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1. Introduction

- 1.1. This Planning Statement ('the Statement') has been instructed by Maryland Securities Ltd and prepared by Deloitte Real Estate to accompany an application for Full Planning Permission and Listed Building Consent (LBC) for works to the existing Brunswick Mill (Grade II Listed) and creation of new homes, on a site located part adjacent to Bradford Road and part adjacent to Bradford Road and Beswick Street (the 'Site') as part of a residential led mixed use development.
- 1.2. A Site Plan is contained at Appendix A.
- 1.3. The Grade II Listed mill dates back to 1839, since which there have been several alterations and extensions to the mill, with the latest additions in the 1950's. Adjacent to Brunswick Mill to the South is the former cotton mill immediately west of Brunswick Mill, also known as/locally known as Pooley's Mill/India Mill, demolished in c. 2007-2008 which retains only small vestiges of perimeter walls. The former mill remains Grade II listed on the National Heritage List despite its demolition, therefore the surviving structures are still listed accordingly.
- 1.4. The mill and the adjoining site are in a dilapidated condition, negatively impacting on the quality of the local environment. The planning application and LBC is focused on the re-purposing and restoration of the Grade II Listed Brunswick Mill, securing its long-term sustainable use.
- 1.5. The Mill contains a number of existing occupiers who have been notified and consulted on the proposals. These existing functions do not generate sufficient income to support the long-term sustainable use of the Mill and therefore it is necessary to bring forward mixed use proposals that will support the viability of a sensitive, conservation led refurbishment and repair of the Mill that will safeguard it for many years and decades to come.
- 1.6. Notwithstanding their typical short term, flexible leasing terms, occupiers will be formally served 6 months notices prior to any development coming forward and subject to the grant of planning permission. Until this point, occupiers are free to remain in the building as long as is possible, should they wish to do so. In addition, the applicant is offering local agency support in order to help source and secure alternative facilities in the City. This is set out within the Occupier Strategy document submitted with the application, the content of which we envisage would be a condition imposed on any planning permission for this scheme.
- 1.7. The proposals to redevelop the adjoining land have been carefully considered to ensure that the Mill remains the dominant building and are appropriate in scale to the locality, with the amenity of adjoining residential uses fully taken into account.
- 1.8. The importance of regenerating the historic mills to preserve local character and achieve a sense of place, is identified within successive versions of the Eastlands Regeneration Framework. The most recently endorsed 2017 version states: *'Regeneration of the area will be underpinned by the reuse and preservation of historic mill buildings fronting onto the canal. Infill developments on adjoining undeveloped sites should be of a scale and character to complement these buildings, reinforcing the respective identities of the old and the new'*.
- 1.9. As illustrated within the Site Plan, the adjoining land falls into 2 ownerships and therefore dialogue has taken place with the adjoining landowners to provide for the comprehensive development of the site as a whole.
- 1.10. The Site has a strategic location between two major focal points of major investment and regeneration, namely Manchester's expanding city centre including neighbourhoods such as Ancoats and New Islington

and the Etihad Campus which is home to international sports brands and stadia in addition to a new £350 million arena which is currently under construction. Furthermore, the proposals are immediately adjacent to one of the key walking and cycling routes between the Etihad Campus and the city centre in the form of the Ashton Canal towpath - one of the key principles of the proposals includes a connection to the towpath through the development.

- 1.11. Within this Statement the highly accessible nature of the Site by a range of modes of sustainable transport is presented. It is within easy walking and cycling distance of the city centre and is in close proximity to the Metrolink, which connects into the city centre and the national rail network as well as local bus services.
- 1.12. The proposals focus on securing the long term use of the Mill, through refurbishment and repair works to create residential dwellings; below which are units for the use of the community including for creative purposes, education and social meetings, commercial and retail space such as for yoga classes, and art gallery space. In addition, the proposals include the development of 2 additional buildings to the south one which is for residential use only and a further building for residential use with commercial space at the ground floor. The Proposed Description of Development is as follows:

A full application for the refurbishment, repair and reconfiguration of Brunswick Mill (including the removal of low and negligibly significant elements) to create work spaces, retail, community uses (Use Class E and Use Class F2) at the ground and first floors and new homes (Class C3) together with redevelopment of land to the (north) of Brunswick mill to create two new buildings and new homes (class C3) and commercial/ work spaces (Use Class E and Use Class F2) at the ground floor, together with roof top amenity space, car parking, access and servicing arrangements, landscaping, a new pedestrian access route to the Ashton Canal and other associated works.

