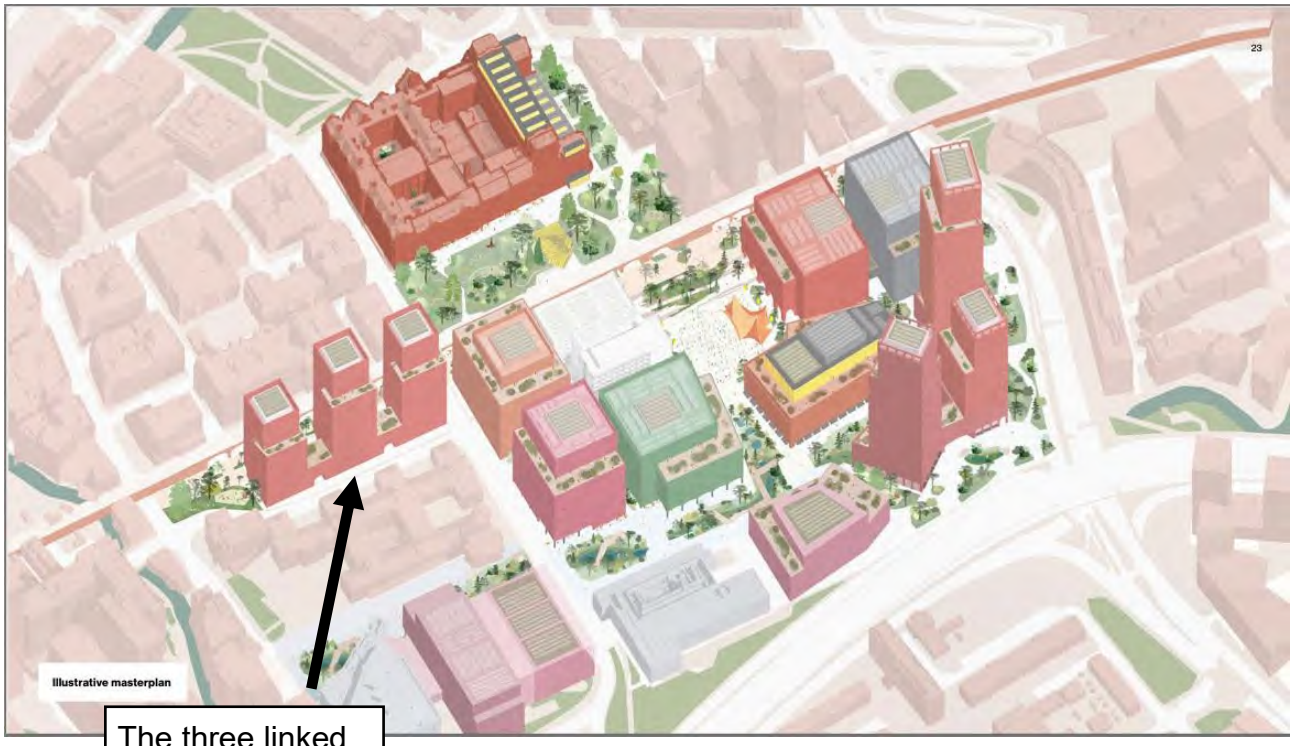
(b) The three taller buildings were only shown on an "illustrative masterplan" drawing without any storey heights or floorspace measurements but clearly were not the very tall towers illustrated elsewhere on the plan next to the Mancunian Way. It has been confirmed this was only intended to be indicative and existing local residents were assured that any planning application process for the site would address the planning issues to avoid harm to the amenity (including residential amenity), local environment (including townscape and heritage), health and well-being, and community within the adjacent area. This should be achieved by having full regard to all relevant national and local planning policy and guidance with their due weight as 'material planning considerations'. The planning application does not meaningfully achieve this and the SRF should not be driving any need or desire to achieve a particular quantum (or amount) of development or design outcome on this site particularly when Sister is a very large site with ample opportunity to position taller buildings and great massing fronting London Road and the Mancunian Way where the impact to residents is much reduced. On this basis the application should be refused planning permission.

Additional background information:

A Strategic Regeneration Framework (SRF) is the means by which a landowner and/or developer can identify an area (which may be one site or a larger area containing a number of sites) and set out a masterplan for its future redevelopment. This is invariably a process undertaken with the support and involvement of the City Council as the Council needs to approve the SRF for it to become a 'material planning consideration' and carry weight in the Council's future decision-making such as on planning applications. The SRF process is accompanied by limited public consultation carried out for the most part by the proposer.

The Planning Committee considered a planning application for the proposed 'Oxygen Towers' tall building scheme at 140 Great Ancoats Street (at the junction with Store Street and near Piccadilly Village) at its meeting last November (25th November 2025). During the meeting the Deputy Head of the Planning Service usefully confirmed that SRF is **not** planning policy and is only guidance, is subordinate to policy, and is of relatively low status as a material planning consideration. Government policy is preeminent followed by the Council's own local policy which should accord with Government policy. Unusually for such a proposal, the Oxygen Towers scheme was refused planning permission very much due to the impact on the amenity of existing nearby residents.

A video recording of the November 2025 Planning Committee meeting can be viewed at https://player.vimeo.com/video/1129898464?badge=0&autopause=0&player_id=0&app_id=58479
with the relevant case being from 1:07:15 to 1:30:00 in the video.



The three linked taller buildings being suggested by the SISTER SRF on the application site looming over Granby Village behind.

The original “Illustrative masterplan” drawing in the SISTER SRF document.

The SISTER (formerly I.D. Manchester) SRF:

The application site is within this SRF area against its northern boundary with the railway viaduct. This SRF covers an extensive area and includes a long southern boundary to Mancunian Way. At the time the SRF was being proposed, local residents took every opportunity to object to the locating of taller buildings being proposed by the SRF against the northern boundary of the application site. It was obvious that locating three buildings that are notably taller than nearby buildings in this location would inevitably cause disamenity especially through overshadowing to the existing residential community directly north of the site. Other sites within the SRF area - such as alongside Mancunian Way - could have been identified instead for such tall buildings. However, it is apparent that, while the SRF proposers wanted tall buildings within their development they wanted to create the best environment for new occupants within the SRF area. By placing the taller buildings against the norther boundary they intentionally aimed to minimise any adverse impacts within the SRF area by ensuring these were inflicted outside the SRF boundary.

Despite these objections the City Council approved the SRF with three taller buildings on the application site. In an email with a local resident the Chair of Planning Committee has, however, confirmed that the placement of tall buildings and wider impacts would be addressed as a part of any subsequent planning application for the site suggesting an acknowledgement that SRF may need to be revised. Indeed, the proposal as now shown

in the submitted application includes three taller buildings but not of broadly equal height shown by the SRF which the applicants claim is to mitigate against issues of overshadowing, daylight and sunlight on residential properties to the north of the development. It is evident, however, that their redistribution of the proposed SRF massing within the application site may improved matters for some existing residents but further exacerbates the harm that would be caused to others and considerably so.

Existing urban townscape context

OBJECTION

The siting, height (or 'scale') and massing of the proposal fails to appropriately and meaningfully respond to the existing urban townscape context but instead inappropriately responds to the character of more distant parts of the Southern Arc. The proposal, therefore, fails to have appropriate regard to relevant national and local policy, guidance and best practice relating to urban design and conservation principles and how new development should respond to context. In support of this objection the following points are particularly noted:

(a) The site contains a low level multi-storey car park and a small landscaped area of incidental, land that was left-over once the car park had been sited on an irregular shaped site. This open space has been poorly used/mis-used and maintained over many years and not perceived as a leisure space. This development does not make a positive contribution to the local townscape other than, possibly, part of the grouping of modernist buildings associated with the rest of the SISTER SRF area.

(b) The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent, taller built form down in order to respond to this change in scale and character.

(c) The 'Southern Arc' is the name that has been given to an area of land sweeping around the southern side of the city centre along Mancunian Way. It is not a formal designation. It is an area that has seen incremental redevelopment often with tall buildings. The applicant wants to associate the application site and rest of the SISTER SRF with the Southern Gateway to suggest the character of the area is one of modern tall buildings. While this may be their aspiration it is not the reality of the existing urban context of the site. We are located much further North of the Mancunian Way whereas towers at New Jackson Street and now Mayfield are essentially built very close to the Mancunian Way where there was lots of open and unencumber land for such tall towers to site in without causing to neighbouring areas.

(d) Contrary to statements made in the application, the proposal has failed to have meaningful regard to all relevant planning policy and guidance and has failed to show meaningful regard to, and respect for existing urban context. The proposal is contrary to planning policy and guidance.

Additional background information:

Policy in the National Planning Policy Framework (NPPF) and the government's 'National Design Guide '(NDG) of 2021 set down basic principles to achieve good (if not excellent) design in new development. The application appears not to even acknowledge the NDG and certainly fails to have any regard to it. Both the NPPF and NDG identify the importance of understanding and appropriately responding to the local landscape context and creating welcoming places in which to live, work and visit. Creating such places is not just about the new development itself and meeting the needs of new residents but the impact this development has on the surrounding area and existing users and community.

The City Council's statutory local development plan reflects this policy and guidance including in its Core Strategy Policy H12, specifically on Purpose Built Student Accommodation (PBSA). Policy H12 confirms that the design and layout of such development should ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise or disturbance, or impact on the streetscene either from the proposed development itself or when combined with existing accommodation. Various paragraphs of the supplementary planning document (SPD) section of the City Council's 'Guide to Development' all stress the need for new development to respect and be informed by their settings and to be of an appropriate height having regard to location, character of the area and specific site circumstances and local effects, such as microclimatic ones. The guidance section of the 'Guide to Development' also confirms in Paragraph 11.45 that new developments in conservation areas or elsewhere should not be designed in isolation; and considerations of design and layout must be informed by the wider context including both immediate neighbouring buildings, and the townscape of the wider locality. Paragraph 3 explicitly confirms that the Guide "sets the context within which developers and architects will have to work".

The application site and its actual existing urban landscape context

The majority of the application site is broadly rectangular but narrows at its western end as a consequence of the realignment of Charles Street in the 1950's/60's to accommodate the existing multi-storey car park than now occupies the rectangular part of the site. As was typical and problematic with many such much post-war schemes, the left-over area ('site left over after planning' known as SLOAP) was merely landscaped in a rudimentary manner - hence the existing trees and grass - and remained as a small, incidental and poorly maintained area used by rough sleepers and for fly-tipping rather than recreation. The proposal is effectively replicating this approach which the City Council's Guide to Development in Manchester was intended to prevent.

It is accepted the existing car park structure itself does not make an obvious positive contribution to the local townscape (although it could be seen as contributing to the modernist character of the 1950's/60's university development of which it formed a part) and an appropriately designed replacement development could make a greater contribution. The car park is lower than most of the surrounding buildings which contributes to the historic pattern of development visible at this boundary of the conservation area where the redevelopment of the Victorian city by the Edwardians for new and often larger textile warehouses abruptly stops as the City lost its domination of the world textile market. The existing car park does not dominate the listed railway viaduct or the adjacent taller buildings just inside the conservation area and so has a minimal impact on the setting of the conservation area. The proposed development will remove such historic views from the south and dwarf the nearby historic built form.

The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent, taller built form down in order to respond to this change in scale and character with the tallest new buildings kept towards London Road and Oxford Street. The applicant's own Design and Access Statement (p.18) shows the area characterised by "20 - 40m" high buildings mostly historic and mostly in the conservation area and where the soon to be demolished Faraday Tower is a 1960's anomaly. This is evident by a simple analysis of this surrounding context which identifies several component parts:

(1) The area to the north of the nearby railway viaduct - from the Oxford Street in the west to London Road in the east - is covered by the Whitworth Street Conservation Area with its particular high quality townscape. This is derived principally from 6 - 7

storey former Victorian and Edwardian warehouses with some elements of lower built form on a series of colliding grids of streets. This is the character of that part of the conservation area closest to and just to the north of the application site. The streets and spaces within the area all benefit from direct sunlight and good levels of natural daylight as the built form defines but does not overly enclose them. This quality of light is an intrinsic part of the historic character of the area in which work within the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Just to the north is the modestly scaled Sackville Gardens - the only public (i.e. Council controlled) open space in this part of the city centre dating from the early 1900's.

(2) The landscaped area of the existing application site is on the north-eastern corner of the Princess Street/Charles Street junction. On the north-western and south-western corners of the junction are modest, two-storey Victorian buildings which (along with the Grade II listed red brick railway viaduct crossing Princess Street) provide a characterful gateway to the conservation area and the context for the two-storey, Grade II listed Lass O'Gowrie public house and several small scale Edwardian former warehouses behind along the north side of Charles Street. The modern eight storey IBIS hotel stands on the south-eastern corner of the junction directly opposite the site without visually over-powering the nearby historic buildings. The historic buildings are red brick (some with terracotta) and slate and the hotel is red brick with lead-like elements.

(3) Moving southwards along Princess Street away from the conservation area and the Princess Street/Charles Street junction, the built form on the west side steps up in height to c.13 storey modern buildings next to the recent Circle Square development and then to a c.15-storey building immediately next to Mancunian Way. The height of built form markedly steps down moving eastwards across Princess Street to the 5-storey University Life Sciences building, a small surface car park and hard landscaped area associated with the River Medlock culvert. The part 8/part 5 storey Pendulum Hotel Weston Halls building (in mostly yellow brick with pitched tile roof) extends along Charles Street opposite the application site to abut the IBIS Hotel in the west and Sackville Street in the east.

(4) Elsewhere around the application site is the former University North Campus. The applicant fails to note this was identified by the 20th Century Society in its 'Potential Conservation Areas Scoping Report' (December 2017, funded by Historic England) as one of only its two potential conservation areas with a predominant twentieth century character in Greater Manchester. It is characterised by well spaced white painted or exposed concrete modernist education buildings arranged around a series of privately controlled but publicly accessible soft landscaped open spaces including the Vimto Park. These buildings are mostly relatively low in height in a mix of 1, 2, 5 and 6 storeys but interspersed with moderately high buildings such as the recently listed Renold Building but includes the tallest building near the application site, the University's Faraday Tower. This in height terms (c.14 storeys) stands in isolation and has a slender rectangular floorplan on a north-south axis minimising the shadow it casts to the north. The various spaces including Sackville Street and Charles Street in the vicinity of the site are full of sunlight and daylight.

Southern Arc

The application refers to the Southern Arc as if it were an established designation but no such reference or boundary can be found in the City Council's statutory development plan. It is understood to refer to an area of land, stretching from Mayfield to Great Jackson Street, arising principally from the building of Mancunian Way in the 1960's and other postwar clearance. To the east of London Road and west of Cambridge Street land

remained vacant or was put into low density industrial/commercial uses but the central section was predominantly developed in the 1950's and 1960's with education buildings whose character has largely been retained to date around the application site. In more recent years different sites within the Southern Arc area have been brought forward with a developer expectation (encouraged by the City Council and its developer-led Strategic Regeneration Frameworks) that high rise/high density development would be acceptable. Policy and guidance, however, makes it clear that such a one-size-fits-all approach cannot be assumed across such an expansive area which abuts a variety of other townscapes.

The application contains information assessing the local townscape context around the site - including some specifically on the conservation area - but this has not been used to inform the evolution of a design that actually responds meaningfully to this context in terms of the siting, scale and massing of the proposed built form. Instead the proposed design is responding to the emerging high density/high-rise townscape in more distant parts of the expansive Southern Arc area which is seemingly the actual design intent as the submitted Environmental Statement (ES Vol 1, Paragraph 3.8) identifies "SISTER as the 'final piece in the regeneration jigsaw 'within the southern arc of Manchester that stretches from Great Jackson Street in the west through to Mayfield." The proposed use of elevation features and materiality to respond visually to nearby 1950's/60's buildings is tokenistic given that this treatment is dressing up a 38+ storey tower in an area characterised by relatively much lower built form. This is not the approach for achieving good design set out in national and local policy and guidance. The proposed development is not innovative in design and does not fit into the overall form and layout of its surroundings as required by the NPPF.

Heritage

OBJECTION

The application fails to appropriately respond to the heritage significance of the Whitworth Street Conservation Area or the settings of nearby listed buildings and non-designated heritage assets so as to avoid harm or keep such harm to the minimum that could be considered appropriate in heritage terms. In this regard the proposal has not had due regard to legislative requirements or to national and local policy, guidance and best practice. In support of this objection the following points are particularly noted:

(a) The application site is outside but immediately adjacent to the conservation area. There remains a need to ensure development within this setting assists to preserve or enhance the character and appearance of the conservation area. The proposed development adversely affects the settings of a number of listed buildings but the application uses an assessment methodology to arrive at a conclusion that the harm it causes to the historic environment is acceptable. This is not the approach sought by policy and guidance which should be to assess the historic environment and then evolve a proposal to avoid harm to it.

(b) The application fails to acknowledge that the character of the conservation area partly derives from the quality and quantity of sunlight and daylight reaching the buildings and spaces between them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Similarly for the nearby Sackville Gardens as an intentionally laid out public space at the heart of the conservation area.

(c) The application is restrictive in its identification of non-designated heritage assets. These should have included several buildings in the area including, for example, Velvet House and 55 - 57 Whitworth Street.
(d) The proposal fails to give the great weight required to the conservation of the historic environment. It does not accord with relevant local and national policies and guidance.

Additional background information:

The Whitworth Street Conservation Area was designated by the City Council in recognition of the area's high quality historic townscape which is one of the most concentrated historic environments within the city centre and of very considerable heritage significance. The character and appearance of the area is derived principally from 6 - 7 storey former Victorian and Edwardian warehouses with some elements of lower built form on a series of colliding grids of streets. Where Sackville Street, Princess Street and Oxford Street pierce the southern boundary of the area the scale of older built form reduces in height which is a visible reminder of where the redevelopment of the Victorian city by the Edwardians in the early 1900's for new and often larger textile warehouses abruptly stops as the City lost its domination of the world textile market. The character of the conservation area also derives from the streets and spaces which all benefit from direct sunlight and good levels of natural daylight as the built form defines but does not overly enclose them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including the inspection and sale of textiles. Just to the north is the modestly scaled Sackville Gardens - the only public (i.e. Council controlled) open space in this part of the city centre dating from the early 1900's.

Paragraph 69(1) of The Planning (Conservation Areas and Listed Buildings) Act 1990 states that conservation areas are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. This is a statutory duty placed on the City Council and refers to the area as designated not the character/appearance as proposers would like to see it in the future. This duty does not stop at the boundary but should also have regard to development within the setting of the area that affects the character within.

The application site is not within the Whitworth Street Conservation Area but is immediately adjacent to it and within its setting. The proposed development would form a highly prominent and alien feature in views into and out of the conservation area. The proposed development would be highly prominent on Sackville Street which is a busy gateway route serving the conservation area. The proposed development would harm the ability to appreciate the character and appearance of the conservation area and would not preserve or enhance the special architectural or historic character or appearance of the conservation area including through the impacts on the quality of light within the public realm and other external spaces and reaching internal spaces of buildings.

The proposed built form would also be a highly intrusive and harmful feature within the settings of a number of listed buildings and a wider number of non-designated heritage assets than have been identified in the application.

The application has downplayed these impacts and the design process resulted in considerable harm to the culturally significant heritage on Manchester and its past status as 'Cottonopolis'. This, and the failure to identify all potential non-designated heritage assets in the locality, is indicative of the general disregard in the application of the existing townscape in order to generate a proposed design that meets a different narrative around

the quantum of development so as to arrive at a design that responds to tall building development elsewhere than in the existing local built context.

The detrimental impact on the settings of heritage assets would be contrary to various national and local policies and not have appropriate regard to national or local guidance or best practice. There is an expectation (including in terms of policy) that new development within the settings of conservation areas and heritage assets (whether or not designated) would respond positively and meaningfully to their heritage significance. The NPPF advises that where development would achieve this it should be treated favourably with the implied message that, where it does not, it should not be treated favourably.

The optimum viable use for the site in heritage terms is the use that achieves the best outcome for conserving heritage assets and their settings which is not necessarily the most economically viable use. The proposal does not represent the optimum viable use for this site in terms of conservation.

That Historic England have not raised objection to the proposal does not mean that the City Council, as the Local Planning Authority, can set aside national and local heritage policies. The City Council should fully recognise that heritage assets are an irreplaceable resource that should be conserved so that they can contribute to the quality of life of existing and future generations. Great weight should be given to their conservation.

The almost complete iQ development at Echo Street within the Whitworth Street Conservation Area is an example of inappropriate development that can take place when heritage and townscape policies are not given sufficient weight when determining planning applications and unfortunately this is more of the same but arguably even more damaging.

Proposed design and impact on amenity

OVERARCHING OBJECTION

Following recognised principles of good design (including regard to the existing context) rather than an apparent expectation of achieving a pre-determined quantum of development within the site (driven by the SRF) should have led to an appropriate design of development for this site. The predetermined quantum of development, the lack of appropriate or meaningful consideration given by the applicants to the existing urban townscape once they had assessed it, the adverse impacts caused over much of the local area affected by the proposal, and lack of regard to policy, guidance and best practice regarding good design have led to a wholly inappropriate and discordant proposed design. This design results in a built form that gives rise to a range of harmful (including exceptionally harmful) impacts on amenity within the surrounding area. The proposed design is contrary to a wide range of national, local policies, guidance and best practice and certainly does not represent good or exceptional design in terms of policy. In support of this objection the following points are particularly noted:

(a) The application has selective and partial regard to planning policy and guidance and fails to have regard to the National Design Guide (NDG) as required by the National Planning Policy Framework (NPPF), and particular regard, has for example, to NDG Paragraphs 42, 43, 48, 67 and 71.

(b) There is failure to appreciate that policy documents including the NPPF need to be treated holistically rather than cherry picking policies to support a desired outcome.

(c) NPPF (Paragraph 135) requires developments that "are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change" but the latter is not expected to be at the expense of the former. In any event, the proposal is not innovative nor does it represent "appropriate change".
(d) The proposal inappropriately refers to unadopted, draft policy to support their application.
(e) The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

Additional background information:

To achieve an appropriate design outcome for this site (including in terms of impacts on residential amenity and the environment within the surrounding area) there is no requirement in the statutory development plan to provide the quantum of development now being proposed. The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

It is unacceptable that the applicants fail to have regard to the National Design Guide (NDG) as required by the NPPF (Paragraph 134) and uses unadopted draft policy such as that relating to tall buildings (Planning and Tall Buildings Statement, Paragraph 6.30) in their attempt to justify the proposal. The proposal clearly would not accord with various parts of the NDG including those referring to new developments having a meaningful response to context (such as, for example, in Paragraphs 42, 43 and 48) and identity (for example, Paragraphs 67 and 71).

Irrespective of the comments made by the applicants, the proposal does not represent good design as is generally sought by planning policy and guidance, nor does it represent exceptional design in policy/guidance terms that could overcome certain other departures from policy. It is noted that NPPF (Paragraph 135) requires developments that "are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change" but the latter is not expected to be at the expense of the former given that the NPPF policies are meant to be read holistically.

The applicants state in the Environmental Statement (ES Vol 1, Paragraph 11.59) that it is unrealistic for existing surrounding residential properties to maintain similar levels of daylight to those currently experienced. However this is perfectly achievable with a full site redevelopment at a moderate height making use of the incidental landscaping and poor quality open space at the westerly end of the application site. And furthermore respecting existing gaps between buildings along Granby Row particularly between Granby House and rear of Fairburn House, 72 Sackville Street. Residents don't suggest there should be no redevelopment of the site but that such development should appropriately respond to the existing character of the area especially regarding height and massing in order to avoid harm and be compatible with the character of the area.

- **<u>Height, massing, siting and orientation: The impact on sunlight, daylight and overshadowing.</u>**

  ### OBJECTION 1

  The proposed incorporation of a tower (tower T3) of 38 storeys (plus rooftop plant) results in a proposed design which is not just uncharacteristic of the surrounding townscape context but would be overwhelming within this context and give rise to significant disamenity to residents and other users of the

surrounding area. A particular impact is the loss of daylight and of direct and reflected sunlight within the adjacent area due to overshadowing and which will be particularly excessive in some homes. This impact would be all the greater when combined with the siting and orientation of the proposed built form. It will give rise to excessive, adverse impacts on amenity within buildings including the homes of many people, within private external amenity spaces, the public/publicly accessible Sackville Gardens and Vimto Park, and within the public realm more generally including through the visually overbearing nature of tower T3. On this basis the proposal would be contrary to a wide range of national and local policies and guidance. In support of this objection the following points are particularly noted:

(a) The proposal has taken the SISTER SRF suggested approach of three linked towers of approximately equal height and size and redistributed the floor space so that one tower, tower T3, now contains some 75% of the floorspace. In terms of height the impact of towers T1 and T2 are more acceptable in terms of the existing urban context than tower T3 which is wholly out of context and unacceptable. The applicants claim this arrangement mitigates against the impact of the proposal on sunlight, daylight and overshadowing but without clearly stating that the mitigation only benefits a proportion of the area north of the viaduct but makes it much worse for the area around tower T3.

(b) Given its footprint and height, tower T3 has significant mass - it is not the “slender” tower the applicants describe. A better description would be ‘Obese’. It is sited close to the northern site boundary. The combination of height, massing, siting, orientation give rise to extreme harm to the amenity (including residential amenity) and environment within the nearby area on the northern side of the viaduct. It will not only affect daylight and sunlight (including reflected sunlight) through overshadowing but will give an oppressive outlook for many nearby homes and give rise to considerable overlooking.

(c) In relative terms tower T2 may be far more acceptable than T3 in terms of height but it is sited even closer to the railway viaduct than T3. This will exacerbate the harmful impacts it has on the neighbouring area. However, the cumulative impact of towers T2 and T3 will be all the greater.

(d) It is evident that placing a large scale development including a massive 38+ storey tower against the south side of the railway viaduct will bring harmful - often extremely harmful - impacts on amenity (including residential amenity) within the primarily residential area immediately to the north of the railway viaduct. Within Granby Village this impact will be to internal living environments and private external amenity spaces (including our own Orient Square, courtyards, balconies and roof terraces) which help provide light to internal spaces. In the wider area it will similarly affect homes and also streets and other open spaces including the nearby Sackville Gardens and Vimto Park.

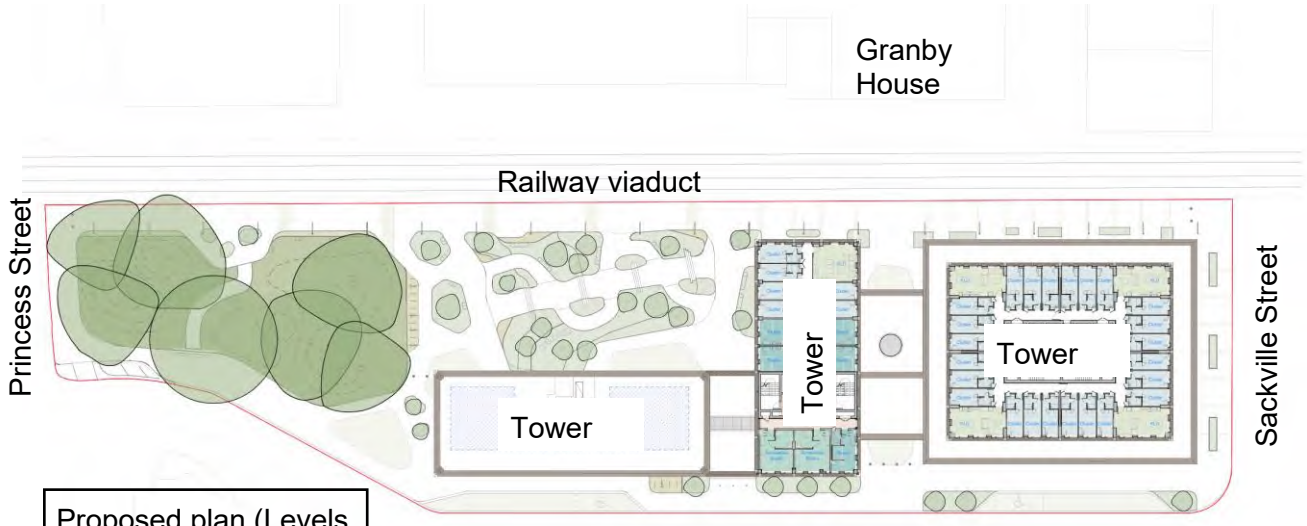
(e) Sackville Gardens and Vimto Park are the two small public/publicly accessible green open spaces serving this locality and a wide area of the city centre and the applicants claim these spaces will not be affected to any notable extent by the proposal. However, common sense and the daily experience of residents and users suggest that (1) the March SHOG Assessment Results for Vimto Park (Table 11.19 of the Environment Statement) showing a less than 1% reduction in 2 hours of Sun Hours on Ground is misleading for the effects at other times of year; and (2) the prediction of a “negligible” increase in shadow over the park (Table 17.8) is simply not credible for the winter months. It is clear that the applicant’s assertions are incorrect and the proposal will cause significant harm to these open spaces. By failing to acknowledge this harm the

proposal will radically diminish the quality of Sackville Gardens and Vimto Park despite recognition in policy and guidance that access to good quality open space and nature is vital to physical and mental health and well-being.

(f) The narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. If there are any areas in the city centre where this would apply it is here.

Additional background information:

The applicants have detailed how the three taller buildings of broadly equal height, massing and footprint originally shown for this site in the SISTER SRF have been reinterpreted to reduce the heights, massing and footprint of two (towers T1 and T2) while increasing the height and massing of the third (tower T3). Tower T3 will contain some 75% of the total floorspace.



Proposed plan (Levels 8 & 9) to differentiate the three towers

The development as now proposed consists of three linked towers: T1 of 8-storeys, T2 of 10 storeys and T3 of 38 storeys each with the additional height of a rooftop plant (building services) structure taking them to stated heights of 62.25m, 67.95m and 148.75m respectively. In terms of height alone towers T1 could be seen to be akin - and to respond appropriately to both the existing adjacent historic built form such as Orient House and Granby House and the more recent IBIS Hotel. Tower T2 begins to exceed the height that has this obvious relationship with the adjacent built form but could be considered as not excessive in this regard in townscape terms. Tower T3, however, is wholly out of context due to colossal height and massing.

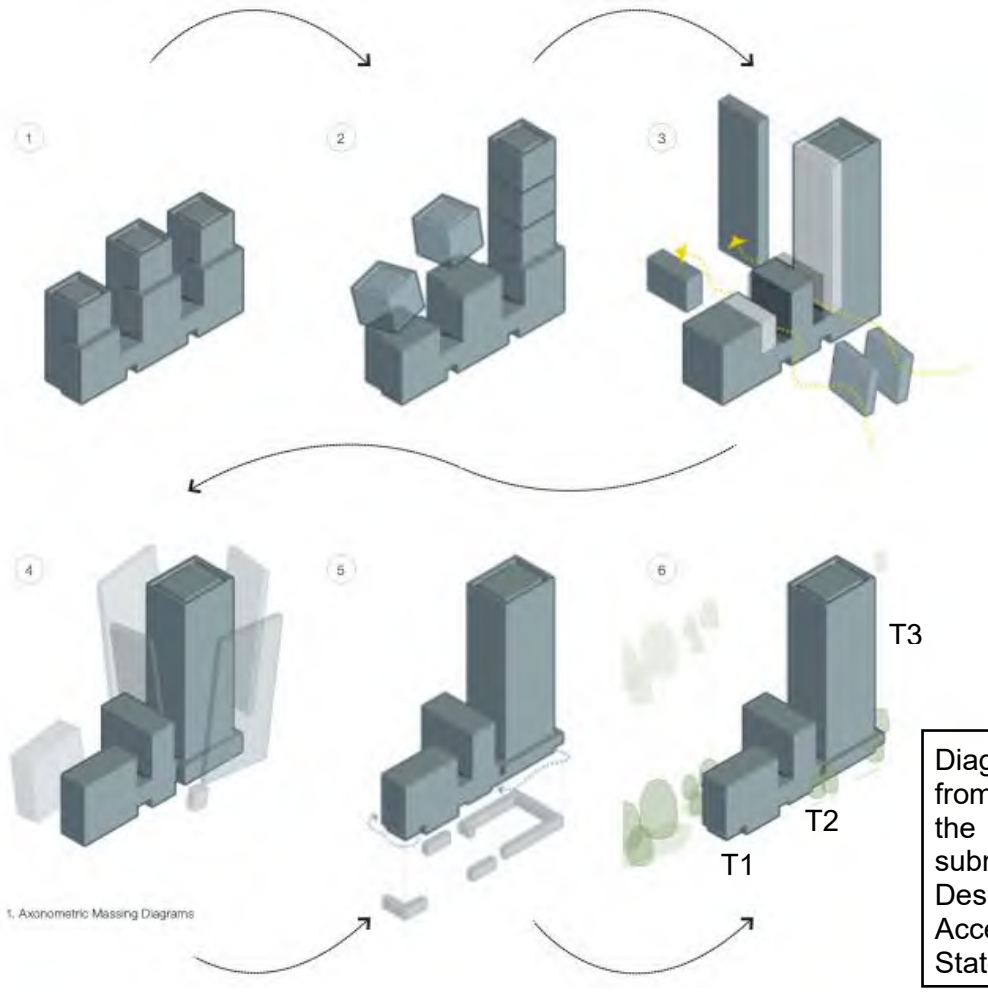


Diagram from p.26 of the submitted Design and Access Statement

The applicants claim the concentrating of massing stacked up at the easterly end of the site is to mitigate against issues of overshadowing, daylight and sunlight on residential properties to the north of the development but this is selective and only applies to the westerly end of the site and 'Princess Square' they are attempting to sell the benefits of. Their redistribution of the proposed SRF massing may improve matters for some existing residents (notably in the Corporate owned fully rented blocks of Orient House and Salisbury House), but further exacerbates the harm caused to individually owned leasehold apartments including many long-standing owner occupiers in Granby House and Granby Village who have lived here for 20, 30 even 40 years. We are very early examples of Manchester's urban regeneration that has proven popular and sustainable as a community for a long period. But we are now at the mercy of developers expecting to build huge towers of student accommodation for short term gain regardless of the impact to our' homes. If PBSA towers are to be part of the Sister redevelopment then as stated by residents in many consultation exercise – place them on the Southern boundary against the Mancunian Way to reduce harm on the Whitworth Street Conservation Area and our homes. As the Sister site is wholly owned by Bruntwood and the University this redistribution is perfectly possible.

The developer redesign compared to the SRF leaves a large area around tower T3 that becomes extremely harmed - more than the SRF envisaged development to which residents raised considerable objection. It is unclear why the applicants consider residents in neighbouring buildings towards the western end of the site require a good standard of residential amenity (by avoiding/minimising overshadowing and the harmful impact on daylight and sunlight) whereas a large number of other neighbouring residents towards the eastern end of the site do not. It is suggested that maybe the corporate ownership and threat of large scale claims or injunctions for right to light claims by the corporate landlords of Orient House and Salisbury House may have influenced these design changes.

The applicants constantly and incorrectly stress the 'slender' nature of tower T3 to somehow suggest a reduced visual impact and impact in the local area on overshadowing, daylight and sunlight. Tower T3 is not slender. It should be more accurately described as 'Obese' given the considerable width and depth with the widest elevations running east-west (parallel to Charles Street) thus overshadowing much more than any slender tower would running north south. It is also close to the northern site boundary all of which maximises this overshadowing on the area northwards. The scale, massing and siting will give rise to an overbearing presence both for those using the area but also in the outlook of many homes in Granby Village.

As with all these daylight, sunlight and overshadowing issues, it is unclear why the applicants consider residents at the western end of the site deserve a more open aspect by proposing lower built form sited almost as far as possible away from the existing residential buildings to the north. In terms of siting in general it is noted that the site boundary follows the existing kerb line along Charles Street and that all three

towers have all been stepped back from this boundary to provide not only a generous footway but also servicing lay-bys.

The area on the northern side of the railway viaduct that would remain extremely harmed by towers T2 and T3 contains many homes and private external amenity spaces including within Granby Village which alone contains over 200 apartments with a variety of communal external spaces (including the green Orient Square at the corner of Granby Row and Samual Ogden Street) and private balconies and roof terraces. The area currently enjoys a good level of sunlight and daylight partly as a consequence of the height of the historic built form, the historic layout of the area designed to facilitate working with textiles in the many (now converted) textile warehouses, and a sensitive approach to planning when regeneration took place in the late 1980's/early 1990's that sought infill development of a corresponding height and massing. This means good levels of not only direct sunlight (including for some facing into courtyards as well as streets) and daylight light but also light percolating into spaces between buildings and reflected light leading to desirable homes that people enjoy living in and an area others enjoy visiting and using. A separate consultants report commissioned by the management companies of Granby Village and Granby House will detail these impacts on them but it is evident that an overly tall and massive building placed immediately southwards of such an area will have a devastating impact on amenity especially of those living closest to tower T3.

The affected area also contains Sackville Gardens (the only nearby public open space apart from the highways) and Vimto Park as a private but publicly accessible space shown as retained by the SISTER SRF proposal. Sackville Gardens is a relatively small public open space but is well used throughout the year by people who live in, visit and use the city centre including a variety of community events. The applicants have discounted the impact on this space although the impact will be considerable by reducing the direct sunlight particularly in the winter months when the sun is low even at midday as shown in the following photographs. This not only impacts on amenity within this important open space and the ability for thousands of

people to enjoy it, but also on the ability for the existing plants to survive let alone thrive.



Photo taken at midday in early January 2025 looking down Sackville Street towards the site of the proposed tower T3. Note how the low Wintertime sun sits low in the sky but manages to illuminate the Gardens through the existing gap in buildings. Compare this with the following image



Image in the submitted Design and Access Statement. View from Sackville Gardens looking down Sackville Street towards the site with the proposed tower T3 as it would be seen. Note how the proposed tower T3 would fill much of the existing gap between the Sackville Building and Whitworth House through which Sackville Gardens currently receives most of its direct sunlight especially the low sun experienced in Wintertime.

The affected area also includes Vimto Park which, like Sackville Gardens, is also north but also east of the proposed tallest tower, tower T3 and is an intensively used green open space especially popular on sunny Summer afternoons. However, Vimto Park is much closer and with their nearest points being only some 25m (about twice the width of Sackville Street) and the impact on sunlight and daylight levels within this space will be considerably affected by overshadowing for much of the later part of the day. The application documentation appears to suggest that Vimto Park will not be overshadowed by the proposed development which is nonsense.

The submitted application includes a document that looks at the impact on health of the proposed development without much regard to the adverse impacts being caused to the area outside the proposal. It does confirm, however, under the heading "Access to open space and nature" that open space helps reduce physical health issues including those associated with sedentary occupations and stressful lifestyles and growing evidence they help to maintain or improve mental health. It seems obvious, therefore, that the limited open spaces that exist within the area and amenity within them should be protected for people in the area including residents and the new occupants of any proposed development on the application site. The current proposal clearly will not achieve this.

The applicants seem to suggest (Planning and tall Buildings Statement, Paragraph 6.242) that residents have bought into an area they knew was next to an SRF and so should have expected their sunlight and daylight levels to be harmed at some point. This misses the point that many residents were in the area before - often a long time before - the SRF and also that there are many planning policies and much guidance that address the need for proposed developments to have meaningful regard to the local urban context to avoid harmful impacts. In this regard it is also noted that the narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. **If there are any areas where this should apply it is here.**

OBJECTION 2

The assessment of the impact of the proposal on sunlight, daylight and overshadowing and the manner in which this has been used and communicated has not assisted to provide an accurate understanding of the real impacts of the proposal to decision-makers and other non-specialists including existing local residents and others who will be affected by the proposal. These impacts include excessive negative impacts especially in the area affected by tower T3. In support of this objection the following points are particularly noted:

(a) The Head and Deputy of the City Council's Planning Service has noted that the assessment of sunlight, daylight and overshadowing is a complex matter and it has been confirmed that there are no specialists within the City Council in this matter. This can only mean the Planning Service has been taking the assessments made by applicants/developers at face value.

(b) The submitted information contains no readily understood visual information that would show the development and the overshadowing it would cause on key dates of the year (Summer and Winter Solstices and Spring and Autumn Equinoxes) and at one hourly intervals throughout these days to track the change during the hours of daylight. These were typically included in past planning applications but developers now get away with omitting these.

(c) The submitted application advises that its assessment has departed from the British Research Establishment (BRE) standards normally used as they felt the existing light standards around the application site were too good and overly emphasised the harmful impact the proposal would have. This seems to have involved benchmarking to set a lower baseline light quality by taking instead the environment around recent "successful" developments elsewhere in the city centre. The applicants do not define how they measure success and they openly confirm that many of these supposedly successful developments do not meet BRE standards. This approach is unacceptable.

(d) The outcome of the assessment is to suggest that the proposal causes harm - including in some cases a “major impact” - on the quality of light reaching a not insignificant number of homes in the area. The applicants merely state that the change in design from the SRF illustration to their proposal has mitigated against this harm although clearly this mitigation has only been to a proportion of the windows. The homes closest to towers T2 and especially T3 continue to be harmed in a major way. This is unacceptable and appropriate mitigation should benefit all the residents which would be expected to involve decreasing the height and massing of built form and to revise siting and height to something more akin to tower T1.

(e) Granby Village should be disaggregated into its five consistent buildings to more clearly show that certain parts will be far more affected than others especially by tower T3.

(f) Having shown that a not insignificant number of existing homes will experience a “major impact” on their sunlight and daylight due to overshadowing the applicants average out their findings across the wider area to reach an overall conclusion that the impact on surrounding properties is“ negligible to minor adverse”. This suggests that the extreme harm caused to some homes is somehow, therefore, considered acceptable.

(g) The assessment unbelievably determines that for surrounding areas of amenity space (by which it must means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) the impacts would be “negligible and considered non-significant requiring no mitigation measures”.

(h) It is unacceptable that the local residents have had to employ their own daylight, sunlight and overshadowing specialist to counter the application assessment. The citizens of Manchester should be able to depend on the City Council to check submitted information with appropriate independent expertise and for there to be accurate and transparent planning applications – not the works of fiction we seem to be presented with all too often.

Additional background information:

A specialist report has been commissioned by the directors of the Granby Village and Granby House management companies to assess the issue of sunlight, daylight and overshadowing which will challenge and counter the information contained in the application. This report is awaited and the following comments are mostly on a non-specialist basis having reviewed the submitted application information.

It seems common sense that a wide footprint, 38+ storey tower sited immediately south of a relatively densely laid out area of much lower (in relative terms) buildings of broadly homogenous height with pockets of open space will cause considerable harm to amenity through overshadowing across much of the area and with a consequential impact on sunlight and daylight (including through reflected light). The planning application, however, requires a specialist report that can confirm the acceptability of a proposal in a more robust manner to allow the Local Planning Authority to show the matter has been fully considered and allow a box to be ticked. Such a process requires a transparent, honest and independent assessment with results that are accurately presented. This has not happened in this instance, and the applicants are being allowed to mark their own homework and determine their proposal to be acceptable not only against all common sense but also against the spun analysis of their own specialist assessment.

In the separate planning application by iQ for the neighbouring Weston Halls/Pendulum Hotel site (still to be decided by the Planning Committee), the specialist daylight, sunlight and overshadowing report openly advises that “There are no specialists within MCC or other statutory consultees relevant to the area of daylight and sunlight” (p.209, Chapter 10, Environmental Statement). The planning application for the SISTER Plot H site covered by this note has now similarly confirmed this lack of expertise.

The Planning Committee considered a planning application for the proposed ‘Oxygen Towers’ tall building scheme at 140 Great Ancoats Street (at the junction with Store Street and near Piccadilly Village) at its meeting last November (25th November 2025). When councillors raised questions and queries about sunlight/ daylight and overshadowing both the Head of the Planning Service, Julie Roscoe, and her deputy, David Roscoe, appeared to allude to this lack of specialists when confirming that this is a highly complex issue. It seems that the Planning Service merely accept the specialist sunlight, daylight and overshadowing reports submitted as a part of planning applications at face value. A video recording of the November 2025 Planning Committee meeting can be viewed at https://player.vimeo.com/video/1129898464?badge=0&autopause=0&player_id=0&app_id=58479
with the relevant case being from 1:07:15 to 1:30:00 in the video.

The specialist report submitted as a part of this application does not include any readily understood illustrative material that would, for example, show the area affected by overshadowing on key dates of the year (Summer solstice, Winter solstice and Spring/Autumn equinoxes) and at hourly intervals throughout these days. The assessment, instead, is made and presented through a series of calculated figures requiring various assumptions including through a lack of information on the internal layouts of existing apartment buildings. The most appropriate assessment would seem to require knowledge of internal layouts of the homes affected but developers claim they are not available when in Granby Village, for example, these exist including in the archived building control records at the Central Reference Library. Alternatively ask the relevant managing agents for surrounding residential buildings for sight of necessary for fire plans that will show apartment layouts and the configuration of spaces in the affected buildings.

The application assessment has allegedly followed the British Research Establishment (BRE) guidelines. However the applicants decided their assessment results showed too great an impact on daylight, sunlight through overshadowing because the existing conditions within the area are too good. On this basis the applicants have manipulated their findings to reduce this adverse impact. In order to make this adjustment the applicants selected a number of recent developments in the city centre they consider “successful” despite many not meeting the BRE standards and without defining how ‘success’ was being measured and by/for whom. In this way, the impacts of the current proposal are being played down by using sub-standard developments that presumably had been approved due to the inability of the Planning Service to understand or interrogate the daylight, sunlight and overshadowing reports submitted as part of the associated previous planning applications.

A further means of presenting the impacts in as positive a light as possible has been to treat Granby Village as a single entity whereas in fact it is a group of five buildings

which would be harmed to different extents by the proposal. Without disaggregating the buildings the harm appears to be to a limited number of apartments across Granby Village whereas, in fact, the greatest harm is concentrated on Velvet House and Velvet Court which due to their location close to tower T3. While the harm may be more concentrated in some parts of Granby Village and the wider area than in others, there will be widely felt adverse impacts as, for example, all five Granby Village buildings have south facing windows and many apartments rely on light (including reflected light) from streets and external amenity areas within the complex including courtyards. The application documentation does not appear to give any consideration to the impacts on these public and private external spaces where achieving a high quality environment makes a significant contribution to the amenity, health and well-being of people using the area including the existing residents.

Nevertheless, the impacts are difficult to hide and Table 11.10 of the application report on sunlight, daylight and overshadowing shows a sizeable proportion of windows (even discounting Weston Hall which is planned to be demolished) will experience a “major impact." In stark terms this would mean a considerable number of residents being permanently, adversely impacted for any new development let alone student accommodation for a transient student population. That this is thought overall to be acceptable is appalling but this decision only seems to be reached by couching these major impacts as only affecting a limited number of apartments of the total considered by the assessment. In this way the report draws the overall - and unbelievable - conclusion (in paragraph 11.172) that that daylight and sunlight impacts to surrounding properties are “negligible to minor adverse” and that no mitigation is required, and for surrounding areas of amenity space (by which is means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) impacts are “negligible and considered non-significant requiring no mitigation measures”.

OBJECTION 3

The proposal would result in a decrease in the amount of sunlight and daylight reaching Granby House and Granby Village, and so would increase the need for internal heating and lighting at times when this is not currently required. This will increase energy usage and costs associated with communal areas and particularly within individual apartments. At the same time this decrease in sunlight and daylight would also remove the physical and financial viability of the use of the Granby Village roofs for the generation of solar power. This is presently being considered as a means of contributing to other proposals already voluntarily implemented and being progressed within Granby Village to reduce energy use and to increase energy generated within Granby Village from sustainable sources. This is seen as means of reducing energy costs (especially given the on-going cost of living crisis) and assisting to meet wider national and local ‘net zero’ aims. In support of this objection the following points are particularly noted:

(a) Granby Village is owned by the apartment owners as shared freehold. The Granby Village Management Company consists of the apartment owners who elect one director for each of the five buildings. The day-to-day management is undertaken

by Scanlans as an appointed specialist property management company with their work overseen by the directors.
(b) All costs within Granby Village are met by through the service charge levied on the individual apartments. One of the largest contributing costs is that of electricity. In order to achieve 'best value' and keep services charges affordable this unfortunately does mean that electricity is from the grid and not self-generated.
(c) The management company has already voluntarily undertaken works to reduce energy use in communal areas by rationalising light fittings, changing to energy efficient light bulbs and installing motion detectors so most lights are only when a space is in use. A heat pump has recently been installed to provide the energy for our communal leisure centre. Proposals are being considered to install charging points within the basement car parking area with spaces for over 200 cars. The possible installation of solar panels - with a focus on the 3 modern flat-roofed buildings within Granby Village - is already being considered as a 'next step' but these plans would hamper the viability given the immense shadowing T3 particularly will cause to Granby Village.

- **<u>Height, massing, siting and orientation: Efficient use of the site, demarcation of gateways to the SISTER SRF area and landmark development</u>**

OBJECTION

The retention of an existing soft landscaped area at the Princess Street end of the site and its extension to create what is still a relatively small open space ("Princess Square") that nevertheless takes a significant proportion of the overall area of the site does not achieve the efficient use of land. It also results in a built form that fails to accord with the Guide to Development in Manchester regarding the demarcation of street corners and frontages with built form. Why this corner should not be 'back of pavement line' redevelopment is no clear.
In support of this objection the following points are particularly noted:

(a) The existing site includes a small incidental landscaped area. This resulted from the placing of the multi-storey car park with it s regular footprint on an irregularly shaped site. This open space only exists due to poor 1960's planning and has been poorly maintained and misused over time. The submitted Ecological Impact Statement rightly describes the "Princess Square" location as it is now as "a small area of poor condition … heavily shaded"; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little.

(b) The existing incidental landscaped area contains seven Category B trees which means they are of moderate value. The Planning Service has previously given planning permission on city centre development sites for schemes that require the removal of trees (subject to replacement trees being planted elsewhere) to ensure both the efficient use of the site and an appropriately designed built form (including the response to adjacent streets) to accord with policies and guidance including in The Guide to Development in Manchester. Planning Permission was recently granted for a development site elsewhere in the SISTER SRF boundary (Plot C) that will involve the removal of 21 Category B trees. The need to retain trees on the application site is inconsistent with an approach of making efficient use of land and achieving a built form that would appropriately respond to the visually important Princess Street/Charles Street junction. In this way the proposed development leaves this visually prominent corner area undeveloped and fails in its aim of creating a notable gateway from

Princess Street into the SISTER SRF area and does not accord with policy and guidance.

(c) Contrary to the claim by the proposers, in a skyline already crowded by tall buildings of questionable design quality, the proposed development can surely not be thought of as a landmark.

Additional background information:

The majority of the application site is broadly rectangular but narrows at its western end as a consequence of the realignment of Charles Street in the 1950's/60's to accommodate the existing multi-storey car park than now occupies the rectangular part of the site. As was typical and problematic with many such post-war schemes the left-over area ('site left over after planning', known as SLOAP) was merely landscaped in a rudimentary manner - hence the existing trees and grass at the Princess Street/Charles Street corner of the site. This has since remained as a small, incidental and poorly maintained area used by rough sleepers and for fly-tipping rather than recreation. The proposal is effectively replicating this approach which the City Council's Guide to Development in Manchester was intended to prevent.

It is accepted that the loss of good quality trees is generally to be avoided. However, such loss has routinely been accepted by the Planning Service where trees are within an identified development site and would prevent the efficient use of the site to achieve other policy objectives. This is usually on the basis that three new trees are planted by the developer for each tree removed in an appropriate, alternative location. This would include, for example, street tree planting around the site. It is noted that a development was recently granted planning permission on SISTER's Plot C site (fronting London Road) which will involve the loss of 28 trees including 21 moderate-value Category B trees in order to accommodate the proposed development. The proposal which is the subject of this note is using the existence of 7 Category B trees as a justification for a scheme that proposes no built form on this SLOAP area. If this argument is accepted there is an obvious contradiction at play within the SISTER SRF area and the wider city.

The provision of publicly accessible open space within this application is well intended but takes a significant proportion of this site which is nevertheless relatively small in area, amounts to no more than a small 'pocket park', and could in no way expect to meet the needs of a fraction of the proposed 1,041 students plus visitors, staff and public. A more effective approach would be for the developer to contribute towards the provision of a more meaningfully sized public open space on nearby land - perhaps as a part of a re-imagined SISTER SRF masterplan - that could begin to address the deficiency of such space for the existing city centre population as augmented by their new residents. Pocket parks will not achieve this.

Effectively sterilising the western end of the application site from built form has resulted in this current SISTER Plot H proposal failing to provide a built form that either appropriately responds to/demarcates the lost building line to the principal Princess Street highway frontage or demarcates the Princess Street/Charles Street corner. Without such built form the proposal does not accord with the Guide to Development in Manchester and references made in the application to the development providing a gateway from Princess Street into the SRF area is largely meaningless especially as the tallest element of built form is at the far eastern end of the site. Most critically, however, the exclusion of this part of the site from built development also means that it cannot make a contribution to achieving a more

lower built form that responds appropriately to the surrounding urban context while maximising the quantum of new development to make efficient use of the site. This would not preclude the provision of some open space between built form and access through to the proposed Altrincham Street route behind street frontage development.