“Listed Building Consent for alterations to Brunswick Mill as part of comprehensive proposals to refurbish, repair and repurpose the building for a mix of commercial and residential uses.”

- 1.13. In addition, we also submit a separate application for listed building consent in relation to the removal of small vestiges of remaining fabric associated with the former cotton mill immediately west of Brunswick Mill, also known as/locally known as Pooley’s Mill/ India Mill, to the immediate south-west of Brunswick Mill. These structures were demolished in c. 2007-2008; however, at the time of the application their listing has not been removed from the register. The applicants have requested urgent confirmation from Historic England for the listing to be removed as the Mill is no longer present and at the time of writing this enquiry has been acknowledged by Historic England as is being prioritised as an urgent case. The associated description is:

Deconstruction of the small vestiges of perimeter walls of the former cotton mill immediately west of Brunswick Mill, known locally as Pooley’s Mill

- 1.14. The term ‘Proposed Development’ used within this Statement refers to all stages of the application.
- 1.15. The remainder of this Statement describes and justifies the Proposed Development with reference to the Development Plan and relevant material considerations, including national planning policy and guidance and local planning guidance documents.

EIA Screening

- 1.16. As directed within Regulation 5(4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 a relevant planning authority should have regard to whether the Proposed Development falls under Schedule 2 and therefore constitutes as ‘EIA Development’. The proposals are not of a type listed in Schedules 1 or 3 of the EIA Regulations.
- 1.17. The EIA Regulations state that the Proposed Development may be considered to be Schedule 2 development under Category 10 ‘Infrastructure Projects,’ of the EIA Regulations:

- Sub-section 10 (b) relates to ‘Urban development projects’, and states that development should be screened for the need for EIA if: (i) the development includes more than 1 hectare of urban development which is not dwellinghouse development; (ii) the development includes more than 150 dwellinghouses; or, (iii) the overall area of development exceeds 5 hectares.

1.18. A formal EIA screening request was submitted to Manchester City Council on 12th April 2021, requesting formal screening opinion and confirmation that the proposals did not constitute as EIA Development.

Application Documentation

1.19. A number of other documents have been submitted to MCC as part of the planning application. These are outlined in Table 1.3.

Table 1.1: List of Application Documents

Document	Prepared by
Application Form and Certificates	Deloitte Real Estate
Site Location Plan	Hodder and Partners
Existing Site Plan	Hodder and Partners
Demolition Plan	Hodder and Partners
Application plans and drawings	Hodder and Partners
Structural drawings	CIVIC
Landscape Plan	Layer
Design and Access Statement	Hodder and Partners
Landscape and Public Realm Strategy	Layer
Daylight and Sunlight Report	AA Projects
Heritage Assessment	Stephen Levrant Heritage Architecture
Window Condition Report	Stephen Levrant Heritage Architecture
Archaeological Assessment	Salford University
Statement of Consultation	Deloitte Real Estate
Travel Plan	Curtins
Transport Statement	Curtins
Waste Management Strategy	Curtins
Ecological Survey	Rachel Hacking Associates
Energy Statement and ESS	Clancy
Ventilation Report	Clancy
Utilities Report	Clancy
Broadband Assessment	Clancy
Flood Risk and Drainage Statement	CIVIC
Noise Statement	Azymuth Acoustics UK
Management Strategy	JLL
Air Quality Statement	Ensafe
TV Reception Survey	G-Tech
Desk Top Geo-Environmental Survey	LK Consulting

Document	Prepared by
Construction Methodology Statement	CIVIC
Structural Appraisal	CIVIC
Feasibility Report	CIVIC
Crime Impact Statement	Wardell Armstrong
Local Labour Agreement	Maryland Securities Ltd
Viability Report	Cushman and Wakefield

Consultation

- 1.20. A pre-application consultation exercise has been undertaken with Ward Councillors, local residents and businesses, in the form of a consultation website which launched on 30th November 2020. A Statement of Consultation is provided in support of this Application.
- 1.21. The consultation website set out the vision for the Site, initial ideas on how it could be masterplanned, and more specifically details the following:
- Site history and context;
 - Site analysis
 - Design principles;
 - Emerging masterplan
 - An opportunity to ‘Have your say’ on the emerging proposals.
- 1.22. Consultation with MCC planning and highway officers and local ward councillors has also taken place. Details of the consultation is contained within the accompanying Statement of Consultation.