The application makes reference to the proposal being a 'landmark' development. However, it is commonplace for proposers of tall buildings to make this claim which become meaningless given the number of tall buildings already in Manchester vying with each other but crowding each other out in a cluttered skyline. Other than having an overly tall element (tower T3) there is nothing in the quality of design that would suggest this development would be a landmark. Regarding this site, it would seem more appropriate to create a design that better celebrates the Princess Street/Charles Street corner with a gateway built form that could be considered a true landmark without relying on inappropriate height midway across the Sister site.

- **Height, massing, siting, orientation: Overbearing presence**

OBJECTION

The proposal, through a combination of height, massing, siting and orientation will have cause significant disamenity by creating a visually oppressive and perceived enclosing built form within the outlook from various nearby properties.

Additional background information:

Under planning there is no right to a view. However, the proposal will have an impact on amenity due to the oppressive intrusion of the development into the townscape and outlook from peoples homes.

- **Height, massing, siting and orientation: Overlooking**

OBJECTION

A degree of overlooking is expected within the city centre. Within the nearby existing, principally residential, area to the north of the railway viaduct residents and other building users do experience overlooking but from a number of potential sources that are not excessive and are proportionate to the human scale of the existing buildings. The height, massing, siting and orientation of the proposed T3 would dramatically and unacceptably increase this potential for overlooking and from a vast number of anonymous windows. This will be particularly the case from towers T3 but also T3, both of which are close to the northern boundary of the site.

Additional background information:

The north elevation of tower T3 directly facing existing residential properties will alone contain windows serving 156 student rooms, 48 studio apartments and 52 communal living spaces. All these communal living spaces are located on the corners of the building and also have windows to the east and west elevations allowing oblique views northwards. The north elevation of T2 which is even closer to the site boundary will contain windows serving an additional 9 student rooms, 9 communal living spaces and 9 communal corridors. All windows are full length and fill a large part of the elevation so looking out is not a case of making a conscious effort

of walking up to a raised window cill but having an expansive view from anywhere within the internal space. Tower T1 is lower in height and further away from existing buildings but with a long north elevation facing these neighbouring existing buildings will only exacerbate the extent of overlooking.

The applicants state (Planning and Tall Buildings Statement, Paragraph 6.246) advises that "privacy" will not be negatively impacted due to building separation and careful window placement. However, it is unclear how this conclusion is reached given the close proximity and orientation of the proposed built form, especially Towers 2 and 3, to existing residential windows and that 100's of new windows in the proposed north elevations that will face directly into those of existing apartments.

- **Height, massing, siting and orientation: Impact on wind.**

OBJECTION

The application has predicted that there will be some impact on wind patterns/strength in the area but suggests it will not cause a safety issue. It is unclear, however, what impact people using the area can actually expect to experience or the consequences for the increased deterioration of/damage to nearby buildings including historic buildings.

- **Height, massing, siting and orientation: Impact on reflected railway noise.**

OBJECTION

The close proximity and design of towers T1 and T2 to the railway viaduct carrying the North-West main railway line and used by countless trains throughout the 24 hour day will give rise to the reflection northwards of railway related noise to the detriment of the amenity of users of the area including existing residents. The elevations are primarily in reflective glazing without any apparent design measures to acoustically attenuate such noise.

- **Servicing**

OBJECTION 1

The proposed development can expect a high level of servicing. This will arise, for example, from the operational needs of the student accommodation and ground floor retail uses, and the various deliveries expected with a student population of 1,041 (plus staff and visitors). This servicing is proposed to be from two lay-bys on the highway and will cause inconvenience and safety concerns for pedestrians using the adjacent footways and particularly in the vicinity of the two lay-bys. This will be exacerbated at the times of student move-in/departure which will exceed the capacity of the two lay-bys with adverse consequences for the safe and convenient use of the surrounding highway network and the likely generation of traffic noise and congestion.

Additional background information:

All servicing would be from two lay-bys on the Charles Street highway. The capacity of two lay-bys to meet the needs of the likely high number of vehicle arrivals/departures including for postal and food deliveries (including online purchases), taxis, and for more general operational needs. It seems that the loading

bays are not expected to cope with the significant vehicle movements associated with student move-in/move-out. The proposed on-street servicing would cause inconvenience and safety issues for those using the highway including pedestrians and cyclists. Both the site and amount of development is large enough to warrant the provision of a dedicated on-site vehicle area for deliveries/loading/unloading. This could take the form of a basement space or well designed, appropriately located and landscaped area within the site that could also be used by taxis and assist with student move-in/move-out.

- **Elevation design considerations**

OBJECTION

The proposed elevation design (including materials with an emphasis on light coloured concrete and finishes) has no resonance with the character of the immediately adjacent Whitworth Street Conservation Area but is intended to respond to the nearby modernist 1950's/60's university architecture elsewhere in the wider SISTER site. However, this is merely a means of window dressing a development that in every other regard such as height, massing and siting fails to have any regard to the existing character of either of these areas and fails to acknowledge decisions already made within the area. In support of this objection the following points are particularly noted:

(a) The proposal fails to acknowledge that many of the existing former university buildings within the SISTER SRF site including those along the east side of Sackville Street are proposed to be demolished as a part of the SRF masterplan.

(b) The proposal fails to acknowledge that the University already has planning approval for the demolition of the modernist Faraday Tower and the future of other modernist buildings around it on the west side of Sackville Street is uncertain.

(c) It is likely that a lighter elevation finish has been selected in the knowledge it can reduce the adverse impact on daylight of the proposed built form and its overly dominant height and massing.

(d) The separate planning application (awaiting a decision) for the iQ development on the Weston hall/Pendulum Hotel site proposes a brick elevation as a means of relating to the conservation area but this site is more distant from the conservation area than this SISTER Plot H proposal so undermining the developer argument of a lighter palette to correspond to neighbouring buildings. While both proposals are out of context and unacceptable due to height, massing and siting, an argument could be made for either approach to elevation design including materials for a more appropriate built form. However, any developments on these two sites should have a coordinated approach towards their context and materiality and currently most obviously Don't !

(e) A high quality elevation design could be achieved with a scale, massing and siting of built form that more appropriately and meaningfully responds to the townscape context with the necessary regard to national and local policy and guidance.

(f) If an out-of-context, overly tall building continues to be proposed on the SISTER Plot H site, a lighter finish to elevation materials (together with appropriate articulation) has the potential to reduce the overbearing visual impact and a lighter finish would provide some reflection of daylight.

- **External on-site open space**

OBJECTION 1

The proposed external on-site open space occupies a relatively large proportion of the site but is in reality a small area for its intended purpose of serving the 1,041 student bedrooms plus staff and visitors and the general public. This area should instead be used to better accommodate a more appropriate built form and quantum of development in order to begin to address the identified adverse impacts of the currently proposed design.

Additional background information:

Somewhat cynically, the application concentrated the proposed built form at the eastern end of the site to maximise the amount of sunlight and daylight reaching its own on-site landscaped external area at the western end of the site.

OBJECTION 2

Any external space should not be used for refuse storage even on a temporary basis and especially not on a prominent street frontage as is being shown on the drawing on p.107 of the submitted Design and Access Statement. All refuse storage should be within the building until collection.

Additional background information:

The Design and Access Statement (p.107) contains a drawing showing a large "external refuse holding area" proposed within this external area and located on the bend in the Charles Street boundary - a prominent focal point on the street frontage and when approaching the site from Princess Street. It is unclear if containerised bins would stand here while awaiting refuse collection or if is would be screened in any way. However, it should be clear that no part of the limited external space or adjacent highway should be lost to such an ancillary use (even on a temporary basis) which would be unsightly and may give rise to odours and misuse. It would be particularly inappropriate on this visually prominent part of the site and would adversely impact on visual amenity within both the site and the adjacent public realm.

Instead, sufficient on-site storage should be provided within the footprint of the building with collection taken from these spaces without the need for any external storage even on collection days. Unsightly containerised bins already plague the City Centre and new development should be designed and managed to avoid contributing to unsightly streetscenes and external spaces.

OBJECTION 3

The use of the proposed external open space for events if these would cause disamenity outside the application site.

Additional background information:

The applicant advises that the external space is proposed to be used for external events. This would give rise to an objection unless a planning condition is attached to control the time and duration of such events and preventing the use of external sources of amplified noise at any time.

- **Design and health**

OBJECTION

The inappropriate design of the development would have a harmful impact on the health and well-being. This would affect not only residents but all those who use the area that would be adversely impacted by the proposal. In support of this objection the following points are particularly noted:

(a) The design of development has been shown to have a link to physical and mental health and a sense of well-being.

(b) A range of Planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF (Paragraph 135) and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2.

(c) The recent pandemic taught us lessons that have soon been forgotten as with the proposed application given the harmful impacts it would have on both the internal environmental quality of people's homes and the quality of external spaces and the way they would be experienced and used.

Additional background information:

The design of development has been shown to have a link to health and a sense of well-being. The submitted information acknowledges this but focuses on the health benefits the proposal would bring to those within the development without addressing the harm caused to the health and well-being of those outside the site through the inappropriate design with its significant effect on amenity both during construction and once the building is in operation. A range of planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF (Paragraph 135) which aims to "create places that …. promote health and well-being, with a high standard of amenity for existing and future users" and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2 refers to a need for development to respond to a sense of place and contribute to well-being.

Regarding health, a lesson learned from the recent pandemic is the importance of the quality of residential amenity within and immediately around homes to maintain health and well-being. This lesson appears to have been soon forgotten by developers and, seemingly, the Planning Service as this proposal will adversely impact residential amenity and amenity within a range of external spaces to the detriment of the health and well-being of many permanent local residents at the expense of accommodating an excessive number of transient students (a description used in Paragraph 6.231 of the submitted Planning and Tall Buildings Statement) in accommodation only designed for short-term occupancy.

- **Design and lessons learned**

OBJECTION

The City Council would seem not to have assessed the impacts of already implemented tall building schemes to learn any lessons for future decision making.

Additional background information:

The adverse impacts of the many similar tall buildings on that have already been implemented within the City Centre are apparent. The City Council should assess these and find an alternative approach before approving any further such developments. The overshadowing and harm to sunlight and daylight levels and wind tunnel effects (and consequential harm to amenity and well-being) will be long-lasting. Managers of the Castlefield Viaduct - a major ongoing regeneration scheme and visitor destination - have confirmed, for example, that they are now having to replace their sun-loving planting scheme to a shade-tolerant scheme due to the excessively tall buildings to the south in the Owen Street/Great Jackson Street area some 250 metres away from the National Trust scheme at their closest point.

Several tall building developments have caused periodic excessive wind tunnel effects - notably on Oxford Road next to Circle Square and on Quay Street next to Spinningfields - and it is assumed that these adverse impacts were not foreseen by similar modelling as has now been undertaken for this application.

The strategic decision on the PSBA use, density of development and quantum of PBSA on this site

OBJECTION 1

There have been various reports to the City Council's Executive Committee in recent years specifically regarding the provision of PBSA and how Policy H12 in the statutory development plan should be interpreted in order to facilitate PBSA being brought forward to meet an identified demand. It is clear, however, from these reports that Policy H12 remains the relevant policy specifically relating to PBSA provision in the statutory development plan. The policy retains primacy over guidance contained in the Committee reports or SRF's. In its current form the proposed PBSA development would be contrary to:

(a) Policy requirement No. 3 of H12 that requires any new development to be sited where this is compatible with existing developments. There is no suggestion that this requirement does not include existing developments such as Granby Village and the proposal would clearly be contrary to this policy due to the harm it would cause to amenity, including residential amenity of those within these existing developments.

(b) Policy requirement No.6 of H12 that aims to ensure there is no unacceptable impact on residential amenity from the proposed development through increased noise, disturbance or impact on the streetscene. The proposed development would have an unacceptable impact on the streetscene through excessive overshadowing and the consequential impact this would have on residential amenity.

PBSA could be acceptable on this site under Policy H12 if the proposed design avoided the harm caused to amenity and the streetscene.

Additional background information:

Policy H12 includes a number of requirements which should all be applied rather than applied selectively. These include requirements 3 and 6 as follows:

"3. High density developments should be sited in locations where this is compatible with existing developments and initiatives, and where retail facilities are within walking distance. Proposals should not lead to an increase in on-street parking in the surrounding area." and

"6. Consideration should be given to the design and layout of the student accommodation and siting of individual uses within the overall development in

relation to adjacent neighbouring uses. The aim is to ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the streetscene either from the proposed development itself or when combined with existing accommodation."

The statutory local development plan makes no specific land-use allocation for this site or quantum of development. The policies within this plan, together with relevant national policies and guidance, should be fully informing the approach that is taken to the site with full regard not only to the site itself but also, as seen above, to its existing wider townscape context.

The City Council's Executive Committee has adopted a report setting out an approach for providing for Purpose Built Student Accommodation (PBSA) within the City. This includes the effective relocation of a transient student population from existing poor quality private sector housing in the suburbs to new high quality accommodation within or adjacent to the City Centre and near higher education establishments. The poor quality housing then becomes available for use as permanent homes for the wider resident community. This also relieves these suburban areas from disbenefits such as the destabilising impact of a constantly changing and significant proportion of the local population, traffic and parking issues and anti-social behaviour which all contribute to a sense of poor community cohesion.

The Committee report identified a large number of potential sites for PSBA to meet the identified demand as augmented by the relocation process. The report acknowledged that not all the identified sites would necessarily be brought forward or with the suggested quantum of development and that other sites not on the list could be brought forward. This application site was not amongst the sites identified by the table in Paragraph 3.9 of the Executive Committee report of 31st May 2023. The application site is effectively a windfall site and will make a contribution to PBSA above that of the sites identified in the table. This is possibly a reflection of the SISTER SRF not originally proposing PBSA for this site and later, in the approved SRF, identifying PBSA only as one of a range of possible uses.

The proposed development accommodates 1,041 PBSA bed spaces by failing to comply with relevant policy or to respond appropriately to relevant guidance. The proposed design demonstrates that it is unlikely any appropriate design would achieve both this compliance and quantum of accommodation. There is nothing exceptional in planning terms about the current proposed use or quantum of development for this particular site that would provide a basis for disregarding other relevant policy and guidance irrelevant. The proposal does not comply with relevant planning policy or accord with guidance.

OBJECTION 2

This proposal uses national and local planning policy and guidance that seeks an increased density of new development as a part of achieving the more efficient use of land without fully acknowledging the caveats and other policies that aim to balance this approach with the impacts on the existing environment and community. There is no acknowledgement in the application that the decision on the proposed quantum of development is driving the need for a design of development which would be incompatible with, and cause great harm to, the surrounding environment and community. That harm should be avoided through due regard to all planning policies and guidance. The decisions behind the proposal leading to the proposed quantum of development is being incorrectly determined by an illustrative axonometric drawing in the SISTER SRF that showed three taller built

forms on this site but the SRF does not constitute planning policy. In support of this objection the following points are particularly noted:

(a) The Deputy Head of the Planning Service, David Roscoe, has publicly confirmed during a recent Planning Committee meeting in November 2025 that SRF's are not planning policy and have a very low status in terms of being a material planning consideration in decision-making, and that planning policy, locally, is contained in the statutory development plan. On this basis the SISTER SRF need not drive a particular quantum of development or built form.

(b) Attention should be placed on adopted planning policy to achieve an appropriate increased density of development on the site. Planning policy does not state what this increase should be presumably to allow local context for any site to be taken fully into account as expected under national and local planning policy and guidance.

(c) In this instance the site is currently occupied by a now closed multi-storey car park and some incidental soft landscaping. This represents a relatively low density of development in the context of the locality around the site. However, neither the application nor SRF give any acknowledgement that even the provision of a built form consistent with the height of existing residential buildings to the north of the site would represent a significant increase in the density of development within the site. There is no need to have three towers of up to 38+ storeys to achieve a considerable increase in density.

(d) The excessive increase in density proposed by the application is presumably driven by land value that has seen a rise in 'expectation value' due to the inappropriate SRF assumption for the site and commercial investment decisions devoid of an appreciation of the unacceptable real-world implications of the proposal.

Additional background information:

The submitted Environmental Statement (ES Vol 1, Paragraph 3.3) states that "The design and planning team has engaged closely with MCC and other key stakeholders throughout this period to ensure that the optimum development proposal was produced for the Site" but without identifying how this optimum has been determined and by who for whom - clearly not the existing local community. This statement is refuted as part of this objection.

The narrative to Core Strategy Policy CC6 specifically regarding the issue of development density confirms that high density development will not always be appropriate in the city centre.

In their Planning and Tall Buildings Statement (Paragraph 6.236) the applicants quote the government's Planning Policy Guidance on 'Making Effective Use of Land' to support their proposed increase in density:

> "All developments should maintain acceptable living standards".
>
> What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high-density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings."

However, in this instance the particular density and good light quality arises from an historic layout and built form and is not a location where tall modern buildings predominate. The proposed development would not be 'in keeping' with the general form of their surroundings which does not include tall buildings such as those being proposed

on this or the neighbouring iQ site. The proposal would not maintain 'acceptable' living standards.

The proposed PBSA use including social cohesion and community stability

OBJECTION

The proposed PBSA represents an unacceptably large addition to the numbers of PBSA bedrooms in the locality in terms of both existing developments and those currently being built within a short distance of the application site. This will significantly and unacceptably alter further the demography of the local area and provide a concentration of PBSA that far outweighs the number of other types of residential accommodation. Such unbalanced communities skewed towards students have already been experienced in those suburban areas within the City that previously became the focus for student accommodation. In those cases, the imbalance led to less stable and cohesive communities as students are transient in nature and so less likely to have any particular commitment to a local area. As a cohort they give rise to other disbenefits around anti-social behaviour and impacts on local services that adversely affect the more permanent local community. This would be inconsistent with a range of national and local policies and guidance regarding achieving balanced, stable and cohesive communities. In support of this objection the following points are particularly noted:

(a) Based on the submitted 'Student Need Assessment', by the end of this year there will be over 4,700 in PBSA developments around the immediate periphery of the SISTER SRF area. This application alone would bring a further 1,041 into this area (a 22% rise) and with the neighbouring iQ proposal on the Weston Halls/Pendulum Hotel site would see a total of over 3,000 beds (a 64% rise). This does not take into account other nearby existing, approved but not built or proposed PBSA developments.

(b) The student population is transient and, perhaps understandably, have no particular commitment to the more stable host community. Concentrations of large numbers of students, as found over the years in suburban locations, bring particular issues which do not assist with community or social cohesion. That students do not contribute in terms of Council Tax to the local area and public services weakens any local connection further.

(c) The existing area around Granby Village is a well established, principally residential area seen as a successful example of early regeneration within the city centre. This character partly arises from a proportion of students within the area, However, the influx of students arising from a development about to be completed plus that on the application site will inevitably alter the demographic mix and character of the area considerably. This impact would only be all the greater factor in the iQ Weston Halls/Pendulum Hotel proposal.

(d) Experience within the Granby Village area has shown that students can bring life and vitality, mostly during term times. However, also during term times, anti-social behaviour increases. While the proposed development may be well run and controlled this does not extend to the behaviour of students once outside the development.

(e) The application makes assumptions around the ability of existing local services to cope with this increased and concentrated local student population. Some of these assumptions are based on students being willing/able, for example, to travel to more distant GPs and dentists and do not sit comfortably with the lived experience of existing residents who already struggle to get to see a GP or NHS dentist.

(f) The applicants also make claims about economic benefits to the area, mainly through an uplift in spending. There are three points here. Firstly, the local area is already well served by a wide range of retail and hospitality venues, and an increase in the transient student population living within the area is not required to support these. Secondly, many of these students would leave the area semi-deserted in university vacation time, calling into question the claims for the creation of a newly vibrant neighbourhood which could sustain local businesses all year round. The third point is that part of any uplift in spending in the local area will largely be a transfer of the same spending away from the suburban areas currently being emptied of student population. The submitted Environment Statement (Paragraph 5.119) advises that "Data from the University of Manchester estimates that first year undergraduate students spend £13,685 per annum." But the same data (for 2026-27), excluding rent and mobile phone contracts, gives a spend of only £5,480 (https://www.manchester.ac.uk/study/undergraduate/fees-and-funding/cost-of-living/). This would give a much lower Total Net Expenditure figure than shown so the economic benefit to the city is more limited than is being suggested.

(g) The City Council's Guide to Development in Manchester acknowledges that successful neighbourhoods are partly achieved by a balance of housing types and mix of uses. The proposal will not enable the balance sought by local policy and guidance to achieve this balance.

(h) The applicant's own Planning and Tall Buildings Statement (Paragraph 3.11) acknowledges the need to provide balanced neighbourhoods when considering new PBSA. More importantly Policy CC10 of the Core Strategy aims to ensure the city centre attracts and retains a wide range of residents including through new development with a particular emphasis on creating a family friendly environment. This proposal will clearly exaggerate an already considerable student population living in PBSA developments in this part of the city centre where, as confirmed by the submitted Environmental Statement (Paragraph 15.59), "the Piccadilly Ward has a much higher concentration of students compared to Manchester as a whole". As has repeatedly been said during the consultation process, residents would favour a development (of equal density) which included a mix of homes for young professionals and families, with appropriate accompanying services and local shops. It seems naive in the extreme to suppose (as does the submitted Planning Statement) that the mere proximity of students would "facilitate informal interactions, knowledge exchange, and the spontaneous formation of collaborative ventures" with those based around SISTER more than would, say, the presence of actual researchers and entrepreneurs living in the neighbourhood over a period of years with their families.

(i) On this basis the proposal does not accord with Policy CC10 or other policy intentions to create a sustainable, stable and cohesive local community.

Additional background information:

The submitted 'Student Need Assessment' (p.24) shows there are already 8 large PBSA developments with a total of 3,496 beds immediately around the periphery of the SISTER SRF area (including those located at the east end of Granby Row (Lambert, Fairfield and Fletcher Houses), those in the Berry Street/Buxton Street area and at Vita Student at Circle Square. There are far more in developments just a little further away.

These will be augmented later this year with the opening of the iQ Echo Street development with 1,224 bedrooms. This will bring the total for the SISTER SRF periphery area to 4,720 by the end of the year.

In addition 2,500 beds are proposed by the current planning application by iQ on the Weston Halls/Pendulum Hotel immediately opposite this SISTER Plot H application on Charles Street. This would require the demolition of the existing building with the loss of 528 beds making a net gain of 1,972 beds.The SISTER Plot H planning application proposes a further 1,041 beds. This makes a total of 3,013 additional beds.

Moving from 4,720 beds to 7,733 is 64% increase in student bed in the immediate locality of the site. This does not take into account the various other PBSA developments existing, approved or proposed in easy reach. The character of the area is already changing with this increase in student accommodation and this change will only become more noticeable as more students move in.

Policy CC3 of the Core Strategy - part of the City Councils statutory development plan - expects the City Centre to have a minimum of 16,500 new housing "units" by 2027 but it is unclear if it expected such a significant proportion to be in PBSA.

Other considerations

- ## Traffic including cycling

OBJECTION 1
While the Highway Authority may consider that the existing highway network can accommodate the traffic movements forecast by the applicants, it is unclear if they agreed with the forecast itself. The applicants appear to downplay the implications for traffic movements within the area and common sense would suggest that some of the forecast figures and expectations around being able to control student move-in and move-out are optimistic.

Additional background information:

The applicants appear to down-play the number and impacts of traffic movements serving the development and their ability to control move-in/move-out days especially as there is reliance on the use of the public highway for all these traffic movements including on the busy Sackville Street. The likely number of assumed car and taxi movements is particularly low. The applicants appear to under-estimate the number of vehicle movements likely to be associated with a student population of 1,041 both now and into the future and it is the local community that will pay the price in congestion, inconvenience, pollution and highway maintenance. We only have to look further down Charles Street at Circle Square to see a constant presence of taxis day and night pulling over and blocking the highway plus delivery vehicles clogging that stretch of Charles Street due to the volume of PBSA and other accommodation at Circle Square.

OBJECTION 2
The proposed 6% secure on-site cycle provision is insufficient provision to meet the future needs of the proposed development and fails to adequately contribute to sustainability and meeting the goal of net zero carbon emissions. Any additional provision should be made within the footprint of the building

and not within any proposed external spaces within or adjacent to the site to avoid physical and visual clutter.

Additional background information:

The proposed 6% proposed parking cycle provision appears exceptionally low given the number of residents, staff and visitors and the effort being made to encourage the use of sustainable and healthy forms of travel. It is understood that the highway authority would ordinarily seek 25% provision and even this seems short-sighted and unhelpful in assisting to achieve the goal of net zero carbon emissions.

- ## Biodiversity

OBJECTION

The height and massing does not have a positive ecological impact.
A "comprehensive review" by the applicants led to the development of an alternative massing strategy, moving from the three broadly uniform-height blocks shown in an illustrative SISTER SRF image to the current proposal. However, there is no indication that the review properly considered a modestly greener four-block solution, abandoning the "Princess Square" concept, using that land to build on, and distributing the proposed planting elsewhere (for example along the Altrincham Street walkway and up and down Sackville Street) or utilizing green roof top gardens possible on lower rise blocks such as T1 thus adding amenity space for the PBSA and improved ecology.
In support of this objection the following points are particularly noted:

(a) The submitted Ecological Impact Statement rightly describes the "Princess Square" location as it is now as "a small area of poor condition … heavily shaded"; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little.

(b) The review of the height and massing has focussed most hope of ecological enhancements on a highly inappropriate spot, partly due to the chimerical idea of this being a favoured future route across to Oxford Road from the SISTER SRF area (the western stretch of Charles Street being notoriously uninviting, because so overshadowed by Circle Square).

- ## Construction phase

OBJECTION 1

The hours for working are inconsistently described within the application and are considered excessive for a site in such close proximity to existing residential buildings and for a construction period of an extended period of time. As a minimum, the hours for working should be reduced to start at 8:30am (rather than the stated 7:30am) on weekdays and still finish at 6:00pm. It should be confirmed that working would not take place on a on a Saturday outside the proposed 8:30am - 2:00pm or at any time on a Sunday, Bank Holiday or Public Holiday (the latter being omitted from all consideration). The application advises that the City Council will need to agree any working outside these hours but gives no information on how this process works. This process should be confirmed as a part of the application and, in any event, any request for additional working should require the sign-off by the three ward councillors and the notification of those people outside the site likely to be affected in advance of the works.

OBJECTION 2

The application contains no information regarding the illumination of the site outside the hours of working which should be designed and operated to provide anything other than minimal security lighting and avoid general illumination and glare outside the site to protect residential amenity and natural environment. An objection would also be raised if the illumination of the site during working hours were to result in excessive light and glare into nearby homes.

- **Operational noise**

OBJECTION

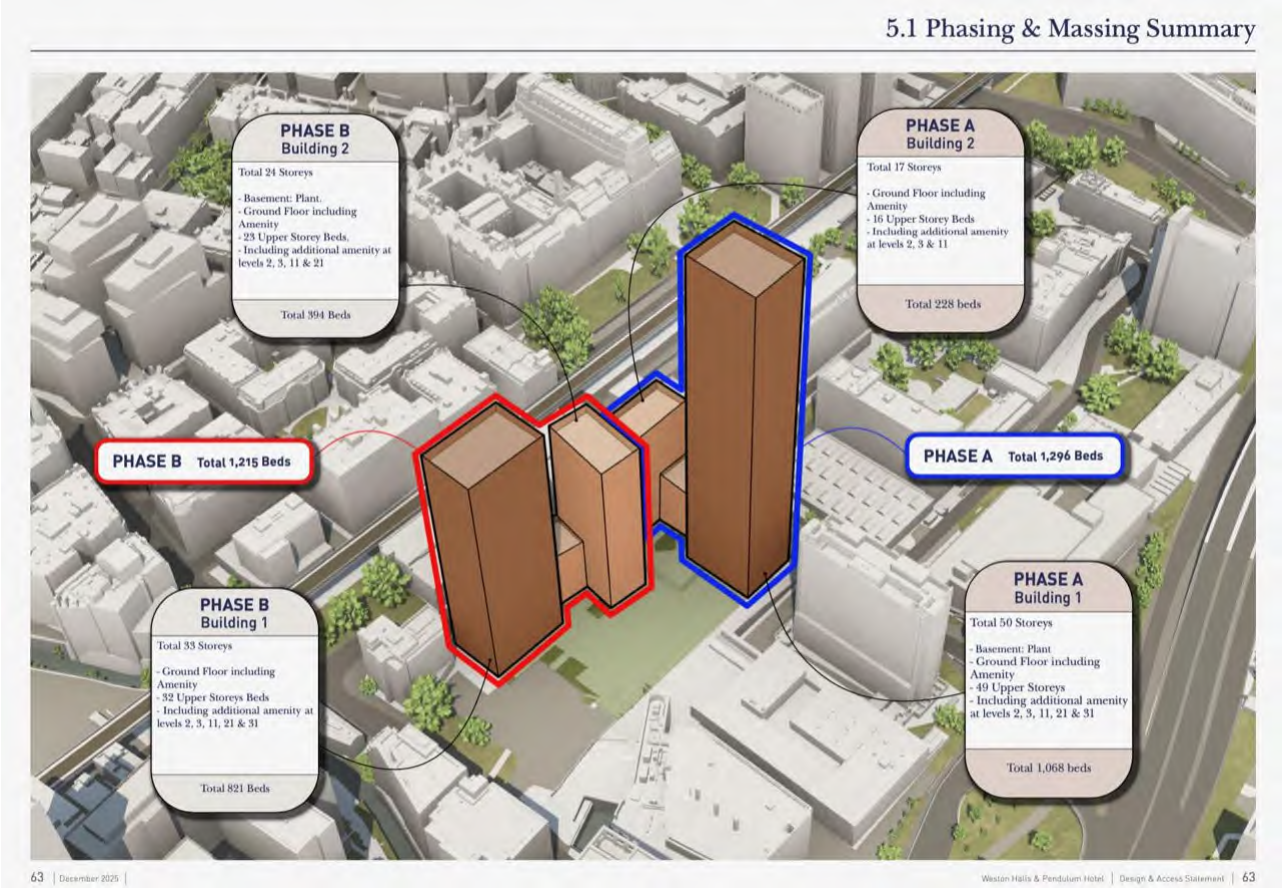
A development not designed and managed to prevent noise disturbance would be unacceptable. Planning conditions should be applied regarding appropriate measures to prevent intermittent or on-going levels of noise outside the built form that would cause disturbance to local residents including noisy uses of external and internal spaces, mechanical equipment (such as ventilation), and so on. The use of the on-site external area for events should not be permitted and there should be no amplified sound allowed within external spaces.

Cumulative impact of this proposal and the iQ PBSA proposal on the adjacent Weston Halls/Pendulum Hotel site and precedent

OBJECTION 1

Neither this proposal nor the iQ proposal on the adjacent Weston Halls/Pendulum Hotel site are acceptable on their own merits. Both individually raise significant objection given the adverse impacts (in some cases exceptionally harmful impacts) they will have on the range of issues covered by this objection including, for example, height and massing, amenity (including residential amenity), the local environment (including streetscape and heritage), health and well-being, and the community. When taken together the cumulative impact of these neighbouring proposals - particularly on the primarily residential area to their north - will be all the greater. Neither proposal takes the other into account, nor do they give meaningful regard to the implications on the future proposals elsewhere in the area.

As a reminder this image from the iQ planning application illustrates their 4 huge towers. Add to this the Sister tower T3 proposed to that is a no way slender 5th tower to block sunlight and daylight to the North. This would be situated in this image immediately above Phase A Building 2 of iQ on the opposite corner of Charles Street / Sackville Street.



In support of this objection and just by way of example the following points are particularly noted:

(a) The proposal for a 2,500 room PBSA development by iQ on the Weston Halls/Pendulum Hotel site consists of four towers of 50, 33, 24 and 17 storeys with linking built form which would effectively form a wall of development along Charles Street between Sackville Street and Princess Street when seen in any oblique view. The tallest 50 storey tower would stand at the eastern end of the site in line with the 38+ storey SISTER Plot H tower visually combining to give a huge and overwhelmingly harmful visual impact both generally and on the amenity of existing residents particularly those immediately northwards of them. Ironically, the taller iQ development would overshadow the SISTER Plot H proposal including the proposed on-site external area within the SISTER Plot H scheme as well as the area north of the railway viaduct. The SISTER Plot H proposal would increase the visual solidity of the iQ wall of development that would be presented to existing residents north of the viaduct by visually obstructing any particular sense of the minimal gaps between the iQ towers. The proposals have not been designed in a coordinated manner to be viewed together and the overall visual impression when viewed from the area north of the viaduct - including the outlook from many existing homes - will be of a bleak shaded wall of nondescript anywhere PBSA built form.

(b) The two proposals will swamp the existing primarily residential community with a further 3,541 students in additional to those already existing and soon to be completed in the area. Charles Street and limited local streets would be expected to cope with the concentrated move in/move out period for many of these students and it is difficult to see how this can be managed in a manner that will not cause excessive disruption and inconvenience for other users of the area including existing local residents.

OBJECTION 2

While each application should be treated on its own merits, within planning there is an acknowledgement of setting a precedent. Granting planning permission for one of these unacceptable proposals is a precedent for the other to be approved too.

Additional background information:

Cynically, on the basis of the SRF process and machinations within the City Council regarding PBSA and policy (including Policy H12 of the Core Strategy of the statutory development plan), it seems that at least parts of the City Council would support this precedent being set on these sites close to existing residents with the adverse impacts on their amenity and health/well-being, the environment and the community being accepted as collateral damage.

Concluding comment

A different approach to the application site should required to overcome the identified policy failings of this proposal. If this is not possible the proposal should be refused planning permission in accordance with Paragraph 139 of the NPPF.

In support of this concluding comment the following points are particularly noted:

(a) A PBSA development on this site gives rise to strong objection.

(b) Paragraph 139 of the NPPF is clear that development that is not well designed should be refused. 'Well designed' is not just about the intrinsic quality of the design of the development but about achieving an appropriate response to other matters. These should include, for example, amenity (including residential amenity) of existing residents and others in the area, the existing townscape context (including heritage), health and well-being and the impact on the local community. This is reflected by national and local policies and guidance including Policy H12 of the Core Strategy.

(c) If a PBSA development on this site is considered to be acceptable in principle by the City Council, the Council should require a comprehensive redesign of the current proposal that ensures it complies with all relevant policy and accords with relevant guidance to achieve a design that responds appropriately to the existing townscape context (including heritage), avoids harm to amenity, health and well-being of existing residents and others in the area (now and future), and supports the local community.

(d) To accept the currently proposed PBSA development on this site would be to accept the harm - Very considerable harm in some instances - that would be caused within the affected area. This harm to local people and environment would be collateral damage just to achieve a tall building townscape in this locality at any cost.

(e) The Planning Service and Planning Committee should recognise that opportunities for tall buildings - including for PBSA - exist elsewhere and this is one city centre location where 'good planning 'would expect adherence to national and local policy intended to protect against inappropriate development and secure a more balanced approach between redevelopment/regeneration and a local community and existing high quality environment.

(f) The applicants claim in their Planning and Tall Building Statement (paragraph 1.8) that "The proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre.". Clearly this is not true on any level let alone in terms of the impact on the surrounding area and the application should be refused planning permission.

9th July 2026

Outlook

Objection to Planning Application number PLA-2026-000312

From [redacted]
Date Wed 08/07/2026 11:59
To Jennifer Atkinson [redacted]
Cc [redacted] Jon-Connor Lyons [redacted] Ross Steven [redacted] Sam Wheeler [redacted]

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ALERT This message originated outside of the Manchester City Council network. **BE CAUTIOUS** before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

Planning Application PLA-2026-000312 – Objection

We wish to register our objection to Planning Application PLA-2026-000312 for the proposed student accommodation development on the Charles Street (SISTER Plot H) site.

We own a flat in Velvet House and am therefore directly affected by this proposal. Our objection is based on material planning considerations, particularly the impact the development would have on residential amenity, daylight and sunlight, townscape, heritage and the character of the local community.

Our principal concern is the proposed 38-storey tower. Its height, bulk and proximity to existing residential buildings are wholly out of keeping with this part of the city centre. The scale of the building would create an oppressive and overbearing presence and would significantly reduce the amount of daylight and sunlight reaching neighbouring homes, including those in Velvet House.

The applicant's own assessment acknowledges that a number of neighbouring homes will experience a "major impact" in terms of daylight and sunlight, yet concludes that the overall effect is only minor by averaging the impacts across a much wider area. This masks the reality that some residents, including those living closest to Tower T3, would experience substantial and permanent harm to their living conditions.

We are also concerned by the effect on the wider residential environment. The proposal would overshadow nearby public spaces, including Sackville Gardens and Vimto Park, reducing the quality of these important green spaces that are heavily used by local residents. The proposal would also introduce significant overlooking from hundreds of student bedrooms and communal areas, reducing privacy for existing residents.

The proposal fails to respond appropriately to its surroundings. The existing area is characterised by a mixture of historic warehouse buildings, moderate-height residential developments and important heritage assets. Introducing a 38-storey tower at this location would dominate the local skyline and harm the setting of the Whitworth Street Conservation Area and nearby heritage buildings rather than respecting their character.

We are also concerned about the cumulative effect of this proposal alongside other large student accommodation schemes in the immediate area. There is already a substantial amount of purpose-built student accommodation nearby, with further schemes proposed. This development would further erode the balance of the local community and conflict with planning policies intended to protect established residential neighbourhoods.

While we support the regeneration of the Charles Street site in principle, we do not believe this application represents an appropriate form of development. A development of a more modest height and scale could deliver regeneration while respecting neighbouring residents and the existing character of the area.

For these reasons we respectfully request that Manchester City Council refuses planning permission for Application PLA-2026-000312.

Regards

[redacted]

Outlook

OBJECTION to Planning Application PLA-2026-000312 – SISTER Plot H, Charles Street

From [redacted]
Date Wed 08/07/2026 11:38
To Jennifer Atkinson [redacted]

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ALERT This message originated outside of the Manchester City Council network. **BE CAUTIOUS** before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

Dear Jennifer,

I wish to register my **OBJECTION** to Planning Application **PLA-2026-000312** as a resident of **Velvet House, Granby Village**.

I object to this application because the proposed scale, height and massing of the development would result in unacceptable harm to the residential amenity of existing residents and fails to achieve an appropriate balance between regeneration and the protection of the surrounding community.

OBJECTION – Loss of daylight, sunlight and residential amenity

The proposed 38-storey tower is excessively tall for this location and would significantly reduce daylight and sunlight to nearby homes, including those within Granby Village. As a resident of Velvet House, I value the natural light that reaches my home and the surrounding communal spaces. The proposal would introduce substantial overshadowing, particularly during the winter months, diminishing the quality of our living environment and the enjoyment of our homes. The applicant acknowledges that some neighbouring residents will experience major impacts, yet still concludes these are acceptable. I do not believe this is consistent with planning policies intended to protect residential amenity.

OBJECTION – Height, scale and townscape

The proposed tower is wholly out of character with the established built form surrounding Granby Village. The proposal fails to respond positively to its immediate context and instead introduces a dominant structure that would overwhelm neighbouring buildings and permanently alter the character of this part of the city. This is contrary to the principles of good design that require development to respond to its surroundings rather than impose an arbitrary quantum of development.

OBJECTION – Impact on public spaces and wellbeing

The proposal would also reduce sunlight reaching nearby public spaces including Sackville Gardens and Vimto Park, which are important green spaces for local residents. These spaces contribute to the health and wellbeing of the existing community and should not be significantly degraded by a

development of this scale. The reduction in daylight and increased overshadowing would diminish their biodiversity and usability throughout the year.

OBJECTION – Impact on the existing community

Granby Village is an established mixed community that already accommodates a significant student population. Adding over 1,000 further purpose-built student bedrooms immediately adjacent to existing residential properties risks further eroding the balance of the neighbourhood. Planning policy seeks to create sustainable and balanced communities, and I am concerned that this proposal would move further away from that objective.

For these reasons, I respectfully request that Manchester City Council **refuses planning permission** for this application.

Yours faithfully,

[redacted]

A resident of Velvet House, Granby Village

Outlook

Application PLA-2026-000312

From [redacted]
Date Tue 07/07/2026 12:41
To Jennifer Atkinson [redacted]

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

ALERT This message originated outside of the Manchester City Council network. BE CAUTIOUS before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

Dear Jennifer Atkinson

[redacted] own a flat in Granby Village and I would like to object to the above application.

I believe that the scale of the proposed development, especially in a conservation area is inappropriate. It will clearly have an impact on our property and reduce our light.

I note that this will be providing yet more student accommodation and as such will be more profitable to the developer than resident housing. My view would be different if this proposal contributed to the housing shortage in the city which has been a cause promoted by the outgoing Mayor of Greater Manchester.

I also note that it will have an impact on our two local parks which will now also be in shade from this very tall development.

Please do not support this application.

[redacted]

The following Objection is submitted by the Granby House RTM Company Limited on behalf of the 69 leaseholders that make up the residential properties in Granby House, Granby Row, Manchester M1 7AR. Granby House is a Grade II former textile warehouse converted in 1985 into flats and was the forerunner for all subsequent regeneration of former textile warehouses into residential properties in the Whitworth Street Conservation Area and The Village.

(1) The site is within the SISTER (formerly I.D. Manchester) Strategic Regeneration Framework (SRF) area which, against local opposition, showed three new taller buildings on the application site when these could have been placed elsewhere in the wider SRF area (e.g. by Mancunian Way) to avoid their harmful impacts on longstanding residents and our conservation area. Residents were assured that future planning applications for the site would protect our amenity. We are now faced with an application - evolved with the support of the City Council's Planning Service - that does not do this at all.

(2) The proposal will also cause harm - often great harm - to amenity (including residential amenity), the environment (including townscape and heritage), health and well-being and to the existing community. These harmful impacts are very much related to the height, massing, siting and orientation of the proposed buildings within the site.

(3) The impact on sunlight and daylight will be very considerable and harmful particularly for Granby House. The application site is immediately to the south of Granby House with just the railway viaduct between. So these proposals would massively overshadow Granby House and surrounding areas in an arc north side of the railway viaduct:

- All parts of Granby House will be affected during the day as the sun moves around impacting the amount and quality of sunlight and daylight - including reflected light - in our homes and communal spaces as well as adjacent streets. Many residents here including some who have lived here for 40 years, will experience, in the words of the applicant, a "major impact" in terms of their daylight and sunlight. But the plans are put forward despite these having a catastrophic impact on our homes.

- The tallest tower will close the gap between existing buildings that has always allowed direct sunlight to reach Sackville Gardens especially during Winter months. It will also greatly overshadow the closer Vimto Park. These are our only two nearby public, green, open spaces serving many 1000's of people every year - both residents and other city centre users.

The applicants have manipulated their assessment of daylight, sunlight and overshadowing so the impact seems less than it will be in reality. They variously claim these harmful impacts do not exist, are negligible or, where harmful, only affect a smaller number of residents so they don't matter. This is nonsense especially given the significance of Sackville Gardens to the LGBTQ+ community and the internationally renowned Gay Village where Sackville Gardens is intrinsic.

(4) It is unacceptable that the applicants have evolved a design with two lower towers and external amenity space ("Princess Square") at the western end of the design which they consider necessary/appropriate mitigation to protect the amenity of some nearby residents (notably in adjacent commercially operated Orient House and Salisbury House residential developments) but have piled development up to an excessive height and massing at the eastern end of the site without the same regard to the nearby residents at that end of the site. This application does not acknowledge or explain this inconsistency.

(5) The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are using policy and guidance selectively and partially to support their proposal at the expense of the area and community outside the site.

(6) The SRF is being used to justify the quantum (or amount) and height of the proposed development. The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process. Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area and people.

(7) The site is currently occupied by a low density development: a multi-storey car park and small piece of incidental, left over land which the applicants own specialists confirm is of little biodiversity value. Planning policy seeks to achieve greater density in the city centre, but there is no acknowledgement by the applicants or planners that a significant increase in development density would be achieved on the site even if it were just developed with buildings of the same height as our own, especially if the whole site was used rather than leaving a large proportion of the site (but small in real terms) as open space which will never meet the needs of 1,041 students plus staff, visitors and public. Instead greedy landowners, national PBSA developers and international investors see the site as a cash-cow and pile the development far higher than anything around creating immense overshadowing and a visually overbearing building where almost 300 bedrooms and communal living rooms will directly overlook our area from its two tallest towers.

(8) Our area is an early example of successful urban regeneration that reinvigorated the city centre. It is long established and stable with a mixed population including a proportion of students. Indeed, existing nearby PBSA developments already cater for 1000's of students and the iQ Echo Street scheme opening this year and will add over 1000 more. The iQ proposal for the Pendulum Hotel site proposes a further 2,500 spaces. Our community is now being overwhelmed by a transient student population, here for only part the year and without any particular commitment to the area. Contrary to relevant policy and guidance, the proposal would not contribute to maintaining or creating a balanced and socially cohesive community it will turn the area into a student ghetto.

(9) This SISTER Plot H proposal needs to be seen in the context of an equally inappropriate and harmful planning application on the adjacent iQ Weston Halls/Pendulum Hotel site which is awaiting a decision. Both proposals need to be considered on their own merits but also in terms of the cumulative impact that they would cause in conjunction with each other. The cumulative harm regarding the preceding points would be all the greater if both proposals were to be approved and built adding 3500 student beds so close to our community.

(10) Taking into account the above, this application - and the application for adjacent iQ Weston Halls/Pendulum Hotel site - should be refused planning permission.

Misrepresentation of the public consultation exercise

OBJECTION

The submitted 'Statement of Consultation' is selective and biased in its reporting of comments made by residents to date and actions taken to mitigate concerns. Problems of overshadowing and the considerable impact to residents in Granby Village and Granby House of tall buildings on Plot H have been raised vociferously on every occasion plans have been discussed during consultation exercises and at the Siter Community panel. These widespread and strong objections raised by local people on both the SISTER (formerly I. D. Manchester) Strategic Regeneration Framework (SRF) and on the application proposal prior to its formal submission have been totally ignored. In support of this objection the following points are particularly noted:

(a) Objection was raised again to the SISTER SRF 'illustrative' proposal for the application site, Plot H, particularly regarding the height and massing, by resident representatives in a meeting with SISTER on 10th October 2024.

(b) The application proposal was presented to resident representatives in a meeting with SISTER on 26th November 2025. Objections were raised to the height, massing and Purpose Built Student Accommodation (PBSA) use. Despite this and the subsequent developer-led public consultation process the actual proposed design has not evolved in any discernible way to take concerns into account.

(c) The applicants note the various reasons for objection and state mitigation they consider necessary and/or have actioned. For the key issue of overshadowing the applicants openly state that by lowering the height of built form on the western half of the site they have mitigated against the impacts on sufficient residents to make the proposal acceptable while not admitting that a not insignificant number of residents remain harmfully impacted by the 38+ storey tower that has now appeared at the eastern end of the site.

Additional background information:

Two Granby Village residents sit on the SISTER Community Panel ostensibly to have an input into the SISTER SRF proposals as they are brought forward. However, it is becoming apparent that the Panel is used by SISTER to communicate their proposals and identify matters of concern or objection so that any proposal can be better presented to justify rather than amend their approach. One of these Granby Village residents is on the Panel to represent the views of local residents in the nearby principally residential area that includes Granby House just to the north of the railway viaduct while the other is on the Panel primarily as a representative of the Friends of Sackville Gardens.

These two residents - referred to in the Statement of Consultation - have consistently objected on behalf of the wider resident community to this proposal for the SISTER Plot H (Charles Street Multi-storey Car Park) site both at the Panel and:

(1) At a separate meeting on 10th October 2024 with Ian Thompson of Counter Culture acting for SISTER prior to the selection of a development partner for the application site. The residents were subsequently advised in November 2025 of the selection of RG Real Estate to deliver PBSA within a tall building proposal.

(2) At a presentation of the proposal to these two residents by the design team for the development on 26th November 2026. This was not part of evolving the design but purely one of presenting the proposal that was then put out to a developer-led consultation.

Planning policy and guidance

OBJECTION

The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are incorrectly and inappropriately using policy and guidance selectively and partially to support their proposal at the expense of the area and community outside the site. In support of this objection the following points are particularly noted:

(a) The following objections will assist to demonstrate this to be the case.

(b) The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process.

(c) Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area, people and community. The National Planning Policy Guidance (NPPG) explicitly states that it should be read holistically. This approach should be taken more broadly when applying relevant policies and guidance with their due weight as 'material planning considerations'.

Strategic Regeneration Frameworks (SRF's)

OBJECTION

Objection continues to be raised to the SISTER (formerly I. D. Manchester) SRF. Those people living in and using the existing locality around the application site foresaw the inevitable harm that would be caused to amenity (including residential amenity) and the environment (including townscape and historic environment) by the SISTER SRF proposing to site three taller buildings on the northern boundary of the SRF area. This is where this harm would be most keenly felt by those northwards of the site. Objection is also raised to the reliance by the applicants on the SRF to justify a particular quantum of development within the site and the continued inclusion of tall built form within the proposal when considerable harm has been identified. It has also been established that SRF's do not constitute planning policy and are a very low level of material consideration subservient to national and local planning policy which includes policy or caveats within policies intended to protect amenity, communities and the environment. In support of this objection the following points are particularly noted:

(a) SRF is not planning policy but only a form of guidance. The Planning Service has confirmed it carries very low weight as a 'material planning consideration' unlike national and local planning policy.

(b) The three taller buildings were only shown on an "illustrative masterplan" drawing without any storey heights or floorspace measurements. It has been confirmed this was only intended to be indicative and existing local residents were assured that any planning application process for the site would address the planning issues to avoid harm to the amenity (including residential amenity), local environment (including townscape and heritage), health and well-being, and community within the adjacent

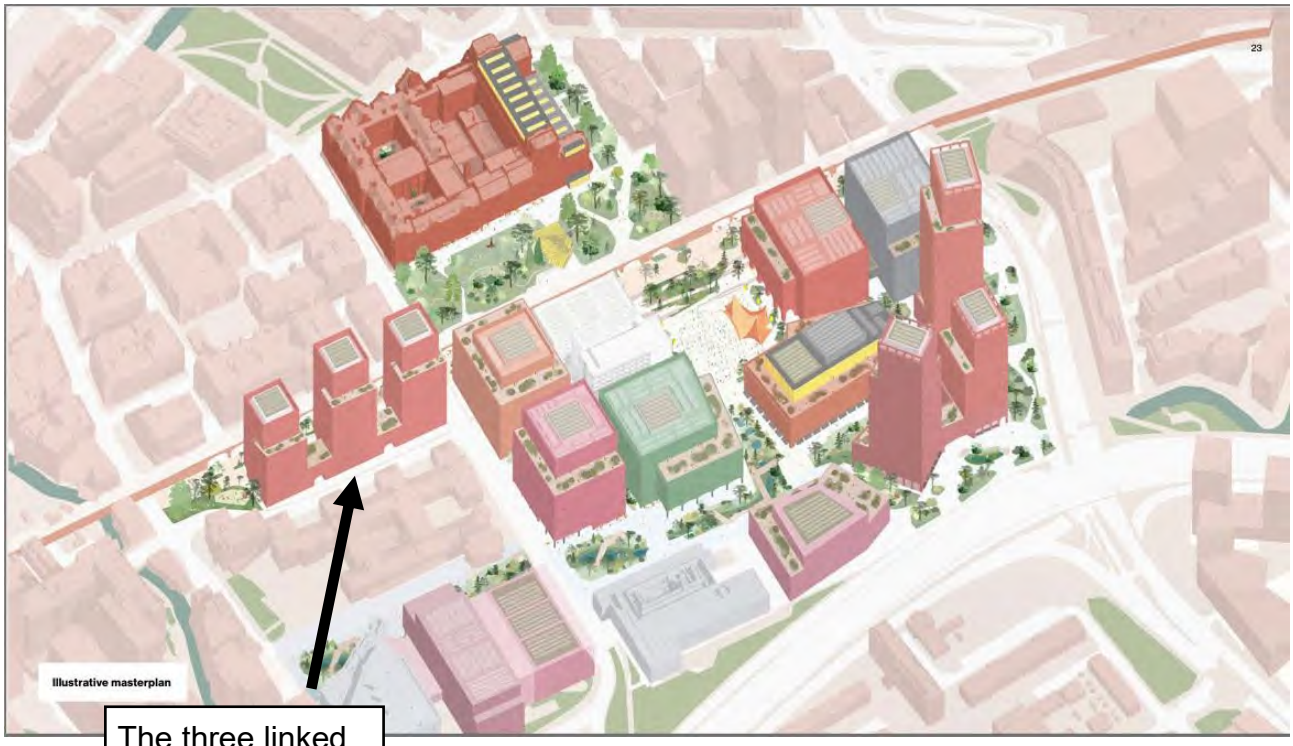
area. This should be achieved by having full regard to all relevant national and local planning policy and guidance with with their due weight as ‘material planning considerations’. The planning application does not meaningfully achieve this and the SRF should not be driving any need or desire to achieve a particular quantum (or amount) of development or design outcome on this site. On this basis the application should be refused planning permission.