Document Structure

- 1.23. This remainder of this Statement is structured as follows:
- Section 2: Site and Surrounding Uses
 - Section 3: Strategic and Regeneration Context
 - Section 4: The Proposed Development
 - Section 5: Development Plan & Material Considerations
 - Section 6: Planning Policy Assessment.
 - Section 7: Summary and Conclusions

2. Site and Surroundings

Site Description

2.1. The Site extends to 0.87 hectares and can be considered to comprise of three main components. Firstly, the Brunswick Mill complex bounded by Bradford Road and the Ashton Canal. The second is a 'middle section' of land to the south west of the Mill and adjacent to Bradford Road. Finally, there is a 'corner plot' located adjacent to Bradford Road and Brunswick Street. It is located within an area defined as Holt Town Central (as identified within the Eastlands Regeneration Framework and is strategically located between two areas of significant investment and regeneration in recent years, namely Manchester City Centre and the Etihad Campus.

History

2.2. The Heritage Statement prepared by Stephen Levrant Heritage Architecture contains a detailed history and assessment of the development of the mill. In short:

- In 1839, the original extent of the mill was constructed, a 7 storey 'L' shape running parallel with the Ashton Canal with a shorter 3 storey wing extending northwards from the mill.
- In 1840-1, additional areas were added extending the Mill to Bradford Road, and increasing the shorter part of the 'L' shape to 7 storeys.
- In 1841, part of the mill collapsed and was reconstructed in that same year, with further additional areas added into 1842.
- A new waste house was added to the complex in 1844.
- In c1880s, two number two-storey extensions were added within the courtyard area.
- In c1890s, a 7-storey dust chute was constructed between the mill chimney and west wing, and a large, single-storey shed was constructed to the north-east corner of the building
- In 1908, two electric towers were added (now demolished) together with an existing sub-station. Brunswick Mill became the first mill in Manchester to be powered by electricity.
- In c1920s, an additional floor level was added and in the 1950s a new office was added.

2.3. During the mid-1960s Brunswick Mill ceased the production of cotton and was henceforth used for various light industrial uses and warehousing. During the c1970s the original mill chimney was taken down, and in 2008 the former India Mills to the west of the site was also taken down.

2.4. Originally the windows across the mill would have each consisted of several small glazed panes with a central opening pivot window. By the late-19th Century all but one window appears to have been replaced with plainer versions comprising 6 glass panes, some with top or middle opening lights.

2.5. The Heritage Statement notes the significance of various elements on the Mill under 3 broad categories: high heritage significance, considerable heritage significance, low heritage significance and no significance / detrimental. The significance of the building / site primarily lies in it being a distinctive example an early Victorian spinning mill, being structurally and technologically innovative, and also in being an example of a mill adapting to suit changing technologies, both in relation to power supply (the first mill in the region to be converted to use mains electricity), and spinning technology (the structure adapted to take ring spinning machinery). It is also significant through its association with notable millwrights.

2.6. In terms of significance, Brunswick Mill's tightly coherent original design gives little room for disaggregation into separate parts. The majority of the building, including each of the four wings, the

cobbled courtyard, engine house, waste house, and two original stone staircases including steps and iron handrails, should all be considered to be of high significance.

- 2.7. Areas of considerable significance include the 1910s canteen tiling to the third floor level of the east wing, the 1920s addition of a top floor level to the north entrance block and waste house, the late-19th/early-20th Century iron fire escape staircases to the internal courtyard, the surviving terracotta tiling to the mill floors, and the surviving late 19th Century casement windows.
- 2.8. Areas of low significance include the two c1880s loading bays and 1908 electric sub-station, which were constructed much later and impede into the spatial quality of the internal courtyard, and the c1950s buildings to the east of the site.
- 2.9. It is demonstrated in this report and elsewhere within the submission information how the current proposals minimise and compromise to the building's significance through minimal interventions on the areas of high significance, incorporating those features into the proposed design.