Additional background information:

A Strategic Regeneration Framework (SRF) is the means by which a landowner and/or developer can identify an area (which may be one site or a larger area containing a number of sites) and set out a masterplan for its future redevelopment. This is invariably a process undertaken with the support and involvement of the City Council as the Council needs to approve the SRF for it to become a ‘material planning consideration’ and carry weight in the Council’s future decision-making such as on planning applications. The SRF process is accompanied by limited public consultation carried out for the most part by the proposer.

The Planning Committee considered a planning application for the proposed ‘Oxygen Towers’ tall building scheme at 140 Great Ancoats Street (at the junction with Store Street and near Piccadilly Village) at its meeting last November (25th November 2025). During the meeting the Deputy Head of the Planning Service usefully confirmed that SRF is **not** planning policy and is only guidance, is subordinate to policy, and is of relatively low status as a material planning consideration. Government policy is preeminent followed by the Council’s own local policy which should accord with Government policy. Unusually for such a proposal, the Oxygen Towers scheme was refused planning permission very much due to the impact on the amenity of existing nearby residents.

A video recording of the November 2025 Planning Committee meeting can be viewed at https://player.vimeo.com/video/1129898464?badge=0&autopause=0&player_id=0&app_id=58479
with the relevant case being from 1:07:15 to 1:30:00 in the video.



The three linked taller buildings being suggested by the SISTER SRF on the application site looming over Granby House behind.

The original “Illustrative masterplan” drawing in the SISTER SRF document.

The SISTER (formerly I.D. Manchester) SRF:

The application site is within this SRF area against its northern boundary with the railway viaduct. This SRF covers an extensive area and includes a long southern boundary to Mancunian Way. At the time the SRF was being proposed, local residents took every opportunity to object to the locating of taller buildings being proposed by the SRF against the northern boundary of the application site. It was obvious that locating three buildings that are notably taller than nearby buildings in this location would inevitably cause disamenity especially through overshadowing to the existing residential community directly north of the site. Other sites within the SRF area - such as alongside Mancunian Way - could have been identified instead for such tall buildings. However, it it is apparent that, while the SRF proposers wanted tall buildings within their development they wanted to create the best environment for new occupants within the SRF area. By placing the taller buildings against the norther boundary they intentionally aimed to minimise any adverse impacts within the SRF area by ensuring these were inflicted outside the SRF boundary.

Despite these objections the City Council approved the SRF with three taller but what looked to be relatively squat towers on the application site as they were far from being the skyscrapers illustrated on the opposite side of Sister campus against the Mancunian Way. In an email with a local resident the Chair of Planning Committee has, however, confirmed that the placement of tall buildings and wider impacts would be addressed as a part of any

subsequent planning application for the site suggesting an acknowledgement that SRF may need to be revised. Indeed, the proposal as now shown in the submitted application includes three linked buildings comprising two medium rise taller buildings but then a third building T3 that is colossal both in height and massing. For the applicants to describe this T3 as a slender tower is nonsense. It is both broad and deep especially running East-West along Charles Street and thus blocking sunlight over our Conservation Area for longer. The vast majority of the year we will be shadowed by this T3 tower other than during the high Summer when the sun would be overhead. The 38 storey equivalent tower built and occupied at Circle Square further along Charles is slender in its East-West orientation to minimise overshadowing whereas this T3 tower at the same height is anything but slender. Obese would be a better description.

The applicants claim this concentrating of massing is to mitigate against issues of overshadowing, daylight and sunlight on residential properties to the north of the development. It is evident, however, that their redistribution of the proposed SRF massing within the application site may improve matters for some existing residents (notably in the Corporate owned fully rented blocks of Orient House and Salisbury House), but further exacerbates the harm caused to individually owned leasehold apartments including many long-standing owner occupiers in Granby House and Granby Village who have lived here for 20, 30 even 40 years. We are very early examples of Manchester's urban regeneration that has proven popular and sustainable as a community for a long period. But we are now at the mercy of developers expecting to build huge towers of student accommodation for short term gain regardless of the impact to our' homes. If PBSA towers are to be part of the Sister redevelopment then as stated by residents in many consultation exercise – place them on the Southern boundary against the Mancunian Way to reduce harm on the Whitworth Street Conservation Area and our homes.

Existing urban townscape context

OBJECTION

The siting, height (or 'scale') and massing of the proposal fails to appropriately and meaningfully respond to the existing urban townscape context but instead inappropriately responds to the character of more distant parts of the Southern Arc. The proposal, therefore, fails to have appropriate regard to relevant national and local policy, guidance and best practice relating to urban design and conservation principles and how new development should respond to context. In support of this objection the following points are particularly noted:

(a) The site contains a low level multi-storey car park and a small landscaped area of incidental, land that was left-over once the car park had been sited on an irregular shaped site. This open space has been poorly used/mis-used and maintained over many years and not perceived as a leisure space. This development does not make a positive contribution to the local townscape other than, possibly, part of the grouping of modernist buildings associated with the rest of the SISTER SRF area.

(b) The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent, taller built form down in order to respond to this change in scale and character.

(c) The 'Southern Arc' is the name that has been given to an area of land sweeping around the southern side of the city centre along Mancunian Way. It is not a formal designation. It is an area that has seen incremental redevelopment often with tall buildings. The applicant wants to associate the application site and rest of the

SISTER SRF with the Southern Gateway to suggest the character of the area is one of modern tall buildings. While this may be their aspiration it is not the reality of the existing urban context of the site.

(d) Contrary to statements made in the application, the proposal has failed to have meaningful regard to all relevant planning policy and guidance and has failed to show meaningful regard to and respect the existing urban context. The proposal is contrary to planning policy and guidance.

Additional background information:

Policy in the National Planning Policy Framework (NPPF) and the government's 'National Design Guide '(NDG) of 2021 set down basic principles to achieve good (if not excellent) design in new development. The application appears not to even acknowledge the NDG and certainly fails to have any regard to it. Both the NPPF and NDG identify the importance of understanding and appropriately responding to the local landscape context and creating welcoming places in which to live, work and visit. Creating such places is not just about the new development itself and meeting the needs of new residents but the impact this development has on the surrounding area and existing users and community.

The City Council's statutory local development plan reflects this policy and guidance including in its Core Strategy Policy H12, specifically on Purpose Built Student Accommodation (PBSA). Policy H12 confirms that the design and layout of such development should ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise or disturbance, or impact on the streetscene either from the proposed development itself or when combined with existing accommodation. Various paragraphs of the supplementary planning document (SPD) section of the City Council's 'Guide to Development' all stress the need for new development to respect and be informed by their settings and to be of an appropriate height having regard to location, character of the area and specific site circumstances and local effects, such as microclimatic ones. The guidance section of the 'Guide to Development' also confirms in Paragraph 11.45 that new developments in conservation areas or elsewhere should not be designed in isolation; and considerations of design and layout must be informed by the wider context including both immediate neighbouring buildings, and the townscape of the wider locality. Paragraph 3 explicitly confirms that the Guide "sets the context within which developers and architects will have to work".

The application site and its actual existing urban landscape context

The majority of the application site is broadly rectangular but narrows at its western end as a consequence of the realignment of Charles Street in the 1950's/60's to accommodate the existing multi-storey car park than now occupies the rectangular part of the site. As was typical and problematic with many such much post-war schemes, the left-over area ('site left over after planning' known as SLOAP) was merely landscaped in a rudimentary manner - hence the existing trees and grass - and remained as a small, incidental and poorly maintained area used by rough sleepers and for fly-tipping rather than recreation. The proposal is effectively replicating this approach which the City Council's Guide to Development in Manchester was intended to prevent.

It is accepted the existing car park structure itself does not make an obvious positive contribution to the local townscape (although it could be seen as contributing to the modernist character of the 1950's/60's university development of which it formed a part) and an appropriately designed replacement development could make a greater contribution. The car park is lower than most of the surrounding buildings which contributes to the historic pattern of development visible at this boundary of the

conservation area where the redevelopment of the Victorian city by the Edwardians for new and often larger textile warehouses abruptly stops as the City lost its domination of the world textile market. The existing car park does not dominate the listed railway viaduct or the adjacent taller buildings just inside the conservation area and so has a minimal impact on the setting of the conservation area. The proposed development will remove such historic views from the south and dwarf the nearby historic built form.

The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent, taller built form down in order to respond to this change in scale and character with the tallest new buildings kept towards London Road and Oxford Street. The applicant's own Design and Access Statement (p.18) shows the area characterised by "20 - 40m" high buildings mostly historic and mostly in the conservation area and where the soon to be demolished Faraday Tower is a 1960's anomaly. This is evident by a simple analysis of this surrounding context which identifies several component parts:

(1) The area to the north of the nearby railway viaduct - from the Oxford Street in the west to London Road in the east - is covered by the Whitworth Street Conservation Area with its particular high quality townscape. This is derived principally from 6 - 7 storey former Victorian and Edwardian warehouses with some elements of lower built form on a series of colliding grids of streets. This is the character of that part of the conservation area closest to and just to the north of the application site. The streets and spaces within the area all benefit from direct sunlight and good levels of natural daylight as the built form defines but does not overly enclose them. This quality of light is an intrinsic part of the historic character of the area in which work within the warehouses required good levels of natural light to function including for the the inspection and sale of textiles. Just to the north is the modestly scaled Sackville Gardens - the only public (i.e. Council controlled) open space in this part of the city centre dating from the early 1900's.

(2) The landscaped area of the existing application site is on the north-eastern corner of the Princess Street/Charles Street junction. On the north-western and south-western corners of the junction are modest, two-storey Victorian buildings which (along with the Grade II listed red brick railway viaduct crossing Princess Street) provide a characterful gateway to the conservation area and the context for the two-storey, Grade II listed Lass O'Gowrie public house and several small scale Edwardian former warehouses behind along the north side of Charles Street. The modern eight storey IBIS hotel stands on the south-eastern corner of the junction directly opposite the site without visually over-powering the nearby historic buildings. The historic buildings are red brick (some with terracotta) and slate and the hotel is red brick and lead-like elements.

(3) Moving southwards along Princess Street away from the conservation area and the Princess Street/Charles Street junction, the built form on the west side steps up in height to c.13 storey modern buildings next to the recent Circle Square development and then to a c.15-storey building immediately next to Mancunian Way. The height of built form markedly steps down moving eastwards across Princess Street to the 5-storey University Life Sciences building, a small surface car park and hard landscaped area associated with the River Medlock culvert. The part 8/part 5 storey Pendulum Hotel Weston Halls building (in mostly yellow brick with pitched tile roof) extends along Charles Street opposite the application site to abut the IBIS Hotel in the west and Sackville Street in the east.

(4) Elsewhere around the application site is the former University North Campus. The applicant fails to note this was identified by the 20th Century Society in its 'Potential Conservation Areas Scoping Report' (December 2017, funded by Historic England)

as one of only its two potential conservation areas with a predominant twentieth century character in Greater Manchester. It is characterised by well spaced white painted or exposed concrete modernist education buildings arranged around a series of privately controlled but publicly accessible soft landscaped open spaces including the Vimto Park. These buildings are mostly relatively low in height in a mix of 1, 2, 5 and 6 storeys but interspersed with moderately high buildings such as the recently listed Renold Building but includes the tallest building near the application site, the University's Faraday Tower. This in height terms (c.14 storeys) stands in isolation and has a slender rectangular floorplan on a north-south axis minimising the shadow it casts to the north. The various spaces including Sackville Street and Charles Street in the vicinity of the site are full of sunlight and daylight.

Southern Arc

The application refers to the Southern Arc as if it were an established designation but no such reference or boundary can be found in the City Council's statutory development plan. It is understood to refer to an area of land, stretching from Mayfield to Great Jackson Street, arising principally from the building of Mancunian Way in the 1960's and other postwar clearance. To the east of London Road and west of Cambridge Street land remained vacant or was put into low density industrial/commercial uses but the central section was predominantly developed in the 1950's and 1960's with education buildings whose character has largely been retained to date around the application site. In more recent years different sites within the Southern Arc area have been brought forward with a developer expectation (encouraged by the City Council and its developer-led Strategic Regeneration Frameworks) that high rise/high density development would be acceptable. Policy and guidance, however, makes it clear that such a one-size-fits-all approach cannot be assumed across such an expansive area which abuts a variety of other townscapes.

The application contains information assessing the local townscape context around the site - including some specifically on the conservation area - but this has not been used to inform the evolution of a design that actually responds meaningfully to this context in terms of the siting, scale and massing of the proposed built form. Instead the proposed design is responding to the emerging high density/high-rise townscape in more distant parts of the expansive Southern Arc area which is seemingly the actual design intent as the submitted Environmental Statement (ES Vol 1, Paragraph 3.8) identifies "SISTER as the 'final piece in the regeneration jigsaw 'within the southern arc of Manchester that stretches from Great Jackson Street in the west through to Mayfield." The proposed use of elevation features and materiality to respond visually to nearby 1950's/60's buildings is tokenistic given that this treatment is dressing up a 38+ storey tower in an area characterised by relatively much lower built form. This is not the approach for achieving good design set out in national and local policy and guidance. The proposed development is not innovative in design and does not fit into the overall form and layout of its surroundings as required by the NPPF.

Heritage

OBJECTION

The application fails to appropriately respond to the heritage significance of the Whitworth Street Conservation Area or the settings of nearby listed buildings and non-designated heritage assets so as to avoid harm or keep such harm to the minimum that could be considered appropriate in heritage terms. In this regard the proposal has not had due regard to legislative requirements or to national and local

policy, guidance and best practice. In support of this objection the following points are particularly noted:

(a) The application site is outside but immediately adjacent to the conservation area. There remains a need to ensure development within this setting assists to preserve or enhance the character and appearance of the conservation area. The proposed development adversely affects the settings of a number of listed buildings but the application uses an assessment methodology to arrive at a conclusion that the harm it causes to the historic environment is acceptable. This is not the approach sought by policy and guidance which should be to assess the historic environment and then evolve a proposal to avoid harm to it.

(b) The application fails to acknowledge that the character of the conservation area partly derives from the quality and quantity of sunlight and daylight reaching the buildings and spaces between them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Similarly for the nearby Sackville Gardens as an intentionally laid out public space at the heart of the conservation area.

(c) The application is restrictive in its identification of non-designated heritage assets. These should have included several buildings in the area including, for example, Velvet House and 55 - 57 Whitworth Street.

(d) The proposal fails to give the great weight required to the conservation of the historic environment. It does not accord with relevant local and national policies and guidance.

Additional background information:

The Whitworth Street Conservation Area was designated by the City Council in recognition of the area's high quality historic townscape which is one of the most concentrated historic environments within the city centre and so of very considerable heritage significance. The character and appearance of the area is derived principally from 6 - 7 storey former Victorian and Edwardian warehouses with some elements of lower built form on a series of colliding grids of streets. Where Sackville Street, Princess Street and Oxford Street pierce the southern boundary of the area the scale of older built form reduces in height which is a visible reminder of where the redevelopment of the Victorian city by the Edwardians in the early 1900's for new and often larger textile warehouses abruptly stops as the City lost its domination of the world textile market. The character of the conservation area also derives from the streets and spaces which all benefit from direct sunlight and good levels of natural daylight as the built form defines but does not overly enclose them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including the inspection and sale of textiles. Just to the north is the modestly scaled Sackville Gardens - the only public (i.e. Council controlled) open space in this part of the city centre dating from the early 1900's.

Paragraph 69(1) of The Planning (Conservation Areas and Listed Buildings) Act 1990 states that conservation areas are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. This is a statutory duty placed on the City Council and refers to the area as designated not the character/appearance as proposers would like to see it in the future. This duty does not stop at the boundary but should also have regard to development within the setting of the area that affects the character within.

The application site is not within the Whitworth Street Conservation Area but is immediately adjacent to it and within its setting. The proposed development would form a

highly prominent and alien feature in views into and out of the conservation area. The proposed development would be highly prominent on Sackville Street which is a busy gateway route serving the conservation area. The proposed development would harm the ability to appreciate the character and appearance of the conservation area and would not preserve or enhance the special architectural or historic character or appearance of the conservation area including through the impacts on the quality of light within the public realm and other external spaces and reaching internal spaces of buildings.

The proposed built form would also be a highly intrusive and harmful feature within the settings of a number of listed buildings and a wider number of non-designated heritage assets than have been identified in the application.

The application has had regard to the settings of heritage assets that would (or would potentially) be impacted by the proposal but the harm to these settings is downplayed in the application and so the design process has resulted in the current proposal that causes considerable harm to heritage significance. This, and the failure to identify all potential non-designated heritage assets in the locality, is indicative of the general disregard in the application of the existing townscape in order to generate a proposed design that meets a different narrative around the quantum of development so as to arrive at a design that responds to tall building development elsewhere than in the existing local built context.

The detrimental impact on the settings of heritage assets would be contrary to various national and local policies and not have appropriate regard to national or local guidance or best practice. There is an expectation (including in terms of policy) that new development within the settings of conservation areas and heritage assets (whether or not designated) would respond positively and meaningfully to their heritage significance. The NPPF advises that where development would achieve this it should be treated favourably with the implied message that, where it does not, it should not be treated favourably.

The optimum viable use for the site in heritage terms is the use that achieves the best outcome for conserving heritage assets and their settings which is not necessarily the most economically viable use. The proposal does not represent the optimum viable use for this site in terms of conservation.

That Historic England have not raised objection to the proposal does not mean that the City Council, as the Local Planning Authority, can set aside national and local heritage policies. The City Council should fully recognise that heritage assets are an irreplaceable resource that should be conserved so that they can contribute to the quality of life of existing and future generations. Great weight should be given to their conservation.

The almost complete iQ development at Echo Street within the Whitworth Street Conservation Area is an example of inappropriate development that can take place when heritage and townscape policies are not given sufficient weight when determining planning applications.

Proposed design and impact on amenity

OVERARCHING OBJECTION

Following recognised principles of good design (including regard to the existing context) rather than an apparent expectation of achieving a pre-determined quantum of development within the site (driven by the SRF) should have led to an

appropriate design of development for this site. The predetermined quantum of development, the lack of appropriate or meaningful consideration given by the applicants to the existing urban townscape once they had assessed it, the adverse impacts caused over much of the local area affected by the proposal, and lack of regard to policy, guidance and best practice regarding good design have led to a wholly inappropriate and discordant proposed design. This design results in a built form that gives rise to a range of harmful (including exceptionally harmful) impacts on amenity within the surrounding area. The proposed design is contrary to a wide range of national, local policies, guidance and best practice and certainly does not represent good or exceptional design in terms of policy. In support of this objection the following points are particularly noted:

(a) The application has selective and partial regard to planning policy and guidance and fails to have regard to the National Design Guide (NDG) as required by the National Planning Policy Framework (NPPF), and particular regard, has for example, to NDG Paragraphs 42, 43, 48, 67 and 71.

(b) There is failure to appreciate that policy documents including the NPPF need to be treated holistically rather than cherry picking policies to support a desired outcome.

(c) NPPF (Paragraph 135) requires developments that "are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change" but the latter is not expected to be at the expense of the former. In any event, the proposal is not innovative nor does it represent "appropriate change".

(d) The proposal inappropriately refers to unadopted, draft policy to support their application.

(e) The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

Additional background information:

To achieve an appropriate design outcome for this site (including in terms of impacts on residential amenity and the environment within the surrounding area) there is no requirement in the statutory development plan to provide the quantum of development now being proposed. The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

It is unacceptable that the applicants fail to have regard to the National Design Guide (NDG) as required by the NPPF (Paragraph 134) and uses unadopted draft policy such as that relating to tall buildings (Planning and Tall Buildings Statement, Paragraph 6.30) in their attempt to justify the proposal. The proposal clearly would not accord with various parts of the NDG including those referring to new developments having a meaningful response to context (such as, for example, in Paragraphs 42, 43 and 48) and identity (for example, Paragraphs 67 and 71).

Irrespective of the comments made by the applicants, the proposal does not represent good design as is generally sought by planning policy and guidance, nor does it represent exceptional design in policy/guidance terms that could overcome certain other departures from policy. It is noted that NPPF (Paragraph 135) requires developments that "are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change" but the latter is not expected to be at the expense of the former given that the NPPF policies are meant to be read holistically.

The applicants state in the Environmental Statement (ES Vol 1, Paragraph 11.59) that it is unrealistic for existing surrounding residential properties to maintain similar levels of daylight to those currently experienced. This is without acknowledging that there has not

been a suggestion by resident representatives there should be no redevelopment of the site but that such development should appropriately respond to the existing character of the area in order to avoid harm, be compatible with the character of the area and not to unduly impact existing residents. The reality is major impact to a number of apartments especially in Granby House on the southern and easterly elevation given the orientation, size and scale not only reducing light levels drastically but also ruining the setting of our Grade II listed building we call home.

- **Height, massing, siting and orientation: The impact on sunlight, daylight and overshadowing.**

OBJECTION 1

The proposed incorporation of a tower (tower T3) of 38 storeys (plus rooftop plant) results in a proposed design which is not just uncharacteristic of the surrounding townscape context but would be overwhelming within this context and give rise to significant disamenity to residents and other users of the surrounding area. A particular impact is the loss of daylight and of direct and reflected sunlight within the adjacent area due to overshadowing and which will be particularly excessive in some homes. This impact would be all the greater when combined with the siting and orientation of the proposed built form. It will give rise to excessive, adverse impacts on amenity within buildings including the homes of many people, within private external amenity spaces, the public/publicly accessible Sackville Gardens and Vimto Park, and within the public realm more generally including through the visually overbearing nature of tower T3. On this basis the proposal would be contrary to a wide range of national and local policies and guidance. In support of this objection the following points are particularly noted:

(a) The proposal has taken the SISTER SRF suggested approach of three linked towers of approximately equal height and size and redistributed the floor space so that one tower, tower T3, now contains some 75% of the floorspace. In terms of height the impact of towers T1 and T2 are more acceptable in terms of the existing urban context than tower T3 which is wholly out of context and unacceptable. The applicants claim this arrangement mitigates against the impact of the proposal on sunlight, daylight and overshadowing but without clearly stating that the mitigation only benefits a proportion of the area north of the viaduct but makes it worse for the area around tower T3.

(b) Given its footprint and height tower T3 has has significant mass - it is not the “slender” tower the applicants describe. It is “Obese” and sited close to the northern site boundary. The combination of height, massing, siting, orientation give rise to extreme harm to the amenity (including residential amenity) and environment within the nearby area on the northern side of the viaduct. It will not only affect daylight and sunlight (including reflected sunlight) through overshadowing but will give an oppressive outlook for many nearby homes and give rise to considerable overlooking.

(c) In relative terms tower T2 may be far more acceptable than T3 in terms of height but it is sited even closer to the railway viaduct than T3 but at the rear of Granby House it will further reduce light generally and shadow the rear of our building later in the day. This will exacerbate the harmful impacts it has on the neighbouring area. The cumulative impact of towers T2 and T3 will be all the greater – let alone adding in the submitted plans for the Pendulum Hotel site on the opposite side of Charles Street.

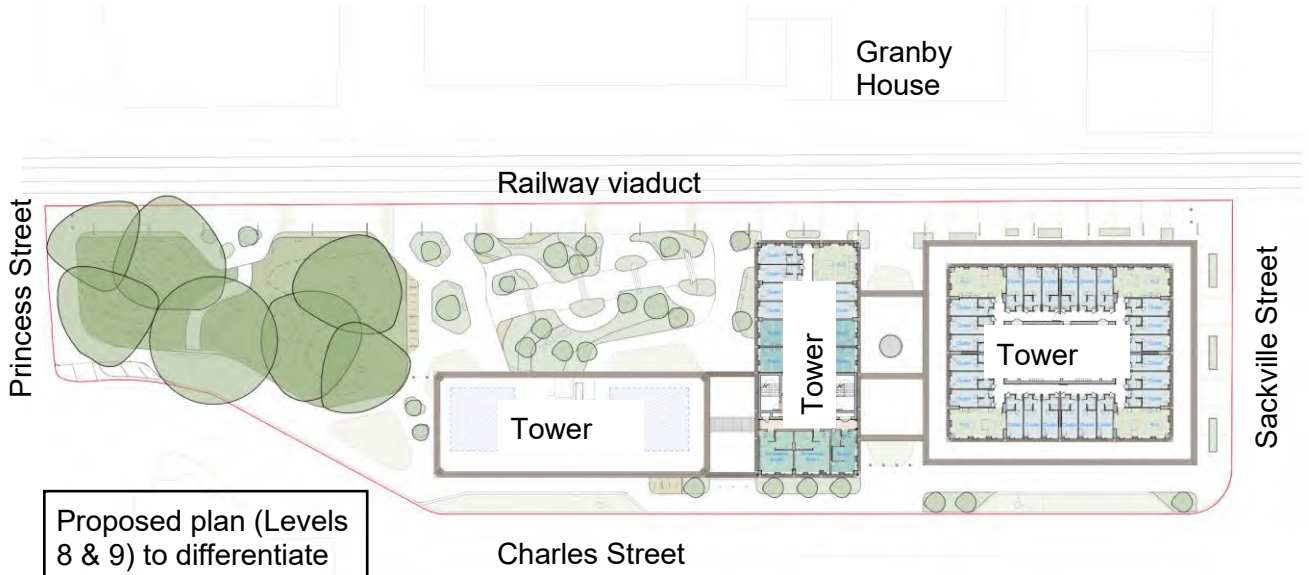
(d) It is evident that placing a large scale development including an “obese” 38+ storey tower against the south side of the railway viaduct will bring harmful - often extremely harmful - impacts on amenity (including residential amenity) within the primarily residential area immediately to the north of the railway viaduct. Within Granby House this impact will be to internal living environments and shared communal spaces.In the wider area it will similarly affect homes in nearby Granby Village and also streets and other open spaces including the nearby Sackville Gardens and Vimto Park.

(e) Sackville Gardens and Vimto Park are the two small public/publicly accessible green open spaces serving this locality and a wide area of the city centre and the applicants claim these spaces will not be affected to any notable extent by the proposal. However, common sense and the daily experience of residents and users suggest that (1) the March SHOG Assessment Results for Vimto Park (Table 11.19 of the Environment Statement) showing a less than 1% reduction in 2 hours of Sun Hours on Ground is misleading for the effects at other times of year; and (2) the prediction of a “negligible” increase in shadow over the park (Table 17.8) is simply not credible for the winter months. It is clear that the applicant’s assertions are incorrect and the proposal will cause significant harm to these open spaces. By failing to acknowledge this harm the proposal will radically diminish the quality of Sackville Gardens and Vimto Park despite recognition in policy and guidance that access to good quality open space and nature is vital to physical and mental health and well-being.

(f) The narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. If there are any areas in the city centre where this would apply it is here.

Additional background information:

The applicants have detailed how the three taller buildings of broadly equal height, massing and footprint originally shown for this site in the SISTER SRF have been reinterpreted to reduce the heights, massing and footprint of two (towers T1 and T2) while increasing the height and massing of the third (tower T3). Tower T3 will contain some 75% of the total floorspace.



Proposed plan (Levels 8 & 9) to differentiate the three towers

The development as now proposed consists of three linked towers: T1 of 8-storeys, T2 of 10 storeys and T3 of 38 storeys each with the additional height of a rooftop plant (building services) structure taking them to stated heights of 62.25m, 67.95m and 148.75m respectively. In terms of height alone towers T1 could be seen to be akin - and to respond appropriately to both the existing adjacent historic built form such as Orient House and Granby House and the more recent IBIS Hotel. Tower T2 begins to exceed the height that has this obvious relationship with the adjacent built form but could be considered as not excessive in this regard in townscape terms. Tower T3, however, is wholly out of context in with the surrounding context due to its height and massing.

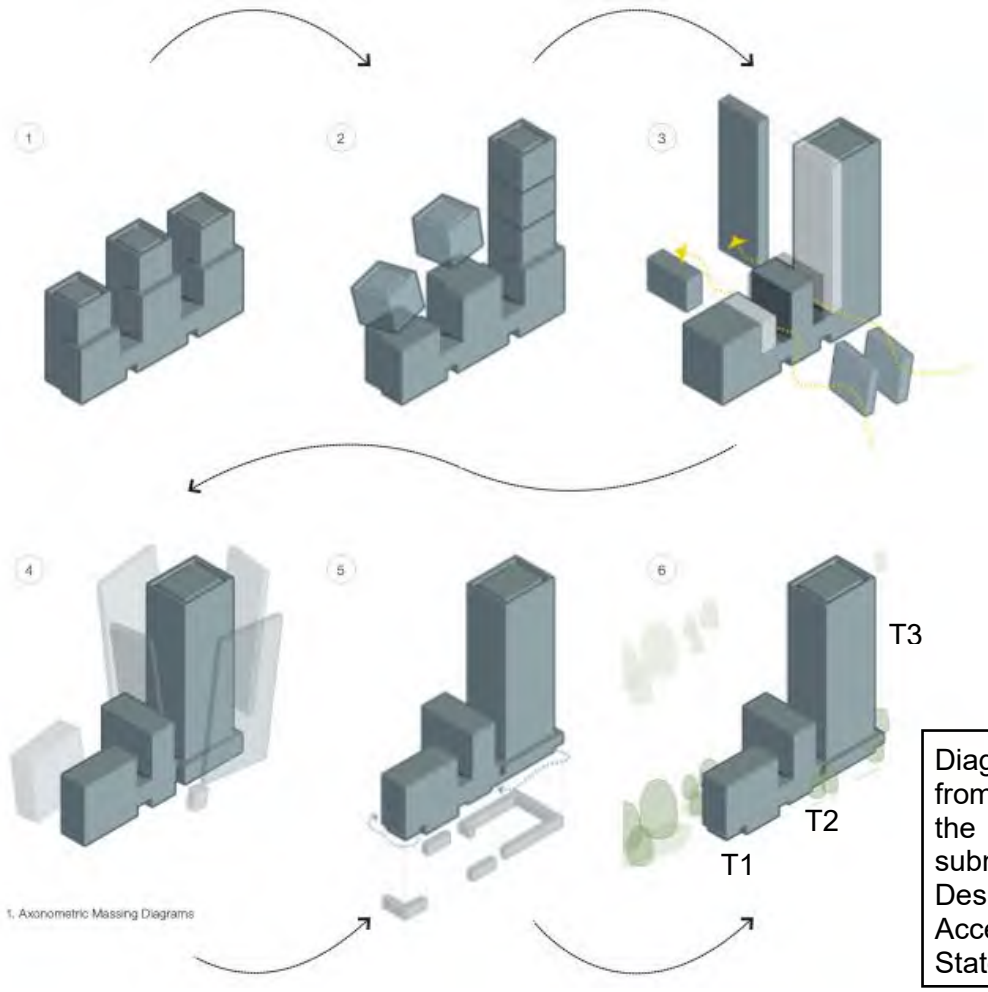


Diagram from p.26 of the submitted Design and Access Statement

The applicants state that the change in design between that envisaged by the SISTER SRF and the application proposal has been to mitigate against the impact of their proposed development on the daylight, sunlight and overshadowing of the neighbouring area. The changes made to the height and massing of towers T1 and T2 and plus the siting and orientation of tower T1 may indeed assist to mitigate impacts on a part of the neighbouring area and especially the existing (commercially operated) residential buildings (Salisbury House and Orient House) immediately to the north of the viaduct. However, it also ensures the on-site open space (on the north side of tower T1) is not unduly overshadowed unlike various existing public and private spaces currently enjoyed including by existing residents.

Despite this change in design the application proposal still leaves a large area around tower T3 that remains extremely harmed - probably more so than by the SRF envisaged development to which which residents raised considerable objection. It is unclear why the applicants consider residents in neighbouring buildings towards the western end of the site require a good standard of residential amenity (by avoiding/minimising overshadowing and the harmful impact on daylight and sunlight) whereas a large number of other neighbouring residents towards the eastern end of the site do not. The applicants constantly and incorrectly stress the ‘slender’ nature of tower T3 to somehow suggest a reduced visual impact and impact in the local area on overshadowing, daylight and sunlight. Tower T3 is not slender. It is sited with the

widest elevations running east-west (parallel to Charles Street) and is close to the northern site boundary all of which maximises this overshadowing on the area northwards. The scale, massing and siting will give rise to an overbearing presence both for those using the area but also within the outlook from many existing apartments.

Admittedly, for the current proposal, even relocating tower T3 the short distance to sit on the southern site boundary to maximise its distance away from the northern boundary would probably make negligible difference to the overshadowing or the overbearing nature of the building experienced in the nearby area and homes given the height of the proposed tower. As with the daylight, sunlight and overshadowing issue, it is unclear why the applicants consider residents at the western end of the site deserve a more open aspect by proposing lower built form sited almost as far as possible away from the existing residential buildings to the north. In terms of siting in general it is noted that the site boundary follows the existing kerb line along Charles Street and that all three towers have all been stepped back from this boundary to provide not only a generous footway but also servicing lay-bys.

The area on the northern side of the railway viaduct that would remain extremely harmed by towers T2 and T3 contains many homes and private external amenity spaces including within Granby House and a variety of communal external spaces (including the permiter parking surrounding Granby House). The area currently enjoys a good level of sunlight and daylight partly as a consequence of the height of the historic built form, the historic layout of the area designed to facilitate working with textiles in the many (now converted) textile warehouses, and a sensitive approach to planning when regeneration took place from the mid 1980's with the conversion of Granby House to residential use as a starting point. From the late 1980s and 1990's further infill and conversions such as Granby Village are of corresponding height and massing. This means good levels of not only direct sunlight (including for some facing into courtyards of Granby Village opposite as well as surrounding streets) and daylight light but also light percolating into spaces between buildings and reflected light leading to desirable homes that people enjoy living in and an area others enjoy visiting and using. A separate consultants report commissioned by the management companies of Granby Village and Granby House will detail these impacts on them but it is evident that an overly tall and massive building placed immediately southwards of such an area will have a devastating impact on amenity especially for Granby House.

The affected area also contains Sackville Gardens (the only nearby public open space apart from the highways) and Vimto Park as a private but publicly accessible space shown as retained by the SISTER SRF proposal. Sackville Gardens is a relatively small public open space but is well used throughout the year by people who live in, visit and use the city centre including a variety of community events. The applicants have discounted the impact on this space although the impact will be considerable by reducing the direct sunlight particularly during and around Wintertime when the sun is low even at midday as shown in the following photographs. This not only impacts on amenity within this important open space and

the ability for thousands of people to enjoy it, but also on the ability for the existing plants to survive let alone thrive.



Photo taken at midday in early January 2025 looking down Sackville Street towards the site of the proposed tower T3. Note how the low Wintertime sun sits low in the sky but manages to illuminate the Gardens through the existing gap in buildings. Compare this with the following image



Image in the submitted Design and Access Statement. View from Sackville Gardens looking down Sackville Street towards the site with the proposed tower T3 as it would be seen. Note how the proposed tower T3 would fill much of the existing gap between the Sackville Building and Whitworth House through which Sackville Gardens currently receives most of its direct sunlight especially the low sun experienced in Wintertime.

The affected area also includes Vimto Park which, like Sackville Gardens, is also directly north of the proposed tallest tower, tower T3 and is an intensively used green open space especially popular on sunny Summer afternoons. However, Vimto Park is much closer and with their nearest points being only some 25m (about twice the width of Sackville Street) and the impact on sunlight and daylight levels within this space will be considerably affected by overshadowing for much of the day. The application documentation appears to suggest that Vimto Park will not be overshadowed by the proposed development.

The submitted application includes a document that looks at the impact on health of the proposed development without much regard to the adverse impacts being caused to the area outside the proposal. It does confirm, however, under the heading “Access to open space and nature” it confirms open space helps reduce physical

health issues including those associated with sedentary occupations and stressful lifestyles and growing evidence they help to maintain or improve mental health. It seems obvious, therefore, that the limited open spaces that exist within the area and amenity within them should be protected including for existing people using the area including residents and the new occupants of any proposed development on the application site. The current proposal clearly will not achieve this.

The applicants seem to suggest (Planning and tall Buildings Statement, Paragraph 6.242) that residents have bought into an area they knew was next to an SRF and so should have expected their sunlight and daylight levels to be harmed at some point. This misses the point that many residents were in the area well before - often a long time before – Up to 40 years !

Also in terms of urban context, it is also noted that the narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. If there are any areas where this would apply it is here.

OBJECTION 2

The assessment of the impact of the proposal on sunlight, daylight and overshadowing and the manner in which this has been used and communicated has not assisted to provide an accurate understanding of the real impacts of the proposal to decision-makers and other non-specialists including existing local residents and others who will be affected by the proposal. These impacts include excessive negative impacts especially in the area affected by tower T3. In support of this objection the following points are particularly noted:

(a) The Head and Deputy of the City Council's Planning Service has noted that the assessment of sunlight, daylight and overshadowing is a complex matter and it has been confirmed that there are no specialists within the City Council in this matter. This can only mean the Planning Service has been taking the assessments made by applicants/developers at face value.

(b) The submitted information contains no readily understood visual information that would show the development and the overshadowing it would cause on key dates of the year (Summer and Winter Solstices and Spring and Autumn Equinoxes) and at one hourly intervals throughout these days to track the change during the hours of daylight.

(c) The submitted application advises that its assessment has departed from the British Research Establishment (BRE) standards normally used as they felt the existing light standards around the application site were too good and overly emphasised the harmful impact the proposal would have. This seems to have involved benchmarking to set a lower baseline light quality by taking instead the environment around recent "successful" developments elsewhere in the city centre. The applicants do not define how they measure success and they openly confirm that many of these supposedly successful developments do not meet BRE standards. This approach appears a 'Race to the Bottom' in terms of residential amenity for existing city centre residents. Hardly encouraging of sustainable and long term communities the Council say they want to encourage. This approach would mean developers can blight existing residents with their development plans as long as the impact isn't worse than the worst the City has

to offer. When seeing some of the worst developments Manchester city centre offers there are too many poor quality units with very low residential amenity given external light levels and narrow streets with towering new developments back of pavement line regardless of how grim that makes the whole environment. This causes high turnover of residents as the living environments inside are poor and substandard. It is totally unacceptable for residents in Granby House to suffer this same fate just to satisfy a developer of PBSA that has zero merit and contributes nothing to the area.

(d) The outcome of the assessment is to suggest that the proposal causes harm - including in some cases a “major impact” - on the quality of light reaching a not insignificant number of homes in the area. The applicants merely state that the change in design from the SRF illustration to their proposal has mitigated against this harm although clearly this mitigation has only been to a proportion of the windows. The homes closest to towers T2 and especially T3 continue to be harmed in a major way. This is unacceptable and appropriate mitigation should benefit all the residents which would be expected to involve decreasing the height and massing of built form especially T3 and to revise siting to something more akin to tower T1.

(e) Granby House easterly and southerly elevations will be so heavily impacted by T3 as to make those apartments more akin to caves than apartments. The deep internal layout of these apartments especially on the easterly aspect is a result of Granby House being a deep building itself and relies heavily on the large windows the building benefits from combined with the open aspect to the South to flood the eastern side of the building with sunlight and daylight to make the apartments not the lightest or brightest but at least still a decent standard. Granby House also benefits from ‘Right to Light’ and although not a planning matter should provide further protection that acceptable light levels will continue. However these homes will be severely impacted by T3 given the proximity, height and width of such a huge and “obese” tower of circa 750 students beds.

(f) Having shown that a not insignificant number of existing homes will experience a “major impact” on their sunlight and daylight due to overshadowing the applicants average out their findings across the wider area to reach an overall conclusion that the impact on surrounding properties is“ negligible to minor adverse”. This suggests that the extreme harm caused to some homes is somehow, therefore, considered acceptable when reality is major harm.

(g) The assessment unbelievably determines that for surrounding areas of amenity space (by which is means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) the impacts would be “negligible and considered non-significant requiring no mitigation measures”.

(h) It is unacceptable that the local residents have had to employ their own daylight, sunlight and overshadowing specialist to counter the application assessment. The citizens of Manchester should be able to depend on the City Council to check submitted information with appropriate independent expertise to verify this sort of manipulation of data and falsehoods concerning the impact of major developments. Developers and their consultants can simply make up the figures and analysis to suit their requirements and the Planners wave this through to committee.

Additional background information:

A specialist report has been commissioned by the directors of the Granby Village and Granby House management companies to assess the issue of sunlight, daylight and

overshadowing which will challenge and counter the information contained in the application. This report is awaited and the following comments are most on a non-specialist basis having reviewed the submitted application information.

It is obvious a wide footprint, 38+ storey tower sited immediately south of a relatively densely laid out area of much lower (in relative terms) buildings of broadly homogenous height with pockets of open space will cause considerable harm to amenity through overshadowing across much of the area and with a consequential impact on sunlight and daylight (including through reflected light). The planning application, however uses dubious analysis in specialists reports to 'prove' acceptability of a proposal and the Local Planning Authority accept at face value that fully considered, acceptable and allow a box to be ticked. Such a process requires a transparent, honest and independent assessment with results accurately presented. This has not happened in this instance, and the applicants are being allowed to mark their own homework and determine their proposal to be acceptable not only against all common sense but also against the spun analysis of their own specialist assessment.

In the separate planning application by iQ for the neighbouring Weston Halls/Pendulum Hotel site (still to be decided by the Planning Committee), the specialist daylight, sunlight and overshadowing report openly advises that "There are no specialists within MCC or other statutory consultees relevant to the area of daylight and sunlight" (p.209, Chapter 10, Environmental Statement). The planning application for the SISTER Plot H site covered by this note has now similarly confirmed this lack of expertise.

The Planning Committee considered a planning application for the proposed 'Oxygen Towers' tall building scheme at 140 Great Ancoats Street (at the junction with Store Street and near Piccadilly Village) at its meeting last November (25th November 2025). When councillors raised questions and queries about sunlight/ daylight and overshadowing both the Head of the Planning Service, Julie Roscoe, and her deputy, David Roscoe, appeared to allude to this lack of specialists when confirming that this is a highly complex issue. It seems that the Planning Service merely accept the specialist sunlight, daylight and overshadowing reports submitted as a part of planning applications at face value. A video recording of the November 2025 Planning Committee meeting can be viewed at
https://player.vimeo.com/video/1129898464?badge=0&autopause=0&player_id=0&app_id=58479
with the relevant case being from 1:07:15 to 1:30:00 in the video.

The specialist report submitted as a part of this application does not include any readily understood illustrative material that would, for example, show the area affected by overshadowing on key dates of the year (Summer solstice, Winter solstice and Spring/Autumn equinoxes) and at hourly intervals throughout these days as was typically in planning applications such as these. The assessment, instead, is made and presented through a series of calculated figures requiring various assumptions including through a lack of information on the internal layouts of existing apartment buildings. The most appropriate assessment would seem to require knowledge of internal layouts of the homes affected but often these seem to have been claimed to not be available although for Granby House, for example, these exist including in the archived building control records at the Central Reference Library or

could be obtained by requesting plans that the buildings management company require for fire safety etc.

The application assessment has allegedly followed the British Research Establishment (BRE) guidelines. However the applicants decided their assessment results showed too great an impact on daylight, sunlight through overshadowing because the existing conditions within the area are too good. On this basis the applicants have manipulated their findings to reduce this adverse impact. In order to make this adjustment the applicants selected a number of recent developments in the city centre they consider "successful" despite many not meeting the BRE standards and without defining how 'success' was being measured and by/for whom. In this way, the impacts of the current proposal were being played down by using sub-standard developments that presumably had been approved due to the inability of the Planning Service to understand or interrogate the daylight, sunlight and overshadowing reports submitted as part of the associated previous planning applications.

Nevertheless, the impacts are difficult to hide and Table 11.10 of the application report on sunlight, daylight and overshadowing shows a sizeable proportion of windows (even discounting Weston Hall which is planned to be demolished) will experience a "major impact." In stark terms this would mean a considerable number of permanent residents being permanently, adversely impacted for any new development let alone temporary accommodation for a transient student population. That this is thought to overall be acceptable is appalling but this decision only seems to be reached by couching these major impacts as only affecting a limited number of apartments of the total considered by the assessment. In this way the report draws the overall - and unbelievable - conclusion (in paragraph 11.172) that that daylight and sunlight impacts to surrounding properties are "negligible to minor adverse" and that no mitigation is required, and for surrounding areas of amenity space (by which is means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) impacts are "negligible and considered non-significant requiring no mitigation measures".

- **Height, massing, siting and orientation: Efficient use of the site, demarcation of gateways to the SISTER SRF area and landmark development**

OBJECTION

The retention of an existing soft landscaped area at the Princess Street end of the site and its extension to create what is still a relatively small open space ("Princess Square") that nevertheless takes a significant proportion of the overall area of the site does not achieve efficient use of land. It also results in a built form that fails to accord with the Guide to Development in Manchester regarding the demarcation of street corners and frontages with built form. In support of this objection the following points are particularly noted:

(a) The existing site includes a small incidental landscaped area. This resulted from the placing of the multi-storey car park with it's regular footprint on an irregularly shaped site. This open space only exists due to poor 1960's planning and has been poorly maintained and misused over time. The submitted Ecological Impact Statement rightly describes the "Princess Square" location as it is now as "a small area of poor condition … heavily shaded"; and it sits at a busy road

junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little.

(b) The existing incidental landscaped area contains seven Category B trees which means they are of moderate value. The Planning Service has previously given planning permission on city centre development sites for schemes that require the removal of trees (subject to replacement trees being planted elsewhere) to ensure both the efficient use of the site and an appropriately designed built form (including the response to adjacent streets) to accord with policies and guidance including in The Guide to Development in Manchester. Planning Permission was recently granted for a development site elsewhere in the SISTER SRF boundary (Plot C) that will involve the removal of 21 Category B trees. The need to retain trees on the application site is inconsistent with an approach of making efficient use of land and achieving a built form that would appropriately respond to the visually important Princess Street/Charles Street junction. In this way the proposed development leaves this visually prominent corner area undeveloped and fails in its aim of creating a notable gateway from Princess Street into the SISTER SRF area and does not accord with policy and guidance.

(c) Contrary to the claim by the proposers, in a skyline already crowded by tall buildings of questionable design quality, the proposed development can surely not be thought of as a landmark.

Additional background information:

The majority of the application site is broadly rectangular but narrows at its western end as a consequence of the realignment of Charles Street in the 1950's/60's to accommodate the existing multi-storey car park than now occupies the rectangular part of the site. As was typical and problematic with many such post-war schemes the left-over area ('site left over after planning', known as SLOAP) was merely landscaped in a rudimentary manner - hence the existing trees and grass at the Princess Street/Charles Street corner of the site. This has since remained as a small, incidental and poorly maintained area used by rough sleepers and for fly-tipping rather than recreation. The proposal is effectively replicating this approach which the City Council's Guide to Development in Manchester was intended to prevent.

It is accepted that the loss of good quality trees is generally to be avoided. However, such loss has routinely been accepted by the Planning Service where trees are within an identified development site and would prevent the efficient use of the site to achieve other policy objectives. This is usually on the basis that three new trees are planted by the developer for each tree removed in an appropriate, alternative location. This would include, for example, street tree planting around the development site. It is noted that a development was recently granted planning permission on SISTER's Plot C site (fronting London Road) which will involve the loss of 28 trees including 21 moderate-value Category B trees in order to accommodate the proposed development. The proposal which is the subject of this note is using the existence of 7 Category B trees as a justification for a scheme that proposes no built form on this SLOAP area. If this argument is accepted there is an obvious contradiction at play within the SISTER SRF area and the wider city.

The provision of publicly accessible open space within this application is well intended but takes a significant proportion of this site which is nevertheless relatively small in area, amounts to no more than a small 'pocket park', and could in no way expect to meet the needs of a fraction of the proposed 1,041 students plus visitors,

staff and public. A more effective approach would be for the developer to contribute towards the provision of a more meaningfully sized public open space on nearby land - perhaps as a part of a re-imagined SISTER SRF masterplan - that could begin to address the deficiency of such space for the existing city centre population as augmented by their new residents. Pocket parks will not achieve this. Roof gardens could also be an option to provide quality and secure outside spaces for the students the development will accommodate. But neither Sister Plot H or IQ plans on the Pendulum Hotel site include roof gardens as the developer narratives are that huge towers are necessary to allow green space between for their students.

Effectively sterilising the eastern end of the application site from built form has resulted in this current SISTER Plot H proposal failing to provide a built form that either appropriately responds to/demarcates the lost building line to the principal Princess Street highway frontage or demarcates the Princess Street/Charles Street corner. Without such built form the proposal does not accord with the Guide to Development in Manchester and references made in the application to the development providing a gateway from Princess Street into the SRF area is largely meaningless especially as the tallest element of built form is at the far eastern end of the site. Most critically, however, the exclusion of this part of the site from built development also means that it cannot make a contribution to achieving a more lower built form that responds appropriately to the surrounding urban context while maximising the quantum of new development to make efficient use of the site. This would not preclude the provision of some open space and proposed Altrincham Street route behind street frontage development.

The application makes reference to the proposal being a ‘landmark’ development. However, it is commonplace for proposers of tall buildings to make this claim which become meaningless given the number of tall buildings already in Manchester vying with each other but crowding each other out in a cluttered skyline. Other than having an overly tall element (tower T3) there is nothing in the quality of design that would suggest this development would be a landmark instead it dominates and certainly does not ‘preserving or enhancing’ the adjacent conservation area or Granby House or other listed buildings near to it. Regarding this site, it would seem more appropriate to create a design that better celebrates the Princess Street/Charles Street corner with a gateway built form that could be considered a true landmark without relying on inappropriate excessive height at the other end of the site.

- **Height, massing, siting, orientation: Overbearing presence**

OBJECTION

The proposal, through a combination of height, massing, siting and orientation will cause significant disamenity by creating a visually oppressive and perceived enclosing built form within the outlook from various nearby properties.

Additional background information:

Under planning there is no right to a view. However, the proposal will have a huge impact on amenity for many in Granby House due to the oppressive intrusion of the development into the townscape and outlook from people’s homes.

- **Height, massing, siting and orientation: Overlooking**

OBJECTION

A degree of overlooking is expected within the city centre. Within the nearby existing, principally residential, area to the north of the railway viaduct residents and other building users do experience overlooking but from a number of potential sources that are not excessive and are proportionate to the human scale of the existing buildings. The height, massing, siting and orientation of the proposed built would dramatically and unacceptably increase this potential for overlooking and from a vast number of anonymous windows. This will be particularly the case from towers T2 and T3 which are close to the northern boundary of the site and exacerbated by tower T1. T3 is akin to a watchtower over the conservation area. And not a slender tower and a single watchman. Its 750 watchman in T3 alone.

Additional background information:

The north elevation of tower T3 directly facing existing residential properties will alone contain windows serving 156 student rooms, 48 studio apartments and 52 communal living spaces. All these communal living spaces are located on the corners of the building and also have windows to the east and west elevations allowing oblique views northwards. The north elevation of T2 which is even closer to the site boundary will contain windows serving an additional 9 student rooms, 9 communal living spaces and 9 communal corridors. All windows are full length and fill the majority of the elevation so looking out is not a case of making a conscious effort of walking up to a raised window cill but having an expansive view from anywhere within the internal space. Tower T1 is lower in height and further away from existing buildings but with a long north elevation facing these neighbouring existing buildings will only exacerbate the extent of overlooking.

The applicants state (Planning and Tall Buildings Statement, Paragraph 6.246) advises that “privacy” will not be negatively impacted due to building separation and careful window placement. However, it is unclear how this conclusion is reached given the close proximity and orientation of the proposed built form, especially Towers 2 and 3, to existing residential windows and that 100’s of new windows in the proposed north elevations that will face directly into those of existing apartments.

- **Height, massing, siting and orientation: Impact on wind.**

OBJECTION

The application has predicted that there will be some impact on wind patterns/strength in the area but suggests it will not cause a safety issue. It is unclear, however, what impact people using the area can actually expect to experience or the consequences for the increased deterioration of/damage to nearby buildings including historic buildings.

- **Height, massing, siting and orientation: Impact on reflected railway noise.**

  OBJECTION
  The close proximity and design of towers T1 and T2 to the railway viaduct carrying the North-West main railway line and used by countless trains throughout the 24 hour day will give rise to the reflection northwards of railway related noise to the detriment of the amenity of users of the area including existing residents. The elevations are primarily in reflective glazing without any apparent design measures to acoustically attenuate such noise.

- **Servicing**

  OBJECTION 1
  The proposed development can expect a high level of servicing. This will arise, for example, from the operational needs of the student accommodation and ground floor retail uses, and the various deliveries expected with a student population of 1,041 (plus staff and visitors). This servicing is proposed to be from two lay-bys on the highway and will cause inconvenience and safety concerns for pedestrians using the adjacent footways and particularly in the vicinity of the two lay-bys. This will be exacerbated at the times of student move-in/departure which will exceed the capacity of the two lay-bys with adverse consequences for the safe and convenient use of the surrounding highway network and the likely generation of traffic noise especially if combined with 2500+ students on the Pendulum Hotel site. Chaos.

  Additional background information:
  All servicing would be from two lay-bys on the Charles Street highway. The capacity of two lay-bys to meet the needs of the likely high number of vehicle arrivals/departures including for postal and food deliveries (including online purchases), taxis, and for more general operational needs. It seems that the loading bays are not expected to cope with the significant vehicle movements associated with student move-in/move-out. The proposed on-street servicing would cause inconvenience and safety issues for those using the highway including pedestrians and cyclists. Both the site and amount of development is large enough to warrant the provision of dedicated on-site vehicle area for deliveries/loading/unloading. This could take the form of a basement space or well designed, appropriately located and landscaped area within the site that could also be used by taxis and assist with student move-in/move-out.

- **Elevation design considerations**

  OBJECTION
  The proposed elevation design (including materials with an emphasis on light coloured concrete and finishes) has no resonance with the character of the immediately adjacent Whitworth Street Conservation but is intended to respond to the nearby modernist 1950's/60's university architecture elsewhere in the wider SISTER site. However, this is merely a means of window dressing a development that in every other regard such as height, massing and siting fails to have any regard to the existing character of either of these areas and

fails to acknowledge decisions already made within the area. In support of this objection the following points are particularly noted:

(a) The proposal fails to acknowledge that many of the existing former university buildings within the SISTER SRF site including those along the east side of Sackville Street are proposed to be demolished as a part of the SRF masterplan.

(b) The proposal fails to acknowledge that the University already has planning approval for the demolition of the modernist Faraday Tower and the future of other modernist buildings around it on the west side of Sackville Street is uncertain.

(c) It is likely that a lighter elevation finish has been selected in the knowledge it can reduce the adverse impact on daylight of the proposed built form and its overly dominant height and massing but the downside is it stands out like a sore thumb.

(d) The separate planning application (awaiting a decision) for the iQ development on the Weston hall/Pendulum Hotel site proposes a brick elevation as a means of relating to the conservation area but this site is more distant from the conservation area than this SISTER Plot H proposal. While both proposals are out of context and unacceptable due to height, massing and siting, an argument could be made for either approach to elevation design including materials for a more appropriate built form. However, any developments on these two sites should have a coordinated approach towards their context and materiality but unfortunately don't. Bad Planning at its most obvious.

(e) A high quality elevation design could be achieved with a scale, massing and siting of built form that more appropriately and meaningfully responds to the townscape context with the necessary regard to national and local policy and guidance.

(f) If an out-of-context, overly tall building continues to be proposed on the SISTER Plot H site, a lighter finish to elevation materials (together with appropriate articulation) has the potential to reduce the overbearing visual impact and a lighter finish would provide some reflection of daylight.

-
- **<u>External on-site open space</u>**

OBJECTION 1

The proposed external on-site open space occupies a relatively large proportion of the site but is in reality a small area for its intended purpose of serving the 1,041 student bedrooms plus staff and visitors and the general public. This area should instead be used to better accommodate a more appropriate built form and quantum of development in order to begin to address the identified adverse impacts of the currently proposed design.

Additional background information:

Somewhat cynically, the application concentrated the proposed built form at the eastern end of the site to maximise the amount of sunlight and daylight reaching its own on-site landscaped external area at the western end of the site despite it being in reality of little consequence. No roof top areas of T1 or T2 are proposed as roof top garden spaces which could far better meet demand from students for outside space.

OBJECTION 2

Any external space should not be used for refuse storage even on a temporary basis and especially not on a prominent street frontage as is being shown on the drawing on p.107 of the submitted Design and Access Statement. All refuse storage should be within the building until collection.

Additional background information:

The Design and Access Statement (p.107) contains a drawing showing a large "external refuse holding area" proposed within this external area and located on the bend in the Charles Street boundary - a prominent focal point on the street frontage and when approaching the site from Princess Street. It is unclear if containerised bins would stand here while awaiting refuse collection or if this would be screened in any way. However, it should be clear that no part of the limited external space or adjacent highway should lost to such an ancillary use (even on a temporary basis) which would be unsightly and may give rise to odours and misuse. It would be particularly inappropriate on this visually prominent part of the site and would adversely impact on visual amenity within both the site and the adjacent public realm.

Instead, sufficient on-site storage should be provided within the footprint of the building with collection taken from these spaces without the need for any external storage even on collect days. Unsightly containerised bins already plague the City Centre and new development should be designed and managed to avoid contributing to unsightly streetscene and domination of external spaces.

OBJECTION 3

The use of the proposed external open space for events if these would cause disamenity outside the application site.

Additional background information:

The applicant advises that the external space is proposed to be used for external events. This would give rise to an objection unless a planning condition is attached to control the time and duration of such events and preventing the use of external sources of amplified noise at any time. As to whether a narrow and noisy patch of grass and some trees eve offers any merit as an event space is debatable anyway.

- **Design and health**

OBJECTION

The inappropriate design of the development would have a harmful impact on the health and well-being. This would affect not only residents but all those who use the area that would be adversely impacted by the proposal. In support of this objection the following points are particularly noted:

(a) The design of development has been shown to have a link to physical and mental health and a sense of well-being.

(b) A range of Planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF (Paragraph 135) and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2.

(c) The recent pandemic taught us lessons that have soon been forgotten as with the proposed application given the harmful impacts it would have on both the internal environmental, quality of people's homes and the quality of external spaces, plus the way they would be experienced and used.

Additional background information:

The design of development has been shown to have a link to health and a sense of well-being. The submitted information acknowledges this but focuses on the health benefits the proposal would bring to those within the development without addressing the harm caused to the health and well-being of those outside the site through the inappropriate design with its significant effect on amenity both during construction and once the building is in operation. A range of planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF (Paragraph 135) which aims to "create places that …. promote health and well-being, with a high standard of amenity for existing and future users" and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2 refers to a need for development to respond to a sense of place and contribute to well-being.

Regarding health, a lesson learned from the recent pandemic is the importance of the quality of residential amenity within and immediately around homes to maintain health and well-being. This lesson appears to have been soon forgotten by developers and, seemingly, the Planning Service as this proposal will adversely impact residential amenity and amenity within a range of outside spaces to the detriment of the health and well-being of many permanent local residents at the expense of accommodating an excessive number of transient students (a description used in Paragraph 6.231 of the submitted Planning and Tall Buildings Statement) in accommodation only designed for short-term occupancy given the entire development is PBSA.

- **Design and lessons learned**

OBJECTION

The City Council would seem not to have assessed the impacts of already implemented tall building schemes to learn any lessons for future decision making.

Additional background information:

The adverse impacts of the many similar tall buildings that have already been implemented within the City Centre are apparent. The City Council should assess these and find an alternative approach before approving any further such developments. The overshadowing and harm to sunlight and daylight levels and wind tunnel effects (and consequential harm to amenity and well-being) will be long-lasting. Managers of the Castlefield Viaduct - a major ongoing regeneration scheme and visitor destination - have confirmed, for example, that they are now having to replace their sun-loving planting scheme to a shade-tolerant scheme due to the excessively tall buildings to the south in the Owen Street/Great Jackson Street area some 250 metres away from the National Trust scheme at their closest point.

Several tall building developments have caused periodic excessive wind tunnel effects - notably on Oxford Road next to Circle Square with as it happens another 38 storey tower albeit slender whereas the Sister T3 tower is instead "Obese" given its

huge massing, and on Quay Street next to Spinningfields - and it is assumed that these impacts were not foreseen by similar modelling as has now been undertaken for this application.

The strategic decision on the PSBA use, density of development and quantum of PBSA on this site

OBJECTION 1

There have been various reports to the City Council's Executive Committee in recent years specifically regarding the provision of PBSA and how Policy H12 in the statutory development plan should be interpreted in order to facilitate PBSA being brought forward to meet an identified demand. It is clear, however, from these reports that Policy H12 remains the relevant policy specifically relating to PBSA provision in the statutory development plan. The policy retains primacy over guidance contained in the Committee reports or SRF's. In its current form the proposed PBSA development would be contrary to:

(a) Policy requirement No. 3 of H12 that requires any new development to be sited where this is compatible with existing developments. It is not compatible in this form (especially T3) for existing developments such as Granby House and the proposal would clearly be contrary to this policy due to the harm it would cause to amenity, including residential amenity of those within Granby House and other existing developments nearby.

(b) Policy requirement No.6 of H12 that aims to ensure there is no unacceptable impact on residential amenity from the proposed development through increased noise, disturbance or impact on the streetscene together with a swamping of the local area with 1000s of extra students. The proposed development would have an unacceptable impact on the streetscene through excessive overshadowing and the consequential impact this would have on residential amenity.

PBSA could be acceptable on this site under Policy H12 if the proposed design avoided the harm caused to amenity and the streetscene.

Additional background information:

Policy H12 includes a number of requirements which should all be applied rather than applied selectively. These include requirements 3 and 6 as follows:

"3. High density developments should be sited in locations where this is compatible with existing developments and initiatives, and where retail facilities are within walking distance. Proposals should not lead to an increase in on-street parking in the surrounding area." and

"6. Consideration should be given to the design and layout of the student accommodation and siting of individual uses within the overall development in relation to adjacent neighbouring uses. The aim is to ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the streetscene either from the proposed development itself or when combined with existing accommodation."

The statutory local development plan makes no specific land-use allocation for this site or quantum of development. The policies within this plan, together with relevant national policies and guidance, should be fully informing the approach that is taken to the site with full regard not only to the site itself but also, as seen above, to its existing wider townscape context.

The City Council's Executive Committee has adopted a report setting out an approach for providing for Purpose Built Student Accommodation (PBSA) within the City. This includes the effective relocation of a transient student population from existing poor quality private sector housing in the suburbs to new high quality accommodation within or adjacent to the City Centre and near higher education establishments. The poor quality housing then becomes available for use as permanent homes for the wider resident community. This also relieves these suburban areas from disbenefits such as the destabilising impact of a constantly changing and significant proportion of the local population, traffic and parking issues and anti-social behaviour which all contribute to a sense of poor community cohesion.

The Committee report identified a large number of potential sites for PSBA to meet the identified demand as augmented by the relocation process. The report acknowledged that not all the identified sites would necessarily be brought forward or with the suggested quantum of development and that other sites not on the list could be brought forward. This application site was not amongst the sites identified by the table in Paragraph 3.9 of the Executive Committee report of 31st May 2023. The application site is effectively a windfall site and will make a contribution to PBSA above that of the sites identified in the table. This is possibly a reflection of the SISTER SRF not originally proposing PBSA for this site and later, in the approved SRF, identifying PBSA only as one of a range of possible uses.

The proposed development can only accommodate 1,041 PBSA bed spaces by failing to comply with relevant policy or to respond appropriately to relevant guidance. The proposed design demonstrates that it is unlikely any appropriate design would achieve both this compliance and quantum of accommodation. There is nothing exceptional in planning terms about the current proposed use or quantum of development for this particular site that would provide a basis for disregarding other relevant policy and guidance irrelevant. The proposal does not comply with relevant planning policy or accord with guidance.

OBJECTION 2

This proposal uses national and local planning policy and guidance that seeks an increased density of new development as a part of achieving the more efficient use of land without fully acknowledging the caveats and other policies that aim to balance this approach with the impacts on the existing environment and community. There is no acknowledgement in the application that the decision on the proposed quantum of development is driving the need for a design of development which would be incompatible with, and cause great harm to, the surrounding environment and community. That harm should be being avoided through due regard to all planning policies and guidance. The decisions behind the proposal leading to the proposed quantum of development is being incorrectly determined by an illustrative axonometric drawing in the SISTER SRF that showed three taller built forms on this site but the SRF does not constitute planning policy.

In support of this objection the following points are particularly noted:

(a) The Deputy Head of the Planning Service, David Roscoe, has publicly confirmed during a recent Planning Committee meeting in November 2025 that SRF's are not planning policy and have a very low status in terms of being a material planning consideration in decision-making, and that planning policy, locally, is contained in the statutory development plan. On this basis the SISTER SRF need not drive a particular quantum of development or built form.

(b) Attention should be placed on adopted planning policy to achieve an appropriate increased density of development on the site. Planning policy does not state what this increase should be presumably to allow local context for any site to be taken fully into account as expected under national and local planning policy and guidance.

(c) In this instance the site is currently occupied by a now closed multi-storey car park and some incidental soft landscaping. This represents a relatively low density of development in the context of the locality around the site. However, neither the application nor SRF give any acknowledgement that even the provision of a built form consistent with the height of existing residential buildings to the north of the site would represent a significant increase in the density of development within the site. There is no need to have three towers of up to 38+ storeys to achieve a considerable increase in density.

(d) The excessive increase in density proposed by the application is presumably driven by land value that has seen a rise in 'expectation value' due to the inappropriate SRF assumption for the site and commercial investment decisions devoid of an appreciation of the unacceptable real-world implications of the proposal. Further given the wider redevelopment of Sister, large scale PBSA could readily be provided for adjacent o the Mancunian Way instead of butt up to a conservation area and listed buildings.

Additional background information:

The submitted Environmental Statement (ES Vol 1, Paragraph 3.3) states that "The design and planning team has engaged closely with MCC and other key stakeholders throughout this period to ensure that the optimum development proposal was produced for the Site - but without identifying how this optimum has been determined - clearly not the existing local community. This statement is refuted by this objection.

The narrative to Core Strategy Policy CC6 specifically regarding the issue of development density confirms that high density development will not always be appropriate in the city centre.

In their Planning and Tall Buildings Statement (Paragraph 6.236) the applicants quote the government's Planning Policy Guidance on 'Making Effective Use of Land' to support their proposed increase in density:

> "All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high-density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings."

However, in this instance the particular density and good light quality arises from an historic layout and built form and is not a location where tall modern buildings predominate. The proposed development would not be 'in keeping' with the general form of their surroundings which does not include tall buildings such as those being proposed on this or the neighbouring iQ site. The proposal would not maintain 'acceptable' living standards for existing residents.

The proposed PBSA use including social cohesion and community stability

OBJECTION

The proposed PBSA represents an unacceptably large addition to the numbers of PBSA bedrooms in the locality in terms of both existing developments and those currently being built within a short distance of the application site. This will significantly and unacceptably alter further the demography of the local area and provide a concentration of PBSA that far outweighs the number of other types of residential accommodation. Such unbalanced communities skewed towards students have already been experienced in those suburban areas within the City that previously became the focus for student accommodation. In those cases, the imbalance led to less stable and cohesive communities as students are transient in nature and so less likely to have any particular commitment to a local area. As a cohort they give rise to other disbenefits around anti-social behaviour and impacts on local services that adversely affect the more permanent local community. This would be inconsistent with a range of national and local policies and guidance regarding achieving balanced, stable and cohesive communities. In support of this objection the following points are particularly noted:

(a) Based on the submitted 'Student Need Assessment', by the end of this year there will be over 4,700 PBSA rooms around the immediate periphery of the SISTER SRF area. This application alone would bring a further 1,041 into this area (a 22% rise) and with the neighbouring iQ proposal on the Weston Halls/Pendulum Hotel site would see a total of over 3,000 beds (a 64% rise). This does not take into account other nearby existing, approved but not built or proposed PBSA developments.

(b) The student population is transient and, perhaps understandably, have no particular commitment to the more stable host community. Concentrations of large numbers of students, as found over the years in suburban locations, bring particular issues which do not assist with community or social cohesion. That students do not contribute in terms of Council Tax to the local area and public services weakens any local connection further and frankly resentment by local residents who experience issues with students in their locality.

(c) The existing area around Granby House is a well established, principally residential area seen as a successful example of early regeneration within the city centre. This character partly arises from a proportion of students within the area, However, the influx of students arising from a development about to be completed (Echo St) plus that on the application site will inevitably alter the demographic mix and character of the area considerably. This impact would be all the greater with the huge iQ Weston Halls/Pendulum Hotel proposal adding 2500+ more student rooms.

(d) Experience within Granby House and surrounding residential buildings area has shown that students can bring some life and vitality, mostly during term times. However, also during term times, anti-social behaviour increases. While the proposed development may be well run and controlled this does not extend to the behaviour of students once outside the development.

(e) The application makes assumptions around the ability of existing local services ability to cope with this increased and concentrated local student population. Some of these assumptions are based on students being willing/able, for example, to travel to more distant GPs and dentists and do not sit comfortably with the lived experience of existing residents who already struggle to get to see a GP or NHS dentist.

(f) The applicants also make claims about economic benefits to the area, mainly through an uplift in spending. There are three points here. Firstly, the local area is already well served by a wide range of retail and hospitality venues, and an increase in the

transient student population living within the area is not required to support these. Secondly, many of these students would leave the area semi-deserted in university vacation time, calling into question the claims for the creation of a newly vibrant neighbourhood which could sustain local businesses all year round. It wont. The third point is that part of any uplift in spending in the local area will largely be a transfer of the same spending away from the suburban areas currently being emptied of student population. The submitted Environment Statement (Paragraph 5.119) advises that "Data from the University of Manchester estimates that first year undergraduate students spend £13,685 per annum." But the same data (for 2026-27), excluding rent and mobile phone contracts, gives a spend of only £5,480 (https://www.manchester.ac.uk/study/undergraduate/fees-and-funding/cost-of-living/). This would give a much lower Total Net Expenditure figure than shown so the economic benefit to the city is more limited than is being suggested.

(g) The City Council's Guide to Development in Manchester acknowledges that successful neighbourhoods are partly achieved by a balance of housing types and mix of uses. The proposal will not enable the balance sought by local policy and guidance to achieve this balance.

(h) The applicant's own Planning and Tall Buildings Statement (Paragraph 3.11) acknowledges the need to provide balanced neighbourhoods when considering new PBSA. More importantly Policy CC10 of the Core Strategy aims to ensure the city centre attracts and retains a wide range of residents including through new development with a particular emphasis on creating a family friendly environment. This proposal will clearly exaggerate an already considerable student population living in PBSA developments in this part of the city centre where, as confirmed by the submitted Environmental Statement (Paragraph 15.59), "the Piccadilly Ward has a much higher concentration of students compared to Manchester as a whole". As has repeatedly been said during the consultation process, residents would favour a development (of equal density) which included a mix of homes for young professionals and families, with appropriate accompanying services and local shops. It seems naive in the extreme to suppose (as does the submitted Planning Statement) that the mere proximity of students would "facilitate informal interactions, knowledge exchange, and the spontaneous formation of collaborative ventures" with those based around SISTER more than would, say, the presence of actual researchers and entrepreneurs living in the neighbourhood over a period of years with their families and where a true community can grow.

(i) On this basis the proposal does not accord with Policy CC10 or other policy intentions to create a sustainable, stable and cohesive local community.

Additional background information:

The submitted 'Student Need Assessment' (p.24) shows there are already 8 large PBSA developments with a total of 3,496 beds immediately around the periphery of the SISTER SRF area (including those located at the east end of Granby Row (Lambert, Fairfield and Fletcher Houses), those in the Berry Street/Buxton Street area and at Vita Student at Circle Square. There are far more in developments just a little further away.

These will be augmented later this year with the opening of the iQ Echo Street development with 1,224 bedrooms. This will bring the total for the SISTER SRF periphery area to 4,720 by the end of the year.

In addition 2,500 beds are proposed by the current planning application by iQ on the Weston Halls/Pendulum Hotel immediately opposite this SISTER Plot H application on Charles Street. This would require the demolition of the existing building with the loss of

528 beds making a net gain of 1,972 beds. The SISTER Plot H planning application proposes a further 1,041 beds. This makes a total of 3,013 additional beds.

Moving from 4,720 beds to add 3,013 (a total of 7,733) means a 64% increase in student beds in the immediate locality of the site. This does not take into account the various other PBSA developments existing, approved or proposed in easy reach. The character of the area is already changing with this increase in student accommodation and this change will only become more noticeable as more students move in.

Policy CC3 of the Core Strategy - part of the City Councils statutory development plan - expects the City Centre to have a minimum of 16,500 new housing "units" by 2027 but it is unclear if it expected such a significant proportion to be in PBSA.

Other considerations

- ## Traffic including cycling

OBJECTION 1
While the Highway Authority may consider that the existing highway network can accommodate the traffic movements forecast by the applicants, it is unclear if they agreed with the forecast itself. The applicants appear to downplay the implications for traffic movements within the area and common sense would suggest that some of the forecast figures and expectations around being able to control student move-in and move-out are optimistic.

Additional background information:

The applicants appear to down-play the number and impacts of traffic movements serving the development and their ability to control move-in/move-out days especially as there is reliance on the use of the public highway for all these traffic movements including on the busy Sackville Street. The likely number of assumed car and taxi movements is particularly low when the lived experience on Circle Square further down Charles Street is of a stream of taxis and delivery vehicles to the PBSA there. The applicants appear to under estimate the number of vehicle movements likely to be associated with a student population of 1,041 both now and into the future and it is the local community that will pay the price in congestion, inconvenience, pollution and highway maintenance.

OBJECTION 2
The proposed 6% secure on-site cycle provision is insufficient provision to meet the future needs of the proposed development and fails to adequately contribute to sustainability and meeting the goal of net zero carbon emissions. Any additional provision should be made within the footprint of the building and not within any proposed external spaces within or adjacent to the site to avoid physical and visual clutter.

Additional background information:

The proposed 6% proposed parking cycle provision appears exceptionally low given the number of residents, staff and visitors and the effort being made to encourage the use of sustainable and healthy forms of travel. It is understood that the highway

authority would ordinarily seek 25% provision and even this seems short-sighted and unhelpful in assisting to achieve the goal of net zero carbon emissions.

- **Biodiversity**

OBJECTION

The effect of the proposed height and massing on the potential of the development to have a positive ecological impact gives rise to objection. A "comprehensive review" by the applicants led to the development of an alternative massing strategy, moving from the three broadly uniform-height blocks shown in an illustrative SISTER SRF image to the current proposal. However, there is no indication that the review properly considered a modestly greener four-block solution, abandoning the "Princess Square" concept, using that land to build on, and distributing the proposed planting elsewhere (for example along the Altrincham Street walkway and up and down Sackville Street). In support of this objection the following points are particularly noted:

(a) The submitted Ecological Impact Statement rightly describes the "Princess Square" location as it is now as "a small area of poor condition … heavily shaded"; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little.

(b) The review of the height and massing has focussed most hope of ecological enhancements on a highly inappropriate spot, partly due to the chimerical idea of this being a favoured future route across to Oxford Road from the SISTER SRF area (the western stretch of Charles Street being notoriously uninviting, because so overshadowed by Circle Square's foreboding impact), being repeated and trumped by the iQ plans for Pendulum hotel site with huge towers running East/West along the South side of Chalres Street. Another dark tunnel of a stretch of Charles Street in the making.

- **Construction phase**

OBJECTION 1

The hours for working are inconsistency described within the application and are considered excessive for a site in such close proximity to existing residential buildings and for a construction period of an extended period of time. As a minimum, the hours for working should be reduced to start at 8:30am (rather than the stated 7:30am) on weekdays and still finish at 6:00pm. It should be confirmed that working would not take place on a Saturday outside the proposed 8:30am - 2:00pm or at any time on a Sunday, Bank Holiday or Public Holiday (the latter being omitted from all consideration). The application advises that the City Council will need to agree any working outside these hours but gives no information on how this process works. This process should be confirmed as a part of the application and, in any event, any request for additional working should require the sign-off by the three ward councillors and the notification of those people outside the site likely to be affected in advance of the works.

OBJECTION 2

The application contains no information regarding the illumination of the site outside the hours of working which should be designed and operated to provide anything other than minimal security lighting and avoid general illumination and glare outside the site to protect residential amenity and natural environment. An objection would also be raised if the illumination of the site during working hours were to result in excessive light and glare into nearby homes.

- **Operational noise**

OBJECTION

Planning conditions should be applied with appropriate measures to prevent intermittent or on-going levels of noise outside the built form that would cause disturbance to local residents including noisy uses of external and internal spaces, mechanical equipment (such as ventilation), and so on. The use of the on-site external area for events should not be permitted and there should be no amplified sound allowed within external spaces.

Cumulative impact of this proposal and the iQ PBSA proposal on the adjacent Weston Halls/Pendulum Hotel site and precedent

OBJECTION 1

Neither this proposal nor the iQ proposal on the adjacent Weston Halls/Pendulum Hotel site are acceptable on their own merits. Both individually raise significant objection given the adverse impacts (in some cases exceptionally harmful impacts) they will have on the range of issues covered by this objection note including, for example, amenity (including residential amenity), the local environment (including streetscape and heritage), health and well-being, and the community. When taken together the cumulative impact of these neighbouring proposals - particularly on the primarily residential area to their north - will be all the greater. Neither proposal takes the other into account, nor do they give meaningful regard to the implications on the future proposals elsewhere in the area. In support of this objection and just by way of example the following points are particularly noted:

(a) The proposal for a 2,500 room PBSA development by iQ on the Weston Halls/Pendulum Hotel site consists of four towers of 50, 33, 24 and 17 storeys with linking built form which would effectively form a wall of development along Charles Street between Sackville Street and Princess Street when seen in any oblique view. The tallest 50 storey tower would stand at the eastern end of the site adjacent to the 38+ storey SISTER Plot H tower visually combining to give a huge and overwhelmingly harmful visual impact both generally and on the amenity of existing residents particularly those immediately northwards of them. Ironically, the taller iQ development would overshadow the SISTER Plot H proposal including the proposed on-site external area within the SISTER Plot H scheme as well as the area north of the railway viaduct. The SISTER Plot H proposal would increase the visual solidity of the iQ wall of development that would be presented to existing residents north of the viaduct by visually obstructing any particular sense of the minimal gaps between the iQ towers. The proposals have not been designed in a coordinated manner to be viewed together and the overall visual impression when viewed from the area north

of the viaduct - including the outlook from many existing homes - will be of a bleak shaded wall of nondescript anywhere PBSA built form the length of Charles Street.

(b) The two proposals will swamp the existing primarily residential community with a further 3,541 students in additional to those already existing and soon to be completed in the area. Charles Street and limited local streets would be expected to cope with the concentrated move in/move out period for many of these students and it is difficult to see how this can be managed in a manner that will not cause excessive disruption and inconvenience for other users of the area including existing local residents.

OBJECTION 2

While each application should be treated on its own merits it is clear that within planning there is an acknowledgement of setting a precedent. By granting planning permission for one of these unacceptable proposals will set a precedent and make the other more difficult to resist.

Additional background information:

Cynically, on the basis of the SRF process and machinations within the City Council regarding PBSA and policy (including Policy H12 of the Core Strategy of the statutory development plan), it seems that at least parts of the City Council would support this precedent being set on these sites close to existing residents with the adverse impacts on their amenity and health/well-being, the environment and the community being accepted as collateral damage. The message is that existing communities are entirely dispensable in favour of PBSA developers having free reign.

Concluding comment

An alternative approach to the application site should be required that would have the potential to overcome the identified policy failings of this proposal. If this is not possible the proposal should be refused planning permission in accordance with Paragraph 139 of the NPPF. In support of this concluding comment the following points are particularly noted:

(a) A PBSA development on this site gives rise to strong objection.

(b) Paragraph 139 of the NPPF is clear that development that is not well designed should be refused. 'Well designed' is not just about the intrinsic quality of the design of the development but about achieving an appropriate response to other matters. These should include, for example, the amenity (including residential amenity) of existing residents and other users of the area, the existing townscape context (including heritage), health and well-being and the impact on the local community. This is reflected by national and local policies and guidance including Policy H12 of the Core Strategy.

(c) If a PBSA development on this site is considered to be acceptable in principle by the City Council, the Council should require a comprehensive redesign of the current proposal that ensures it complies with all relevant policy and accords with relevant guidance to achieve a design that responds appropriately to the existing townscape context (including heritage), avoids harm to the amenity, health and well-being of existing residents and other users of the area (now and into the future), and supports the local community.

(d) To accept the currently proposed PBSA development on this site would be to accept the harm - the very considerable harm in some instances - that would be caused within the affected area. It would be to treat this harm to local people and

environment merely as collateral damage in achieving a tall building townscape in this locality at any cost and regardless of heritage impacts.

(e) The Planning Service and Planning Committee should recognise that opportunities for tall buildings - including for PBSA - exist elsewhere and this is one city centre location where ‘good planning ’would expect adherence to national and local policy intended to protect against inappropriate development and secure a more balanced approach between redevelopment/regeneration and a local community and existing high quality environment.

(f) So, to return to the opening part of this note: The applicants claim in their Planning and Tall Building Statement (paragraph 1.8) that “The proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre.”. Clearly this is not true on any level let alone in terms of the impact on the surrounding area and the application should be refused planning permission.

7th July 2026

Outlook

Application number PLA-2026-000312- Objection

From [redacted]
Date Tue 07/07/2026 08:30
To Jennifer Atkinson [redacted]

You don't often get email from [redacted] Learn why this is important

ALERT This message originated outside of the Manchester City Council network. **BE CAUTIOUS** before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

Dear Jennifer,

I own a flat in Granby Village and I want to strongly object to this proposal. I find it incredible that the council should even consider this 38 storey high monstrosity in a conservation area where residents have to follow strict rules for things as small as the type of window frames we can use. This building is massively out of keeping with the surrounding area and has been dishonestly represented by the developers as not overshadowing Granby Village and causing minimal impact on local amenity. In reality, it would overshadow and overlook Granby Village. It would have a major effect on the quality and amount of sunlight and daylight in the village and in Sackville and Vimto parks, which are the only outside green spaces for very many flat dwellers locally. It would also put pressure on local amenities and further dilute the existing community and its social cohesion with a transient population that has no commitment to the area. It is particularly concerning that another major development is planned on the adjacent iQ Weston Halls/Pendulum Hotel site, which would multiply the harmful effects. The proposals are already causing a great deal of stress and upset for residents. Their implementation would significantly affect the health and wellbeing of the local community, harm the environment and cause a significant loss of amenity.

The applicants have selectively and partially quoted planning guidance . The SRF is NOT planning policy. The council should follow national and local planning guidance and reject this application.

Developers like to build student accommodation because they can charge more for smaller units. The University is happy to support the development because the funding will support its own plans. The Council's relationship with the University and developers should not be so cosy that it ignores the needs of its residents. What Manchester actually needs is affordable housing, not cash cows for developers. Granby Village was one of the first inner city developments and helped to bring the city centre back to life. Please don't abandon us now.

regards,

[redacted]

Outlook

Objections to TALL BUILDING PROPOSAL ON SISTER PLOT H (Charles Street car park)

From [redacted]
Date Tue 07/07/2026 02:07
To Jennifer Atkinson [redacted]
Cc Jon-Connor Lyons [redacted] Sam Wheeler [redacted] Ross Steven [redacted]

Some people who received this message don't often get email from [redacted] Learn why this is important

ALERT This message originated outside of the Manchester City Council network. **BE CAUTIOUS** before clicking any links or opening any attachments. Please remember your Cyber Training and report anything suspicious.

For consideration

I am an owner of a leased property in Bombay House. I suffered significant loss of income when the buikding works took place on whitworth street and claimed a huge amount of light foprm my property.

I am currently investing over 25,000 GBP to update and modernise the property to negate the effect of the building opposite taking the light. This type of investment keeps small business working, if this development goes ahead the investment may be futile as tenants and owners would not want to live/rent ina building site which is overoccupied.

Is the development for students financially viable when online studies are becoming a preferred way of learning. will students occupy these twoers or will they end up vacant

There are so many other areas in Manchester this development could be placed which would not have such a negative impact on existing property and heritage.

Misrepresentation of the public consultation exercise
OBJECTION The submitted ‘Statement of Consultation’ is selective and biased in its reporting of comments made by residents to date and actions taken to mitigate concerns. It does not acknowledge the strong objections raised by local people on both the SISTER (formerly I. D. Manchester) Strategic Regeneration Framework (SRF) and on the application proposal prior to its formal submission. In support of this objection the following points are particularly noted: (a) Objection was raised again to the SISTER SRF ‘illustrative’ proposal for the application site, Plot H, particularly regarding the height and massing, by resident representatives in a meeting with SISTER on 10th October 2024. (b) The application proposal was presented to resident representatives in a meeting with SISTER on 26th November 2025. Objections were raised to the height, massing and Purpose Built Student Accommodation (PBSA) use. Despite this and the subsequent developer-led public consultation process the actual proposed design has not evolved in any discernible way to take concerns into account. (c) The applicants note the various reasons for objection and state mitigation they consider necessary and/or have actioned. For the key issue of overshadowing the applicants openly state that by lowering the height of built form on the western half of the site they have mitigated against the impacts on sufficient residents to make the proposal acceptable while not

admitting that a not insignificant number of residents remain harmfully impacted by the 38+ storey tower that has now appeared at the eastern end of the site

Planning policy and guidance OBJECTION The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are incorrectly and inappropriately using policy and guidance selectively and partially to support their proposal at the expense of the area and community outside the site. In support of this objection the following points are particularly noted: (a) The following objections will assist to demonstrate this to be the case. (b) The Planning Service has confirmed the SRF is not planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process. (c) Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area, people and community. The National Planning Policy Guidance (NPPG) explicitly states that it should be read holistically. This approach should be taken more broadly when applying relevant policies and guidance with their due weight as 'material planning considerations'. Strategic Regeneration Frameworks (SRF's) OBJECTION Objection continues to be raised to the SISTER (formerly I. D. Manchester) SRF. Those people living in and using the existing locality around the application site foresaw the inevitable harm that would be caused to amenity (including residential amenity) and the environment (including townscape and historic environment) by the SISTER SRF proposing to site three taller buildings on the northern boundary of the SRF area. This is where this harm would be most keenly felt by those northwards of the site. Objection is also raised to the reliance by the applicants on Page 7 of 46 the SRF to justify a particular quantum of development within the site and the continued inclusion of tall built form within the proposal when considerable harm has been identified. It has also been established that SRF's do not constitute planning policy and are a very low level of material consideration subservient to national and local planning policy which includes policy or caveats within policies intended to protect amenity, communities and the environment. In support of this objection the following points are particularly noted: (a) SRF is not planning policy but only a form of guidance. The Planning Service has confirmed it carries very low weight as a 'material planning consideration' unlike national and local planning policy. (b) The three taller buildings were only shown on an "illustrative masterplan" drawing without any storey heights or floorspace measurements. It has been confirmed this was only intended to be indicative and existing local residents were assured that any planning application process for the site would address the planning issues to avoid harm to the amenity (including residential amenity), local environment (including townscape and heritage), health and well-being, and community within the adjacent area. This should be achieved by having full regard to all relevant national and local planning policy and guidance with their due weight as 'material planning considerations'. The planning application does not meaningfully achieve this and the SRF should not be driving any need or desire to achieve a particular quantum (or amount) of development or design outcome on this site. On this basis the application should be refused planning permission.

Existing urban townscape context OBJECTION The siting, height (or 'scale') and massing of the proposal fails to appropriately and meaningfully respond to the existing urban townscape context but instead inappropriately responds to the character of more distant parts of the Southern Arc. The proposal, therefore, fails to have appropriate regard to relevant national and local policy, guidance and best practice relating to urban design and conservation principles and how new development should respond to context. In support of this objection the following points are particularly noted: (a) The site contains a low level multi-storey car park and a small landscaped area of incidental, land that was left-over once the car park had been sited on an irregular shaped site. This open space has been poorly used/mis-used and maintained over many years and not perceived as a leisure space. This development does not make a positive contribution to the local townscape other than, possibly, part of the grouping of modernist buildings associated with the rest of the SISTER SRF area. (b) The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent, taller built form down in order to respond to this change in scale and

character. (c) The ‘Southern Arc’ is the name that has been given to an area of land sweeping around the southern side of the city centre along Mancunian Way. It is not a formal designation. It is an area that has seen incremental redevelopment often with tall buildings. The applicant wants to associate the application site and rest of the SISTER SRF with the Southern Gateway to suggest the character of the area is one of modern tall buildings. While this may be their aspiration it is not the reality of the existing urban context of the site. (d) Contrary to statements made in the application, the proposal has failed to have meaningful regard to all relevant planning policy and guidance and has failed to show meaningful regard to and respect the existing urban context. The proposal is contrary to planning policy and guidance.

Heritage OBJECTION The application fails to appropriately respond to the heritage significance of the Whitworth Street Conservation Area or the settings of nearby listed buildings and non-designated heritage assets so as to avoid harm or keep such harm to the minimum that could be considered appropriate in heritage terms. In this regard the proposal has not had due regard to legislative requirements or to national and local policy, guidance and best practice. In support of this objection the following points are particularly noted: (a) The application site is outside but immediately adjacent to the conservation area. There remains a need to ensure development within this setting assists to preserve or enhance the character and appearance of the conservation area. The proposed development adversely affects the settings of a number of listed buildings but the application uses an assessment methodology to arrive at a conclusion that the harm it causes to the historic environment is acceptable. This is not the approach sought by policy and guidance which should be to assess the historic environment and then evolve a proposal to avoid harm to it. (b) The application fails to acknowledge that the character of the conservation area partly derives from the quality and quantity of sunlight and daylight reaching the buildings and spaces between them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Similarly for the nearby Page 13 of 46 Sackville Gardens as an intentionally laid out public space at the heart of the conservation area. (c) The application is restrictive in its identification of non-designated heritage assets. These should have included several buildings in the area including, for example, Velvet House and 55 - 57 Whitworth Street. (d) The proposal fails to give the great weight required to the conservation of the historic environment. It does not accord with relevant local and national policies and guidance

Proposed design and impact on amenity OVERARCHING OBJECTION Following recognised principles of good design (including regard to the existing context) rather than an apparent expectation of achieving a pre-determined quantum of development within the site (driven by the SRF) should have led to an appropriate design of development for this site. The predetermined quantum of development, the lack of appropriate or meaningful consideration given by the applicants to the existing urban townscape once they had assessed it, the adverse impacts caused over much of the local area affected by the proposal, and lack of regard to policy, guidance and best practice regarding good design have led to a wholly inappropriate and discordant proposed design. This design results in a built form that gives rise to a range of harmful (including exceptionally harmful) impacts on amenity within the surrounding area. The proposed design is contrary to a wide range of national, local policies, guidance and best practice and certainly does not Page 15 of 46 represent good or exceptional design in terms of policy. In support of this objection the following points are particularly noted: (a) The application has selective and partial regard to planning policy and guidance and fails to have regard to the National Design Guide (NDG) as required by the National Planning Policy Framework (NPPF), and particular regard, has for example, to NDG Paragraphs 42, 43, 48, 67 and 71. (b) There is failure to appreciate that policy documents including the NPPF need to be treated holistically rather than cherry picking policies to support a desired outcome. (c) NPPF (Paragraph 135) requires developments that “are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change” but the latter is not expected to be at the expense of the former. In any event, the proposal is not innovative nor does it represent “appropriate change”. (d) The proposal inappropriately refers to unadopted, draft policy to support their application. (e) The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

Height, massing, siting and orientation: The impact on sunlight, daylight and overshadowing. OBJECTION 1 The proposed incorporation of a tower (tower T3) of 38 storeys (plus rooftop plant) results in a proposed design which is not just uncharacteristic of the surrounding townscape context but would be overwhelming within this context and give rise to significant disamenity to residents and other users of the surrounding area. A particular impact is the loss of daylight and of direct and reflected sunlight within the adjacent area due to overshadowing and which will be particularly excessive in some homes. This impact would be all the greater when combined with the siting and orientation of the proposed built form. It will give rise to excessive, adverse impacts on amenity within buildings including the homes of many people, within private external amenity spaces, the public/publicly accessible Sackville Gardens and Vimto Park, and within the public realm more generally including through the visually overbearing nature of tower T3. On this basis the proposal would be contrary to a wide range of national and local policies and guidance. In support of this objection the following points are particularly noted: (a) The proposal has taken the SISTER SRF suggested approach of three linked towers of approximately equal height and size and redistributed the floor space so that one tower, tower T3, now contains some 75% of the floorspace. In terms of height the impact of towers T1 and T2 are more acceptable in terms of the existing urban context than tower T3 which is wholly out of context and unacceptable. The applicants claim this arrangement mitigates against the impact of the proposal on sunlight, daylight and overshadowing but without clearly stating that the mitigation only benefits a proportion of the area north of the viaduct but makes it worse for the area around tower T3. (b) Given its footprint and height tower T3 has has significant mass - it is not the “slender” tower the applicants describe. It is sited close to the northern site boundary. The combination of height, massing, siting, orientation give rise to extreme harm to the amenity (including residential amenity) and environment within the nearby area on the northern side of the viaduct. It will not only affect daylight and sunlight (including reflected sunlight) through overshadowing but will give an oppressive outlook for many nearby homes and give rise to considerable overlooking. (c) In relative terms tower T2 may be far more acceptable than T3 in terms of height but it is sited even closer to the railway viaduct than T3. This will exacerbate the harmful impacts it has on the neighbouring area. However, the cumulative impact of towers T2 and T3 will be all the greater. (d) It is evident that placing a large scale development including a massive 38+ storey tower against the south side of the railway viaduct will bring harmful - often extremely harmful - impacts on amenity (including residential amenity) within the primarily residential area immediately to the north of the railway viaduct. Within Granby Village this impact will be to internal living environments, private external amenity spaces (including Orient Square, courtyards, balconies and roof terrace) which help provide light to internal spaces. In the wider area it will similarly affect homes and also streets and other open spaces including the nearby Sackville Gardens and Vimto Park. Page 17 of 46 (e) Sackville Gardens and Vimto Park are the two small public/publicly accessible green open spaces serving this locality and a wide area of the city centre and the applicants claim these spaces will not be affected to any notable extent by the proposal. However, common sense and the daily experience of residents and users suggest that (1) the March SHOG Assessment Results for Vimto Park (Table 11.19 of the Environment Statement) showing a less than 1% reduction in 2 hours of Sun Hours on Ground is misleading for the effects at other times of year; and (2) the prediction of a “negligible” increase in shadow over the park (Table 17.8) is simply not credible for the winter months. It is clear that the applicant’s assertions are incorrect and the proposal will cause significant harm to these open spaces. By failing to acknowledge this harm the proposal will radically diminish the quality of Sackville Gardens and Vimto Park despite recognition in policy and guidance that access to good quality open space and nature is vital to physical and mental health and well-being. (f) The narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. If there are any areas in the city centre where this would apply it is here

OBJECTION 2 The assessment of the impact of the proposal on sunlight, daylight and overshadowing and the manner in which this has been used and communicated has not assisted to provide an accurate understanding of the real impacts of the proposal to decision-makers and other non-specialists including existing local residents and others who will be affected by the proposal. These impacts include excessive negative impacts especially in the area affected by tower T3. In support of this objection the following points are particularly noted: (a) The Head and Deputy of the City Council’s Planning Service has noted that the assessment of sunlight, daylight and overshadowing is a complex matter and it has been confirmed that there are no specialists within the City Council in this matter. This can only mean the

Planning Service has been taking the assessments made by applicants/developers at face value. (b) The submitted information contains no readily understood visual information that would show the development and the overshadowing it would cause on key dates of the year (Summer and Winter Solstices and Spring and Autumn Equinoxes) and at one hourly intervals throughout these days to track the change during the hours of daylight. (c) The submitted application advises that its assessment has departed from the British Research Establishment (BRE) standards normally used as they felt the existing light standards around the application site were too good and overly emphasised the harmful impact the proposal would have. This seems to have involved benchmarking to set a lower baseline light quality by taking instead the environment around recent “successful” developments elsewhere in the city centre. The applicants do not define how they measure success and they Page 23 of 46 openly confirm that many of these supposedly successful developments do not meet BRE standards. This approach is unacceptable. (d) The outcome of the assessment is to suggest that the proposal causes harm - including in some cases a “major impact” - on the quality of light reaching a not insignificant number of homes in the area. The applicants merely state that the change in design from the SRF illustration to their proposal has mitigated against this harm although clearly this mitigation has only been to a proportion of the windows. The homes closest to towers T2 and especially T3 continue to be harmed in a major way. This is unacceptable and appropriate mitigation should benefit all the residents which would be expected to involve decreasing the height and massing of built form and to revise siting to something more akin to tower T1. (e) Granby Village should be disaggregated into its five consistent buildings to more clearly show that certain parts will be far more affected than others especially by tower T3. (f) Having shown that a not insignificant number of existing homes will experience a “major impact” on their sunlight and daylight due to overshadowing the applicants average out their findings across the wider area to reach an overall conclusion that the impact on surrounding properties is “negligible to minor adverse”. This suggests that the extreme harm caused to some homes is somehow, therefore, considered acceptable. (g) The assessment unbelievably determines that for surrounding areas of amenity space (by which is means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) the impacts would be “negligible and considered non-significant requiring no mitigation measures”. (h) It is unacceptable that the local residents have had to employ their own daylight, sunlight and overshadowing specialist to counter the application assessment. The citizens of Manchester should be able to depend on the City Council to check submitted information with appropriate independent expertise

Height, massing, siting and orientation: Efficient use of the site, demarcation of gateways to the SISTER SRF area and landmark development OBJECTION The retention of an existing soft landscaped area at the Princess Street end of the site and its extension to create what is still a relatively small open space (“Princess Square”) that nevertheless takes a significant proportion of the overall area of the site does not achieve the efficient use of land. It also results in a built form that fails to accord with the Guide to Development in Manchester regarding the demarcation of street corners and frontages with built form. In support of this objection the following points are particularly noted: (a) The existing site includes a small incidental landscaped area. This resulted from the placing of the multi-storey car park with it s regular footprint on an irregularly shaped site. This open space only exists due to poor 1960’s planning and has been poorly maintained and misused over time. The submitted Ecological Impact Statement rightly describes the “Princess Square” location as it is now as “a small area of poor condition … heavily shaded”; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little. Page 26 of 46 (b) The existing incidental landscaped area landscaped area contains seven Category B trees which means they are of moderate value. The Planning Service has previously given planning permission on city centre development sites for schemes that require the removal of trees (subject to replacement trees being planted elsewhere) to ensure both the efficient use of the site and an appropriately designed built form (including the response to adjacent streets) to accord with policies and guidance including in The Guide to Development in Manchester. Planning Permission was recently granted for a development site elsewhere in the SISTER SRF boundary (Plot C) that will involve the removal of 21 Category B trees. The need to retain trees on the application site is inconsistent with an approach of making efficient use of land and achieving a built form that would appropriately respond to the visually important Princess Street/Charles Street junction. In this way the proposed development leaves this visually prominent corner area undeveloped and fails in its aim of

creating a notable gateway from Princess Street into the SISTER SRF area and does not accord with policy and guidance. (c) The gateway into the SISTER including street strees (d) Contrary to the claim by the proposers, in a skyline already crowded by tall buildings of questionable design quality, the proposed development can surely not be thought of as a landmark.

Height, massing, siting, orientation: Overbearing presence OBJECTION The proposal, through a combination of height, massing, siting and orientation will have cause significant disamenity by creating a visually oppressive and perceived enclosing built form within the outlook from various nearby properties.

Height, massing, siting and orientation: Overlooking OBJECTION A degree of overlooking is expected within the city centre. Within the nearby existing, principally residential, area to the north of the railway viaduct residents and other building users do experience overlooking but from a number of potential sources that are not excessive and are proportionate to the human scale of the existing buildings. The height, massing, siting and orientation of the proposed built would dramatically and unacceptably increase this potential for overlooking and from a vast number of anonymous windows. This will be particularly the case from towers T2 and T3 which are close to the northern boundary of the site and exacerbated by tower T1

he proposed PBSA use including social cohesion and community stability OBJECTION The proposed PBSA represents an unacceptably large addition to the numbers of PBSA bedrooms in the locality in terms of both existing developments and those currently being built within a short distance of the application site. This will significantly and unacceptably alter further the demography of the local area and provide a concentration of PBSA that far outweighs the number of other types of residential accommodation. Such unbalanced communities skewed towards students have already been experienced in those suburban areas within the City that previously became the focus for student accommodation. In those cases, the imbalance led to less stable and cohesive communities as students are transient in nature and so less likely to have any particular commitment to a local area. As a cohort they give rise to other disbenefits around anti-social behaviour and impacts on local services that adversely affect the more permanent local community. This would be inconsistent with a range of national and local policies and guidance regarding achieving balanced, stable and cohesive communities. In support of this objection the following points are particularly noted: (a) Based on the submitted ‘Student Need Assessment’, by the end of this year there will be over 4,700 in PBSA developments around the immediate periphery of the SISTER SRF area. This application alone would bring a further 1,041 into this area (a 22% rise) and with the the neighbouring iQ proposal on the Weston Halls/Pendulum Hotel site would see a total of over 3,000 beds (a 64% rise). This does not take into account other nearby existing, approved but not built or proposed PBSA developments. (b) The student population is transient and, perhaps understandably, have no particular commitment to the more stable host community. Concentrations of large numbers of students, as found over the years in suburban locations, bring particular issues which do not assist with community or social cohesion. That students do not contribute in terms of Council Tax to the local area and public services weakens any local connection further. (c) The existing area around Granby Village is a well established, principally residential area seen as a successful example of early regeneration within the city centre. This character partly arises from a proportion of students within the area, However, the influx of students arising from a development about to be completed plus that on the application site will inevitably alter the demographic mix and character of the area considerably. This impact would only be all the greater factor in the iQ Weston Halls/Pendulum Hotel proposal. (d) Experience within the Granby Village area has shown that students can bring life and vitality, mostly during term times. However, also during term times, anti-social behaviour increases. While the proposed development may be well run and controlled this does not extend to the behaviour of students once outside the development. (e) The application makes assumptions around the ability of existing local services ability to cope with this increased and concentrated local student population. Some of these assumptions are based on students being willing/able, for example, to travel to more distant GPs and dentists and do not sit comfortably with the lived Page 37 of 46 experience of existing residents who already struggle to get to see a GP or NHS dentist. (f) The applicants also make claims about economic benefits to the area, mainly through an uplift in spending. There are three points here. Firstly, the local area is already well served by a wide range of retail and hospitality venues, and an

increase in the transient student population living within the area is not required to support these. Secondly, many of these students would leave the area semi-deserted in university vacation time, calling into question the claims for the creation of a newly vibrant neighbourhood which could sustain local businesses all year round. The third point is that part of any uplift in spending in the local area will largely be a transfer of the same spending away from the suburban areas currently being emptied of student population. The submitted Environment Statement (Paragraph 5.119) advises that “Data from the University of Manchester estimates that first year undergraduate students spend £13,685 per annum.” But the same data (for 2026-27), excluding rent and mobile phone contracts, gives a spend of only £5,480 (https://www.manchester.ac.uk/study/undergraduate/fees-and-funding/cost-ofliving/). This would give a much lower Total Net Expenditure figure than shown so the economic benefit to the city is more limited than is being suggested. (g) The City Council’s Guide to Development in Manchester acknowledges that successful neighbourhoods are partly achieved by a balance of housing types and mix of uses. The proposal will not enable the balance sought by local policy and guidance to achieve this balance. (h) The applicant’s own Planning and Tall Buildings Statement (Paragraph 3.11) acknowledges the need to provide balanced neighbourhoods when considering new PBSA. More importantly Policy CC10 of the Core Strategy aims to ensure the city centre attracts and retains a wide range of residents including through new development with a particular emphasis on creating a family friendly environment. This proposal will clearly exaggerate an already considerable student population living in PBSA developments in this part of the city centre where, as confirmed by the submitted Environmental Statement (Paragraph 15.59), “the Piccadilly Ward has a much higher concentration of students compared to Manchester as a whole”. As has repeatedly been said during the consultation process, residents would favour a development (of equal density) which included a mix of homes for young professionals and families, with appropriate accompanying services and local shops. It seems naive in the extreme to suppose (as does the submitted Planning Statement) that the mere proximity of students would “facilitat[e] informal interactions, knowledge exchange, and the spontaneous formation of collaborative ventures” with those based around SISTER more than would, say, the presence of actual researchers and entrepreneurs living in the neighbourhood over a period of years with their families. (i) On this basis the proposal does not accord with with Policy CC10 or other policy intentions to create a sustainable, stable and cohesive local community.