Present Day

- 2.10. The present land use of the Site varies. The north-eastern part is occupied by Brunswick Mill, a large textile mill that is currently occupied by 11 tenants including music studios, supply and repair workshops, and storage, which all have a formal notice periods to vacate of between 2 and 6 months. There has been ongoing dialogue with the tenants regarding their relocation and alternative premises. Further details are contained within in the accompanying planning application documentation.
- 2.11. Whilst an iconic building and a symbol of Manchester's industrial heritage, the mill building is 'run-down' and in need of a new purpose and lease of life to ensure its longevity. Many of the windows, where they exist are in need of repair, there is cracking of lintels throughout, and water ingress has resulted in damp and water damage, plus there is general loss of masonry pointing throughout with some areas of spalled and missing masonry units. A structural survey has been undertaken which accompanies this planning application and provides in depth details. Within the survey a series of remedial works are presented and discussed to address the items raised which require attention and include repair and replacement of lintels, brickwork repair and general masonry repair and pointing.
- 2.12. The physical appearance of the building from the street scene is that of a run-down building, with broken, and boarded up windows (as illustrated in figure 2.1), fly tipping within and around the site and evidence of antisocial behaviour e.g. drug use and graffiti. There is little natural surveillance of the area nor the key walking route along the canal.



Figure 2.1: North front of the mill illustrating blocked up windows

2.13. As referenced at the beginning of this chapter, aside from the mill building, the site also includes land immediately to the south west of the existing mill building (the ‘middle section’) and a separate parcel of land on the corner of Beswick Street and Bradford Road (the ‘corner site’). The corner site is separated from the mill and the adjoining land by land in separate ownership that forms the access to a former listed cotton mill that faced Ashton Canal. The corner site (1-7 Beswick Street) was the subject of a Prior Notice of Demolition in 2018 (ref. 119268/DEM/2018), to which there were no objection and the building has since been demolished. This area to the south of the mill building is currently vacant.

Site Context

2.14. The Site is located within Holt Town Central as identified within the Eastlands Regeneration Framework; an area which connects the Etihad Campus and the Ancoats and New Islington neighbourhoods; the area has long been regarded as the “missing link” in the regeneration of the Ashton Canal Corridor from the City Centre to the Etihad Campus.

2.15. To the west of the site on the opposite side of Bradford Road and to the south on the opposite side of Beswick Street are established residential areas falling within Miles Platting and New Islington. To the north of the site and to the east, on the opposite side of the Canal, are a series of commercial buildings and services yards including the Pretty Little Thing HQ building (located in the former Wellington Mill). The Ashton Canal runs along the southern boundary of the Site and provides an excellent pedestrian and cycling connection ‘off road’ from the city centre core to the east.

2.16. In terms of immediate development context, to the west adjacent to the Site on the opposite site of Bradford Road, a scheme for the development of 13 homes was approved in 2019 (app. Ref. 123725/FO/2019). Further residential development has also been approved along the Ashton Canal moving towards to the City Centre for an Urban Splash scheme, Stubbs Mews, for 18 3 storey homes (app. Ref. 122597/FO/2019). Across from the canal on Pollard Street, in October 2020 an extension to the Pretty Little Thing (PLT) HQ was approved (app. Ref. 127505/FO/2020) to create additional office accommodation. This is further to a recent approval for new premises for PLT located further along Pollard Street, approved in 2019 (app. Ref. 122809/FO/2019).

Accessibility

- 2.17. The Site is in a sustainable and accessible location to the east of Manchester City Centre; well connected to the City Centre, the Etihad Campus and adjoining neighbourhoods.
- 2.18. The site is highly accessible being adjacent to walking and cycling routes connecting to the city centre, the Etihad Campus and beyond. Bradford Road also connects into the Manchester Inner Ring Road providing excellent accessibility to the wider city region by car. The Site is located 400 m from Holt Town Metrolink stop and 600 m from the New Islington Metrolink stop and c. 1.4 km from Piccadilly Station to the south west which is also accessible directly by Metrolink. A bus stop is located on Bradford Road immediately adjacent to the proposed development which serves a number of buses including the 74, 76, and 217 providing accessibility into Manchester City Centre, Withington, and Wythenshawe.
- 2.19. The location of the canal towpath along the southern boundary provides further excellent connectivity for pedestrians and cyclists. The proposals seek to enhance this connection creating a further pedestrian connection from Bradford Road through the site onto the canal towpath.

Site Specific Designations

Environmental Designations

- 2.20. The Site is located in Flood Zone 1 and is therefore at low risk of flooding.
- 2.21. The Ecological Survey which has been undertaken for the site notes that the Phase 1 Habitats present on the site are common throughout the UK. No nationally rare or locally rare plant species were located during the Extended Phase 1 Habitat Survey. The Survey notes scattered trees are found within the area of continuous scrub and long the site boundaries which are all self-seeded and of a similar semi-mature age. A daytime bat survey has been undertaken, no evidence of bat activity was found however it is noted there are several potential entry points and bat roost features found across the building's exterior and interior spaces. It is recommended further bat survey work is required to determine presence/likely absence of bats at the mill building, and the type of bat roost present.

Conservation and Heritage

- 2.22. The Site is not located within a conservation area, or any Site of Special Scientific Interest.
- 2.23. As noted above Brunswick Mill is Grade II Listed. There are also a number of Listed Buildings within the wider area, including:
1. Brunswick Mill (No. 1) Grade II Listed.

2. Former Pooley's Mill / India Mill (No. 2), to the immediate south-west of Brunswick Mill, was demolished in c. 2007-2008. At the time of this application, the applicants have requested urgent confirmation from Historic England for the listing to be removed as the Mill is no longer present. The enquiry has been acknowledged by Historic England as is being prioritised as an urgent case.
3. The Ashton Canal Bridge No.5 (Grade II listed, No. 3)
4. Spectator Mill (Grade II listed, No. 4)
5. Hope Mill (Grade II* listed, No. 5),
6. The Ashton Canal Bridge No.4 (Grade II listed, No.6)



Regeneration Context

- 2.24. The Site is identified with the Eastlands Regeneration Framework document which was last endorsed in 2017. The Site is located within the Holt Town Central Area as defined within the 2017 ERF update. This area is located between, and connects, the Etihad Campus and the Ancoats and New Islington neighbourhoods. The area has been seen as the 'missing link' in the regeneration of the Ashton Canal Corridor from the City Centre to the Etihad Campus.
- 2.25. The ERF 2017 set out Holt Town as a mixed-use neighbourhood anticipating higher density residential uses including family homes across a range of price points and tenures, employment space for a wide variety of businesses from "makers" to tech entrepreneurs, with local retail and services to support the wider area, making maximum use of the proximity to the Holt Town Metrolink stop.
- 2.26. The ERF also highlights the potential of 'the extraordinary listed former mill buildings' offering significant potential for commercial, residential and cultural uses, creating a neighbourhood of character, similar to Ancoats.
- 2.27. It is noted regeneration of the area will be underpinned by the reuse and preservation of historic mill buildings fronting onto the canal and that infill developments on adjoining sites should be of a scale and character to complement these buildings, reinforcing the respective identities of the old and the new.