Biodiversity OBJECTION The effect of the proposed height and massing on the potential of the development to have a positive ecological impact gives rise to objection. A “comprehensive review” by the applicants led to the development of an alternative massing strategy, moving from the three broadly uniform-height blocks shown in an illustrative SISTER SRF image to the current proposal. However, there is no indication that the review properly considered a modestly greener four-block solution, abandoning the “Princess Square” concept, using that land to build on, and distributing the proposed planting elsewhere (for example along the Altrincham Street walkway and up and down Sackville Street). In support of this objection the following points are particularly noted: (a) The submitted Ecological Impact Statement rightly describes the “Princess Square” location as it is now as “a small area of poor condition … heavily shaded”; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little. (b) The review of the height and massing has focussed most hope of ecological enhancements on a highly inappropriate spot, partly due to the chimerical idea of this being a favoured future route across to Oxford Road from the SISTER SRF area (the western stretch of Charles Street being notoriously uninviting, because so overshadowed by Circle Square). • Construction phase OBJECTION 1 The hours for working are inconsistency described within the application and are considered excessive for a site in such close proximity to existing residential buildings and for a construction period of an extended period of time. As a minimum, the hours for working should be reduced to start at 8:30am (rather than the stated 7:30am) on weekdays and still finish at 6:00pm. It should be confirmed that working would not take place on a on a Saturday outside the proposed 8:30am - 2:00pm or at any time on a Sunday, Bank Holiday or Public Holiday (the latter being omitted from all consideration). The application advises that the City Council will need to agree any working outside these hours but gives no information on how this process works. This process Page 40 of 46 should be confirmed as a part of the application and, in any event, any request for additional working should require the sign-off by the three ward councillors and the notification of those people outside the site likely to be affected in advance of the works. OBJECTION 2 The application contains no information regarding the illumination of the site outside the hours of working which should be designed and operated to provide anything other than minimal security lighting and avoid general illumination and glare outside the site to protect

residential amenity and natural environment. An objection would also be raised if the illumination of the site during working hours were to result in excessive light and glare into nearby homes. • Operational noise OBJECTION A development not designed and managed to prevent disturbance through noise generated by the proposed use would be unacceptable. Planning conditions should be applied regarding appropriate measures to prevent intermittent or on-going levels of noise outside the built form that would cause disturbance to local residents including noisy uses of external and internal spaces, mechanical equipment (such as ventilation), and so on. The use of the on-site external area for events should not be permitted and there should be no amplified sound allowed within external spaces. Cumulative impact of this proposal and the iQ PBSA proposal on the adjacent Weston Halls/Pendulum Hotel site and precedent OBJECTION 1 Neither this proposal nor the iQ proposal on the adjacent Weston Halls/Pendulum Hotel site are acceptable on their own merits. Both individually raise significant objection given the adverse impacts (in some cases exceptionally harmful impacts) they will have on the range of issues covered by this objection note including, for example, amenity (including residential amenity), the local environment (including streetscape and heritage), health and well-being, and the community. When taken together the cumulative impact of these neighbouring proposals - particularly on the primarily residential area to their north - will be all the greater. Neither proposal takes the other into account, nor do they give meaningful regard to the implications on the future proposals elsewhere in the area. In support of this objection and just by way of example the following points are particularly noted: (a) The proposal for a 2,500 room PBSA development by iQ on the Weston Halls/ Pendulum Hotel site consists of four towers of 50, 33, 24 and 17 storeys with linking built form which would effectively form a wall of development along Charles Street between Sackville Street and Princess Street when seen in any oblique view. The Page 41 of 46 tallest 50 storey tower would stand at the eastern end of the site adjacent to the 38+ storey SISTER Plot H tower visually combining to give a huge and overwhelmingly harmful visual impact both generally and on the amenity of existing residents particularly those immediately northwards of them. Ironically, the taller iQ development would overshadow the SISTER Plot H proposal including the proposed on-site external area within the SISTER Plot H scheme as well as the area north of the railway viaduct. The SISTER Plot H proposal would increase the visual solidity of the iQ wall of development that would be presented to existing residents north of the viaduct by visually obstructing any particular sense of the minimal gaps between the iQ towers. The proposals have not been designed in a coordinated manner to be viewed together and the overall visual impression when viewed from the area north of the viaduct - including the outlook from many existing homes - will be of a bleak shaded wall of nondescript anywhere PBSA built form. (b) The two proposals will swamp the existing primarily residential community with a further 3,541 students in additional to those already existing and soon to be completed in the area. Charles Street and limited local streets would be expected to cope with the concentrated move in/move out period for many of these students and it is difficult to see how this can be managed in a manner that will not cause excessive disruption and inconvenience for other users of the area including existing local residents. OBJECTION 2 While each application should be treated on its own merits it is clear that within planning there is an acknowledgement of setting a precedent. By granting planning permission for one of these unacceptable proposals will set a precedent and make the other more difficult to resit

Concluding comment An alternative approach to the application site should be required that would have the potential to overcome the identified policy failings of this proposal. If this is not possible the proposal should be refused planning permission in accordance with Paragraph 139 of the NPPF. In support of this concluding comment the following points are particularly noted: (a) A PBSA development on this site gives rise to strong objection. (b) Paragraph 139 of the NPPF is clear that development that is not well designed should be refused. ‘Well designed’ is not just about the intrinsic quality of the design of the development but about achieving an appropriate response to other matters. These should include, for example, the amenity (including residential amenity) of existing residents and other users of the area, the existing townscape context Page 42 of 46 (including heritage), health and well-being and the impact on the local community. This is reflected by national and local policies and guidance including Policy H12 of the Core Strategy. (c) If a PBSA development on this site is considered to be acceptable in principle by the City Council, the Council should require a comprehensive redesign of the current proposal that ensures it complies with all relevant policy and accords with relevant guidance to achieve a design that responds appropriately to the existing townscape context (including heritage), avoids harm to the amenity, health and well-being of existing residents and other users of the area (now and into the future), and supports the local community. (d) To accept the currently proposed PBSA development on this site would be to

accept the harm - the very considerable harm in some instances - that would be caused within the affected area. It would be to treat this harm to local people and environment merely as collateral damage in achieving a tall building townscape in this locality at any cost. (e) The Planning Service and Planning Committee should recognise that opportunities for tall buildings - including for PBSA - exist elsewhere and this is one city centre location where 'good planning' would expect adherence to national and local policy intended to protect against inappropriate development and secure a more balanced approach between redevelopment/regeneration and a local community and existing high quality environment. (f) So, to return to the opening part of this note: The applicants claim in their Planning and Tall Building Statement (paragraph 1.8) that "The proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre.". Clearly this is not true on any level let alone in terms of the impact on the surrounding area and the application should be refused planning permission. Appendix: Policy and Guidance documents used when preparing these advice notes The policy and guidance documents used when preparing these advice notes have included the following: National Planning Policy Framework (Dec 2024) Government policy document This describes how economically, environmentally and socially sustainable development should be brought forward. It should be read as a holistic development i.e. all policies need to be read in conjunction with each other. Regard has also been had to the relevant parts of the associated Planning practice Guidance. Particularly relevant parts of the NPPF include: Para 40 Pre-consultation Para 44 EIA's Section 12 Achieving well-designed places: Paras 131, 132, 135, 137, 138, 139, 140 Section 14 Meeting the challenge of climate change Section 16 Conserving and enhancing the historic environment: Paras 202, 207, 208, 210, 212, 215, 219 Page 43 of 46 Glossary Provides the government definition of "Brownfield land" National Design Guide Government document Much of this document is relevant but particular attention is draw to the sections on "context" and "identity" which form the basis for the other subsequent considerations in the document. The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning Note 3 (Second Edition, 2017) Advice prepared by Historic England as the government's principal adviser on the historic environment. Places for Everyone 2024 A Strategic document prepared by the Greater Manchester Combined Authority. Particularly relevant policies: Policy JP-S1: Sustainable development Policy JP-H3: Type size and design of new housing: Defers consideration of student housing to district local plan Policy JP-P1: Sustainable places: Para 9.15 "All development should achieve a high design quality consistent with the ten characteristics set out in the National Design Guide" Policy JP-P2: Heritage Policy JP-P6: Health The document sets out proposal for becoming carbon neural by 2038. Local Plan Manchester City Council's local development plan. Consists of several documents and particularly relevant policies include: Core Strategy: CC 3 (Housing) CC 6 (City Centre high density development - must have regard to tall buildings policy (EN2)) CC 7 (Mixed use) CC 8 (The need for an approved development framework to guide a large scale development proposal - does not seem to be the case with the iQ proposal) CC 9 (Design & Heritage) H 12 (PBSA - Especially paragraphs 3 (parking), 4 (local services), 5 (safety and security), 6 (impact on local amenity) T 1 (Sustainable transport including taking account of other road users) EN 1 (Design principles and link back to national guidance) EN 2 (Tall Buildings - including a need to be appropriately located with particular regard to Paragraphs 12.14 (local context) and 12.12 (the need to consider all design policies as the policy context against which tall building proposals will be considered) EN 3 (Heritage) EN 15 (Biodiversity) Page 44 of 46 PA 1 (Developer contributions) DM 1 (Development management) Extant Unitary Development Plan Policies DC18 (Conservation Areas) DC19 (Listed Buildings) DC 26 (Development and noise) Guide to Development in Manchester Supplementary Planning Document and Planning Policy Guidance (Adopted 2007) Virtually all this document is relevant but in particular. Parts 1 and 2 are considered in turn: Part 1 (SPD) Sections 1 - 10 inc 2.3 (Response of new development to existing context and character) 2.6 (Response of new development to heritage) 2.7 (Response of new development increasing density to existing context) 2.8 (Retaining and enhancing sense of place) 2.13 (Buildings should relate well to each other and respect their setting) 2.14 (Building height and existing context) 2.5 (Streets should be designed for people not just for vehicles to pass through) 2.31 (Need for adequate on-site servicing provision) 3.37 (Provision of street trees) 2.40 (Public realm) 2.41 (Public realm) 2.43 (Public realm) 2.45 (Mix of housing large, single tenure housing developments need to contribute to a balanced neighbourhood) 2.47 (Mix of uses) 2.49 (Safety and security) 2.56 (Impact on global environment) 4.2 (Sustainable development) 4.13 (Sustainability including reuse of existing structures) 4.15 (Biodiversity) 6.9 (Cycle parking provision) 7.2 (Response to built context) 8.3 (Promotion of informal surveillance) 9.9 (Promotion of social inclusion) 9.11 (Quality and aesthetics of the built environment to health) Part 2 (Guidance) Sections 11 & 12 11.1 (Response of new development to context) 11.4 (Response of new development to context) 11.43 (Design) 11.45 (Response

of new development to context) 12.8 (Response of new development to context including ground level treatments, servicing, microclimate (overshadowing, air turbulence) 12.10 (Sustainable development) 12.13 (Recognition of lack of open space in the city centre) 12.20 (City Centre design and the “street wall”) 12.26 (Tall buildings) Page 45 of

[redacted]

Consultation response on Planning Application Ref. No. PLA-2026-000312 for the proposed demolition of the existing building and a new development on the site of the Charles Street Multi-storey Car Park (SISTER Plot H), Charles Street , Manchester, M1 7AR.

PRINCIPAL POINTS OF OBJECTION

(1) The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being, and communities. The applicants are using policy and guidance selectively and partially to support their proposal at the expense of the area and community outside the site.

(2) The site is within the SISTER (formerly I.D. Manchester) Strategic Regeneration Framework (SRF) area. The SRF is being used to justify the quantum (or amount) and height of the proposed development. The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process. Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area and people.

(3) Against local opposition, the SISTER SRF showed three new taller buildings on the application site when these could have been placed elsewhere in the wider SRF area (e.g. by Mancunian Way) to avoid their harmful impacts on our area. Residents were assured by the Council and SISTER that future planning applications for the site would protect our amenity. We are now faced with an application that does not do this.

(4) The proposal will also cause harm - often great harm - to amenity (including residential amenity), the environment (including townscape and heritage), health and well-being and to the existing community. These harmful impacts are very much related to the height, massing, siting and orientation of the proposed buildings within the site.

(5) There will be a very considerable and harmful impact on sunlight and daylight in the area. The application site is immediately to the south of the railway viaduct and the proposal would overshadow large parts of the area around it in an arc on the north side of the railway viaduct. The applicants have manipulated their assessment of daylight,

sunlight and overshadowing so the impact seems less than it will be in reality. They variously claim these harmful impacts do not exist, are negligible or, where harmful, only affect a smaller number of residents so they don't matter. In particular, I note:

- All parts of Granby Village will be affected during the day as the sun moves around impacting the amount and quality of sunlight and daylight - including reflected light - in our homes and our outside private and communal spaces as well as adjacent streets. A considerable number of residents - especially those in Velvet House and Velvet Court - will experience, in the words of the applicant, a "major impact" in terms of their daylight and sunlight. Many residents in the nearby Granby House will be similarly very badly affected.
- The tallest tower will close the gap between existing buildings that has always allowed direct sunlight to reach Sackville Gardens especially during Winter months. It will also greatly overshadow the closer Vimto Park. These are our only two nearby green, open spaces serving many 1000's of people every year - both residents and other city centre users.
- The proposal will remove the physical and financial viability of the use of Granby Village roofs for the generation of solar power . This is presently being considered alongside other initiatives that have been or are being voluntarily implemented to reduce energy usage and increase on-site generation of electricity from sustainable sources within Granby Village as a part of assisting to meet the national and local 'net zero' goal and address the on-going cost of living crisis.

(6) It is unacceptable that the applicants have evolved a design with two lower towers and external amenity space ("Princess Square") at the western end of the site which they consider necessary/appropriate mitigation to protect the amenity of some nearby residents (primarily in the corporately owned and commercially operated Orient House and Salisbury House) but have piled development up to an excessive 38+ storey height and massing at the eastern end of the site without the same regard to the nearby residents (primarily individually owned leasehold apartments many with long-standing residents) at that end of the site especially in Velvet House, Velvet Court and Granby House. This application fails to explain this unacceptable inconsistency and why some residents deserve a poor standard of amenity while others do not.

(7) The site is currently occupied by a low density development: a multi-storey car park and small piece of incidental, left over land which the applicants own specialists confirm is of little biodiversity value. Planning policy seeks to achieve greater density in the city centre, but there is no acknowledgement by the applicants that a significant increase in development density would be achieved on the site even if it were just developed with buildings of the same height as our own, especially if the whole site was used rather than leaving a large proportion of the site (but small in real terms) as open space which will never meet the needs of 1,041 students plus staff, visitors and public. Instead, greedy landowners, national PBSA developers and international investors see the site as a cash-cow and pile the development far higher than anything around creating immense overshadowing and a visually overbearing building where almost 300 bedrooms and communal living rooms will directly overlook existing homes from its two tallest towers.

(8) By leaving the 1950's/60's incidental open space at the prominent Princess Street/ Sackville Street junction the proposal merely replicates an urban design deficiency of this earlier development and fails to achieve an appropriate built form on the Princess Street/ Charles Street corner or the stated proposal objective of creating an SRF gateway development.

(9) Our area is an early example of successful urban regeneration that reinvigorated the city centre. It is long established and stable with a mixed population including a proportion of students. Indeed, existing nearby PBSA developments already cater for 1000's of students and the iQ Echo Street scheme opening this year and will add over 1000 more. The iQ proposal for the Pendulum Hotel site proposes a further 2,500 spaces. Our community is now being overwhelmed by a transient student population, here for only part the year and without any particular commitment to the area. Contrary to relevant policy and guidance, the proposal would not contribute to maintaining or creating a balanced and socially cohesive community.

(10) This SISTER Plot H proposal needs to be seen in the context of an equally inappropriate and harmful planning application on the adjacent iQ Weston Halls/ Pendulum Hotel site which is awaiting a planning decision. Both proposals need to be considered on their own merits but also in terms of the cumulative impact they would cause in conjunction with each other. Individually each would have excessively harmful impacts on the local area, and their cumulative harm regarding the preceding points would be all the greater if both proposals were to be approved and built.

(11) Taking into account the above and the more detailed attached comments below, this application - and the application for adjacent iQ Weston Halls/Pendulum Hotel site - should be refused planning permission.

OBJECTIONS IN FULL

Overarching comment

The applicants claim in their Planning and Tall Building Statement (Paragraph 1.8) that "The Proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre." The following will show this is clearly not true on any level let alone in terms of the impact on the surrounding area and especially not on Velvet House and Velvet Court (both parts of Granby Village) or nearby Granby House.

Misrepresentation of the public consultation exercise

OBJECTION

The submitted 'Statement of Consultation' is selective and biased in its reporting of comments made by residents to date and actions taken to mitigate concerns. It does not acknowledge the strong objections raised by local people on both the SISTER (formerly I. D. Manchester) Strategic Regeneration Framework (SRF) and on the application proposal prior to its formal submission. In support of this objection the following points are particularly noted:

(a) Objection was raised again to the SISTER SRF 'illustrative' proposal for the application site, Plot H, particularly regarding the height and massing, by resident representatives at a meeting with SISTER on 10th October 2024.

(b) The application proposal was presented to resident representatives in a meeting with SISTER on 26th November 2025. Objections were raised to the height, massing and Purpose Built Student Accommodation (PBSA) use. Despite this and the subsequent developer-led public consultation process, the actual proposed design has not evolved in any discernible way to take concerns into account.

(c) The applicants note the various reasons for local objection and identify the mitigation they consider necessary and/or have actioned. For the key issue of overshadowing the applicants openly state that by lowering the height of built form on the western half of the site they have mitigated against the impacts on sufficient residents to make the proposal acceptable while not admitting that a not insignificant number of residents remain harmfully impacted by the 38+ storey tower that has now appeared at the eastern end of the site. In the words of the applicants' own assessment the proposal continues to cause "major harm" to many of these residents.

Additional background information:

I am one of the two Granby Village residents among the community representatives that sit on the SISTER Community Panel ostensibly to have an input into the SISTER SRF proposals as they are brought forward. However, it is becoming apparent that the Panel is used by SISTER to communicate their proposals and identify matters of concern or objection so that any proposal can be better presented to justify rather than amend their approach. I am primarily on the Panel as the representative of the Friends of Sackville Gardens and the other Granby Village resident is on the Panel to represent the views of

local residents in the nearby principally residential area that includes Granby Village just to the north of the railway viaduct.

Us two Granby Village residents - referred to in the Statement of Consultation - have consistently objected on behalf of the wider resident community to this proposal for the SISTER Plot H (Charles Street Multi-storey Car Park) site both at the Panel (with the support of various other Panel members) and:

(1) At a separate meeting on 10th October 2024 with Ian Thompson of Counter Culture acting for SISTER prior to the selection of a development partner for the application site. Their comments went completely unheeded and the residents were subsequently advised in November 2025 of the selection of RG Real Estate to deliver PBSA within a tall building proposal.

(2) At a presentation of the proposal to these two residents by the design team for the development on 26th November 2026. This was not part of evolving the design but purely one of presenting the proposal that was then put out to a developer-led consultation.

Planning policy and guidance

OBJECTION

The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are incorrectly and inappropriately using policy and guidance selectively and partially to support their proposal at the expense of the area and community outside the site. In support of this objection the following points are particularly noted:

(a) The following objections will assist to demonstrate this to be the case.

(b) The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process.

(c) Instead of the approach taken by the applicants, policies and guidance should have been used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area, people and community. The National Planning Policy Guidance (NPPG) explicitly states that it should be read holistically. This approach should be taken more broadly when applying relevant policies and guidance with their due weight as 'material planning considerations'. On this basis, the current proposal should be refused (or withdrawn) and a more appropriate policy evolved.

Strategic Regeneration Frameworks (SRF's)

OBJECTION

Objection continues to be raised to the SISTER (formerly I. D. Manchester) SRF. Those people living in and using the existing locality around the application site

foresaw the inevitable harm that would be caused to amenity (including residential amenity) and the environment (including townscape and historic environment) by the SISTER SRF proposing to site three taller buildings on the northern boundary of the SRF area. This is where this harm would be most keenly felt by those northwards of the SRF area. Objection is also raised to the reliance by the applicants on the SRF to justify a particular quantum of development within the site and the continued inclusion of tall built form within the proposal when considerable harm has been identified including by the application. It has also been established that SRF's do not constitute planning policy and are a very low level of material consideration subservient to national and local planning policy which includes policy or caveats within policies intended to protect amenity, communities and the environment. In support of this objection the following points are particularly noted:

(a) SRF is not planning policy but only a form of guidance. The Planning Service has confirmed it carries very low weight as a 'material planning consideration' unlike national and local planning policy.

(b) The three taller buildings were only shown in the SRF on an "illustrative masterplan" drawing without any storey heights or floorspace measurements. It has been confirmed this was only intended to be indicative and existing local residents were assured that any planning application process for the site would address the planning issues to avoid harm to the amenity (including residential amenity), local environment (including townscape and heritage), health and well-being, and community within the adjacent area. This should be achieved by having full regard to all relevant national and local planning policy and guidance with with their due weight as 'material planning considerations'. The planning application does not meaningfully achieve this and the SRF should not be driving any need or desire to achieve a particular quantum (or amount) of development or design outcome on this site. On this basis the application should be refused planning permission.

Additional background information:

A Strategic Regeneration Framework (SRF) is the means by which a landowner and/or developer can identify an area (which may be one site or a larger area containing a number of sites) and set out a masterplan for its future redevelopment. This is invariably a process undertaken with the support and involvement of the City Council as the Council needs to approve the SRF for it to become a 'material planning consideration' (even if of a very low status) and carry some weight in the Council's future decision-making such as on planning applications. The SRF process is accompanied by limited public consultation carried out for the most part by the proposer.

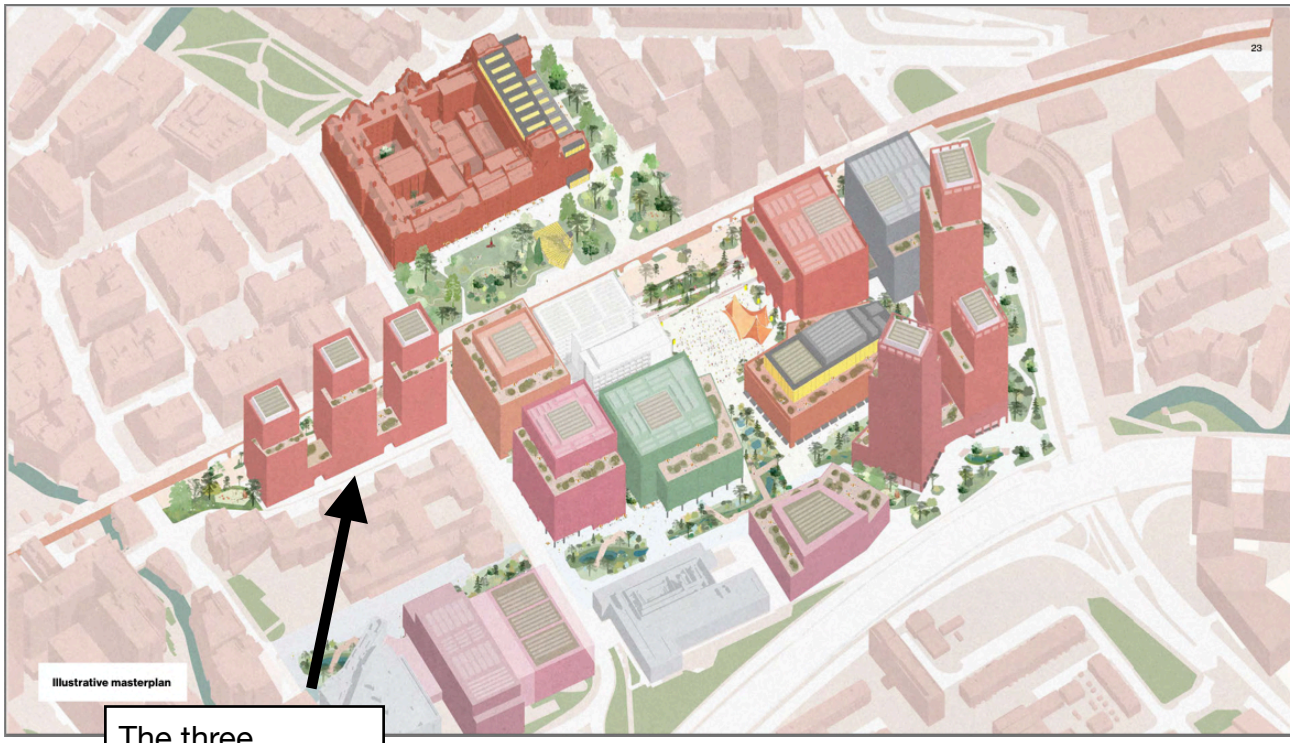
The Planning Committee considered a planning application for a tall building scheme at 140 Great Ancoats Street (at the junction with Store Street and near Piccadilly Village) at its meeting on 25th November 2025. During the meeting the Deputy Head of the Planning Service usefully confirmed that SRF is **not** planning policy and is only guidance, is subordinate to policy, and is of relatively low status as a material planning consideration. Government policy is preeminent followed by the Council's own local policy which should accord with Government policy. Unusually for such a proposal, this Great Ancoats Street scheme was refused planning permission very much due to the impact on the amenity of existing nearby residents.

A video recording of the November 2025 Planning Committee meeting can be viewed at

https://player.vimeo.com/video/1129898464?badge=0&autopause=0&player_id=0&app_id=58479 with the relevant case being from 1:07:15 to 1:30:00 in the video.

The SISTER (formerly I.D. Manchester) SRF:

The application site is within this SRF area against its northern boundary with the railway viaduct. This SRF covers an extensive area and includes a long southern boundary to Mancunian Way. At the time the SRF was being proposed, local residents took every opportunity to object to the locating of taller buildings being proposed by the SRF against the northern boundary of the application site. It was obvious that locating three buildings that are notably taller than nearby buildings in this location would inevitably cause disamenity especially through overshadowing to the existing residential community directly north of the site. Other sites within the SRF area - such as alongside Mancunian Way - could have been identified instead for such tall buildings. However, it it is apparent that while the SRF proposers wanted tall buildings within their development they also wanted to create the best environment for new occupants within the SRF area. By placing the taller buildings against the norther boundary they intentionally aimed to minimise any adverse impacts within the SRF area by ensuring these were inflicted outside the SRF boundary.



The three linked taller buildings being suggested by the SISTER SRF on the application site looming over Granby Village behind.

The original “Illustrative masterplan” drawing in the SISTER SRF document.

Despite these objections the City Council approved the SRF with three taller buildings on the application site. In an email to me the Chair of Planning Committee has, however, confirmed that the placement of tall buildings and wider impacts would be addressed as a part of any subsequent planning application for the site suggesting an acknowledgement that SRF may need to be revised. Indeed, the proposal as now shown in the submitted application includes three taller buildings but not of broadly equal height shown by the SRF which the applicants claim is to mitigate against issues of overshadowing, daylight and sunlight on residential properties to the north of the development. It is evident, however, that their redistribution of the proposed SRF massing within the application site may improved matters for some existing residents but further exacerbates the harm that would be caused to others.

Existing urban townscape context

OBJECTION

The siting, height (or 'scale') and massing of the proposal fails to appropriately and meaningfully respond to the existing urban townscape context but instead inappropriately responds to the character of more distant parts of the 'Southern Arc'. The proposal, therefore, fails to have appropriate regard to relevant national and local policy, guidance and best practice relating to urban design and conservation principles and how new development should respond to context. In support of this objection the following points are particularly noted:

(a) The site contains a low level multi-storey car park and a small landscaped area of incidental, land that was left-over once the car park had been sited on an irregularly shaped site. This open space has been poorly used/mis-used and maintained over many years and not perceived as a leisure space. This development does not make a positive contribution to the local townscape other than, possibly, part of the grouping of modernist buildings associated with much of the SISTER SRF area.

(b) The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent and more distant, taller built form down in order to respond to this change in scale and character.

(c) The 'Southern Arc' is the name that has been given to an area of land sweeping around the southern side of the city centre along Mancunian Way. It is not a formal designation. It is an area that has seen incremental redevelopment often with tall buildings. The applicant wants to associate the application site and rest of the SISTER SRF with the Southern Arc to suggest the existing character of the area is one of modern tall buildings. While this may be their aspiration it is not the reality of the existing urban context of the site.

(d) Contrary to statements made in the application, the proposal has failed to have meaningful regard to all relevant planning policy and guidance and has failed to show meaningful regard to and respect the existing urban context. The proposal is contrary to planning policy and guidance.

Additional background information:

Policy in the National Planning Policy Framework (NPPF) and the government's 'National Design Guide' (NDG) of 2021 set down basic principles to achieve good (if not excellent) design in new development. The application appears not to even acknowledge the NDG and certainly fails to have any regard to it. Both the NPPF and NDG identify the

importance of understanding and appropriately responding to the local landscape context and creating welcoming places in which to live, work and visit. Creating such places is stated as not just being about the new development itself and meeting the needs of new residents but the impact this development has on the surrounding area and existing users and community.

The City Council's statutory local development plan reflects this policy and guidance including in its Core Strategy Policy H12, specifically on Purpose Built Student Accommodation (PBSA). Policy H12 confirms that the design and layout of such development should ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise or disturbance, or impact on the streetscene either from the proposed development itself or when combined with existing accommodation. There is no suggestion that this impact on the streetscene would not include overshadowing. Various paragraphs of the supplementary planning document (SPD) section of the City Council's 'Guide to Development' all stress the need for new development to respect and be informed by their settings and to be of an appropriate height having regard to location, character of the area and specific site circumstances and local effects, such as microclimatic ones. The guidance section of the 'Guide to Development' also confirms in Paragraph 11.45 that new developments in conservation areas or elsewhere should not be designed in isolation; and considerations of design and layout must be informed by the wider context including both immediate neighbouring buildings, and the townscape of the wider locality. Paragraph 3 explicitly confirms that the Guide "sets the context within which developers and architects will have to work".

The application site and its actual existing urban landscape context
The majority of the application site is broadly rectangular but narrows at its western end as a consequence of the realignment of Charles Street in the 1950's/60's to accommodate the existing multi-storey car park than now occupies the rectangular part of the site. As was typical and problematic with many such much post-war schemes, the left-over area ('site left over after planning' known as SLOAP) was merely landscaped in a rudimentary manner - hence the existing trees and grass - and remained as a small, incidental and poorly maintained area used by rough sleepers and for fly-tipping rather than recreation. The proposal is effectively replicating this unacceptable approach to the siting of development which the City Council's Guide to Development in Manchester was intended to prevent.

It is accepted the existing car park structure itself does not make an obvious positive contribution to the local townscape (although it could be seen as contributing to the modernist character of the 1950's/60's university development of which it formed a part) and an appropriately designed replacement development could make a greater contribution. The car park is lower than most of the surrounding buildings which contributes to the historic pattern of development visible at this boundary of the conservation area where the redevelopment of the Victorian city by the Edwardians for new and often larger textile warehouses abruptly stops as the City lost its domination of the world textile market. The existing car park does not dominate the listed railway viaduct or the adjacent taller buildings (Many historic, some listed) just inside the conservation area and so has a minimal impact on the setting of the conservation area. The proposed development will remove such historic views from the south and dwarf the nearby historic built form.

The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more

recent, taller built form down in order to respond to this change in scale and character with the tallest new buildings kept towards London Road and Oxford Street. The applicant's own Design and Access Statement (p.18) shows the area characterised by "20 - 40m" high buildings mostly historic and mostly in the conservation area and where the taller and soon to be demolished Faraday Tower is a 1960's anomaly. This is evident by a simple analysis of this surrounding context which identifies several component parts:

(1) The area to the north of the nearby railway viaduct - from the Oxford Street in the west to London Road in the east - is covered by the Whitworth Street Conservation Area with its particular high quality townscape. This is derived principally from 6 - 7 storey former Victorian and Edwardian warehouses with some elements of lower built form on a grid of streets. This is the character of that part of the conservation area closest to and just to the north of the application site. The streets and spaces within the area all benefit from direct sunlight and good levels of natural daylight as the built form defines but does not overly enclose them. This quality of light is an intrinsic part of the historic character of the area in which work within the warehouses required good levels of natural light to function including for the the inspection and sale of textiles. Just to the north is the modestly scaled Sackville Gardens - the only public (i.e. Council controlled) open space in this part of the city centre dating from the early 1900's.

(2) The landscaped area of the existing application site is on the north-eastern corner of the Princess Street/Charles Street junction. On the north-western and south-western corners of the junction are modest, two-storey Victorian buildings which (along with the Grade II listed red brick railway viaduct crossing Princess Street) provide a characterful gateway to the conservation area and the context for the two-storey, Grade II listed Lass O'Gowrie public house and several small scale Edwardian former warehouses behind along the north side of Charles Street. The modern eight storey IBIS hotel stands on the south-eastern corner of the junction directly opposite the site without visually over-powering the nearby historic buildings. The historic buildings are red brick (some with terracotta) and slate and the hotel is red brick and lead-like elements.

(3) Moving southwards along Princess Street away from the conservation area and the Princess Street/Charles Street junction, the built form on the west side steps up in height to c.13 storey modern buildings next to the recent Circle Square development and then to a c.15-storey building immediately next to Mancunian Way. The height of built form markedly steps down moving eastwards across Princess Street to the 5-storey University Life Sciences building, a small surface car park and hard landscaped area associated with the River Medlock culvert. The part 8/part 5-storey Pendulum Hotel Weston Halls building (in mostly yellow brick with pitched tile roof) extends along Charles Street opposite the application site to abut the IBIS Hotel in the west and Sackville Street in the east.

(4) Elsewhere around the application site is the former University North Campus. The applicant fails to note this was identified by the 20th Century Society in its 'Potential Conservation Areas Scoping Report' (December 2017, funded by Historic England) as one of only its two potential conservation areas with a predominant twentieth century character in Greater Manchester. It is characterised by well spaced white painted or exposed concrete modernist education buildings arranged around a series of privately controlled but publicly accessible soft landscaped open spaces including the Vimto Park. These buildings are mostly relatively low in height in a mix of 1, 2, 5 and 6 storeys but interspersed with moderately high buildings such as the recently listed Renold Building (6-storey tower on a 2-storey podium) but includes the tallest building near the application site, the University's Faraday Tower. This in height terms (c.14 storeys) stands in isolation and has a slender rectangular

floorplan on a north-south axis minimising the shadow it casts to the north. The various spaces including Sackville Street and Charles Street in the vicinity of the site are full of sunlight and daylight.

Southern Arc
The application refers to the Southern Arc as if it were an established designation but no such reference or boundary can be found in the City Council's statutory development plan. It is understood to refer to an area of land, stretching from Mayfield to Great Jackson Street, arising principally from the building of Mancunian Way in the 1960's and other postwar clearance. To the east of London Road and west of Cambridge Street land remained vacant or was put into low density industrial/commercial uses but the central section was predominantly developed in the 1950's and 1960's with education buildings whose character has largely been retained to date around the application site. In more recent years different sites within the Southern Arc area have been brought forward incrementally with a developer expectation (encouraged by the City Council and its developer-led Strategic Regeneration Frameworks) that high rise/high density development would be acceptable. Policy and guidance, however, makes it clear that such a one-size-fits-all approach cannot be assumed across such an expansive area which abuts a variety of other townscapes.

The application contains information assessing the local townscape context around the site - including some specifically on the conservation area - but this has not then been used to inform the evolution of a design that actually responds meaningfully to this context in terms of the siting, scale and massing of the proposed built form. Instead the proposed design is responding to the emerging high density/high-rise townscape in more distant parts of the expansive Southern Arc area which is seemingly the actual design intent as the submitted Environmental Statement (ES Vol 1, Paragraph 3.8) identifies "SISTER as the 'final piece in the regeneration jigsaw' within the southern arc of Manchester that stretches from Great Jackson Street in the west through to Mayfield." The proposed use of elevation features and materiality to respond visually to nearby 1950's/60's buildings is tokenistic given that this treatment is dressing up a 38+ storey tower in an area characterised by relatively much lower built form including that from the 1950's and 60's. This is not the approach for achieving good design set out in national and local policy and guidance. The proposed development is not innovative in design and does not fit into the overall form and layout of its surroundings as required by the NPPF.

Heritage

OBJECTION
The application fails to appropriately respond to the heritage significance of the Whitworth Street Conservation Area or the settings of nearby listed buildings and non-designated heritage assets so as to avoid harm or keep such harm to the minimum that could be considered appropriate in heritage terms. In this regard the proposal has not had due regard to legislative requirements or to national and local policy, guidance and best practice. In support of this objection the following points are particularly noted:

(a) The application site is outside but immediately adjacent to the conservation area. There remains a need to ensure development within this setting assists to preserve or enhance the character and appearance of the conservation area. The proposed development adversely affects the settings of a number of listed buildings but the

application uses an assessment methodology to arrive at a conclusion that the harm it causes to the historic environment is acceptable. This is not the approach sought by policy and guidance which should be to assess the historic environment and then evolve a proposal to avoid harm to it and to take opportunities to better reveal the heritage significance.

(b) The application fails to acknowledge that the character of the conservation area partly derives from the quality and quantity of sunlight and daylight reaching the buildings and spaces between them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Similarly for the nearby Sackville Gardens as an intentionally laid out public space at the heart of the conservation area.

(c) The application is restrictive in its identification of non-designated heritage assets. These should have included several buildings in the area including, for example, Velvet House and 55 - 57 Whitworth Street.

(d) The proposal fails to give the great weight required to the conservation of the historic environment. It does not accord with relevant local and national policies and guidance.

Additional background information:

The Whitworth Street Conservation Area was designated by the City Council in recognition of the area's high quality historic townscape which is one of the most concentrated historic environments within the city centre and so of very considerable heritage significance. The character and appearance of the area is derived principally from 6 - 7 storey former Victorian and Edwardian warehouses with some elements of lower built form on a series of colliding grids of streets. Where Sackville Street, Princess Street and Oxford Street pierce the southern boundary of the area the scale of older built form reduces in height which is a visible reminder of where the redevelopment of the Victorian city by the Edwardians in the early 1900's for new and often larger textile warehouses abruptly stops as the City lost its domination of the world textile market. The character of the conservation area also derives from the streets and spaces which all benefit from direct sunlight and good levels of natural daylight as the built form defines but does not overly enclose them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Just to the north is the modestly scaled Sackville Gardens - the only public (i.e. Council controlled) open space in this part of the city centre dating from the early 1900's.

Paragraph 69(1) of The Planning (Conservation Areas and Listed Buildings) Act 1990 states that conservation areas are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. This is a statutory duty placed on the City Council and refers to the area as designated not the character/appearance as proposers would like to see it in the future. This duty does not stop at the boundary but should also have regard to development within the setting of the area that affects the character within.

The application site is not within the Whitworth Street Conservation Area but is immediately adjacent to it and within its setting. The proposed development would form a highly prominent and alien feature in views into and out of the conservation area. The proposed development would be highly prominent on Sackville Street which is a busy gateway route serving the conservation area. The proposed development would harm the

ability to appreciate the character and appearance of the conservation area and would not preserve or enhance the special architectural or historic character or appearance of the conservation area including through the impacts on the quality of light within the public realm and other external spaces and reaching internal spaces of buildings.

The proposed built form would also be a highly intrusive and harmful feature within the settings of a number of listed buildings and a wider number of non-designated heritage assets than have been identified in the application.

The application has had regard to the settings of heritage assets that would (or would potentially) be impacted by the proposal but the harm to these settings is downplayed in the application and so the design process has resulted in the current proposal that causes considerable harm to heritage significance. This, and the failure to identify all potential non-designated heritage assets in the locality, is indicative of the general disregard in the application of the existing townscape in order to generate a proposed design that meets a different narrative around the quantum of development so as to arrive at a design that responds to tall building development elsewhere than in the existing local built context.

The detrimental impact on the settings of heritage assets would be contrary to various national and local policies and not have appropriate regard to national or local guidance or best practice. There is an expectation (including in terms of policy) that new development within the settings of conservation areas and heritage assets (whether or not designated) would respond positively and meaningfully to their heritage significance. The NPPF advises that where development would achieve this it should be treated favourably with the implied message that, where it does not, it should not be treated favourably.

The optimum viable use for the site in heritage terms is the use that achieves the best outcome for conserving heritage assets and their settings which is not necessarily the most economically viable use. The proposal does not represent the optimum viable use for this site in terms of conservation.

That Historic England have not raised objection to the proposal does not mean that the City Council, as the Local Planning Authority, can set aside national and local heritage policies. The City Council should fully recognise that heritage assets are an irreplaceable resource that should be conserved so that they can contribute to the quality of life of existing and future generations. Great weight should be given to their conservation.

The almost completed iQ development at Echo Street within the Whitworth Street Conservation Area is a nearby example of inappropriate development that can take place when heritage and townscape policies are not given sufficient weight when determining planning applications.

Proposed design and impact on amenity

OVERARCHING OBJECTION

Following recognised principles of good design (including regard to the existing context) rather than an apparent expectation of achieving a pre-determined quantum of development within the site (driven by the SRF) should have led to an appropriate design of development for this site. The predetermined quantum of

development, the lack of appropriate or meaningful consideration given by the applicants to the existing urban townscape once they had assessed it, the adverse impacts caused over much of the local area affected by the proposal, and lack of regard to policy, guidance and best practice regarding good design have led to a wholly inappropriate and discordant proposed design. This design results in a built form that gives rise to a range of harmful (including exceptionally harmful) impacts on amenity within the surrounding area. The proposed design is contrary to a wide range of national, local policies, guidance and best practice and certainly does not represent good or exceptional design in terms of policy. In support of this objection the following points are particularly noted:

(a) The application has selective and partial regard to planning policy and guidance and fails to have meaningful - if any - regard to the National Design Guide (NDG) as required by the National Planning Policy Framework (NPPF). This objection has particular regard, for example, to NDG Paragraphs 42, 43, 48, 67 and 71.

(b) There is failure to appreciate that policy documents including the NPPF need to be treated holistically rather than cherry picking policies to support a desired outcome.

(c) NPPF (Paragraph 135) requires developments that "are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change" but the latter is not expected to be at the expense of the former. In any event, the proposal is not innovative nor does it represent "appropriate change".

(d) The proposal inappropriately refers to unadopted, draft policy to support their application.

(e) The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

Additional background information:

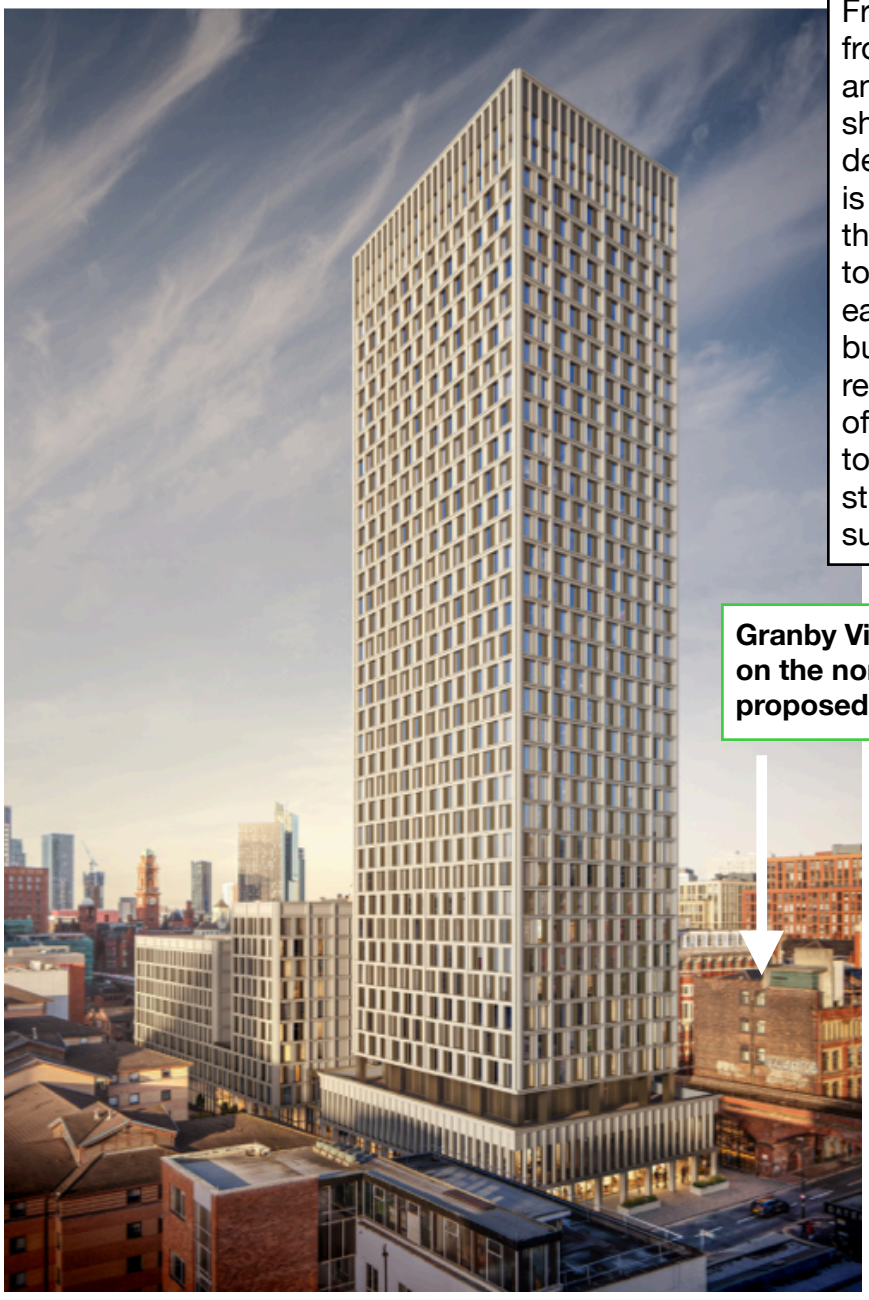
To achieve an appropriate design outcome for this site (including in terms of impacts on residential amenity and the environment within the surrounding area) there is no requirement in the statutory development plan to provide the quantum of development now being proposed. The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

It is unacceptable that the applicants fail to have meaningful - if any - regard to the National Design Guide (NDG) as required by the NPPF (Paragraph 134) and uses unadopted draft policy such as that relating to tall buildings (Planning and Tall Buildings Statement, Paragraph 6.30) in their attempt to justify the proposal. The proposal clearly would not accord with various parts of the NDG including those referring to new developments having a meaningful response to context (such as, for example, in Paragraphs 42, 43 and 48) and identity (for example, Paragraphs 67 and 71).

Irrespective of the comments made by the applicants, the proposal does not represent good design as is generally sought by planning policy and guidance, nor does it represent exceptional design in policy/guidance terms that could overcome certain other departures from policy. It is noted that NPPF (Paragraph 135) requires developments that "are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change" but the latter is not expected to be at the expense of the former given that the NPPF policies are meant to be read holistically.

The applicants state in the Environmental Statement (ES Vol 1, Paragraph 11.59) that it is unrealistic for existing surrounding residential properties to maintain similar levels of daylight to those currently experienced. This is without acknowledging that there has not

been a suggestion by resident representatives there should be no redevelopment of the site but that such development should appropriately respond to the existing character of the area in order to avoid harm and be compatible with the character of the area.



Front cover image taken from the submitted Design and Access Statement showing the proposed development. This image is misleading as it shows the south elevation of the tower as sunlit (and the east elevation in shade) but without showing the resultant overshadowing of the Granby Village area to its north which is also still shown impossibly as sunlit.

Granby Village down here on the north side of the proposed development

- **<u>Height, massing, siting and orientation: The impact on sunlight, daylight and overshadowing.</u>**

OBJECTION 1

The proposed incorporation of a tower (tower T3) of 38 storeys (plus rooftop plant) results in a proposed design which is not just uncharacteristic of the surrounding townscape context but would be overwhelming within this context and give rise to significant disamenity to residents and other users of the surrounding area. A particular impact is the loss of daylight, sunlight and reflected light within the adjacent area due to overshadowing and which will be particularly excessive in some homes including in Velvet House, Velvet Court and Granby House. This impact would be all the greater when combined with the siting and orientation of the proposed built form. It will give rise to excessive, adverse impacts on amenity within buildings including the homes of many people, within private external amenity spaces, the public/publicly accessible Sackville Gardens and Vimto Park, and within the public realm more generally including through the visually overbearing nature of tower T3. On this basis the proposal would be contrary to a wide range of national and local policies and guidance. In support of this objection the following points are particularly noted:

(a) The proposal has taken the SISTER SRF suggested approach of three linked towers of approximately equal height and size and redistributed the floor space so that one tower, tower T3, now contains some 75% of the floorspace. In terms of height the impact of towers T1 and T2 are more acceptable in terms of the existing urban context than tower T3 which is wholly out of context and unacceptable. The applicants claim this arrangement mitigates against the impact of the proposal on sunlight, daylight and overshadowing but without clearly stating that the mitigation only benefits a proportion of the area north of the viaduct but makes it worse for the area around tower T3 including in Velvet House, Velvet Court and Granby House.

(b) Tower T3 has has significant mass given its footprint and height. I is certainly not the “slender” tower the applicants constantly describe. It is sited close to the northern site boundary. The combination of height, massing, siting, orientation give rise to extreme harm to the amenity (including residential amenity) and environment within the nearby area on the northern side of the viaduct. It will not only affect daylight and sunlight (including reflected light) through overshadowing but will give an oppressive outlook for many nearby homes and give rise to considerable overlooking.

(c) In relative terms tower T2 may be far more acceptable than T3 in terms of height but it is sited even closer to the railway viaduct than T3. This will exacerbate the harmful impacts it has on the neighbouring area. However, the cumulative impact of towers T2 and T3 will be all the greater.

(d) It is evident that placing a large scale development including a massive 38+ storey tower against the south side of the railway viaduct will bring harmful - often extremely harmful - impacts on amenity (including residential amenity) within the primarily residential area immediately to the north of the railway viaduct. Within Granby Village this impact will be to internal living environments, private external amenity spaces (including Orient Square, courtyards, balconies and roof terrace of Velvet House) which help provide light to internal spaces. In the wider area it will similarly affect homes and also

streets and other open spaces including the nearby Sackville Gardens and Vimto Park.

(e) The affected area also contains Sackville Gardens (the only nearby green public open space apart from the highways) and Vimto Park as a private but publicly accessible green space shown as retained by the SISTER SRF proposal. Both are relatively small but are well used throughout the year by 1000's of people who live in, visit and use the city centre including a variety of community events. The applicants have discounted the impact of overshadowing on both spaces although common sense and practical lived experience of those using the area and living nearby would confirm otherwise. For example, it is evident that tower T3 would block much of the direct sunlight reaching Sackville Gardens that reaches it between existing buildings particularly during and around Wintertime when the sun is low even at midday as shown in the following photographs. This would impact not only amenity within this important open space and the ability for thousands of people to enjoy it, but also on the ability for the existing plants to survive let alone thrive. The impact on the closer Vimto Park through overshadowing would be similarly extensive if not all the greater.

(f) The proposed development is being imposed on an existing urban layout where the streets/street widths were never intended to accommodate buildings of the height now being proposed - especially not of tower T3 - and still maintain good levels of light within external spaces and buildings. The streets were set down at a time when, at most, they were expected to have frontage development of, at most, 5 to 7 or 8 storey warehouses possibly mixed with lower built form of 2 - 3 storey terraced housing and low rise workshops and yards. The adverse impact on the quality of sunlight and daylight arising from recent inappropriate tall building development can be readily experienced on the length of Charles Street between Princess Street and Oxford Street. Are these overshadowed canyon spaces really the environment Manchester City Council should be aiming to leave as a legacy for future generations?

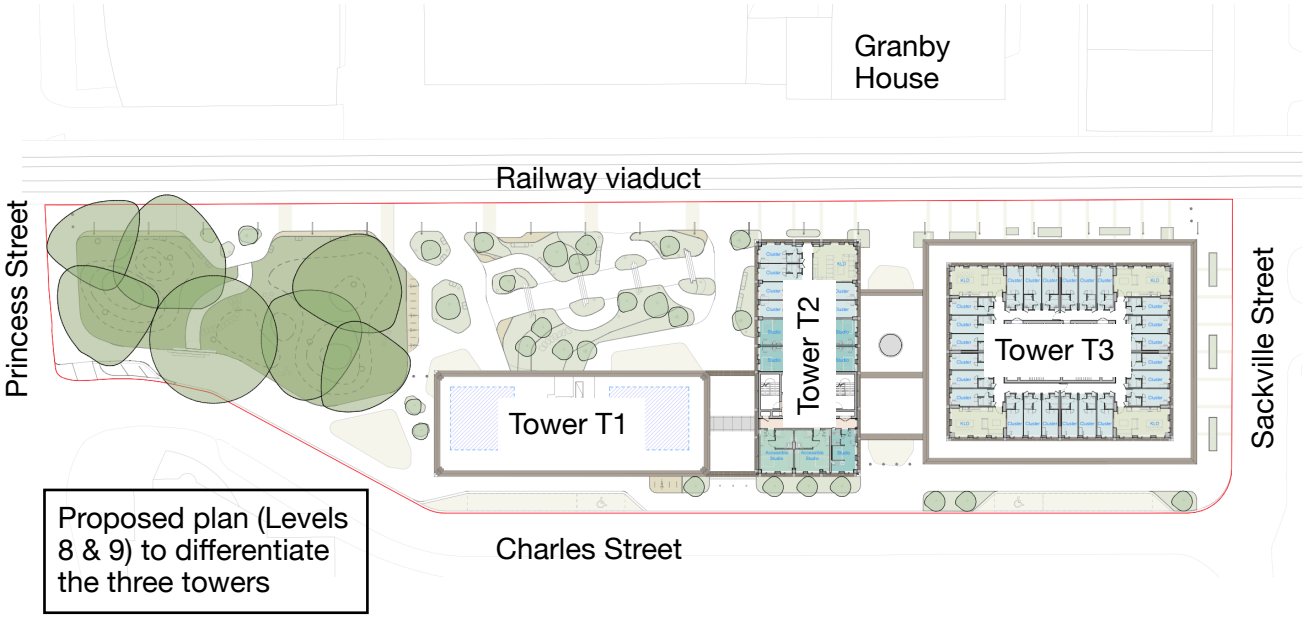
(g) The narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. If there are any areas in the city centre where this would apply it is here.

Additional background information:

The applicants have detailed how the three taller buildings of broadly equal height, massing and footprint originally shown for this site in the SISTER SRF have been reinterpreted to reduce the heights, massing and footprint of two (towers T1 and T2) while increasing the height and massing of the third (tower T3). Tower T3 will contain some 75% of the total floorspace.

The development as now proposed consists of three linked towers: T1 of 8-storeys, T2 of 10 storeys and T3 of 38 storeys each with the additional height of a rooftop plant (building services) structure taking them to stated heights of 62.25m, 67.95m and 148.75m respectively. In terms of height alone, tower T1 could be seen to be akin to - and to respond appropriately to - both the existing adjacent historic built form such as Orient House and Granby House and the more recent IBIS Hotel. Tower T2 begins to exceed the height that has this obvious relationship with the adjacent built form but could be considered as not excessive in this regard in

townscape terms. Tower T3, however, is wholly out of context within the surrounding context due to its height and massing.



Proposed plan (Levels 8 & 9) to differentiate the three towers

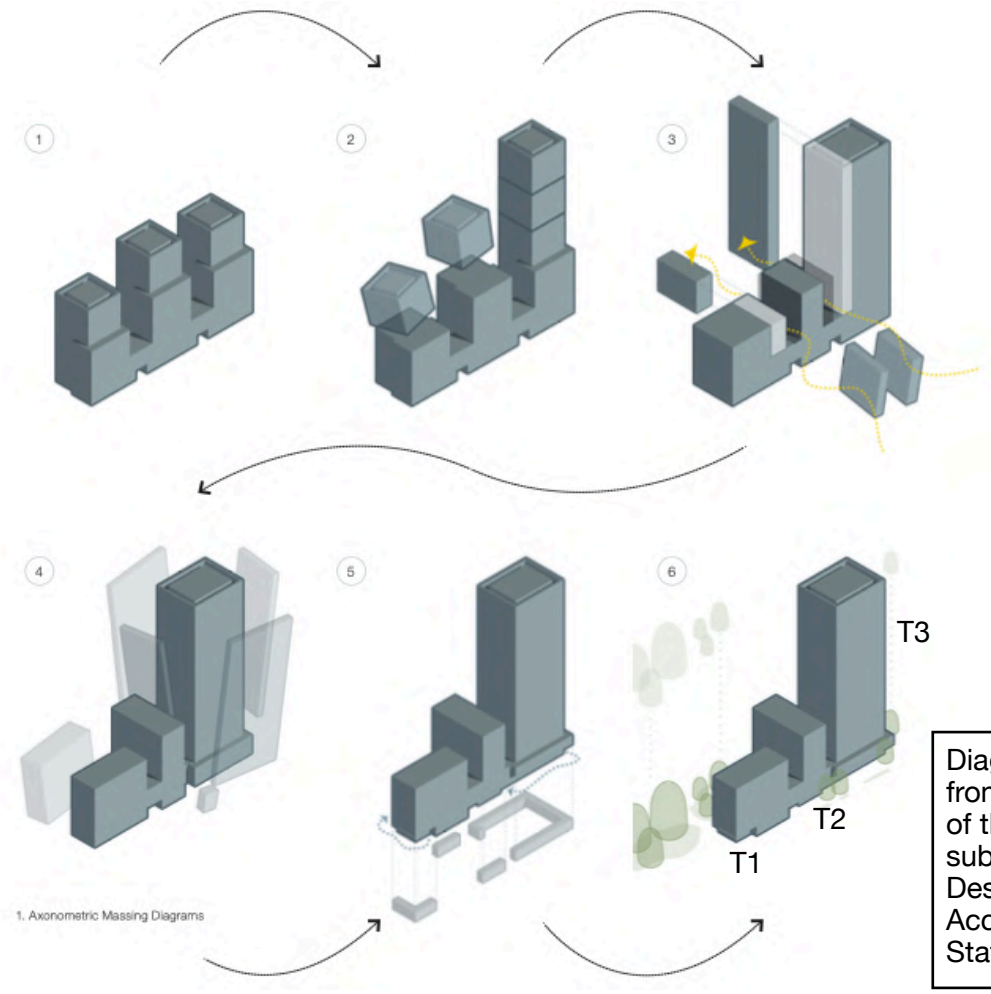


Diagram from p.26 of the submitted Design and Access Statement

The applicants state that the change in design between that envisaged by the SISTER SRF and the application proposal has been to mitigate against the impact of their proposed development on the daylight, sunlight and overshadowing of the residential properties to the north of the proposed development.

The changes made to the height and massing of towers T1 and T2 and plus the siting and orientation of tower T1 may indeed assist to mitigate impacts on a part of the neighbouring area to the north and especially some existing residents (notably in the corporately owned fully rented blocks of Orient House and Salisbury House). These changes also ensure the on-site open space (on the north side of tower T1), “Princess Square”, is not unduly overshadowed unlike the impact it will have on various existing public and private spaces currently enjoyed including by existing residents.

However, the changes only serve to further exacerbate the harm caused to a large area around T3 - probably more so than by the SRF envisaged development to which residents raised very considerable objection. It is unclear why the applicants consider residents in neighbouring buildings towards the western end of the site require a good standard of residential amenity (by avoiding/minimising overshadowing and the harmful impact on daylight and sunlight) whereas a large number of other neighbouring residents towards the eastern end of the site do not. However, it is noted that the eastern area - away from Orient House and Salisbury House - contains individually owned leasehold apartments including many long-standing owner occupiers in Granby House and Granby Village who have lived here for 20, 30 even 40 years. We are very early examples of Manchester’s urban regeneration that has proven popular and sustainable as a community for a long period. But we are now at the mercy of developers expecting to build huge towers of PBSA for short term gain regardless of the impact to our’ homes. If PBSA towers are to be part of the SISTER SRF then, as stated by residents at every opportunity in the consultation process - place them on the southern SRF boundary against the Mancunian Way to reduce harm on the Whitworth Street Conservation Area and our homes.

The applicants constantly and incorrectly stress the ‘slender’ nature of tower T3 to somehow suggest a reduced visual impact and impact in the local area on overshadowing, daylight and sunlight. Tower T3 is not slender. It is sited with the widest elevations running east-west (parallel to Charles Street) and is close to the northern site boundary all of which maximises this overshadowing on the area northwards. The scale, massing and siting will give rise to an overbearing presence both for those using the area but also within the outlook from many existing apartments.

Admittedly, for the current proposal, even relocating tower T3 the short distance to sit on the southern site boundary to maximise its distance away from the northern boundary would probably make negligible difference to the overshadowing or the overbearing nature of the building experienced in the nearby area and homes given the height of the proposed tower. As with the daylight, sunlight and overshadowing issue, it is unclear why the applicants consider residents at the western end of the site deserve a more open aspect by proposing lower built form sited almost as far as possible away from the existing residential buildings to the north. In terms of siting in general it is noted that the site boundary follows the existing kerb line along Charles

Street and that all three towers have all been stepped back from this boundary to provide not only a generous footway but also servicing lay-bys.

The area on the northern side of the railway viaduct that would remain extremely harmed by towers T2 and T3 contains many homes and private external amenity spaces including within Granby Village which alone contains over 200 apartments with a variety of communal external spaces (including the green Orient Square at the corner of Granby Row and Samual Ogden Street) and private balconies and Velvet House roof terrace. The area currently enjoys a good level of sunlight and daylight partly as a consequence of the height and massing of the historic built form, the historic layout of the area designed to facilitate working with textiles in the many (now converted) textile warehouses, and a sensitive approach to planning when regeneration took place in the late 1980's/early 1990's that sought infill development of a corresponding height and massing. This means good levels of direct sunlight (including for some facing into courtyards as well as streets) and daylight and also light percolating into spaces between buildings and reflected light has resulted in desirable homes that people enjoy living in and an area others enjoy visiting and using. A separate consultants report commissioned by the management companies of Granby Village and Granby House will detail the harmful impacts of the proposal on them but it is evident that an overly tall and massive building placed immediately southwards of such a much lower area will have a devastating impact on amenity especially of those living closest to tower T3.

Sackville Gardens and Vimto Park are the two small public/publicly accessible green open spaces serving this locality and a wide area of the city centre. many 1000's of people use them every year both for amenity and leisure but also, in the case of Sackville Gardens, for a number of community events of both local and national/ international significance such as 'Manchester Pride' and 'Sparkle Weekend'. The applicants claim these spaces will not be affected to any notable extent by the proposal but common sense and the practical lived experience of residents and users of these spaces confirm this will not be the case for either space. For example, it is evident that tower T3 would block much of the direct sunlight reaching Sackville Gardens that reaches it between existing buildings particularly during and around Wintertime when the sun is low even at midday as shown in the following photographs. This would impact not only amenity within this important open space and the ability for thousands of people to enjoy it, but also on the ability for the existing plants to survive let alone thrive.

Vimto Park, like Sackville Gardens, is directly north of the proposed tallest tower, tower T3 and is an intensively used green open space especially popular on sunny Summer afternoons. However, Vimto Park is much closer to tower T3 with their nearest points being only some 25m apart (about twice the width of Sackville Street) and the impact on sunlight and daylight levels within this space will be considerably affected by overshadowing for much of the day. However, the application documentation appears to suggest that Vimto Park will not be overshadowed by the proposed development. Regarding the submitted information, for example, (1) the March SHOG Assessment Results for Vimto Park (Table 11.19 of the Environment Statement) showing a less than 1% reduction in 2 hours of Sun Hours on Ground is misleading for the effects at other times of year; and (2) the prediction of a "negligible" increase in shadow over the park (Table 17.8) is simply not credible for the winter months.

It is clear that the applicant's assertions are incorrect and the proposal will cause significant harm to these open spaces. By failing to acknowledge this harm the proposal will radically diminish the quality of Sackville Gardens and Vimto Park despite recognition in policy and guidance that access to good quality open space and nature is vital to physical and mental health and well-being.



Photo taken at midday in early January 2025 looking down Sackville Street towards the site of the proposed tower T3. Note how the low Wintertime sun sits low in the sky but manages to illuminate the Gardens through the existing gap in buildings. Compare this with the following image

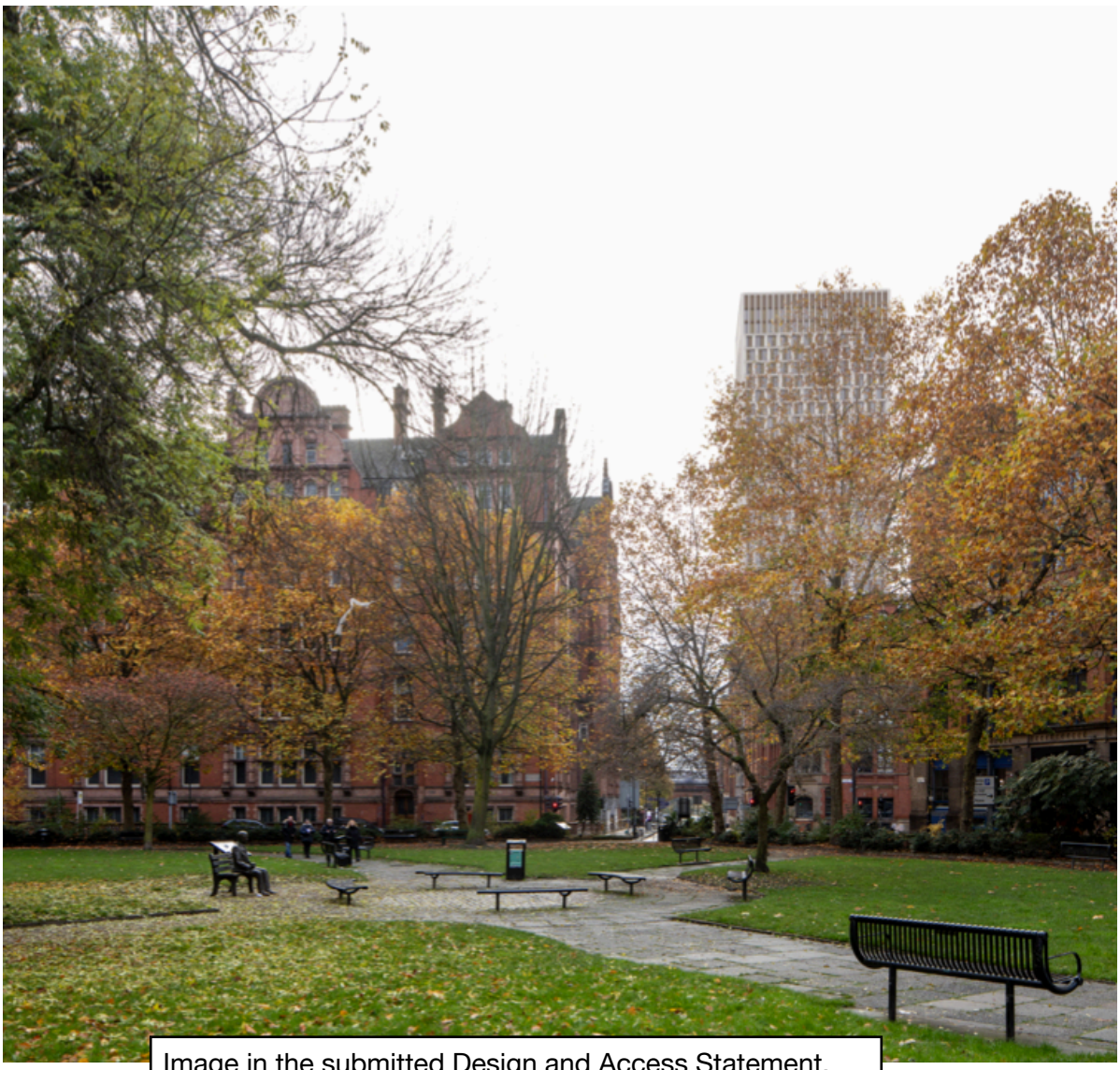


Image in the submitted Design and Access Statement. View from Sackville Gardens looking down Sackville Street towards the site with the proposed tower T3 as it would be seen. Note how the proposed tower T3 would fill much of the existing gap between the Sackville Building and Whitworth House through which Sackville Gardens currently receives most of its direct sunlight especially the low sun experienced in Wintertime.

The submitted application includes a document that looks at the impact on health of the proposed development without much regard to the adverse impacts being caused to the area outside the proposal. It does confirm, however, under the heading “Access to open space and nature” that open space helps reduce physical health issues including those associated with sedentary occupations and stressful lifestyles and growing evidence they help to maintain or improve mental health. It seems obvious, therefore, that the limited open spaces that exist within the area and amenity within them should be protected including for existing people using the area including residents and the new occupants of any proposed development on the application site. The current proposal clearly will not achieve this.

The applicants seem to suggest (Planning and tall Buildings Statement, Paragraph 6.242) that residents have bought into an area they knew was next to an SRF and so should have expected their sunlight and daylight levels to be harmed at some point. This misses the point that many residents were in the area before - often a long time before - the SRF and also that there are many planning policies and much guidance that address the need for proposed developments to have meaningful regard to the local urban context to avoid harmful impacts. In this regard it is also noted that the narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. If there are any areas where this would apply it is here.

OBJECTION 2

The proposal would result in a decrease in the amount of sunlight and daylight reaching Granby Village, and so would increase the need for internal heating and lighting at times when this is not currently required. This will increase energy usage and costs associated with communal areas and particularly within individual apartments. At the same time this decrease in sunlight and daylight would also remove the physical and financial viability of the use of the Granby Village roofs for the generation of solar power. This is presently being considered as a means of contributing to other proposals already voluntarily implemented and being progressed within Granby Village to reduce energy use and to increase energy generated within Granby Village from sustainable sources. This is seen as means of reducing energy costs (especially given the on-going cost of living crisis) and assisting to meet the wider national and local goal of 'net zero'. In support of this objection the following points are particularly noted:

(a) Granby Village is owned by the apartment owners. Granby Village Management Company consists of the apartment owners who elect one director for each of the five consistent buildings. The day-to-day management is undertaken by Scanlans as an appointed specialist property management company with their work overseen by the directors.

(b) All costs within Granby Village are met by through the service charge levied on the individual apartments. One of the largest contributing costs is that of electricity. In order to achieve 'best value' and keep services charges affordable this unfortunately does not mean that electricity is necessarily from sustainable sources.

(c) The management company has already voluntarily undertaken works to reduce energy use in communal areas by rationalising/reducing the number of light fittings, changing to energy efficient light bulbs and installing motion detectors so most lights are only when a space is in use. A heat pump has recently been installed to provide the energy for our communal leisure centre. Proposals are being progressed to install charging points within the basement car parking area with spaces for over 200 cars. The possible installation of solar panels - with a focus on the modern flat-roofed buildings within Granby Village - is already being considered as a 'next step'.

OBJECTION 3

The assessment of the impact of the proposal on sunlight, daylight and overshadowing and the manner in which this has been used and communicated has not assisted to provide an accurate understanding of the real impacts of the proposal to decision-makers and other non-specialists including existing local residents and others who will be affected by the proposal. These impacts include excessive negative impacts especially in the area affected by tower T3. In support of this objection the following points are particularly noted:

(a) The Head and Deputy of the City Council's Planning Service has noted that the assessment of sunlight, daylight and overshadowing is a complex matter and it has been confirmed that there are no specialists within the City Council in this matter. This can only mean the Planning Service has been taking the assessments made by applicants/developers at face value.

(b) The submitted information contains no readily understood visual information that would show the development and the overshadowing it would cause on key dates of the year (Summer and Winter Solstices and Spring and Autumn Equinoxes) and at one hourly intervals throughout these days to track the change during the hours of daylight.

(c) The submitted application advises that its assessment has departed from the normally used British Research Establishment (BRE) standards as they felt the existing light standards around the application site were too good and so overly emphasised the harmful impact the proposal would have. This seems to have involved benchmarking to set a lower baseline light quality by taking instead the environment around recent "successful" developments elsewhere in the city centre. The applicants do not define how they measure success and they openly confirm that many of these supposedly successful developments do not meet BRE standards. This approach is unacceptable.

(d) Despite this 'benchmarking', the outcome of the assessment advises that the proposal causes harm - including in some cases a "major impact" - on the quality of light reaching a not insignificant number of homes in the area. The applicants merely state that the change in design from the SRF illustration to their proposal has mitigated against this harm although clearly this mitigation has only been to a proportion of the windows. The homes closest to towers T2 and especially T3 continue to be harmed in a major way. This is unacceptable and appropriate mitigation should benefit all the residents which would be expected to involve decreasing the height and massing of built form and to revise the siting to something more akin to tower T1.

(e) Granby Village should be disaggregated into its five consistent buildings to more clearly show that certain parts (such as Velvet House and Velvet Court) will be far more affected than others especially by tower T3.

(f) Having shown that a not insignificant number of existing homes will experience a "major impact" on their sunlight and daylight due to overshadowing, the applicants average out their findings across the wider area to reach an overall conclusion that the impact on surrounding properties is "negligible to minor adverse". This suggests that the extreme harm caused to some homes is somehow, therefore, considered acceptable.

(g) The assessment unbelievably determines that for surrounding areas of amenity space (by which it means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) the impacts would be "negligible and

considered non-significant requiring no mitigation measures". In reality these spaces will experience considerable harm.

(h) It is unacceptable that the local residents have had to employ their own daylight, sunlight and overshadowing specialist to counter the application assessment. The citizens of Manchester should be able to depend on the City Council to have appropriate independent expertise to analyse and verify or challenge submitted information.

Additional background information:

A specialist report has been commissioned by the directors of the Granby Village and Granby House management companies to assess the issue of sunlight, daylight and overshadowing which will challenge and counter the information contained in the application. This report is awaited and the following comments are most on a non-specialist basis having reviewed the submitted application information.

It seems common sense that a 38+ storey tower with a wide footprint on an east-west axis and sited immediately south of a relatively densely laid out area of much lower (in relative terms) buildings of broadly homogenous height with pockets of open space would cause considerable harm to amenity through overshadowing across much of the area and with a consequential impact on sunlight and daylight (including arsing from reflected light). The planning application, however, requires a specialist report that can confirm the acceptability of a proposal in a more robust manner to allow the Local Planning Authority to show the matter has been fully considered and allow a box to be ticked. Such a process requires a transparent, honest and independent assessment with results that are accurately presented. This has not happened in this instance, and the applicants are being allowed to mark their own homework and determine their proposal to be acceptable not only against all common sense but also against the spun analysis of their own specialist assessment.

In the separate planning application by iQ for the neighbouring Weston Halls/ Pendulum Hotel site (still to be decided by the Planning Committee), the specialist daylight, sunlight and overshadowing report openly advises that "There are no specialists within MCC or other statutory consultees relevant to the area of daylight and sunlight" (p.209, Chapter 10, Environmental Statement). The planning application for the SISTER Plot H site covered by this note has now similarly confirmed this lack of expertise.

The Planning Committee considered a planning application for the proposed tall building scheme at 140 Great Ancoats Street (at the junction with Store Street and near Piccadilly Village) at its meeting on 25th November 2025. When councillors raised questions and queries about sunlight, daylight and overshadowing both the Head of the Planning Service, Julie Roscoe, and her deputy, David Roscoe, appeared to allude to this lack of specialists when confirming that this is a highly complex issue. It seems that the Planning Service merely routinely accepts the specialist sunlight, daylight and overshadowing reports submitted as a part of planning applications at face value. A video recording of the November 2025 Planning Committee meeting can be viewed at https://player.vimeo.com/video/1129898464?badge=0&autopause=0&player_id=0&app_id=58479 with the relevant case being from 1:07:15 to 1:30:00 in the video.

The specialist report submitted as a part of this application does not include any readily understood illustrative material that would, for example, show the area affected by overshadowing on key dates of the year (Summer solstice, Winter solstice and Spring/Autumn equinoxes) and at hourly intervals throughout these days. The assessment, instead, is made and presented through a series of calculated figures requiring various assumptions including through a lack of information on the internal layouts of existing apartment buildings. The most appropriate assessment would seem to require knowledge of internal layouts of the homes affected but often these seem to have been claimed to not be available although, for Granby Village for example, these exist including in the archived building control records at the Central Reference Library.

The application assessment has allegedly followed the British Research Establishment (BRE) guidelines. However the applicants decided their assessment results showed too great an impact on daylight and sunlight through overshadowing because the existing conditions within the area are too good. On this basis the applicants have manipulated their findings to reduce this adverse impact. In order to make this adjustment the applicants selected a number of recent developments in the city centre they consider “successful” (without defining how ‘success’ was being measured and by/for whom) and despite many not even meeting the BRE standards. In this way, the impacts of the current proposal were being played down by using sub-standard developments that presumably had been approved due to the inability of the Planning Service to understand or interrogate the daylight, sunlight and overshadowing reports submitted as part of the associated previous planning applications.

A further means of presenting the impacts in as positive a light as possible has been to treat Granby Village as a single entity whereas in fact it is a group of five buildings and several open spaces which would be harmed to different extents by the proposal. Without disaggregating the buildings and spaces the harm appears to be to a limited number of apartments across Granby Village whereas, in fact, the greatest harm is concentrated on Velvet House and Velvet Court due to their location relative in particular to tower T3. While the harm may be more concentrated in some parts of Granby Village and the wider area than in others, there will be widely felt adverse impacts as, for example, all five Granby Village buildings have south facing windows and many apartments rely on light (including reflected light) from streets and external amenity areas within the complex including courtyards. The application documentation does not appear to give any consideration to the impacts on these public and private external spaces where achieving a high quality environment makes a significant contribution to the amenity, health and well-being of people using the area including the existing residents.

Nevertheless, the adverse impacts of the proposal are difficult to hide and Table 11.10 of the application report on sunlight, daylight and overshadowing shows a sizeable proportion of windows (even discounting Weston Hall which is planned to be demolished) will experience a “major impact." In stark terms this would mean a considerable number of permanent residents being permanently, adversely impacted for a new development but , in this instance, a development of short-term accommodation for a transient student population. That the applicants consider this to be acceptable is appalling but this decision only seems to be reached by couching these major impacts as only affecting a limited number of apartments of the total

considered by the assessment. In this way the report draws the overall - and unbelievable - conclusion (in paragraph 11.172) that that daylight and sunlight impacts to surrounding properties are “negligible to minor adverse” and that no mitigation is required, and for surrounding areas of amenity space (by which is means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) impacts are “negligible and considered non-significant requiring no mitigation measures”.

- **<u>Height, massing, siting and orientation: Efficient use of the site, demarcation of gateways to the SISTER SRF area and landmark development</u>**

OBJECTION

The retention of an existing soft landscaped area at the Princess Street end of the site and its extension to create what is still a relatively small open space (“Princess Square”) that nevertheless takes a significant proportion of the overall area of the site does not achieve the efficient use of land. It also results in a built form that fails to accord with the Guide to Development in Manchester regarding the demarcation of street corners and frontages with built form. In support of this objection the following points are particularly noted:

(a) The existing site includes a small incidental landscaped area. This resulted from the placing of the multi-storey car park with it s regular footprint on an irregularly shaped site. This open space only exists due to poor 1960’s planning and has been poorly maintained and misused over time. The submitted Ecological Impact Statement rightly describes the “Princess Square” location as it is now as “a small area of poor condition … heavily shaded”; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition were to be improved.

(b) The existing incidental landscaped area contains seven Category B trees which means they are of moderate value. The Planning Service has previously given planning permission on city centre development sites for schemes that require the removal of trees (subject to replacement trees being planted elsewhere) in order to ensure both the efficient use of the site and an appropriately designed built form can accord with policies and guidance including in The Guide to Development in Manchester including the response to adjacent streets. A recent example was the granting of planning Permission for a development site elsewhere in the SISTER SRF boundary (Plot C) that will involve the removal of 21 Category B trees. The need to retain trees on the application site is, therefore, inconsistent with an approach of making efficient use of land and achieving a built form that would appropriately respond to the visually important Princess Street/Charles Street junction. In this way the proposed development leaves this visually prominent corner area undeveloped and fails in its aim of creating a notable gateway from Princess Street into the SISTER SRF area and does not accord with policy and guidance.

(c) Leaving the western end of the site adjacent to the Princess Street/Charles Street junction as landscaped open space would fail to create an appropriate gateway to the SISTER SRF which is a stated objective of the proposal.

(d) Contrary to the claim by the proposers, in a skyline already crowded by tall buildings of questionable design quality, the proposed development can surely not be thought of as a landmark.

Additional background information:

The majority of the application site is broadly rectangular but narrows at its western end as a consequence of the realignment of Charles Street in the 1950's/60's to accommodate the existing multi-storey car park than now occupies the rectangular part of the site. As was typical and problematic with many such much post-war schemes the left-over area ('site left over after planning', known as SLOAP) was merely landscaped in a rudimentary manner - hence the existing trees and grass at the Princess Street/Charles Street corner of the site. This has since remained as a small, incidental and poorly maintained area used by rough sleepers and for fly-tipping rather than recreation. The proposal is effectively replicating this approach which the City Council's Guide to Development in Manchester was intended to prevent.

It is accepted that the loss of good quality trees is generally to be avoided. However, such loss has routinely been accepted by the Planning Service where trees are within an identified development site and would prevent the efficient use of the site to achieve other policy objectives including good design. This is usually on the basis that three new trees are planted by the developer for each tree removed in an appropriate, alternative location. This would include, for example, street tree planting around the site. It is noted that a development was recently granted planning permission on SISTER's Plot C site (fronting London Road) which will involve the loss of 28 trees including 21 moderate-value Category B trees in order to accommodate the proposed development. The proposal which is the subject of this objection is using the existence of 7 Category B trees as a justification for a scheme that proposes no built form on this SLOAP area. If this argument is accepted there is an obvious contradiction at play within the SISTER SRF area and the wider city.

The provision of publicly accessible open space within this application is well intended but takes a significant proportion of this site which is nevertheless relatively small in area, amounts to no more than a small 'pocket park', and could in no way expect to meet the needs of a fraction of the proposed 1,041 students plus visitors, staff and public. A more effective approach would be for the developer to contribute towards the provision of a more meaningfully sized public open space on nearby land - perhaps as a part of a re-imagined SISTER SRF masterplan - that could begin to address the deficiency of such space for the existing city centre population as augmented by their new residents. Pocket parks will not achieve this.

Effectively sterilising the eastern end of the application site from built form has resulted in this current SISTER Plot H proposal failing to provide a built form that either appropriately responds to/demarcates the lost building line to the principal Princess Street highway frontage or demarcates the Princess Street/Charles Street corner. Without such built form the proposal does not accord with the Guide to Development in Manchester and references made in the application to the development providing a gateway from Princess Street into the SRF area is largely meaningless especially as the tallest element of built form is at the far eastern end of the site. Most critically, however, the exclusion of this part of the site from built development also means that it can not make a contribution to achieving a lower

built form that responds appropriately to the surrounding urban context while maximising the quantum of new development to make efficient use of the site. This would not preclude the provision of some open space and proposed Altrincham Street route behind street frontage development.

The application makes reference to the proposal being a 'landmark' development. However, it is commonplace for proposers of tall buildings to make this claim which become meaningless given the number of tall buildings already in Manchester vying with each other but crowding each other out in a cluttered skyline. Other than having an overly tall element (tower T3) there is nothing in the quality of design that would suggest this development would be a landmark. Regarding this site, it would seem more appropriate to create a design that better celebrates the Princess Street/ Charles Street corner with a gateway built form that could be considered a true landmark without relying on inappropriate height.

- **Height, massing, siting, orientation: Overbearing presence**

OBJECTION

The proposal, through a combination of height, massing, siting and orientation will have cause significant disamenity by creating a visually oppressive and perceived enclosing built form within the outlook from various nearby properties.

Additional background information:

Under planning there is no right to a view. However, the proposal will have an impact on amenity due to the oppressive and intrusive nature of the development into the townscape and outlook form peoples homes.

- **Height, massing, siting and orientation: Overlooking**

OBJECTION

A degree of overlooking is expected within the city centre. Within the nearby existing, principally residential, area to the north of the railway viaduct residents and other building users do experience overlooking but from a number of potential sources that are not excessive and are proportionate to the human scale of the existing buildings. The height, massing, siting and orientation of the proposed built would dramatically and unacceptably increase this potential for overlooking and from a vast number of anonymous windows. This will be particularly the case from towers T2 and T3 which are close to the northern boundary of the site and exacerbated by tower T1 and exacerbated further by the extensive use of areas of full-height glazing.

Additional background information:

The north elevation of tower T3 directly facing existing residential properties will alone contain windows serving 156 student rooms, 48 studio apartments and 52 communal living spaces. All these communal living spaces are located on the corners of the building and also have windows to the east and west elevations

allowing additional oblique views northwards. The north elevation of T2 which is even closer to the site boundary will contain windows serving an additional 9 student rooms, 9 communal living spaces and 9 communal corridors. All windows are full length and fill the majority of the elevation so looking out is not a case of making a conscious effort of walking up to a raised window cill but, instead, having an expansive view from anywhere within the internal space. As with overshadowing, it would be the existing homes adjacent to the eastern end of the application site that would experience the greatest extent of overlooking. It is noted that tower T1 is lower in height and further away from existing buildings but with a long north elevation facing adjacent existing buildings and so would further exacerbate the cumulative extent of overlooking.

The applicants state (Planning and Tall Buildings Statement, Paragraph 6.246) advises that "privacy" will not be negatively impacted due to building separation and careful window placement. However, it is unclear how this conclusion is reached given the close proximity and orientation of the proposed built form, especially Towers 2 and 3, to existing residential windows and that 100's of new windows in the proposed north elevations that will face directly into those of existing apartments.

- **<u>Height, massing, siting and orientation: Impact on wind.</u>**

  OBJECTION

  The application has predicted that there will be some impact on wind patterns/ strength in the area but suggests it will not cause a safety issue. It is unclear, however, what impact people using the area can actually expect to experience or the consequences for the increased deterioration of/damage to nearby buildings including historic buildings. In support of this objection the following points are particularly noted:

  (a) Other tall building developments implemented elsewhere in the city centre no doubt underwent similar modelling when being proposed. Nevertheless there are examples throughout the city centre where the modelling has been insufficient to foresee the adverse impacts on the surrounding open spaces and neighbouring buildings due to wind. For example, on both Oxford Road and Charles Street adjacent to the Circle-Square development and on Quay Street.

  (b) There is no confidence that the modelling in this instance has given enough regard to the proposed development on its own or in conjunction with the immediately adjacent four-tower iQ proposal on the Weston Hall/Pendulum Hotel site.

- **<u>Height, massing, siting and orientation: Impact on reflected railway noise.</u>**

  OBJECTION

  The close proximity and design of towers T1 and T2 to the railway viaduct carrying the North-West main railway line and used by countless trains throughout the 24 hour day will give rise to the reflection northwards of railway

related noise to the detriment of the amenity of users of the area including existing residents. The elevations are primarily in reflective glazing without any apparent design measures to acoustically attenuate such noise.

- **Servicing**

OBJECTION 1

The proposed development can expect a high level of servicing. This will arise, for example, from the operational needs of the student accommodation and ground floor retail uses, and the various deliveries expected with a student population of 1,041 (plus staff and visitors). This servicing is proposed to be from two lay-bys on the highway and will cause inconvenience and safety concerns for pedestrians using the adjacent footways and particularly in the vicinity of the two lay-bys. This will be exacerbated at the times of student move-in/move-out which will exceed the capacity of the two lay-bys with adverse consequences for the safe and convenient use of the surrounding highway network (including footways) and the likely generation of traffic noise.

Additional background information:

All servicing would be from two lay-bys on the Charles Street highway. The capacity of two lay-bys to meet the needs of the likely high number of vehicle arrivals/departures including for postal and food deliveries (including online purchases), taxis, and for more general operational needs. It seems that the loading bays are not expected to cope with the significant vehicle movements associated with student move-in/move-out. The proposed on-street servicing would cause inconvenience and safety issues for those using the highway including pedestrians and cyclists. Both the site and amount of development is large enough to warrant the provision of dedicated on-site vehicle area for deliveries/loading/unloading. This could take the form of a basement space or well designed, appropriately located and landscaped area within the site that could also be used by taxis and assist with student move-in/move-out.

- **Elevation design considerations**

OBJECTION

The proposed elevation design (including materials with an emphasis on light coloured concrete and finishes) has no resonance with the character of the immediately adjacent Whitworth Street Conservation but is intended to respond to the nearby modernist 1950's/60's university architecture elsewhere in the wider SISTER site. However, this is merely a means of window dressing a development that in every other regard such as height, massing and siting fails to have any regard to the existing character of either of these areas and fails to acknowledge decisions already made within the area including the demolition of many of the nearby modernist buildings. In support of this objection the following points are particularly noted:

(a) The proposal fails to acknowledge that many of the existing former university buildings within the SISTER SRF site including those along the east side of

Sackville Street are proposed to be demolished as a part of the SRF masterplan.

(b) The proposal fails to acknowledge that the University already has planning approval for the demolition of the modernist Faraday Tower and the future of other modernist buildings around it on the west side of Sackville Street is uncertain.

(c) It is likely that a lighter elevation finish has been selected in the knowledge it can reduce the adverse impact on daylight of the proposed built form and its overly dominant height and massing.

(d) The separate planning application (awaiting a decision) for the iQ development on the Weston hall/Pendulum Hotel site proposes a brick elevation as a means of relating to the conservation area but this site is more distant from the conservation area than this SISTER Plot H proposal. While both proposals are out of context and unacceptable due to height, massing and siting, an argument could be made for either approach to elevation design including materials for a more appropriate built form. However, any developments on these two sites should have a coordinated approach towards their context and materiality.

(e) A high quality elevation design could be achieved with a scale, massing and siting of built form that more appropriately and meaningfully responds to the townscape context with the necessary regard to national and local policy and guidance.

(f) If an out-of-context, overly tall building continues to be proposed on the SISTER Plot H site, a lighter finish to elevation materials (together with appropriate articulation) has the potential to reduce the overbearing visual impact and a lighter finish would provide some reflection of daylight.

- **<u>External on-site open space</u>**

OBJECTION 1

The proposed external on-site open space occupies a relatively large proportion of the site but is in reality a small area for its intended purpose of serving the 1,041 student bedrooms plus staff and visitors and the general public. This area should instead be used to better accommodate a more appropriate built form and quantum of development in order to begin to address the identified adverse impacts of the currently proposed design.

Additional background information:

Somewhat cynically, the application concentrated the proposed built form at the eastern end of the site to maximise the amount of sunlight and daylight reaching its own on-site landscaped external area at the western end of the site and to minimise the impact upon the adjacent corporately owned and commercially run Orient House and Salisbury House buildings.

OBJECTION 2

Any external space should not be used for refuse storage even on a temporary basis and especially not on a prominent street frontage as is being shown on

the drawing on p.107 of the submitted Design and Access Statement. All refuse storage should be within the building until collection.

Additional background information:

The Design and Access Statement (p.107) contains a drawing showing a large "external refuse holding area" proposed within this external area and located on the bend in the Charles Street boundary - a prominent street frontage and a particular focal point when approaching the site from Princess Street. It is unclear if containerised bins would stand here while awaiting refuse collection and/or if this would be screened in any way. However, it should be clear that no part of the limited external space or adjacent highway should lost to such an ancillary use (even on a temporary basis) which would be unsightly and may give rise to odours and misuse. It would be particularly inappropriate on this visually prominent part of the site and would adversely impact on visual amenity within both the site and the adjacent public realm.

Instead, sufficient on-site storage should be provided within the footprint of the building with collection taken from these internal spaces without the need for any external storage even on collect days. Unsightly containerised bins already plague the City Centre and new development should be designed and managed to avoid creating an unsightly streetscene and external spaces.

OBJECTION 3

The use of the proposed external open space for events if these would cause disamenity outside the application site.

Additional background information:

The applicant advises that the external space is proposed to be used for external events. This would give rise to an objection unless a planning condition is attached to control the time and duration of such events and preventing the use of external sources of amplified noise at any time.

- **<u>Design and health</u>**

OBJECTION

The inappropriate design of the development would have a harmful impact on the health and well-being. This would affect not only residents but all those who use the area. In support of this objection the following points are particularly noted:

(a) The design of development has been shown to have a link to physical and mental health and a sense of well-being.

(b) A range of Planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF (Paragraph 135) and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2.

(c) The recent pandemic taught us lessons that have soon been forgotten as by the proposed application given the harmful impacts it would have on both the

internal environmental quality of people's homes and the quality of external spaces and the way they would be experienced and used.

Additional background information:

The design of development has been shown to have a link to health and a sense of well-being. The submitted information acknowledges this but focuses on the health benefits the proposal would bring to those within the development without addressing the harm caused to the health and well-being of those outside the site through the inappropriate design with its significant effect on amenity both during construction and once the building is in operation. A range of planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF (Paragraph 135) which aims to "create places that …. promote health and well-being, with a high standard of amenity for existing and future users", and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2 refers to a need for development to respond to a sense of place and contribute to well-being.

Regarding health, a lesson learned from the recent pandemic is the importance of the quality of residential amenity within and immediately around homes to maintain health and well-being. This lesson appears to have been soon forgotten by the applicants as this proposal will adversely impact residential amenity and amenity within a range of external spaces to the detriment of the health and well-being of many permanent local residents at the expense of accommodating an excessive number of transient students (a description used in Paragraph 6.231 of the submitted Planning and Tall Buildings Statement) in accommodation only designed for short-term occupancy.

- **Design and lessons learned**

OBJECTION

The City Council would seem not to have assessed the impacts of already implemented tall building schemes to learn any lessons for future decision making.

Additional background information:

The adverse impacts of the many similar tall buildings that have already been implemented within the City Centre on their surrounding areas are apparent. The City Council should assess these and find an alternative approach before approving any further such developments. The overshadowing and harm to sunlight and daylight levels and wind tunnel effects (and consequential harm to amenity and well-being) will be long-lasting. Managers of the Castlefield Viaduct - a major ongoing regeneration scheme and visitor destination - have confirmed, for example, that they are now having to replace their sun-loving planting scheme to a shade-tolerant scheme due to the excessively tall buildings to the south in the Owen Street/Great Jackson Street area some 250 metres away from the National Trust scheme at their closest point.

Several tall building developments have caused periodic excessive wind tunnel effects - notably on Oxford Road next to Circle Square and on Quay Street next to

Spinningfields - and it is assumed that these impacts were not foreseen by similar modelling as has now been undertaken for this application.

The strategic decision on the PSBA use, density of development and quantum of PBSA on this site and over-development

OBJECTION 1

There have been various reports to the City Council's Executive Committee in recent years specifically regarding the provision of PBSA and how Policy H12 in the statutory development plan should be interpreted in order to facilitate PBSA being brought forward to meet an identified demand. It is clear, however, from these reports that Policy H12 remains the relevant policy specifically relating to PBSA provision in the statutory development plan. The policy retains primacy over guidance contained in the Committee reports or SRF's. In its current form the proposed PBSA development would be contrary to:

(a) Policy requirement No. 3 of H12 that requires any new development to be sited where this is compatible with existing developments. There is no suggestion that this requirement does not include existing developments such as Granby Village and the proposal would clearly be contrary to this policy due to the harm it would cause to amenity, including residential amenity of those within these existing developments.

(b) Policy requirement No.6 of H12 that aims to ensure there is no unacceptable impact on residential amenity from the proposed development through increased noise, disturbance or impact on the streetscene. The proposed development would have an unacceptable impact on the streetscene through excessive overshadowing and the consequential impact this would have on residential amenity.

PBSA could be acceptable on this site under Policy H12 if the proposed design avoided the harm caused to amenity and the streetscene which is clearly not the case here where the current proposal represents over-development.

Additional background information:

Policy H12 includes a number of requirements which should all be applied rather than applied selectively. These include requirements 3 and 6 as follows:

"3. High density developments should be sited in locations where this is compatible with existing developments and initiatives, and where retail facilities are within walking distance. Proposals should not lead to an increase in on-street parking in the surrounding area." and

"6. Consideration should be given to the design and layout of the student accommodation and siting of individual uses within the overall development in relation to adjacent neighbouring uses. The aim is to ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the streetscene either from the proposed development itself or when combined with existing accommodation."

The statutory local development plan makes no specific land-use allocation for this site or quantum of development. The policies within this plan, together with relevant national policies and guidance, should be fully informing the approach that is taken to the site with

full regard not only to the site itself but also, as seen above, to its existing wider townscape context.

The City Council's Executive Committee has adopted a report setting out an approach for providing for Purpose Built Student Accommodation (PBSA) within the City. This includes the effective relocation of a transient student population from existing poor quality private sector housing in the suburbs to new high quality accommodation within or adjacent to the City Centre and near higher education establishments. The poor quality housing then becomes available for use as permanent homes for the wider resident community. This also relieves these suburban areas from disbenefits such as the destabilising impact of a constantly changing and significant proportion of the local population, traffic and parking issues and anti-social behaviour which all contribute to a sense of poor community cohesion and merely transfers these disbenefits to the city centre.

The Committee report identified a large number of potential sites for PSBA to meet the identified demand as augmented by the relocation process. The report acknowledged that not all the identified sites would necessarily be brought forward or with the suggested quantum of development and that other sites not on the list could be brought forward. This application site was not amongst the sites identified by the table in Paragraph 3.9 of the Executive Committee report of 31st May 2023. The application site is effectively a windfall site and would make a contribution to PBSA above that of the sites identified in the table. This is possibly a reflection of the SISTER SRF not originally proposing PBSA for this site and later, in the approved SRF, identifying PBSA only as one of a range of possible uses.

The proposed development can only accommodate 1,041 PBSA bed spaces by failing to comply with relevant policy or to respond appropriately to relevant guidance. The proposed design demonstrates that it is unlikely any appropriate design would achieve both this compliance and quantum of accommodation. There is nothing exceptional in planning terms about the current proposed use or quantum of development for this particular site that would provide a basis for disregarding other relevant policy and guidance irrelevant. The proposal does not comply with relevant planning policy or accord with guidance.

OBJECTION 2

This proposal uses national and local planning policy and guidance that seeks an increased density of new development as a part of achieving the more efficient use of land without fully acknowledging the caveats and other policies that aim to balance this approach with the impacts on the existing environment and community. There is no acknowledgement in the application that the decision on the proposed quantum of development is driving the need for a design of development which would be incompatible with, and cause great harm to, the surrounding environment and community. That harm should be avoided through due regard to all planning policies and guidance. The decisions behind the proposal leading to the proposed quantum of development is being incorrectly determined by an illustrative axonometric drawing in the SISTER SRF that showed three taller built forms on this site but the SRF does not constitute planning policy. In support of this objection the following points are particularly noted:

(a) The Deputy Head of the Planning Service, David Roscoe, has publicly confirmed during a recent Planning Committee meeting in November 2025 that SRF's are not

planning policy and have a very low status in terms of being a material planning consideration in decision-making, and that planning policy, locally, is contained in the statutory development plan. On this basis the SISTER SRF need not drive a particular quantum of development or built form.

(b) Attention should be placed on adopted planning policy to achieve an appropriate increased density of development on the site. Planning policy does not state what this increase should be presumably to allow local context for any site to be taken fully into account as expected under national and local planning policy and guidance.

(c) In this instance the site is currently occupied by a now closed multi-storey car park and some incidental soft landscaping. This represents a relatively low density of development in the context of the locality around the site. However, neither the application nor SRF give any acknowledgement that even the provision of a built form consistent with the height of existing residential buildings to the north of the site would represent a significant increase in the density of development within the site. There is no need to have three towers of up to 38+ storeys to achieve a considerable increase in density.

(d) The excessive increase in density proposed by the application is presumably driven by land value that has seen a rise in 'expectation value' due to the inappropriate SRF assumption for the site and commercial investment decisions devoid of an appreciation of the unacceptable real-world implications of the proposal. The proposed development represents over-development.

Additional background information:

The submitted Environmental Statement (ES Vol 1, Paragraph 3.3) states that "The design and planning team has engaged closely with MCC and other key stakeholders throughout this period to ensure that the optimum development proposal was produced for the Site" but without identifying how this optimum has been determined who for whom - clearly not the existing local community. This statement is refuted by this objection.

The narrative to Core Strategy Policy CC6 specifically regarding the issue of development density confirms that high density development will not always be appropriate in the city centre. This is one such site where this would apply although a higher density than is achieved at present would be possible.

In their Planning and Tall Buildings Statement (Paragraph 6.236) the applicants quote the government's Planning Policy Guidance on 'Making Effective Use of Land' to support their proposed increase in density:

> "All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high-density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings."

However, in this instance the the particular existing density and good light quality arises from an historic layout and built form and this is not a location where tall modern buildings predominate. The proposed development would not be 'in keeping' with the general form of their surroundings which does not include tall buildings such as those being proposed on this or the neighbouring iQ site. The proposal would not maintain 'acceptable' living standards. It would represent an over-development of the site.

The proposed PBSA use including social cohesion and community stability

OBJECTION

The proposed PBSA represents an unacceptably large addition to the numbers of PBSA bedrooms in the locality in terms of both existing developments and those currently being built within a short distance of the application site. This will significantly and unacceptably alter further the demography of the local area and provide a concentration of PBSA that far outweighs the number of other types of residential accommodation. Such unbalanced communities skewed towards students have already been experienced in those suburban areas within the City that previously became the focus for student accommodation. In those cases, the imbalance led to less stable and cohesive communities as students are transient in nature and so less likely to have any particular commitment to a local area. As a cohort they give rise to other disbenefits around anti-social behaviour and impacts on local services that adversely affect the more permanent local community. This would be inconsistent with a range of national and local policies and guidance regarding achieving balanced, stable and cohesive communities. In support of this objection the following points are particularly noted:

(a) Based on the submitted 'Student Need Assessment', by the end of this year there will be over 4,700 in PBSA developments around the immediate periphery of the SISTER SRF area. This application alone would bring a further 1,041 into this area (a 22% rise) and together with the the neighbouring iQ proposal on the Weston Halls/ Pendulum Hotel site would see a total of over 3,000 beds (a 64% rise). This does not take into account other nearby existing, approved but not built or proposed PBSA developments.

(b) The student population is transient and, perhaps understandably, has no particular commitment to the more stable host community. Concentrations of large numbers of students, as found over the years in suburban locations, bring particular issues which do not assist with community or social cohesion. That students do not contribute in terms of Council Tax to the local area and public services weakens any local connection further.

(c) The existing area around Granby Village is a well established, principally residential area seen as a successful example of early regeneration within the city centre. This character partly arises from a proportion of students within the area, However, the influx of students arising from a development about to be completed at Echo Street plus that on the application site will inevitably alter the demographic mix and character of the area considerably. This impact would only be all the greater factor in the iQ Weston Halls/Pendulum Hotel proposal.

(d) Experience within the Granby Village area has shown that students can bring life and vitality, mostly during term times. However, also during term times, anti-social behaviour increases. While the proposed development may be well run and controlled this does not extend to the behaviour of students once outside the development.

(e) The application makes assumptions around the ability of existing local services ability to cope with this increased and concentrated local student population. Some of these assumptions are based on students being willing/able, for example, to travel to more distant GPs and dentists and do not sit comfortably with the lived experience of existing residents who already struggle to get to see a GP or NHS dentist.

(f) The applicants also make claims about economic benefits to the area, mainly through an uplift in spending. There are three points here. Firstly, the local area is already well served by a wide range of retail and hospitality venues, and an increase in the transient student population living within the area is not required to support these. Secondly, many of these students would leave the area semi-deserted in university vacation time, calling into question the claims made in the application of the creation of a newly vibrant neighbourhood which could sustain local businesses all year round. The third point is that part of any uplift in spending in the local area will largely be a transfer of the same spending away from the suburban areas currently being emptied of student population. The submitted Environment Statement (Paragraph 5.119) advises that "Data from the University of Manchester estimates that first year undergraduate students spend £13,685 per annum." But the same data (for 2026-27), excluding rent and mobile phone contracts, gives a spend of only £5,480 (https://www.manchester.ac.uk/study/undergraduate/fees-and-funding/cost-of-living/). This would give a much lower Total Net Expenditure figure than shown so the economic benefit to the city is more limited than is being suggested.

(g) The City Council's Guide to Development in Manchester acknowledges that successful neighbourhoods are partly achieved by a balance of housing types and mix of uses. The proposal will not enable the balance sought by local policy and guidance to achieve this balance.

(h) The applicant's own Planning and Tall Buildings Statement (Paragraph 3.11) acknowledges the need to provide balanced neighbourhoods when considering new PBSA. More importantly Policy CC10 of the Core Strategy aims to ensure the city centre attracts and retains a wide range of residents including through new development with a particular emphasis on creating a family friendly environment. This proposal will clearly exaggerate an already considerable student population living in PBSA developments in this part of the city centre where, as confirmed by the submitted Environmental Statement (Paragraph 15.59), "the Piccadilly Ward has a much higher concentration of students compared to Manchester as a whole". As has repeatedly been said during the consultation process, residents would favour a development (of equal density to the existing area adjacent to the site on the north side of the viaduct) which included a mix of homes for young professionals and families, with appropriate accompanying services and local shops. It seems naive in the extreme to suppose (as does the submitted Planning Statement) that the mere proximity of students would "facilitat[e] informal interactions, knowledge exchange, and the spontaneous formation of collaborative ventures" with those based around SISTER more than would, say, the presence of actual researchers and entrepreneurs living in the neighbourhood over a period of years with their families.

(i) On this basis the proposal does not accord with with Policy CC10 or other policy intentions to create a sustainable, stable and cohesive local community.

Additional background information:

The submitted 'Student Need Assessment' (p.24) shows there are already 8 large PBSA developments with a total of 3,496 beds immediately around the periphery of the SISTER SRF area (including those located at the east end of Granby Row (Lambert, Fairfield and Fletcher Houses), those in the Berry Street/Buxton Street area and at Vita Student at Circle Square. There are far more in PBSA developments just a little further away.

These 8 developments will be augmented later this year with the opening of the iQ Echo Street development with 1,224 bedrooms. This will bring the total for the SISTER SRF periphery area to 4,720 by the end of the year.

In addition 2,500 beds are proposed by the current planning application by iQ on the Weston Halls/Pendulum Hotel immediately opposite this SISTER Plot H application on Charles Street. This would require the demolition of the existing building with the loss of 528 beds making a net gain of 1,972 beds. The SISTER Plot H planning application proposes a further 1,041 beds. This makes a total of 3,013 additional beds.

Moving from 4,720 beds to and extra 3,013 (a total of 7,733) means a 64% increase in student bed in the immediate locality of the site. This does not take into account the various other PBSA developments existing, approved or proposed in easy reach. The character of the area is already changing due to this increase in student accommodation and this change will only become more noticeable as more students move in.

Policy CC3 of the Core Strategy - part of the City Councils statutory development plan - expects the City Centre to have a minimum of 16,500 new housing "units" by 2027 but it is unclear if it expected such a significant proportion to be in PBSA.

Other considerations

- ## Traffic including cycling

OBJECTION 1
While the Highway Authority may consider that the existing highway network can accommodate the traffic movements forecast by the applicants, it is unclear if they agreed with the forecast itself. The applicants appear to downplay the implications for traffic movements within the area and common sense would suggest that some of the forecast figures and expectations around being able to control student move-in and move-out are optimistic.

Additional background information:

The applicants appear to down-play the number and impacts of traffic movements serving the development and their ability to control move-in/move-out days especially as there is reliance on the use of the public highway for all these traffic movements including on the busy Sackville Street. The likely number of assumed car and taxi movements is particularly low. The applicants appear to under estimate the number of vehicle movements likely to be associated with a student population of 1,041 both now and into the future and it is the local community that will pay the price in congestion, inconvenience, pollution and highway maintenance.

OBJECTION 2
The proposed 6% secure on-site cycle provision is insufficient provision to meet the future needs of the proposed development and fails to adequately contribute to sustainability and meeting the goal of net zero carbon emissions. Any additional provision should be made within the footprint of the building and

not within any proposed external spaces within or adjacent to the site to avoid physical and visual clutter.

Additional background information:

The proposed 6% proposed parking cycle provision appears exceptionally low given the number of residents, staff and visitors and the effort being made to encourage the use of sustainable and healthy forms of travel. It is understood that the highway authority would ordinarily seek 25% provision and even this seems short-sighted and unhelpful in assisting to achieve the goal of net zero carbon emissions.

- **Biodiversity**

OBJECTION

The effect of the proposed height and massing on the potential of the development to have a positive ecological impact gives rise to objection. A "comprehensive review" by the applicants led to the development of an alternative massing strategy, moving from the three broadly uniform-height blocks shown in an illustrative SISTER SRF image to the current proposal. However, there is no indication that the review properly considered a modestly greener four-block solution, abandoning the "Princess Square" concept, using that land to build on, and distributing the proposed planting elsewhere (for example along the Altrincham Street walkway and up and down Sackville Street). In support of this objection the following points are particularly noted:

(a) The submitted Ecological Impact Statement rightly describes the "Princess Square" location as it is now as "a small area of poor condition … heavily shaded"; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little.

(b) The review of the height and massing has focussed most hope of ecological enhancements on a highly inappropriate spot, partly due to the chimerical idea of this being a favoured future route across to Oxford Road from the SISTER SRF area (the western stretch of Charles Street being notoriously uninviting, because so overshadowed by Circle Square).

- **Construction phase**

OBJECTION 1

The hours for working are inconsistency described within the application and are considered excessive for a site in such close proximity to existing residential buildings and for a construction period of an extended period of time. As a minimum, the hours for working should be reduced to start at 8:30am (rather than the stated 7:30am) on weekdays and still finish at 6:00pm. It should be confirmed that working would not take place on a on a Saturday outside the proposed 8:30am - 2:00pm or at any time on a Sunday, Bank Holiday or Public Holiday (the latter being omitted from all consideration the application). The application advises that the City Council will need to agree any working outside these hours but gives no information on how this process

works. This process should be confirmed as a part of the application and, in any event, any request for additional working should require the sign-off by the three ward councillors and the notification of those people outside the site likely to be affected in advance of the works.

OBJECTION 2

The application contains no information regarding the illumination of the site outside the hours of working which should be designed and operated to provide only minimal security lighting and avoid general illumination and glare outside the site to protect residential amenity and natural environment. An objection would also be raised if the illumination of the site during working hours were to result in excessive light and glare into nearby homes.

- <u>Operational noise</u>

OBJECTION

A development not designed and managed to prevent disturbance through noise generated by the proposed use would be unacceptable. Planning conditions should be applied to any development that may be granted planning permission regarding appropriate measures to prevent intermittent or on-going levels of noise outside the built form that would cause disturbance to local residents including noisy uses of external and internal spaces, mechanical equipment (such as ventilation), and so on. The use of any on-site external area for events should not be permitted and there should be no amplified sound allowed within external spaces.

<u>Cumulative impact of this proposal and the iQ PBSA proposal on the adjacent Weston Halls/Pendulum Hotel site and precedent</u>

OBJECTION 1

Neither this proposal nor the iQ proposal on the adjacent Weston Halls/Pendulum Hotel site are acceptable on their own merits. Both individually raise significant objection given the adverse impacts (in some cases exceptionally harmful impacts) they will have on the range of issues covered by this objection note including, for example, amenity (including residential amenity), the local environment (including streetscape and heritage), health and well-being, and the community. When taken together the cumulative impact of these neighbouring proposals - particularly on the primarily residential area to their north - will be all the greater. Neither proposal takes the other into account, nor do they give meaningful regard to the implications on the future proposals elsewhere in the area. In support of this objection and just by way of example the following points are particularly noted:

(a) The proposal for a 2,500 room PBSA development by iQ on the Weston Halls/ Pendulum Hotel site consists of four towers of 50, 33, 24 and 17 storeys with linking built form which would effectively form a wall of development along Charles Street between Sackville Street and Princess Street when seen in any oblique view. The

tallest 50 storey tower would stand at the eastern end of the site adjacent to the 38+ storey SISTER Plot H tower visually combining to give a huge and overwhelmingly harmful visual impact both generally and on the amenity of existing residents particularly those immediately northwards of them for example in Velvet House, and Velvet Court. Ironically, the taller iQ development would overshadow the SISTER Plot H proposal including the proposed on-site external area within the SISTER Plot H scheme as well as the area north of the railway viaduct. The SISTER Plot H proposal would increase the visual solidity of the iQ wall of development that would be presented to existing residents north of the viaduct by visually obstructing any particular sense of the minimal gaps between the iQ towers. The proposals have not been designed in a coordinated manner to be viewed together and the overall visual impression when viewed from the area north of the viaduct - including the outlook from many existing homes - will be of a bleak shaded wall of nondescript anywhere PBSA built form.

(b) The two proposals will swamp the existing primarily residential community with a further 3,541 students in additional to those already existing and soon to be completed in the area. This would undermine the existing community rather than creating a sustainable and stable community with a mix of housing types and would fail to maintain - let alone enhance - social cohesion.

(c) Charles Street and limited local streets would be expected to cope with the concentrated move in/move out period for many of these students and it is difficult to see how this can be managed in a manner that will not cause excessive disruption and inconvenience for other users of the area including existing local residents.

OBJECTION 2

While each application should be treated on its own merits it is clear that within planning there is an acknowledgement of setting a precedent. By granting planning permission for one of these unacceptable proposals will set a precedent and make the other more difficult to resist.

Additional background information:

Cynically, on the basis of the SRF process and machinations within the City Council regarding PBSA and policy (including Policy H12 of the Core Strategy of the statutory development plan), it seems that at least parts of the City Council would support this precedent being set on these sites close to existing residents with the adverse impacts on their amenity and health/well-being, the environment and the community being accepted as collateral damage.

Concluding comment

An alternative approach to the application site should be required that would have the potential to overcome the identified policy failings of this proposal. If this is not possible the proposal should be refused planning permission in accordance with Paragraph 139 of the NPPF. In support of this concluding comment the following points are particularly noted:

(a) A PBSA development on this site gives rise to strong objection.

(b) Paragraph 139 of the NPPF is clear that development that is not well designed should be refused. 'Well designed' is not just about the intrinsic quality of the design of the development but about achieving an appropriate response to other matters. These should include, for example, the amenity (including residential amenity) of existing residents and other users of the area, the existing townscape context (including heritage), health and well-being and the impact on the local community. This is reflected by national and local policies and guidance including Policy H12 of the Core Strategy.

(c) If a PBSA development on this site is considered to be acceptable in principle by the City Council, the Council should require a comprehensive redesign of the current proposal that ensures it complies with all relevant policy and accords with relevant guidance to achieve a design that responds appropriately to the existing townscape context (including heritage), avoids harm to the amenity, health and well-being of existing residents and other users of the area (now and into the future), and supports the local community.

(d) To accept the currently proposed PBSA development on this site would be to accept the harm - the very considerable harm in some instances - that would be caused within the affected area. It would be to treat this harm to local people and environment merely as collateral damage in achieving a tall building townscape in this locality seemingly at any cost.

(e) The Planning Service and Planning Committee should recognise that opportunities for tall buildings - including for PBSA - exist elsewhere and this is one city centre location where 'good planning' would expect adherence to national and local policy intended to protect against inappropriate development and secure a more balanced approach between redevelopment/regeneration and a local community and existing high quality environment.

(f) So, to return to the opening part of this note: The applicants claim in their Planning and Tall Building Statement (paragraph 1.8) that "The proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre.". Clearly this is not true on any level let alone in terms of the impact on the surrounding area and the application should be refused planning permission.

Appendix: Policy and Guidance documents used when preparing these advice notes

The policy and guidance documents used when preparing these advice notes have included the following:

National Planning Policy Framework (Dec 2024)
Government policy document

This describes how economically, environmentally and socially sustainable development should be brought forward. It should be read as a holistic development i.e. all policies need to be read in conjunction with each other. Regard has also been had to the relevant parts of the associated Planning practice Guidance.

Particularly relevant parts of the NPPF include:
Para 40 Pre-consultation

Para 44 EIA's
Section 12 Achieving well-designed places: Paras 131, 132, 135, 137, 138, 139, 140
Section 14 Meeting the challenge of climate change
Section 16 Conserving and enhancing the historic environment: Paras 202, 207, 208, 210, 212, 215, 219
Glossary Provides the government definition of "Brownfield land"

National Design Guide
Government document

Much of this document is relevant but particular attention is draw to the sections on "context" and "identity" which form the basis for the other subsequent considerations in the document.

The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning Note 3 (Second Edition, 2017)
Advice prepared by Historic England as the government's principal adviser on the historic environment.

Places for Everyone 2024
A Strategic document prepared by the Greater Manchester Combined Authority.

Particularly relevant policies:
Policy JP-S1: Sustainable development
Policy JP-H3: Type size and design of new housing: Defers consideration of student housing to district local plan
Policy JP-P1: Sustainable places: Para 9.15 "All development should achieve a high design quality consistent with the ten characteristics set out in the National Design Guide"
Policy JP-P2: Heritage
Policy JP-P6: Health
The document sets out proposal for becoming carbon neural by 2038.

Local Plan
Manchester City Council's local development plan.

Consists of several documents and particularly relevant policies include:

<u>Core Strategy:</u>
CC 3 (Housing)
CC 6 (City Centre high density development - must have regard to tall buildings policy (EN2))
CC 7 (Mixed use)
CC 8 (The need for an approved development framework to guide a large scale development proposal - does not seem to be the case with the iQ proposal)
CC 9 (Design & Heritage)
H 12 (PBSA - Especially paragraphs 3 (parking), 4 (local services), 5 (safety and security), 6 (impact on local amenity)
T 1 (Sustainable transport including taking account of other road users)
EN 1 (Design principles and link back to national guidance)

EN 2 (Tall Buildings - including a need to be appropriately located with particular regard to Paragraphs 12.14 (local context) and 12.12 (the need to consider all design policies as the policy context against which tall building proposals will be considered)
EN 3 (Heritage)
EN 15 (Biodiversity)
PA 1 (Developer contributions)
DM 1 (Development management)

Extant Unitary Development Plan Policies
DC18 (Conservation Areas)
DC19 (Listed Buildings)
DC 26 (Development and noise)

Guide to Development in Manchester Supplementary Planning Document and Planning Policy Guidance (Adopted 2007)

Virtually all this document is relevant but in particular. Parts 1 and 2 are considered in turn:

Part 1 (SPD) Sections 1 - 10 inc
2.3 (Response of new development to existing context and character)
2.6 (Response of new development to heritage)
2.7 (Response of new development increasing density to existing context)
2.8 (Retaining and enhancing sense of place)
2.13 (Buildings should relate well to each other and respect their setting)
2.14 (Building height and existing context)
2.5 (Streets should be designed for people not just for vehicles to pass through)
2.31 (Need for adequate on-site servicing provision)
3.37 (Provision of street trees)
2.40 (Public realm)
2.41 (Public realm)
2.43 (Public realm)
2.45 (Mix of housing large, single tenure housing developments need to contribute to a balanced neighbourhood)
2.47 (Mix of uses)
2.49 (Safety and security)
2.56 (Impact on global environment)
4.2 (Sustainable development)
4.13 (Sustainability including reuse of existing structures)
4.15 (Biodiversity)
6.9 (Cycle parking provision)
7.2 (Response to built context)
8.3 (Promotion of informal surveillance)
9.9 (Promotion of social inclusion)
9.11 (Quality and aesthetics of the built environment to health)

Part 2 (Guidance) Sections 11 & 12
11.1 (Response of new development to context)
11.4 (Response of new development to context)
11.43 (Design)
11.45 (Response of new development to context)

12.8 (Response of new development to context including ground level treatments, servicing, microclimate (overshadowing, air turbulence)
12.10 (Sustainable development)
12.13 (Recognition of lack of open space in the city centre)
12.20 (City Centre design and the “street wall”)
12.26 (Tall buildings)

6th July 2026

[redacted]

[redacted]

[redacted]

4th July 2026

Planning
Growth and Development
Manchester City Council
PO Box 532
Manchester
M60 2LA

Dear Planning Department,

Sister Plot H (Charles Street Car Park) Planning Application PLA-2026-000312 / PP-14615294

I wish to object in the strongest possible terms to the proposed development of Sister Plot H on the site of the Charles Street Car Park.

The proposal, through a combination of height, massing, siting and orientation will have cause significant disamenity by creating a visually oppressive and perceived enclosing built form within the outlook from various nearby properties, including my own in Granby Village. The proposal will have an impact on amenity due to the oppressive intrusion of the development into the townscape and outlook from my, and other people's homes.

I regard the proposed development to be wholly inappropriate because it is far too large and tall and will dominate the local area and existing properties. The planning application asserts that the application has been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Council. I believe this statement to be wholly inaccurate as the proposed development is totally insensitive both to the needs of existing residents and to the local heritage of the immediate area. I have learned that the City Council does not feel they have the expertise to evaluate the impact on light levels. As a resident, I would ask that the Council therefore acts on the assumption that the impact will be significant so as to protect the existing residents' legitimate interests, or commissions their own independent survey. I would be very happy to provide access to my apartment and its balcony to assist in this survey if required.

The proposed development does not protect our amenity as residents as has been assured by the City Council Planning Service. The proposed development will have an adverse effect on the local environment in terms of the townscape and heritage of the local area and will especially rob local residents to the North of the development of sunlight nd daylight which is vital for mental and physical health and well-being. A range of Planning policies and guidance aim to protect health and well being when new development is proposed including, for example,

the NPPF (Paragraph 135) and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2.

My property is a top floor apartment (apartment 43) within the Granby Village development which is immediately to the North of the proposed development. We have a South West Facing balcony which runs the breadth of the apartment giving natural light and sunlight onto the balcony when sitting outside and into the bedroom and lounge within the apartment. The planning application submitted implies that the impact on daylight and sunlight is either minimal or acceptable. I wish to assert that, as an existing resident of Granby Village, I regarding the impact as hugely significant and totally unacceptable.

I am concerned that the proposed development will mean some 300 bedrooms will directly overlook, and more importantly, look down onto, my balcony which is not currently overlooked by any other buildings. The plans indicate that both bedrooms and communal rooms will face North through floor to ceiling windows so the overlooking will be considerable. The height, massing, siting and orientation of the proposed built would dramatically and unacceptably increase this potential for overlooking and from a vast number of anonymous windows whichwill inevitably adversely my right to privacy.

The abundance of natural light and sunlight arising from its South West facing aspect, and the balcony amenity, was a key reason for our purchasing the property, especially following the Covid pandemic where flat-dwellers were prevented from going outside.

The recent pandemic taught us lessons that have soon been forgotten as with the proposed application given the harmful impacts it would have on both the internal environmental quality of people's homes and the quality of external spaces and the way they would be experienced and used.

I have seen an artists impression of the proposed development and believe it to be wholly misleading because it shows the Granby Village development being bathed in sunlight which would be impossible given that the proposed development is immediately to the South of the property. I am also concerned that the proposed development will overshadow both Vimto Park (which provides essential public green space which is lacking in the local area) and the Granby Village gardens. The Granby Village gardens was again a key reason why I bought the property in the first place.

In addition to our loss of amenity, I am concerned that the development will result in an excessively high density of students within a small area. The PBSA developments already cater for 1,000's of students and the iQ Echo Street scheme will add a further 1,000. The iQ proposal for the Pendulum Hotel site proposed a further 2,500 spaces. This seems far too many for such a small area, especially when considering that the student population is transient. It is well known that areas typically suffer when transient populations become excessive. Creating such a large population of students in a small residential area is contrary to relevant planning policy and guidance because it would help to create or maintain a balanced and socially cohesive community. I am especially concerned if multiple of the proposed student accommodation proposals are approved together as I believe the impact on the local area would be particularly adverse. I therefore object to each of the proposed developments and especially to the collective approval of multiple applications due to the combined negative impact on the local area, and on my myself and my property in particular.

This proposal will adversely impact residential amenity and amenity within a range of external spaces to the detriment of the health and well-being of many permanent local residents at the expense of accommodating an excessive number of transient students (a description used in Paragraph 6.231 of the submitted Planning and Tall Buildings Statement) in accommodation only designed for short-term occupancy.

I wish to object to the proposed development on the grounds that the application is being selective in its application of planning policies, focussing on the development itself rather than on the adverse impact it will have on the surrounding area (in terms of residential amenity, heritage, townscape and quality of local open spaces such as Sackville Gardens and Vimto Park. Both off these areas are very heavily used by the general public, including myself, throughout the year, including during Winter months. These are the only publicly accessible green areas within the local area.

The proposed development has intentionally placed the tall buildings to the North of the site to minimise impact of the development itself (in terms of overshadowing). This is to the detriment of existing residences to the North of the site including Granby Village. The National Planning Policy Guidance (NPPG) explicitly states that it should be read holistically. This approach should be taken more broadly when applying relevant policies and guidance with their due weight as 'material planning considerations'. I believe local and national planning policy considerations should be prioritised over the Strategic Regeneration Framework which does not constitute planning policy.

Both the National Planning Policy Framework (NPPF) and National Design Guide (NDG) identify the importance of understanding and appropriately responding to the local landscape context and creating welcoming places in which to live, work and visit. Creating such places is not just about the new development itself and meeting the needs of new residents but the impact this development has on the surrounding area and existing users and community. I object to the proposed planning development because it direct contradicts these planning frameworks and guides.

Furthermore, the City Council's statutory local development plan reflects this policy and guidance including in its Core Strategy Policy H12, specifically on Purpose Built Student Accommodation (PBSA). Policy H12 confirms that the design and layout of such development should ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise or disturbance, or impact on the streetscene either from the proposed development itself or when combined with existing accommodation. Various paragraphs of the supplementary planning document (SPD) section of the City Council's 'Guide to Development' all stress the need for new development to respect and be informed by their settings and to be of an appropriate height having regard to location, character of the area and specific site circumstances and local effects, such as microclimatic ones. The guidance section of the 'Guide to Development' also confirms in Paragraph 11.45 that new developments in conservation areas or elsewhere should not be designed in isolation; and considerations of design and layout must be informed by the wider context including both immediate neighbouring buildings, and the townscape of the wider locality. Paragraph 3 explicitly confirms that the Guide "sets the context within which developers and architects will have to work".

The area to the North of the proposed development is the Whitworth Street Conservation Area which provides a particularly high quality townscape of 6 or 7 storey former Victorian and Edwardian former warehouses. The streets and spaces within the area all benefit from direct

sunlight and good levels of natural daylight. I object to the proposed development because it will throw these historic buildings into shadow and reduce their historic impact in the local area which will negatively impact the enjoyment that people drive from their existence. Although the proposed development is not within the conservation area, it undoubtedly will cast a huge shadow over it which will deplete its value. The harm can only be minimised or eradicated by rejecting the planning application or modifying it to ensure the new buildings are of a comparable height and mass. The proposed development would harm the ability to appreciate the character and appearance of the conservation area and would not preserve or enhance the special architectural or historic character or appearance of the conservation area including through the impacts on the quality of light within the public realm and other external spaces and reaching internal spaces of buildings.

OVERARCHING OBJECTION Following recognised principles of good design (including regard to the existing context) rather than an apparent expectation of achieving a pre-determined quantum of development within the site (driven by the SRF) should have led to an appropriate design of development for this site. The predetermined quantum of development, the lack of appropriate or meaningful consideration given by the applicants to the existing urban townscape once they had assessed it, the adverse impacts caused over much of the local area affected by the proposal, and lack of regard to policy, guidance and best practice regarding good design have led to a wholly inappropriate and discordant proposed design. This design results in a built form that gives rise to a range of harmful (including exceptionally harmful) impacts on amenity within the surrounding area. The proposed design is contrary to a wide range of national, local policies, guidance and best practice and certainly does not represent good or exceptional design in terms of policy. In support of this objection the following points are particularly noted:

a) The application has selective and partial regard to planning policy and guidance and fails to have regard to the National Design Guide (NDG) as required by the National Planning Policy Framework (NPPF), and particular regard, has for example, to NDG Paragraphs 42, 43, 48, 67 and 71.
b) There is failure to appreciate that policy documents including the NPPF need to be treated holistically rather than cherry picking policies to support a desired outcome.
c) NPPF (Paragraph 135) requires developments that “are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change” but the latter is not expected to be at the expense of the former. In any event, the proposal is not innovative nor does it represent “appropriate change”.
d) The proposal inappropriately refers to unadopted, draft policy to support their application.
e) The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

The close proximity and design of towers T1 and T2 to the railway viaduct carrying the North-West main railway line and used by countless trains throughout the 24 hour day will give rise to the reflection northwards of railway related noise to the detriment of the amenity of users of the area including existing residents. The elevations are primarily in reflective glazing without any apparent design measures to acoustically attenuate such noise. I therefore object to the proposed development on the grounds of increased noise.

I object to the proposed development ue to the inevitably high levels of servicing that will be required for the buildings. This will arise, for example, from the operational needs of the student

accommodation and ground floor retail uses, and the various deliveries expected with a student population of 1,041 (plus staff and visitors). This servicing is proposed to be from two lay-bys on the highway and will cause inconvenience and safety concerns for pedestrians using the adjacent footways and particularly in the vicinity of the two lay-bys. This will be exacerbated at the times of student move-in/departure which will exceed the capacity of the two lay-bys with adverse consequences for the safe and convenient use of the surrounding highway network and the likely generation of traffic noise. Student move in/departures are typically concentrated within a small number of weekends and will undoubtedly cause traffic chaos and safety concerns during these periods.

The proposed elevation design (including materials with an emphasis on light coloured concrete and finishes) has no resonance with the character of the immediately adjacent Whitworth Street Conservation but is intended to respond to the nearby modernist 1950's/60's university architecture elsewhere in the wider SISTER site. However, this is merely a means of window dressing a development that in every other regard such as height, massing and siting fails to have any regard to the existing character of either of these areas and fails to acknowledge decisions already made within the area. I therefore object to this development on the ground of elevation design considerations.

In support of this objection the following points are particularly noted: (a) (b) (c) (d) (e) (f)

a) The proposal fails to acknowledge that many of the existing former university buildings within the SISTER SRF site including those along the east side of Sackville Street are proposed to be demolished as a part of the SRF masterplan.
b) The proposal fails to acknowledge that the University already has planning approval for the demolition of the modernist Faraday Tower and the future of other modernist buildings around it on the west side of Sackville Street is uncertain.
c) It is likely that a lighter elevation finish has been selected in the knowledge it can reduce the adverse impact on daylight of the proposed built form and its overly dominant height and massing.
d) The separate planning application (awaiting a decision) for the iQ development on the Weston hall/Pendulum Hotel site proposes a brick elevation as a means of relating to the conservation area but this site is more distant from the conservation area than this SISTER Plot H proposal. While both proposals are out of context and unacceptable due to height, massing and siting, an argument could be made for either approach to elevation design including materials for a more appropriate built form. However, any developments on these two sites should have a coordinated approach towards their context and materiality.
e) A high quality elevation design could be achieved with a scale, massing and siting of built form that more appropriately and meaningfully responds to the townscape context with the necessary regard to national and local policy and guidance.
f) If an out-of-context, overly tall building continues to be proposed on the SISTER Plot H site, a lighter finish to elevation materials (together with appropriate articulation) has the potential to reduce the overbearing visual impact and a lighter finish would provide some reflection of daylight.

The proposed external on-site open space occupies a relatively large proportion of the site but is in reality a small area for its intended purpose of serving the 1,041 student bedrooms plus staff and visitors and the general public. I object to the planning application on this bases because the area should instead be used to better accommodate a more appropriate built form

and quantum of development in order to begin to address the identified adverse impacts of the currently proposed design.

I object to the external space being used for refuse storage even on a temporary basis and especially not on a prominent street frontage as is being shown on the drawing on p.107 of the submitted Design and Access Statement. No part of the limited external space or adjacent highway should lost to such an ancillary use (even on a temporary basis) which would be unsightly and may give rise to odours and misuse. It would be particularly inappropriate on this visually prominent part of the site and would adversely impact on visual amenity within both the site and the adjacent public realm. Unsightly containerised bins already plague the City Centre and new development should be designed and managed to avoid contributing to unsightly streetscene and external spaces. All refuse storage should be within the building until collection (as happens within Granby Village).

I object to the use of the proposed external open space for events if these would cause disamenity outside the application site unless a planning condition is attached to control the time and duration of such events and preventing the use of external sources of amplified noise at any time.

I object to the planning application on the basis that it does not comply with Policy H12 of the statutory development plan. Requirement 3 states that "Proposals should not lead to an increase in on-street parking in the surrounding area." This is inevitable especially during student change-over periods and the start and end of term. At these times there will be significant volumes of parents attempting to pick up and drop off students' possessions. This will cause chaos due to the lack of on-site parking and the distinct lack of loading bays.

Requirement 6 states that "Consideration should be given to the design and layout of the student accommodation and siting of individual uses within the overall development in relation to adjacent neighbouring uses. The aim is to ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the streetscene either from the proposed development itself or when combined with existing accommodation." It is commonly known that high densities of students typically generate increased noise levels, and that is why the city council is seeking to move students from suburban areas. Furthemore, the excessive scale and height of the proposed development will materially over-shadow existing lower-rise residential blocks including Granby Village.

The planning application cites national and local planning policy and guidance that seeks an increased density of new development as a part of achieving the more efficient use of land without fully acknowledging the caveats and other policies that aim to balance this approach with the impacts on the existing environment and community. There is no acknowledgement in the application that the decision on the proposed quantum of development is driving the need for a design of development which would be incompatible with, and cause great harm to, the surrounding environment and community. I therefore object to this planning application on these grounds. That harm should be being avoided through due regard to all planning policies and guidance. The decisions behind the proposal leading to the proposed quantum of development is being incorrectly determined by an illustrative axonometric drawing in the SISTER SRF that showed three taller built forms on this site but the SRF does not constitute planning policy. In support of this objection the following points are particularly noted:

a) The Deputy Head of the Planning Service, David Roscoe, has publicly confirmed during a recent Planning Committee meeting in November 2025 that SRF's are not planning policy and have a very low status in terms of being a material planning consideration in decision-making, and that planning policy, locally, is contained in the statutory development plan. On this basis the SISTER SRF need not drive a particular quantum of development or built form.
b) Attention should be placed on adopted planning policy to achieve an appropriate increased density of development on the site. Planning policy does not state what this increase should be presumably to allow local context for any site to be taken fully into account as expected under national and local planning policy and guidance.
c) In this instance the site is currently occupied by a now closed multi-storey car park and some incidental soft landscaping. This represents a relatively low density of development in the context of the locality around the site. However, neither the application nor SRF give any acknowledgement that even the provision of a built form consistent with the height of existing residential buildings to the north of the site would represent a significant increase in the density of development within the site. There is no need to have three towers of up to 38+ storeys to achieve a considerable increase in density.
d) The excessive increase in density proposed by the application is presumably driven by land value that has seen a rise in 'expectation value' due to the inappropriate SRF assumption for the site and commercial investment decisions devoid of an appreciation of the unacceptable real-world implications of the proposal.

The existing lower housing density and good light quality arises from an historic layout and built form and is not a location where tall modern buildings predominate. The proposed development would not be 'in keeping' with the general form of their surroundings which does not include tall buildings such as those being proposed on this or the neighbouring iQ site. The proposal would not maintain 'acceptable' living standards for existing residents.

I object to the planning application on the basis that the proposed PBSA represents an unacceptably large addition to the numbers of PBSA bedrooms in the locality in terms of both existing developments and those currently being built within a short distance of the application site. This will significantly and unacceptably alter further the demography of the local area and provide a concentration of PBSA that far outweighs the number of other types of residential accommodation. Such unbalanced communities skewed towards students have already been experienced in those suburban areas within the City that previously became the focus for student accommodation. In those cases, the imbalance led to less stable and cohesive communities as students are transient in nature and so less likely to have any particular commitment to a local area. As a cohort they give rise to other disbenefits around anti-social behaviour and impacts on local services that adversely affect the more permanent local community. This would be inconsistent with a range of national and local policies and guidance regarding achieving balanced, stable and cohesive communities. In support of this objection the following points are particularly noted:

a) Based on the submitted 'Student Need Assessment', by the end of this year there will be over 4,700 in PBSA developments around the immediate periphery of the SISTER SRF area. This application alone would bring a further 1,041 into this area (a 22% rise) and with the neighbouring iQ proposal on the Weston Halls/Pendulum Hotel site would see a

total of over 3,000 beds (a 64% rise). This does not take into account other nearby existing, approved but not built or proposed PBSA developments.

b) The student population is transient and, perhaps understandably, have no particular commitment to the more stable host community. Concentrations of large numbers of students, as found over the years in suburban locations, bring particular issues which do not assist with community or social cohesion. That students do not contribute in terms of Council Tax to the local area and public services weakens any local connection further.

c) The existing area around Granby Village is a well established, principally residential area seen as a successful example of early regeneration within the city centre. This character partly arises from a proportion of students within the area, However, the influx of students arising from a development about to be completed plus that on the application site will inevitably alter the demographic mix and character of the area considerably. This impact would only be all the greater factor in the iQ Weston Halls/Pendulum Hotel proposal.

d) Experience within the Granby Village area has shown that students can bring life and vitality, mostly during term times. However, also during term times, anti-social behaviour increases. While the proposed development may be well run and controlled this does not extend to the behaviour of students once outside the development.

e) The application makes assumptions around the ability of existing local services ability to cope with this increased and concentrated local student population. Some of these assumptions are based on students being willing/able, for example, to travel to more distant GPs and dentists and do not sit comfortably with the lived experience of existing residents who already struggle to get to see a GP or NHS dentist.

f) The applicants also make claims about economic benefits to the area, mainly through an uplift in spending. There are three points here. Firstly, the local area is already well served by a wide range of retail and hospitality venues, and an increase in the transient student population living within the area is not required to support these. Secondly, many of these students would leave the area semi-deserted in university vacation time, calling into question the claims for the creation of a newly vibrant neighbourhood which could sustain local businesses all year round. The third point is that part of any uplift in spending in the local area will largely be a transfer of the same spending away from the suburban areas currently being emptied of student population. The submitted Environment Statement (Paragraph 5.119) advises that “Data from the University of Manchester estimates that first year undergraduate students spend £13,685 per annum.” But the same data (for 2026-27), excluding rent and mobile phone contracts, gives a spend of only £5,480 (https://www.manchester.ac.uk/study/undergraduate/fees-and-funding/cost-of living/). This would give a much lower Total Net Expenditure figure than shown so the economic benefit to the city is more limited than is being suggested.

g) The City Council’s Guide to Development in Manchester acknowledges that successful neighbourhoods are partly achieved by a balance of housing types and mix of uses. The proposal will not enable the balance sought by local policy and guidance to achieve this balance.

h) The applicant’s own Planning and Tall Buildings Statement (Paragraph 3.11) acknowledges the need to provide balanced neighbourhoods when considering new PBSA. More importantly Policy CC10 of the Core Strategy aims to ensure the city centre attracts and retains a wide range of residents including through new development with a particular emphasis on creating a family friendly environment. This proposal will clearly

exaggerate an already considerable student population living in PBSA developments in this part of the city centre where, as confirmed by the submitted Environmental Statement (Paragraph 15.59), "the Piccadilly Ward has a much higher concentration of students compared to Manchester as a whole". As has repeatedly been said during the consultation process, residents would favour a development (of equal density) which included a mix of homes for young professionals and families, with appropriate accompanying services and local shops. It seems naive in the extreme to suppose (as does the submitted Planning Statement) that the mere proximity of students would "facilitate informal interactions, knowledge exchange, and the spontaneous formation of collaborative ventures" with those based around SISTER more than would, say, the presence of actual researchers and entrepreneurs living in the neighbourhood over a period of years with their families. On this basis the proposal does not accord with Policy CC10 or other policy intentions to create a sustainable, stable and cohesive local community.

The submitted 'Student Need Assessment' (p.24) shows there are already 8 large PBSA developments with a total of 3,496 beds immediately around the periphery of the SISTER SRF area (including those located at the east end of Granby Row (Lambert, Fairfield and Fletcher Houses), those in the Berry Street/Buxton Street area and at Vita Student at Circle Square. There are far more in developments just a little further away. These will be augmented later this year with the opening of the iQ Echo Street development with 1,224 bedrooms. This will bring the total for the SISTER SRF periphery area to 4,720 by the end of the year.

In addition 2,500 beds are proposed by the current planning application by iQ on the Weston Halls/Pendulum Hotel immediately opposite this SISTER Plot H application on Charles Street. This would require the demolition of the existing building with the loss of 528 beds making a net gain of 1,972 beds.The SISTER Plot H planning application proposes a further 1,041 beds. This makes a total of 3,013 additional beds.

Moving from 4,720 beds to 3,013 (a total of 7,733) means a 64% increase in student bed in the immediate locality of the site. This does not take into account the various other PBSA developments existing, approved or proposed in easy reach. The character of the area is already changing with this increase in student accommodation and this change will only become more noticeable as more students move in.

Policy CC3 of the Core Strategy - part of the City Councils statutory development plan - expects the City Centre to have a minimum of 16,500 new housing "units" by 2027 but it is unclear if it expected such a significant proportion to be in PBSA.

I wish to lodge the following objections in relation to the proposed construction phase for the proposed development:

The hours for working are inconsistency described within the application and are considered excessive for a site in such close proximity to existing residential buildings and for a construction period of an extended period of time. As a minimum, the hours for working should be reduced to start at 8:30am (rather than the stated 7:30am) on weekdays and still finish at 6:00pm. It should be confirmed that working would not take place on a on a Saturday outside the proposed 8:30am - 2:00pm or at any time on a Sunday, Bank Holiday or Public Holiday (the latter being omitted from all consideration). The application advises that the City Council will need to agree any working outside these hours but gives no information on how this process

works. This process should be confirmed as a part of the application and, in any event, any request for additional working should require the sign-off by the three ward councillors and the notification of those people outside the site likely to be affected in advance of the works.

I object because he application contains no information regarding the illumination of the site outside the hours of working which should be designed and operated to provide anything other than minimal security lighting and avoid general illumination and glare outside the site to protect residential amenity and natural environment. An objection would also be raised if the illumination of the site during working hours were to result in excessive light and glare into nearby homes.

I object because the development is not designed and managed to prevent disturbance through noise generated by the proposed use would be unacceptable. Planning conditions should be applied regarding appropriate measures to prevent intermittent or on-going levels of noise outside the built form that would cause disturbance to local residents including noisy uses of external and internal spaces, mechanical equipment (such as ventilation), and so on. The use of the on-site external area for events should not be permitted and there should be no amplified sound allowed within external spaces.

I wish to raise a particular objection in relation to the cumulative impact of this proposal and the iQ PBSA proposal on the adjacent Weston Halls/Pendulum Hotel site and the precedent they could set.

Neither this proposal nor the iQ proposal on the adjacent Weston Halls/Pendulum Hotel site are acceptable on their own merits. Both individually raise significant objection given the adverse impacts (in some cases exceptionally harmful impacts) they will have on the range of issues covered by this objection note including, for example, amenity (including residential amenity), the local environment (including streetscape and heritage), health and well-being, and the community. When taken together the cumulative impact of these neighbouring proposals - particularly on the primarily residential area to their north - will be all the greater. Neither proposal takes the other into account, nor do they give meaningful regard to the implications on the future proposals elsewhere in the area. In support of this objection and just by way of example the following points are particularly noted:

a) The proposal for a 2,500 room PBSA development by iQ on the Weston Halls/ Pendulum Hotel site consists of four towers of 50, 33, 24 and 17 storeys with linking built form which would effectively form a wall of development along Charles Street between Sackville Street and Princess Street when seen in any oblique view. The tallest 50 storey tower would stand at the eastern end of the site adjacent to the 38+ storey SISTER Plot H tower visually combining to give a huge and overwhelmingly harmful visual impact both generally and on the amenity of existing residents particularly those immediately northwards of them. Ironically, the taller iQ development would overshadow the SISTER Plot H proposal including the proposed on-site external area within the SISTER Plot H scheme as well as the area north of the railway viaduct. The SISTER Plot H proposal would increase the visual solidity of the iQ wall of development that would be presented to existing residents north of the viaduct by visually obstructing any particular sense of the minimal gaps between the iQ towers. The proposals have not been designed in a coordinated manner to be viewed together and the overall visual impression when viewed from the area north of the viaduct - including the outlook from many existing homes - will be of a bleak shaded wall of nondescript anywhere PBSA built form.

b) The two proposals will swamp the existing primarily residential community with a further 3,541 students in additional to those already existing and soon to be completed in the area. Charles Street and limited local streets would be expected to cope with the concentrated move in/move out period for many of these students and it is difficult to see how this can be managed in a manner that will not cause excessive disruption and inconvenience for other users of the area including existing local residents.

While each application should be treated on its own merits it is clear that within planning there is an acknowledgement of setting a precedent. By granting planning permission for one of these unacceptable proposals will set a precedent and make the other more difficult to resist. I therefore wish to raise an objection because I believe granting these applications on these sites close to existing residents with the adverse impacts on their amenity and health/well-being, the environment and the community would mean that they are being accepted as collateral damage simply to set a precedent that doesn't currently exist.

An alternative approach to the application site should be required that would have the potential to overcome the identified policy failings of this proposal. If this is not possible the proposal should be refused planning permission in accordance with Paragraph 139 of the NPPF. In support of this concluding comment the following points are particularly noted:

a) A PBSA development on this site gives rise to strong objection.
b) Paragraph 139 of the NPPF is clear that development that is not well designed should be refused. 'Well designed' is not just about the intrinsic quality of the design of the development but about achieving an appropriate response to other matters. These should include, for example, the amenity (including residential amenity) of existing residents and other users of the area, the existing townscape context (including heritage), health and well-being and the impact on the local community. This is reflected by national and local policies and guidance including Policy H12 of the Core Strategy.
c) If a PBSA development on this site is considered to be acceptable in principle by the City Council, the Council should require a comprehensive redesign of the current proposal that ensures it complies with all relevant policy and accords with relevant guidance to achieve a design that responds appropriately to the existing townscape context (including heritage), avoids harm to the amenity, health and well-being of existing residents and other users of the area (now and into the future), and supports the local community.
d) To accept the currently proposed PBSA development on this site would be to accept the harm - the very considerable harm in some instances - that would be caused within the affected area. It would be to treat this harm to local people and environment merely as collateral damage in achieving a tall building townscape in this locality at any cost.
e) The Planning Service and Planning Committee should recognise that opportunities for tall buildings - including for PBSA - exist elsewhere and this is one city centre location where 'good planning' would expect adherence to national and local policy intended to protect against inappropriate development and secure a more balanced approach between redevelopment/regeneration and a local community and existing high quality environment.
f) So, to return to the opening part of this note: The applicants claim in their Planning and Tall Building Statement (paragraph 1.8) that "The proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre.".

Clearly this is not true on any level let alone in terms of the impact on the surrounding area and the application should be refused planning permission.

Please do not hesitate to contact me if you wish to discuss any of my objections outlined above (preferably by telephone or email).

Yours sincerely.

[redacted]

Outlook

Objection to the Proposed 38-Storey Development Behind Granby House

From [redacted]
Date Sat 04/07/2026 12:58
To Jennifer Atkinson [redacted]
Cc [redacted]

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Dear Ms Atkinson,

Please find below my objection to the proposed 38-storey development behind Granby House.

Thank you for taking the time to consider my comments.

Kind regards,
[redacted]

Subject: Objection to the Proposed 38-Storey Development Behind Granby House

Dear Planning Officer,

I am the Lease Holder of [redacted] Granby House and wish to object to the proposed 38-storey development immediately behind the building.

My objections are based on the following planning grounds:

The proposed tower is significantly taller than the surrounding buildings and would have an overbearing impact on Granby House and its residents.

The development is likely to result in a substantial loss of daylight and sunlight to neighbouring properties, reducing residential amenity.

The scale and proximity of the building would create an unacceptable sense of enclosure and have a harmful effect on the outlook enjoyed by existing residents.

Construction works are likely to cause prolonged noise, dust, traffic disruption and inconvenience for nearby residents.

The increased density of development may place additional pressure on local transport and public services.

The proposal would adversely affect the character of the surrounding area and the living conditions of existing residents.

I respectfully request that the Council carefully considers the impact of this development on neighbouring residents before making its decision and refuses planning permission unless these concerns can be satisfactorily addressed.

In addition, Granby House is a Grade II listed building, and there are other listed buildings within the surrounding area. I am concerned that the proposed 38-storey tower, because of its exceptional height, scale and massing, would cause harm to the setting and significance of these designated heritage assets. I respectfully request that the Council gives full and careful consideration to the impact of the proposal on the historic environment before determining this planning application.

Thank you for taking my comments into consideration.

Yours faithfully,

[redacted]

Sent from Outlook for Android

Outlook

FORMAL OBJECTION: Planning Application Ref. No. PLA-2026-000312 Proposal: Demolition of existing multi-storey car park and construction of a new Purpose-Built Student Accommodation (PBSA) development comprising 1,041 bed spaces across three linked towe...

From [redacted]
Date Sat 04/07/2026 09:38
To Jennifer Atkinson [redacted]

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Dear Jennifer,

Date: July 4, 2026

I am writing as a local resident to submit a formal OBJECTION to the above planning application. While I do not oppose the sustainable, context-sensitive redevelopment of this site in principle, the scale, massing, density, and configuration of the current proposal represent a significant overdevelopment that will cause severe, irreversible harm to the residential amenity of the surrounding community, local heritage assets, and the demographic balance of the neighbourhood.

The application fails to demonstrate compliance with key provisions of the National Planning Policy Framework (NPPF), the National Design Guide (NDG), the Manchester Core Strategy (specifically Policies H12, EN2, and CC6), and the Guide to Development in Manchester Supplementary Planning Document (SPD).

The specific material planning grounds for this objection are detailed below.

1. Status of the Strategic Regeneration Framework (SRF) vs. Adopted Planning Policy

FORMAL OBJECTION: The applicant inappropriately relies on the SISTER Strategic Regeneration Framework (SRF) to justify the height, massing, and overall quantum of development on Plot H. As established by the Planning Service and confirmed by the Planning Committee (notably during the determination of the Great Ancoats Street application in November 2025), an SRF does not constitute statutory planning policy. It is an unadopted guidance document with exceptionally low weight as a material planning consideration.
Statutory weight lies with the Development Plan (Manchester Core Strategy) and national policy (NPPF). The illustrative masterplan in the SRF cannot override explicit statutory policies designed to safeguard residential amenity, heritage assets, and balanced communities. The proposal must be assessed on its individual planning merits against adopted policy, rather than treating the SRF's high-density targets as a predetermined requirement.

2. Severe Adverse Impact on Daylight, Sunlight, and Overshadowing

FORMAL OBJECTION: The configuration, footprint, and 148.75m height of Tower T3 will cause substantial, unmitigated loss of daylight and sunlight to the established residential community directly to its north (including Granby Village) and nearby public green spaces.

Failure of Applicant's Mitigation: The applicant claims to have mitigated overshadowing by lowering built form on the western portion of the site (Towers T1 and T2). However, this merely concentrates the harmful massing on the eastern boundary. Tower T3 will introduce a massive, non-slender barrier that will cast a vast shadow arc across Granby Village, severely compromising internal living environments and private/communal external spaces.

Manipulation of Assessment Criteria: The applicant's Environmental Statement explicitly departs from standard British Research Establishment (BRE) guidelines. The applicant argues that existing light conditions are "too good," attempting to benchmark a lower baseline of light quality against sub-standard developments elsewhere in the city centre. This methodology is fundamentally flawed. Even within this manipulated assessment, the applicant admits a "major impact" on a significant number of windows, which they unacceptably attempt to obscure by averaging figures across a wider area.

Harm to Public Open Spaces (Sackville Gardens & Vimto Park): Tower T3 closes the critical structural gap that allows direct sunlight to reach Sackville Gardens, particularly during the winter months when the sun is low. Furthermore, the applicant's claim that the impact on Vimto Park (located less than 25 metres away) is "negligible" defies common sense and microclimatic realities. These are the only public green spaces serving thousands of residents and city users; reducing their light quality directly compromises public health, well-being, and urban biodiversity, contrary to Core Strategy Policy EN2.

3. Inappropriate Scale, Massing, Siting, and Townscape Context

FORMAL OBJECTION: The proposal fails to respond meaningfully to the existing urban townscape context, violating Paragraph 135 of the NPPF and the National Design Guide.

Disregard for Immediate Context: The site stands directly adjacent to the Whitworth Street Conservation Area, characterized by cohesive 6–7 storey Victorian and Edwardian warehouses, and the modernist 20th-century university campus townscape. Instead of stepping down to integrate with this sensitive interface, the applicant has designed a 38-storey tower that responds to the high-rise character of distant parts of the "Southern Arc" (such as Great Jackson Street or Mayfield). Tokenistic Materiality: Dressing an out-of-scale, overbearing tower in materials intended to reference nearby 1950s/60s architecture is tokenistic. It fails to address the underlying spatial incompatibility. Furthermore, many of the modernist buildings referenced by the applicant are slated for demolition under the wider SRF (including Faraday Tower, which already has approval for demolition), meaning the proposal anchors its design context to temporary or disappearing structures.

4. Harm to the Historic Environment and Heritage Assets

FORMAL OBJECTION: The development fails to respect or preserve the heritage significance of the Whitworth Street Conservation Area, the Grade II listed railway viaduct, and nearby listed structures, directly violating the statutory duties set out in Section 69(1) of the Planning (Conservation Areas and Listed Buildings) Act 1990 and national heritage policies.

Impact on Character and Public Realm: The high-quality historic character of the Whitworth Street Conservation Area is directly linked to the volume of natural light that reaches its streets and internal warehouse spaces—a functional legacy of the textile industry. The immense overshadowing caused by the proposed development will structurally alter this historic environment.

Prominent and Alien Intrusion: Tower T3 will form a highly intrusive, visually jarring feature along Sackville Street, a key historic gateway into the conservation area. The application downplays these impacts and relies on a restrictive identification of non-designated heritage assets, omitting highly relevant local structures such as Velvet House and 55–57 Whitworth Street. The proposal does not represent the optimum viable use of the site in conservation terms.

5. Intrusive Overlooking and Loss of Privacy
FORMAL OBJECTION: The siting and elevation design of Towers T2 and T3 will introduce severe, uncharacteristic overlooking into established residential properties to the north, directly conflicting with Core Strategy Policy H12's requirement to protect residential amenity.

The north elevation of Tower T3 features floor-to-ceiling windows serving 156 student rooms, 48 studio apartments, and 52 communal living spaces. Because these communal spaces sit on the building corners, they offer expansive, un-attenuated oblique views directly into adjacent private homes. This is compounded by Tower T2, which is sited even closer to the northern boundary and contains 9 student rooms, 9 communal spaces, and 9 corridors directly facing the existing residential area. The sheer volume of anonymous, fully glazed windows creates an oppressive, enclosing, and visually overbearing environment that permanently destroys the privacy of current residents.

6. Over-Concentration of PBSA and Threat to Social Cohesion

FORMAL OBJECTION: The introduction of 1,041 student bed spaces on this site will create an unsustainable concentration of Purpose-Built Student Accommodation, undermining the Council’s policy objective of creating stable, balanced, and socially cohesive communities (Core Strategy Policy H12).

Demographic Imbalance: The applicant's own Student Need Assessment shows that over 4,700 PBSA beds already sit on the immediate periphery of the SISTER area. This application represents a 22% increase. When viewed cumulatively with the pending iQ Weston Halls/Pendulum Hotel application (2,500 spaces) and the newly opened Echo Street scheme, the local community is being systematically overwhelmed by a transient student population.

Failure of Policy H12: Policy H12 (Requirement 3) explicitly states that high-density student developments must be compatible with existing developments. Flooding a stable, long-established residential regeneration area with over a thousand short-term, transient occupants creates an extreme demographic skew. It places a severe strain on local public amenities without contributing to the local tax base (Council Tax), directly mimicking the community destabilization previously observed in suburban student enclaves.

7. Flawed Site Layout, Inefficient Land Use, and Substandard Servicing

FORMAL OBJECTION: The site layout is poorly conceived, failing to make an efficient use of land while simultaneously introducing operational and safety risks to the public highway.

Inefficient Open Space ("Princess Square"): The applicant has left the western end of the site undeveloped as a pocket park ("Princess Square") to justify the extreme vertical density on the rest of the site. The applicant's own ecological and environmental submissions admit this corner area is "poor condition" and "heavily shaded." Siting an open public space at a heavily polluted, noisy, and shaded major road junction is a replication of failed post-war planning design (SLOAP - Site Left Over After Planning). It fails to meet the needs of 1,041 students, staff, and the public. A more sustainable design would feature lower, context-appropriate built form defining the Princess Street/Charles Street corner line, with off-site developer contributions toward meaningful green infrastructure.
Substandard Servicing and Highway Safety: Servicing an accommodation block of this magnitude solely through two on-street lay-bys on Charles Street is completely inadequate. The routine influx of delivery vehicles, online retail couriers, maintenance vehicles, and taxis will create conflict and safety hazards for pedestrians and cyclists on the adjacent footways. This infrastructure will completely fail during student move-in/move-out periods, leading to traffic gridlock and significant noise disturbance. A development of this scale must feature dedicated, on-site, off-highway servicing infrastructure (such as a basement or internal loading bay).

Unacceptable External Refuse Holding Area: The submitted Design and Access Statement (p. 107) illustrates a large external refuse holding area located prominently on the bend of the Charles Street frontage. Placing a temporary or permanent containerised bin storage area at a highly visible focal gateway to the site is visually unacceptable, creates a poor streetscene environment, and poses distinct risks regarding odor and misuse. All refuse management must be contained entirely within the building footprint until the immediate point of collection.

Conclusion

For the reasons outlined above, the proposed development represents an inappropriate, overbearing, and non-compliant form of development that prioritizes maximizing floor area over the statutory protections owed to the existing environment and community.

I formally request that Manchester City Council’s Planning Service protects the residential amenity and heritage of Piccadilly Ward and refuses planning permission for Application Ref. No. PLA-2026-000312.

Thank you for considering these material planning objections. I look forward to receiving notification of the application’s progress and its date of presentation to the Planning and Highways Committee.

Yours sincerely,

[redacted]

Outlook

Planning Application Objection – Plot H, Sister Regeneration Area

From [redacted]
Date Wed 24/06/2026 17:06
To Jennifer Atkinson [redacted]
Cc [redacted]

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Hi Jennifer,

I have already added the below as a comment on the relevant planning file, however I am sending you this directly to ensure I can be informed of any decisions that are made.

I am writing as a resident of Granby House to submit a formal objection to the proposed 38-storey PBSA development. While I support sustainable city-centre regeneration, the unprecedented scale and massing of this tower will cause direct, severe, and unmitigated harm to my home and the wider community. Following a forensic review of the applicant's provided Cumulative Assessment and Alternative Baseline datasets (Tables 11.24 – 11.31), my case against this development is substantially strengthened. The developer's own data reveals that local environmental capacity has been entirely breached.

I urge the Council to refuse this application based on the following material planning considerations:
1. Direct and Severe Impact on Granby House Residential Amenity
A. Catastrophic Escalation of Cumulative Daylight Failures (Table 11.28).
The released cumulative data exposes a staggering deterioration in local living conditions when this scheme is modelled alongside neighbouring committed developments. Under the standalone scheme, 5 windows suffer a "Major" daylight (VSC) failure. However, under the Cumulative Scenario (Scenario 3), this figure explodes to 54 windows—a massive 980% increase in catastrophic daylight failures. Nearby Orient House experiences an even worse explosion, with Major failures skyrocketing from 5 to 97 windows (1840% increase).
The applicant's attempt to dismiss this by averaging the numbers across the wider neighbourhood is a clear misdirection. This scheme, alongside adjacent projects, will systematically strip Granby House of basic natural light, violating Manchester Core Strategy Policy DM1.

B. Severe Winter Sunlight Blackout (Table 11.31)
Table 11.31 contains devastating new evidence regarding solar deprivation during the coldest months of the year.Under cumulative conditions, Major Winter APSH failures at Granby House spike from 7 windows to 35 windows.This means over 60% of Granby House's tested south-facing facade will be plunged into permanent winter darkness. This severe seasonal deprivation directly threatens residents' health and well-being, completely undermining the applicant's claim that the

daylight/sunlight effects are "not significant."

C. Flawed and Skewed Data Sample (Table 11.29)
The applicant boasts a high internal daylight (NSL) compliance rate of 92.5% across the neighbourhood. However, Table 11.29 reveals a severe structural flaw in their methodology: The three properties worst hit by external daylight drops—Granby House, Orient House, and Granby Village—were completely omitted from the internal room layout assessments due to "no publicly available floor plans." The developer is masking severe light loss inside our homes by averaging in data from completely unaffected buildings farther away. This data sample is highly distorted and cannot be relied upon by the Planning Committee.

D. Admitted "Temporary Major Adverse" Construction Noise & Vibration
The ES explicitly names Granby House as a primary sensitive receptor that will experience "Temporary major adverse effects"—the highest tier of environmental harm—during demolition and heavy structural works. With a projected three-year timeline subject to volatile extensions, a generic Construction Environmental Management Plan (CEMP) is entirely insufficient to protect our mental health, sleep, and ability to work from home. Legally binding noise insulation thresholds and proactive residential relocation triggers must be mandated prior to any committee vote.

E. Unmitigated Strain on Local Healthcare Infrastructure
The addition of 1,041 new residents will place immense pressure on local GP surgeries that are already operating far beyond safe capacity. The ES concedes this pressure but speculatively dismisses it by claiming students will remain registered with family GPs. This is a fundamentally flawed and unsafe planning assumption, particularly for international students, and requires explicit Section 106 financial mitigation.

2. Wider Environmental, Safety, and Procedural Failures
Bypassing Mandatory EIA Mitigation: The applicant’s Residual Effects Table routinely pairs a verified "Major" magnitude of environmental change with a medium-sensitivity residential receptor, yet manually downgrades the final conclusion to "Minor Adverse (not significant)." This explicitly violates standard Environmental Impact Assessment (EIA) significance matrices purely to evade the statutory requirement to alter the building's massing or provide architectural mitigation.

Alternative Baseline Saturation: The applicant's admission that switching to an "Alternative Baseline" (Scenario 1a vs 3a) yields no material difference proves that local daylight capacity is entirely exhausted. The massing creates a permanent daylight deficit that no modelling framework can hide.

Critical Solar Glare Public Safety Hazards: Computer modelling predicts multiple instances where the reflective facade will cause significant solar glare "comparable to looking directly at the sun," specifically threatening road users at the Charles Street/Princess Street junction and train drivers on the adjacent rail viaduct. Leaving this public safety hazard to a post-approval condition is unacceptable.

Widespread Degradation of Heritage Assets: The Visual Impact Assessment admits to multiple instances of adverse impacts affecting the immediate setting of Granby House itself (a Grade II listed asset), the listed Sculptural Wall, and the Whitworth Street Conservation Area.Excessive Carbon Footprint: The project directly undermines Manchester’s 2038 zero-carbon target, generating 26,488 tonnes of CO2 during construction and a massive 144,913 tonnes of CO2 over its operational life.

Additionally, the data reveals a catastrophic escalation of environmental damage:
1. Severe Cumulative Escalation: A comparison of Standalone Scenario 2 against Cumulative Scenario 3 reveals that Major daylight (VSC) failures at Orient House explode from 5 to 97 windows, and at Granby House from 5 to 54 windows. My flat will be directly affected by this.

2. Unacceptable Winter Sunlight Deprivation: Table 11.31 proves that under cumulative conditions, over 60% of the south-facing residential facade at Granby House (35 windows) and 45 windows at Granby Village are plunged into a 'Major Adverse' winter sunlight blackout. Again, my flat will be directly affected.

The data proves beyond doubt that this proposal represents a severe case of overdevelopment. It forces the established residents of Granby House to bear the absolute brunt of its environmental fallout—enduring years of major noise disruption, a near-total collapse of winter sunlight, and severely degraded daylight.

I strongly urge the Planning Committee to refuse this application in its current form and direct the applicant to submit a significantly scaled-down, lower-density proposal that respects Manchester's planning policies and preserves the basic residential amenities of its neighbours.

Please keep me informed of any updates, modifications, or committee dates regarding this application.

Thanks,
[redacted]

Aperture - NLC Limited
226 Highlands Boulevard
Leigh on Sea
Essex
SS9 3QY

Our Ref/DW26010

To: Chris Speck - Granby Village (Manchester) Management Company Limited and Granby House RTM Company Limited,

c/o Lisa Price
Scanlans Property Management LLP
Suite 2b, Carvers warehouse,
77 Dale Street,
Manchester.
M1 2HG

& c/o Nancy Evans
Rendall & Rittner Ltd
340 Deansgate,
Manchester,
Greater Manchester.
M3 4LY

By email only [redacted] **&**
[redacted]

22 June 2026

Dear Chris,

Stage 1 – Desktop Review Report of GIA's ES Chapter 11.0 of the EIA Assessment for Charles Street - Multi Storey Car Park (Sister Plot H), Manchester M1 7AR
Daylight, Sunlight and Overshadowing effect on Granby House and Granby Village

Manchester City Council - Planning Application references: EIASCO-025-013, 143741/FO/2025, PLA/2026/000312, OTH/2026/000191

We are appointed by Scanlans Property Management LLP, the property managers of Granby Village (Manchester) Management Company Limited (GVMMCL) for 55, 57 and 59 Whitworth Street, 34, 36, 48 and 50 Granby Row, 60 Sackville Street and 4 and 10 Bombay Street, Greater Manchester.

We are also appointed by the property managers of Granby House RTM Company Limited for (GHRTMCL) Granby House, Granby Row, Manchester, through Rendal & Rittner Limited.

Both GVMMCL & GHRTMCL are concerned about the potential light loss as a result of the implementation of the Sister Plot H development site on their respective properties.

Furthermore, they are also concerned regarding the cumulative impact of neighbouring developments within the vicinity of the development site, namely the other Sister development plots A to G and the Weston Student Halls and Pendulum Hotel, 78 Sackville Street Manchester M1 3BB. Referred to as 'Weston Student Halls' in this report.

Within planning application reference PLA/2026/000312 we note an Environmental Impact Assessment (EIA) has been conducted for the development site at Sister Plot H by GIA, where they have provided the Environmental Statement (ES) Chapter 11.0 of the EIA.

From the perspective of Granby House and Granby Village, we shall be reviewing Deloitte's and GIA's results of their Daylight, Sunlight and Overshadowing assessment and the methodologies employed as part of their following EIA document submissions: -

- Plot H Sister - Planning Statement
- Plot H Sister - ES VOL 1 - Environmental Statement
- Plot H - ES VOL 2 Appendix 15.1_Scenarios 1-3 Combined_FINAL
- Plot H - ES VOL 2 Appendix 15.2_Scenarios 1-3 Combined_FINAL
- Plot H - ES VOL 2 Appendix 15.3 Scenarios 1-3 Combined_FINAL
- Plot H Sister - ES VOL 3 - Non-Technical Summary

To make this review as concise as possible we have taken extracts directly from the documents listed above to highlight the results.

We acknowledge GIA have covered a number of scenarios within their assessment that are discussed in the ES VOL 3 Non-Tech Summary in the **Assessment Methodology** section, **EIA Scenarios** from paragraph 1.24. Paragraph 1.29 includes table 1.1 below.

Table 1.1 – Table of scenarios tested

Scenario 1	Existing Baseline (existing EIA Site, as of December 2025)
Scenario 2	Existing Baseline + Proposed Development
Scenario 3	Existing Baseline + Proposed Development + Cumulative
Scenario 4	Existing Baseline + Proposed Development + IDM Masterplan (future surrounds/ future phases) + Cumulative
Alternative baseline scenarios	
Scenario 1a	Alternative Baseline (existing EIA Site, but with multi-storey car park and retail units demolished)
Scenario 2a	Alternative Baseline + Proposed Development
Scenario 3a	Alternative Baseline + Proposed Development + Cumulative
Scenario 4a	Alternative Baseline + Proposed Development + IDM Masterplan (future surrounds/ future phases) + Cumulative

Paragraph 1.28 states "*The existing baseline considers the Site as it is today, with the existing buildings on site. The alternative baseline assumes the demolition has commenced prior to this redevelopment application*".

From a daylight, sunlight and overshadowing standpoint, I see no merit in this the 'Alternative Baseline' setting from Granby House and Granby Village's perspective as the baseline results do not change based on the GIA summary spreadsheets. The results will show both properties with the same existing level of light in this scenario which is set to be temporary between the completed demolition and construction phase up until the building tops out. Therefore, for the purposes of this review, I shall discount the 'Alternative Baseline' assessment going forward.

More importantly, we believe that Scenarios 1 to 4 of the EIA should be assessed to understand the various impacts based on Granby House and Granby Village.

Paragraph 1.30 includes the following table.

Discipline/ Scenario	1	2	3	4	1a	2a	3a	4a
Townscape and Visual Impact	Y	Y	Y	Y	N	N	N	N
Built Heritage	Y	Y	Y	Y	N	N	N	N
Noise and Vibration	Y	Y	Y	Y	N	N	N	N
Air Quality	Y	N	Y	Y	N	N	N	N
Traffic and Transport	Y	Y	Y	Y	N	N	N	N
Daylight, Sunlight and Overshadowing	Y	Y	Y	N	Y	Y	Y	N
Solar Glare	N	Y	N	N	N	N	N	N
Wind	Y	Y	Y	Y	N	N	N	N
Climate Change	Y	Y	N	N	N	N	N	N
Socio-Economic	Y	Y	Y	Y	N	N	N	N
Human Health	Y	Y	Y	Y	N	N	N	N

GIA have completed their assessment for Scenarios 1 to 3, however Scenario 4 has not been completed, therefore we cannot fully appreciate the true future impact of the Existing Baseline + Proposed Development + IDM Masterplan (future surrounds/ future phases) + Cumulative, which will be the worst case scenario for Granby House and Granby Village.

Whilst this has been discounted by GIA, one does need to be mindful of future impacts, if the Scenario 3 developments are all granted consent, the little light left to many of the

affected neighbouring properties will be exacerbated furthermore by the proposed Scenario 4 developments, namely Sister Masterplan Plots A to G.

A similar scenario was covered earlier this year in the refused Stocktons Development at 140 Great Ancoats Street, Manchester M4 6DU planning Ref: 142535/FO/2025, where the future SRF masterplan schemes were included as a cumulative impact, the results proved this was overburdensome on the already heavily affected neighbouring residential amenity at Oxygen Towers.

This scenario effectively shows the impacted neighbouring residential amenity will see their precious light eroded over time with each phase of development. This is an opportunity to design around this issue with careful management of the SRF maximum parameters to cover off the wider contextual impact.

Methodology

I am largely in agreement with GIA's approach using the assessment methodology in line with Building Research Establishment 209 publication 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2022) 3rd Edition, in accordance with RICS Professional Standards.

It is appropriate to adopt the guidelines set out in the BRE in conjunction with local policy. The Manchester Core Strategy Policy DM1 (Residential Amenity) which states that, all development must consider the impact on surrounding areas in terms of siting, scale, form, massing and notably, residential amenity – including amenities such as daylight, privacy, etc.

The BRE guide sets out numerical target values for various methods of assessing natural lighting adequacies both within and around buildings. Within the guide there are a number of initial daylight and sunlight assessments to establish how complex the assessment needs to be based on the height bulk and massing of the new development and its proximity to neighbouring buildings and property.

At Page 7 Section 1.6 (Introduction), the guide states:

> 1.6 '*The guide is intended for building designers and their clients, consultants, and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design (see Section 5). In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of*

obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings'.

The BRE therefore acknowledge the numerous characteristics affecting construction projects and emphasise the purpose of BR 209 is to encourage good daylighting within buildings, not to create rigid planning constraints.

At Page 14 Section 2.2.2 , the guide outlines methodology to be applied in respect of daylight to existing buildings. Here it states:

2.2.2 '*The guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens, and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas, and garages need not be analysed. The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops, and some offices*.

When assessing impacts on daylight primarily habitable spaces should be considered; save for some special circumstances where safeguarding daylight within certain sensitive nondomestic receptors might be important.

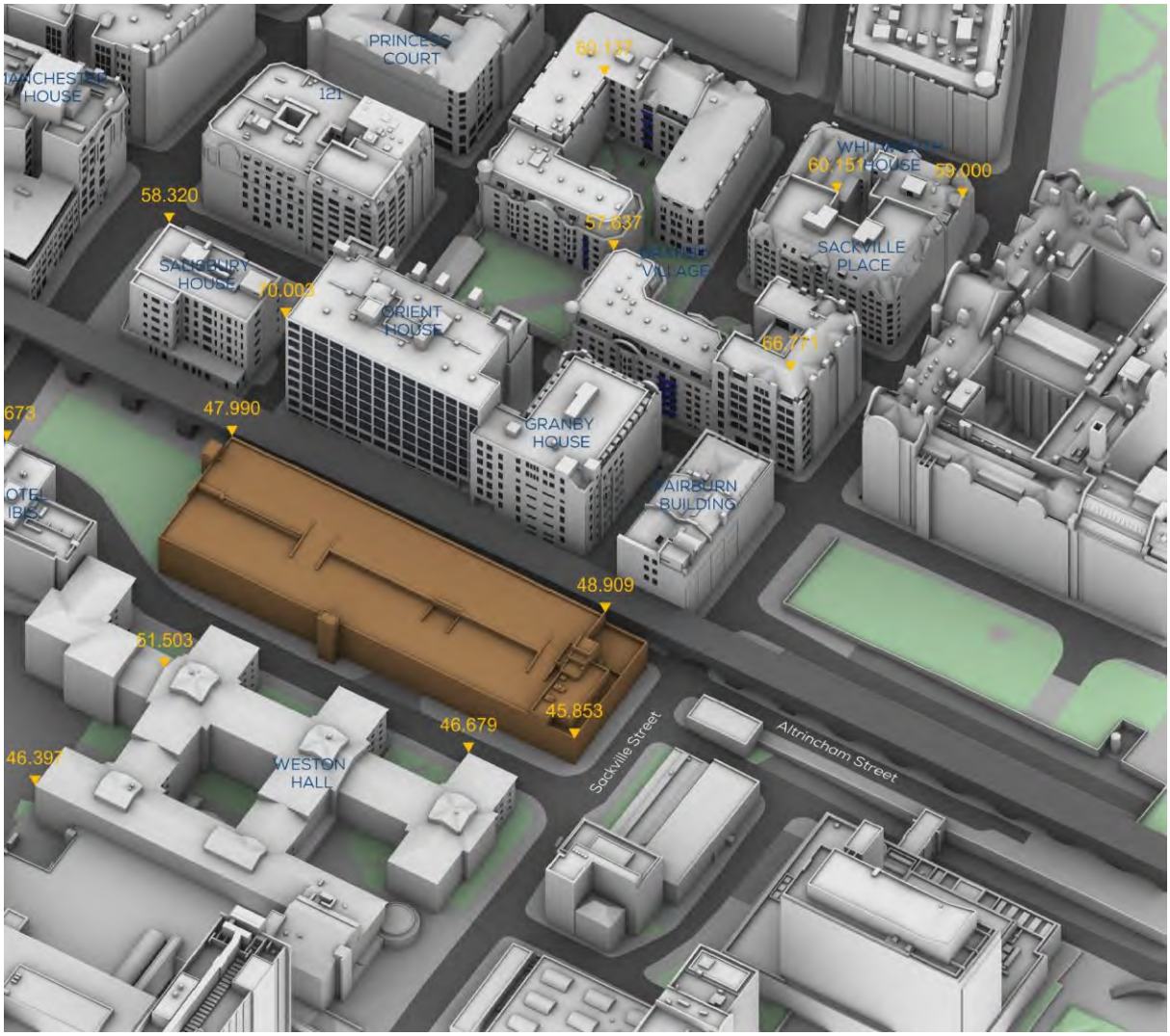
With regards to sunlight in neighbouring properties, Page 24 Section 3.2.3 (Existing Buildings) covers the requirements of sunlight assessments where it states:

3.2.3 '*To assess loss of sunlight to an existing building, it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90° of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. Normally loss of sunlight need not be analysed to kitchens and bedrooms, except for bedrooms that also comprise a living space, for example a bed sitting room in an old people's home. In non-domestic buildings any spaces that are deemed to have a special requirement for sunlight should be checked; they will normally face within 90° of due south anyway*'.

Sunlight assessments should principally therefore concern main living spaces such as living rooms, studios and living-kitchen-diners. All other domestic and non-domestic rooms are deemed less significant in sunlight terms. Again, a level of discretion exists for special domestic and non-domestic sunlight requirements.

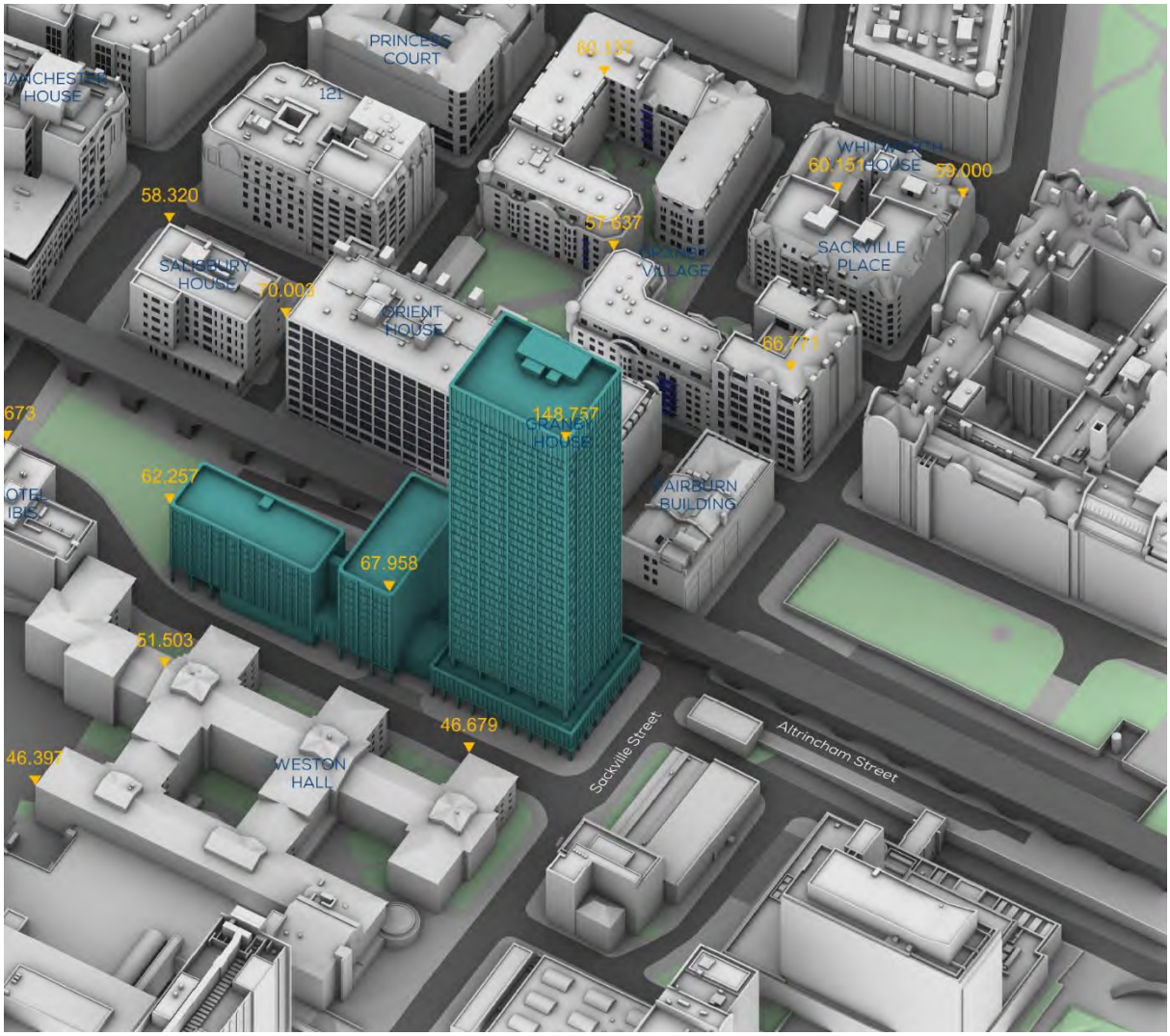
Results Review

Scenario 1 provides the baseline (existing) levels of light with Car Park in place as shown in the GIA imagery of their 3D assessment model below.



The results show the current levels of light received by Granby House and Granby Village. Although, we are more interested in the amount of light reduction as a result of the proposal.

Scenario 1 v Scenario 2 provides the existing vs proposed results to demonstrate the light loss to the neighbouring properties.



We have reviewed the Operation Phase results published within the Environmental Statement: Volume 1 Plot H, Sister, May 2026.

The GIA ES refers to the drawings and results appendix of their assessments as 11.1, 11.2 and 11.3, although the GIA uploaded appendices to the planning portal refer to 15.1, 15.2, 15.3. We assume this is a typographical error and should say 11.1 to 11.3.

For Granby House and Granby Village, GIA have published results for Daylight VSC (Vertical Sky Component) and Sunlight APSH and WPSH (Annual & Winter, Probable Sunlight Hours). Both assessments are an assessment of the window aperture only and not for the light received within the room itself served by the window apertures. This is known as a Daylight NSL (No Skyline) also known as a Daylight Distribution (DD)

assessment. In fairness to GIA and from our own research there are no plans available for either Granby House or Granby Village on the Manchester planning portal and GIA have correctly opted not to assess Granby House and Granby Village for Daylight NSL assessments.

Daylight VSC results are summarised in GIA's Table 11.10 as follows in Scenario 1 vs 2.

Table 11.10 - Summary of Baseline v Proposed VSC Results

Address	Total No. of windows	No. of windows that meet BRE Guidelines	Below BRE Guidelines - Magnitude of Change		
		Negligible	Minor	Moderate	Major
Salisbury House	72	67	5	0	0
Orient House	150	104	18	19	9
Granby House	103	40	6	5	52
Stanlo House	60	59	1	0	0
Weston Hall	358	112	87	44	115
121 Princess Street	39	39	0	0	0
Victoria House	30	30	0	0	0
Granby Village	282	254	18	7	3
4-6 Nobel Way	40	40	0	0	0
36 Charles Street	3	3	0	0	0
Sackville Place	113	113	0	0	0
Whitworth House	9	9	0	0	0
Montana House	31	31	0	0	0
88-92 Princess Street	46	46	0	0	0
Asia House	112	112	0	0	0
Totals	1448	1059	135	75	179

Granby House has 57 out 103 windows assessed impacted beyond a 40% reduction in Daylight which is 55% of windows experiencing a noticeable moderate to major substantial impact.

Granby Village has 10 out 282 windows assessed impacted beyond a 40% reduction in Daylight which is 3% of windows experiencing a noticeable moderate to major substantial impact. However, Granby Village consists of many different buildings and the results should be presented as such so that the occupants can appreciate the impact on their own properties. We would expect to see results for Bombay House, Sackville Place, Velvet Court, Velvet House and Venice Court individually.

I could not find any Window Location drawings for Granby House and Granby Village properties within the EIA or ES Chapter 11.0; therefore, the results have no context to

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them to understand the exact windows of each block are being affected. The NSL drawings show the window ID number but Granby House and Granby Village were not assessed for NSL.

The sunlight APSH assessment results are summarised in GIA's Table 11.12 as follows in Scenario 1 vs 2.

Table 11.12 - Summary of Baseline v Proposed Annual Sunlight Results

Address	Total No. of windows	No. of windows that meet BRE Guidelines Negligible	Below BRE Guidelines - Magnitude of Change		
			Minor	Moderate	Major
Salisbury House	58	58	0	0	0
Orient House	150	149	1	0	0
Granby House	58	29	0	2	27
Stanlo House	34	34	0	0	0
Weston Hall	4	4	0	0	0
121 Princess Street	33	33	0	0	0
Victoria House	10	10	0	0	0
Granby Village	267	248	4	5	10
4-6 Nobel Way	0	0	0	0	0
36 Charles Street	1	1	0	0	0
Sackville Place	107	107	0	0	0
Whitworth House	9	9	0	0	0
Montana House	0	0	0	0	0
88-92 Princess Street	1	1	0	0	0
Asia House	91	91	0	0	0
Totals	823	774	5	7	37

Granby House has 29 out 58 windows assessed impacted beyond a 40% reduction in Sunlight APSH which is 50% of windows experiencing a noticeable moderate to major substantial impact.

Granby Village has 15 out 267 windows assessed impacted beyond a 40% reduction in Sunlight which is 6% of windows experiencing a noticeable moderate to major substantial impact. However, Granby Village consists of many different buildings and the results should be presented as such so that the occupants can appreciate the impact on their own properties.

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The sunlight WPSH assessment results are summarised in GIA's Table 11.13 as follows in Scenario 1 vs 2.

Table 11.13 - Summary of Baseline v Proposed Winter Sunlight Results

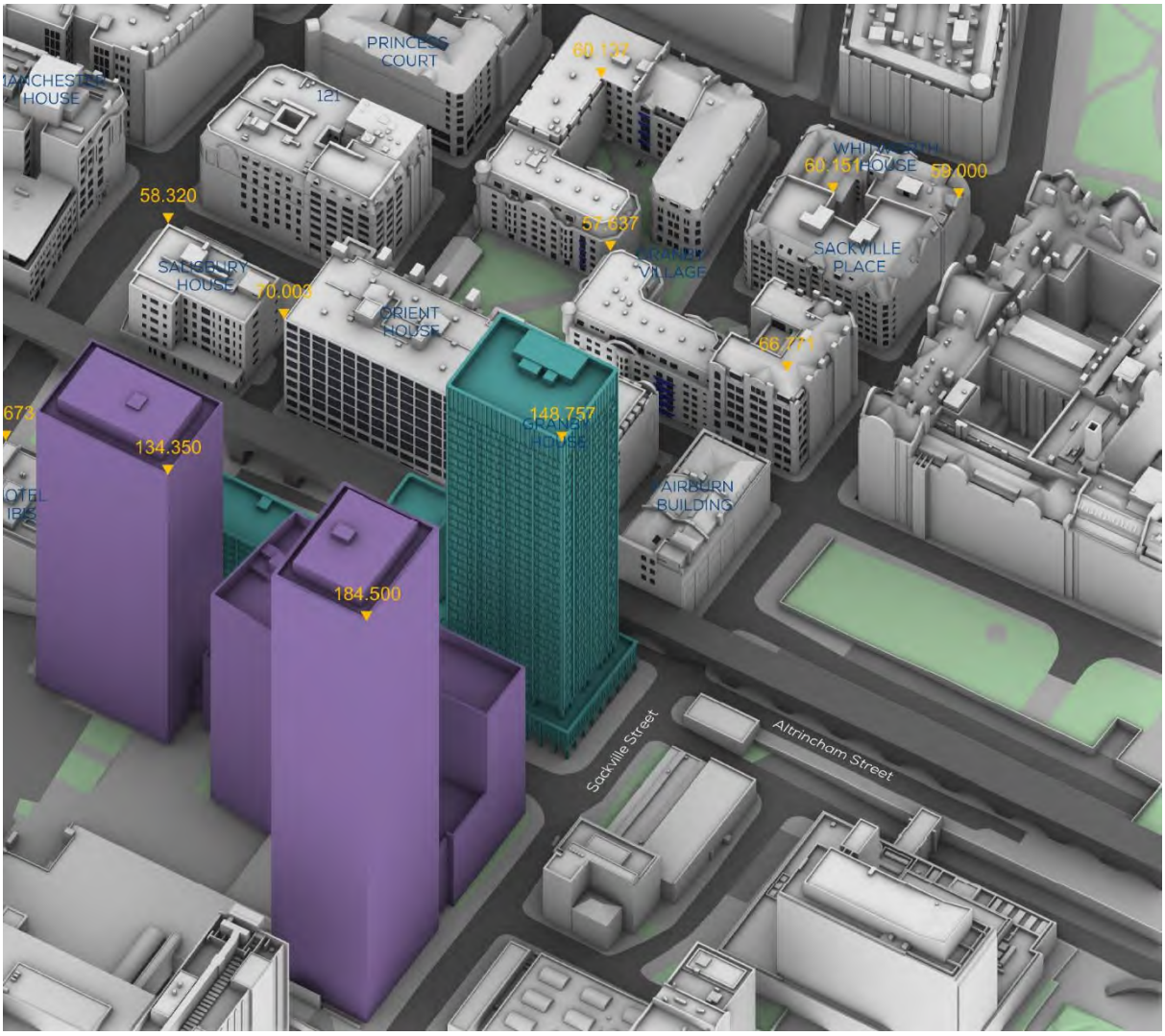
Address	Total No. of windows	No. of windows that meet BRE Guidelines Negligible	Below BRE Guidelines - Magnitude of Change		
			Minor	Moderate	Major
Salisbury House	59	58	0	0	0
Orient House	150	150	0	0	0
Granby House	58	49	0	2	7
Stanlo House	34	34	0	0	0
Weston Hall	4	4	0	0	0
121 Princess Street	33	33	0	0	0
Victoria House	10	10	0	0	0
Granby Village	267	237	3	2	25
4-6 Nobel Way	0	0	0	0	0
36 Charles Street	1	1	0	0	0
Sackville Place	107	107	0	0	0
Whitworth House	9	9	0	0	0
Montana House	0	0	0	0	0
88-92 Princess Street	1	1	0	0	0
Asia House	91	91	0	0	0
Totals	823	784	3	4	32

Granby House has 9 out 58 windows assessed impacted beyond a 40% reduction in Sunlight WPSH which is 16% of windows experiencing a noticeable moderate to major substantial impact.

Granby Village has 27 out 267 windows assessed impacted beyond a 40% reduction in Sunlight which is 10% of windows experiencing a noticeable moderate to major substantial impact.

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Scenario 1 vs Scenario 3 provides the existing vs (proposed & cumulative scheme) at Weston Student Halls results to demonstrate the light loss to the neighbouring properties.



The proposed Plot H Sister development is shown by the green buildings, the Weston Student Halls proposed development is shown with the purple buildings.

Daylight VSC results are summarised in GIA's Table 11.20 as follows in Scenario 1 vs 3.

Table 11.20 - Summary of Baseline v Cumulative VSC Results

Address	Total No. of windows	No. of windows that meet BRE Guidelines Negligible	Below BRE Guidelines - Magnitude of Change		
			Minor	Moderate	Major
Salisbury House	72	11	18	37	6
Orient House	150	19	5	29	97
Granby House	103	40	6	3	54
Stanlo House	60	57	0	0	3
121 Princess Street	39	39	0	0	0
Victoria House	30	30	0	0	0
Granby Village	282	248	15	7	4
4-6 Nobel Way	40	40	0	0	0
36 Charles Street	3	3	0	0	0
Sackville Place	113	113	0	0	0
Whitworth House	9	9	0	0	0
Montana House	31	3	7	19	2
88-92 Princess Street	46	44	2	0	0
Asia House	112	106	6	0	0
Totals	1090	762	67	95	166

Granby House has 57 out 103 windows assessed impacted beyond a 40% reduction in Daylight which is 55% of windows experiencing a noticeable moderate to major substantial impact. This is reported the same as the existing vs proposed scenario, although that seems unlikely, however an independent check would confirm this.

Granby Village has 11 out 282 windows assessed impacted beyond a 40% reduction in Daylight which is 4% of windows experiencing a noticeable moderate to major substantial impact. This is an increase in 1% in the cumulative scenario compared to the existing vs proposed scenario.

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The sunlight APSH assessment results are summarised in GIA's Table 11.22 as follows in Scenario 1 vs 3.

Table 11.22 - Summary of Baseline v Cumulative Annual Sunlight Results

Address	Total No. of windows	No. of windows that meet BRE Guidelines Negligible	Below BRE Guidelines - Magnitude of Change		
			Minor	Moderate	Major
Salisbury House	58	48	6	2	2
Orient House	150	143	0	2	5
Granby House	58	11	0	2	45
Stanlo House	34	34	0	0	0
121 Princess Street	33	33	0	0	0
Victoria House	10	10	0	0	0
Granby Village	267	241	11	5	10
4-6 Nobel Way	0	0	0	0	0
36 Charles Street	1	1	0	0	0
Sackville Place	107	107	0	0	0
Whitworth House	9	9	0	0	0
Montana House	0	0	0	0	0
88-92 Princess Street	1	1	0	0	0
Asia House	91	91	0	0	0
Totals	819	70729	17	11	62

Granby House has 47 out 58 windows assessed impacted beyond a 40% reduction in Sunlight APSH which is 81% of windows experiencing a noticeable moderate to major substantial impact. This is an additional impact of 31% compared to the existing vs proposed scenario of 50% of windows impacted.

Granby Village has 15 out 267 windows assessed impacted beyond a 40% reduction in Sunlight which is 6% of windows experiencing a noticeable moderate to major substantial impact. This is the same as the existing vs proposed impact.

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The sunlight WPSH assessment results are summarised in GIA's Table 11.23 as follows in Scenario 1 vs 3.

Table 11.23 – Summary of Baseline v Cumulative Winter Sunlight Results

Address	Total No. of windows	No. of windows that meet BRE Guidelines Negligible	Below BRE Guidelines – Magnitude of Change		
			Minor	Moderate	Major
Salisbury House	58	57	0	0	1
Orient House	150	149	0	0	1
Granby House	58	21	0	2	35
Stanlo House	34	34	0	0	0
121 Princess Street	33	33	0	0	0
Victoria House	10	8	0	1	1
Granby Village	267	215	1	6	45
4-6 Nobel Way	0	0	0	0	0
36 Charles Street	1	1	0	0	0
Sackville Place	107	107	0	0	0
Whitworth House	9	9	0	0	0
Montana House	0	0	0	0	0
88-92 Princess Street	1	1	0	0	0
Asia House	91	91	0	0	0
Totals	819	726	1	9	83

Granby House has 37 out 58 windows assessed impacted beyond a 40% reduction in Sunlight WPSH which is 64% of windows experiencing a noticeable moderate to major substantial impact. This is an additional impact of 48% compared to the existing vs proposed scenario of 16% of windows impacted.

Granby Village has 51 out 267 windows assessed impacted beyond a 40% reduction in Sunlight which is 19% of windows experiencing a noticeable moderate to major substantial impact. This is an additional impact of 9% compared to the existing vs proposed scenario of 10% of windows impacted.

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GIA have classified the operational residual permanent effects as the following from their Table 11.28.

Likely Significant Effect	Receptor	Mitigation Measure	Means of Mitigation Implementation	Scenario 2: Baseline + Phase A + Phase C - Post Mitigation Residual Effect – Significance and Duration (Temporary/Permanent)
Reduction in daylight	Salisbury House	None	n/a	Minor Adverse – Permanent (not significant)
	Orient House	None	n/a	Minor Adverse – Permanent (not significant)
	Granby House	None	n/a	Minor Adverse – Permanent (not significant)
	Stanlo House	None	n/a	Minor Adverse – Permanent (not significant)
	Weston Hall	None	n/a	Minor Adverse – Permanent (not significant)
	121 Princess Street	None	n/a	Negligible – Permanent
	Victoria House	None	n/a	Negligible – Permanent
	Granby Village	None	n/a	Minor Adverse – Permanent (not significant)
	4-6 Nobel Way	None	n/a	Negligible – Permanent
	36 Charles Street	None	n/a	Negligible – Permanent
	Sackville Place	None	n/a	Negligible – Permanent
	Whitworth House	None	n/a	Negligible – Permanent
	Montana House	None	n/a	Negligible – Permanent
	88-92 Princess Street	None	n/a	Negligible – Permanent
	Asia House	None	n/a	Negligible – Permanent
Reduction in sunlight	Salisbury House	None	n/a	Negligible – Permanent
	Orient House	None	n/a	Minor Adverse – Permanent (not significant)
	Granby House	None	n/a	Minor Adverse – Permanent (not significant)
	Stanlo House	None	n/a	Negligible – Permanent
	Weston Hall	None	n/a	Negligible – Permanent
	121 Princess Street	None	n/a	Negligible – Permanent
	Victoria House	None	n/a	Negligible – Permanent
	Granby Village	None	n/a	Minor Adverse – Permanent (not significant)
	36 Charles Street	None	n/a	Negligible – Permanent
	Sackville Place	None	n/a	Negligible – Permanent
	Whitworth House	None	n/a	Negligible – Permanent
	88-92 Princess Street	None	n/a	Negligible – Permanent

I disagree with the categorisation of the effects in this table. For example, the Daylight VSC for Granby House generates an impact to 57 windows (55%) of the total of 103 windows assessed as a moderate impact (5 windows) and (52 windows) major impact. The impacts have been downgraded by GIA and are misleading in my opinion.

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Scenario 1 vs Scenario 4

This scenario has not been assessed by GIA; however, I believe this scenario must be covered in the analysis to show the additional cumulative impact. It is clear from the Scenario 1 vs Scenario 3 results that the Weston Student Halls scheme has an additional impact on Granby House.

Scenario 4 would have a similar additional impact on the closest Granby Village buildings of Velvet House and Velvet Court, particularly given the location of the proposed blocks of the Sister Plots A, B and D as shown in the masterplan layout below taken from **SRF Area** Figure 4.1.



Overall Summary

Upon review of the GIA ES chapter 1, there will undoubtedly be a severe impact on the Daylight VSC and Sunlight APSH levels for Granby House. There are also localised severe impacts on Granby Village, although at this stage the GIA report does not provide a location for which of the Granby Village buildings will be impacted as there are no window location drawings or diagrams for both properties. Therefore, at this stage we do not know which windows will be affected.

The VSC results only tell half of the neighbouring impact daylight story and usually Daylight NSL results are more onerous in a city environment compared to those VSC results reported.

I am concerned that the magnitude of the results have been downgraded by GIA and could be deemed to be misleading for those reported for Granby House and in part Granby Village.

I am also concerned that Scenario 4 has been discounted from the DSO ES chapter, this Scenario will clearly cause an additional impact to Granby House and Granby Village that must be assessed to demonstrate the future SRF masterplan impact of the future Sister Plots A to G.

Further to our site visit and inspection in of the Granby House and Granby Village residential apartments, we are in the process of conducting our own Stage 2 technical assessment as part of our due diligence exercise.

We will be able to verify GIA's VSC, APSH and WPSH results in due course. We will also calculate the NSL impact to the affected rooms themselves to give both GVMMCL & GHRTMCL a clearer picture of the impacts in all 4 Scenarios which we will be happy to share with Manchester City Council Planning Department.

Given the level of detail and works still required I believe that it is only fair and proper that consideration is given for an extension to the planning consultation period. This is to give us the opportunity to conclude our own investigation and due diligence of the EIA and the ES Chapter 11.0 along with also providing GIA time to update their own assessment providing the missing parts identified within our Stage 1 review.

We shall divert our attention back to our independent Stage 2 – Daylight, Sunlight and Overshadowing technical assessment for Granby House and Granby Village. We shall share our report and findings with you in due course.

If you have any questions or queries relating to this review, please do not hesitate in contacting me.

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We look forward to yours and Manchester City Council's response.

Yours sincerely,

[redacted]

Daniel Wade
Director – Rights of Light, Daylight and Sunlight
For and on behalf of
Aperture - Natural Light Consultants Ltd
226 Highlands Boulevard, Leigh on Sea, Essex SS9 3QY
Tel: [redacted] | E-Mail: [redacted] | Web: **www.aperture-nlc.com**

CC Chris Speck - Granby Village (Manchester) Management Company Limited & Granby House RTM Company Limited
John Whyard - Granby Village (Manchester) Management Company Limited
Nathan Prescott - Granby Village (Manchester) Management Company Limited
David Ball - Granby Village (Manchester) Management Company Limited
Darren Sellers - Granby Village (Manchester) Management Company Limited
Gareth Kavanagh - Granby Village (Manchester) Management Company Limited

DRAGONFLY
CONSULTING

18th June 2026

FAO Jennifer Atkinson

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

By Email to: [redacted]

Dear Jennifer,

DC5567-NL1v2 – Planning App Reference: PLA-2026-000312 – Objection to Erection of 3 Blocks of Purpose-Built Student Accommodation, Ancillary Internal Amenity Space and Commercial Uses at Charles Street Multi-Story Car Park, Charles Street, Manchester

I am Managing Director and Principal Acoustic Consultant for Dragonfly Consulting and act on behalf of FAC251 Ltd as their advisor in matters pertaining to Noise and Vibration.

At the request of my client, I have reviewed the information available on the Manchester City Council (MCC) planning portal in respect of the above application.

The application site, the Charles Street Multi-Story Car Park, sits approximately 60m east of my Client's venue FAC251 (also known as 'Factory') a nightclub and live music venue with a capacity of up to 1200 persons when operating as a nightclub, or 800 persons as a live music venue.

Factory is the former home of Factory Records and as a building has been a pivotal part of Manchester's music scene since 1990 when Factory Records first opened on the site. In 1993 the building was converted to a nightclub and operated as 'Paradise Factory' until 2006. In 2010 the building was re-opened as a nightclub and music venue and has operated as such since 2010, with a premises licence allowing the nightclub to operate from 1100hrs until 0400hrs the following day, every day, except for Sunday when the premises can close at 0500hrs.

Both live events and club nights can generate high levels of music and patron noise which has the potential to impact on residential uses in the immediate vicinity of the premises. In particular, this proposed development site has a direct line of sight to the venue's main entrance.

I would draw your attention to Paragraph 200 of the National Planning Policy Framework, which states as follows:

"*Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on*

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them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

The placing of a residential use in such immediate proximity to a hospitality use, and in particular a venue that has regular live music and nightclub operations, without a detailed assessment of the potential for noise impact of those venues on the proposed dwellings would be clearly contrary to the requirements of paragraph 200 and the 'Agent of Change' principal it sets out.

Given MCC's experience of the negative impacts and costs associated with not ensuring that the Agent of Change principle is properly applied to existing entertainment venues, with the long running 'Night and Day' saga, which has led to a UK first of an abatement notice now permitting a noise nuisance which renders residential dwellings unhabitable, it is critical that the assessment of Entertainment and Hospitality noise is robustly consider as part of this application.

I have been asked to review the Environmental Impact Assessment (EIA) submitted in support of the application, specifically Chapter 8 *Noise and Vibration* and Appendix 8.1 *Noise Impact Assessment* and comment on their suitability to support the application with specific reference to how the submitted supporting documents consider the potential for noise impacts on the proposed development from hospitality noise associated with the operation of FAC251.

In addition to the EIA and appendices, I have also reviewed the proposed development plans available on the Manchester City Council planning portal.

Planning Policy

Chapter 8 of the Environmental; Statement (ES), in my professional opinion, correctly identifies the national and local planning policy considerations, although I would note that the policy review does not identify the proposed development's potential as an 'Agent of Change'. In particular I would draw attention to *Manchester Core Strategy* Policy H12 and Policy DM1.

These policies are identified within Chapter 8 (Paragraph 8.34) as being relevant to this development. These Policies state as follows:

"*Policy H12*

…

6. Consideration should be given to the design and layout of the student accommodation and siting of individual uses within the overall development in relation to adjacent neighbouring uses. The aim is to ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the streetscene either from the proposed development itself or when combined with existing accommodation."

"*Policy DM1*

All development should have regard to the following specific issues for which more detailed guidance may be given within a supplementary planning document:-

…

Effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise."

Finally, the policy review recognises the document *Manchester City Council Planning and Noise Technical Guidance* (October 2022). Whilst this document is not policy and stands as guidance only, it sets out the specific considerations that MCC wish to be addressed when assessing the noise impacts on and from proposed developments, although it is noted that these are incorrectly numbered which could lead to confusion.

Of particular note is Section 3.7.1.2 of this guidance for Entertainment Venues. Section 3.7.1.2 sets out a detailed approach for assessing the noise impact of music venues which references the respected DEFRA research publications NANR45 and NANR 92, both published by Salford University.

Section 3.7.1.2 notes at its final paragraph:

"*Therefore, a criterion that would achieve a condition of 'inaudible' / 'virtually inaudible' which is applicable for new residential developments that are structurally connected to entertainment venues (or vice versa) would be:*

'Music noise levels in the 63Hz and 125Hz octave centre frequency bands (Leq) should be controlled so as not to exceed (in habitable rooms) 47dB and 41dB (Leq,5min), respectively'.

This criterion may also be applicable for new residential developments that are structurally separate from an existing entertainment venue."

Consideration of Entertainment Noise Impacts within EIA

With respect to all other noise impact considerations, the submitted Noise Impact Assessment and the noise chapter of the ES itself appear to measure and assess the impacts in a clear and robust manner.

However, entertainment noise impacts appear to have been completely omitted from both the noise impact assessment and any further consideration within the ES chapter, save for the already identified mention of the MCC technical guidance.

To ensure that the proposed development can comply with both the requirements of both the NPPF as national guidance and both local policy and technical guidance a further detailed assessment of music noise impacts will be required to demonstrate that the proposed development will not be unduly impacted by noise from the operation of FAC251 and that the 'Agent of Change' principle is observed.

Having reviewed the submitted NIA completed by Blackbird Acoustics and in particular the details of the noise survey, I am of the view that it will not be possible to undertake this assessment based on the noise survey data set being currently used to support the application.

Although the noise survey was conducted over a weekend period, which is likely to be a period when FAC251 will have been trading, the NIA identifies the Sound Level Meters (SLM) used in the survey as Norsonic Nor-140 SLMs. Unfortunately, these SLMs are unable to record significant quantities of analysable audio to permit source identification for later identification of periods of music noise.

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As the survey was unattended it is now no longer possible to identify periods of music noise to ensure that the premises was trading and that the operating conditions were representative of worst-case trading conditions for FAC251 from this nose survey data.

Therefore, for the applicant to demonstrate that the proposed development complies with both local and national planning policy, it will therefore be necessary to undertake a further noise survey and a detailed noise impact assessment for entertainment noise impacts. Fac251 Ltd would be happy to provide guidance to the applicant and MCC on suitable dates for an assessment that will ensure the assessment of entertainment noise impacts is robust and reliable.

Objection to the Proposed Development

I am therefore informed that our client Fac251 Ltd wish to object to the application on the grounds that the submitted EIA and the supporting noise impact assessment are not sufficiently technically robust.

Based on our advice, our client Fac251 Ltd, will maintain an objection to this application for any residential use of this site until such time that a suitably robust noise impact assessment and amended EIA is submitted, that demonstrates clearly and robustly there will be no adverse noise impact from the operation of FAC251.

If you have any further queries or require further information, please do not hesitate to contact me.

Yours sincerely,

[redacted]

Chris Chittock BSc (Hons), MIOA
Managing Director
For and on behalf of
Dragonfly Consulting

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Outlook

Objection to Proposed 38-Storey Tower Development Behind Granby House, Granby Row

From [redacted]
Date Fri 05/06/2026 15:40
To Jon-Connor Lyons [redacted] Ross Steven [redacted] Ross Steven [redacted] Jennifer Atkinson
Cc [redacted]

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Objection to Proposed 38-Storey Tower Development Behind Granby House, Granby Row

I wish to formally object to the proposed development, specifically the construction of the 38-storey tower block located directly behind Granby House on Granby Row.

I have been a resident of Granby House for over 20 years and have witnessed the evolution of the surrounding area during that time. While I support appropriate regeneration and recognise the need for new development within the city, I strongly believe that the proposed 38-storey tower is excessive in height, scale, and massing, and is wholly inappropriate for this location.

The proposed tower would be significantly taller than the surrounding buildings and would appear visually dominant within an area characterised predominantly by mid-rise development. As a result, the scheme would be out of keeping with the established character of the neighbourhood and would have a harmful impact on the local townscape.

Of particular concern is the effect the development would have on the residential amenity of existing residents. The height and proximity of the proposed tower are likely to result in a substantial loss of daylight and sunlight to homes within Granby House and neighbouring properties. Access to natural light is a fundamental aspect of residential living conditions, and any significant reduction would adversely affect residents' quality of life and enjoyment of their homes.

Furthermore, the scale of the proposed building raises concerns regarding overdevelopment of the site. A tower of this magnitude would place considerable pressure on the immediate environment while failing to respond appropriately to the context of the surrounding area.

I believe that any redevelopment of this site should be undertaken in a manner that respects the existing urban form and residential community. A building of a similar height to neighbouring developments, in the region of six to seven storeys, would be far more appropriate and would allow regeneration to proceed without causing such significant harm to existing residents and the character

of the area.

I respectfully request that the planning committee gives full consideration to the concerns of local residents and refuses permission for the proposed 38-storey tower in its current form.

Yours faithfully,

[redacted]

Outlook

Objection Planning Application- PLA-2026-000312

From [redacted]
Date Fri 05/06/2026 15:32
To Jennifer Atkinson [redacted]
Cc Sam Wheeler [redacted] Ross Steven [redacted]
Jon-Connor Lyons [redacted]

1 attachment (969 KB)
Granby.pdf;

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To Whom It May Concern,
I wish to formally object to the proposed 38-storey tower development located behind my apartment block (Granby House on Granby Row). Application number PLA-2026-000312
My apartment building (Granby Row) is a Grade II listed structure and sits within a conservation area, and I am deeply concerned that the proposed tower would cause substantial harm to both the heritage significance of the building and surroundings and the amenity enjoyed by its residents.

Loss of Daylight and Sunlight
A development of this scale and height would inevitably result in a significant loss of natural daylight and sunlight to existing homes within the listed building. The proposed tower would cast extensive shadows over neighbouring properties, reducing the amount of direct sunlight received by residents and adversely affecting living conditions throughout the year.
Natural light is a fundamental component of residential amenity. The scale of the proposed development raises serious concerns regarding compliance with recognised daylight and sunlight standards and whether adequate assessment has been undertaken to demonstrate that existing residents will not suffer unacceptable impacts. I have attached a visual from the documentation provided within the planning application. As you can see from the document this will literally put anyone on the back or side of Granby House in the dark

Impact on the Setting of a Listed Building
The listed status of the apartment block reflects its special architectural and historic interest. The construction of a 38-storey tower immediately behind the building would fundamentally alter its setting and visual context.
The overwhelming scale and mass of the proposed tower would dominate views of the listed building, diminishing its prominence and undermining appreciation of its historic character. National and local planning policies require great weight to be given to the conservation of heritage assets and their settings. In my view, the proposal would cause harm that has not been adequately justified.

Scale, Massing and Overdevelopment

The proposed tower appears wholly out of scale with the surrounding built environment, which is within a conservation area. At 38 storeys, it would introduce an excessively dominant structure that would overwhelm neighbouring buildings and create an oppressive sense of enclosure for existing residents.
The development represents an over-intensification of the site and would have a detrimental effect on the character and appearance of the area.

Loss of Outlook and Residential Amenity
Residents of the listed apartment block would experience a significant loss of outlook due to the proximity and height of the proposed tower. The development would create an overbearing presence, reducing openness and adversely affecting the quality of life of those living nearby.

Conclusion
For the reasons set out above, I strongly object to the proposed development. The scheme would result in unacceptable harm through the loss of daylight and sunlight, adverse impacts on the setting of a listed building, excessive scale and massing, and a significant reduction in residential amenity.
I respectfully request that the local planning authority refuse planning permission for this proposal or require substantial revisions to address these concerns.
Yours faithfully,
[redacted]