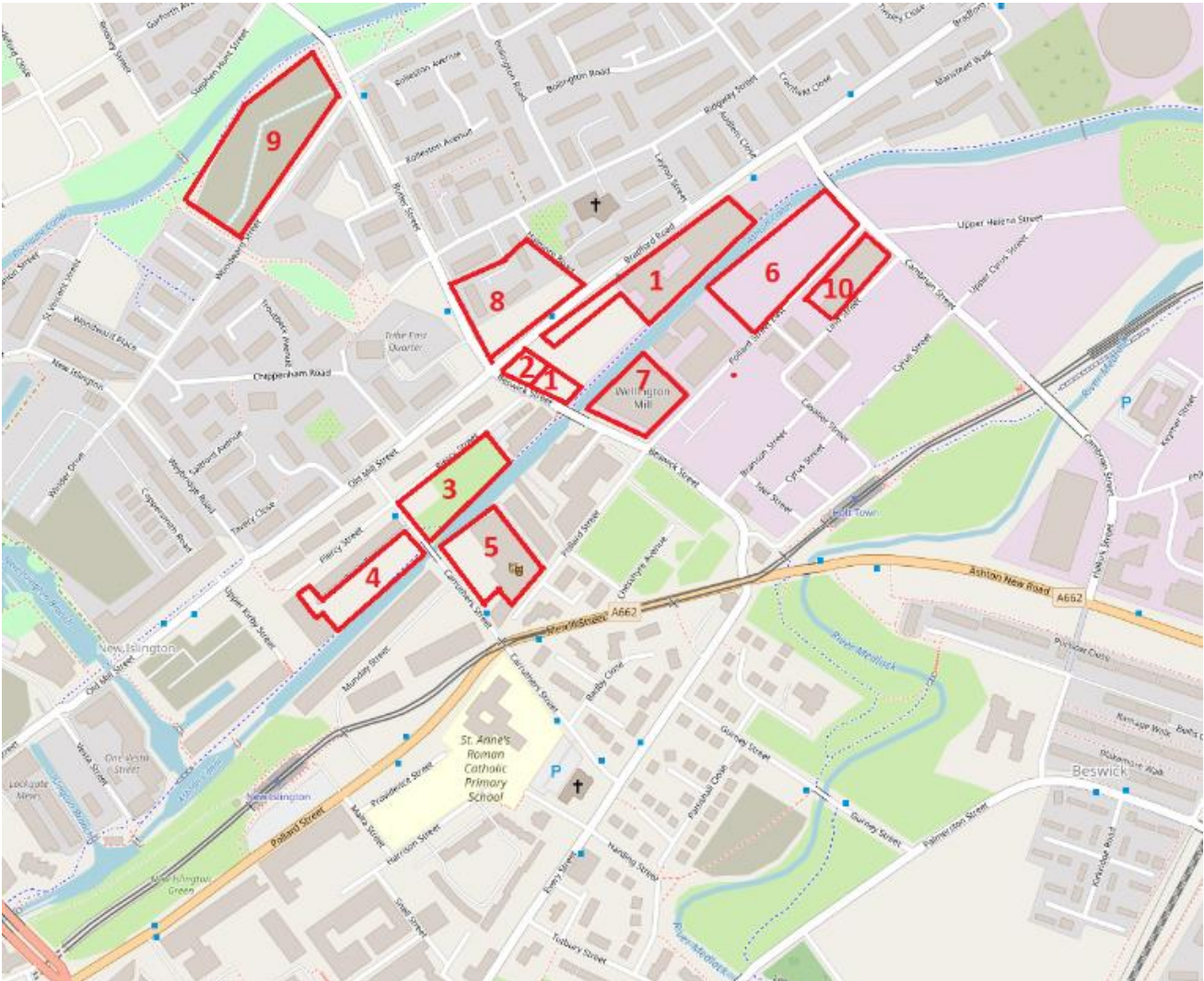
Planning History

2.28. The Site's planning history includes a number of residential development and commercial proposals surrounding the site.

2.29. A summary of the key Site and immediate surroundings planning history is identified in Table 2.1 below:

Table 2.1: Planning History

Application Ref	Description of Development	Decision	Decision Date
1 083665/FO/2007/N2	Refurbishment and conversion of Brunswick Mill to form 126 no. residential units. Erection of part 4, part 8, part 9 storey building and an 11 storey building facing onto Bradford Road, comprising 130 no. apartments and 8 no. town houses, Class A1 retail use (139sqm) Class A2 use (1442sqm) and Class B1 office use (895sqm) (2337sqm in total) with associated carparking at ground and basement levels, together with ancillary landscaping, following demolition of outbuildings and annexes to existing Brunswick Mill	Withdrawn	12 Sep 2008
2 119268/DEM/2018	Prior notification of demolition of buildings and structures	Prior approval	03 Apr 2018
3 122420/FO/2019	Proposed erection of a residential development comprising 17 no. 3 storey houses, with associated car parking, landscaping and boundary treatments	Approved	29 May 2019
4 122597/FO/2019	Proposed erection of a residential development comprising 18 no. 3 storey houses located on a podium above a 64 space surface level car park, with associated access, landscaping and boundary treatments	Approved	21 June 2019
5 122809/FO/2019	Change of use of warehouse (Use Class B2) to offices (Use Class B1) and ancillary support spaces with associated elevational alterations, erection of a single storey substation and security office, car parking and boundary treatment.	Approved	28 June 2019
6 124267/FO/2019	Application for temporary siting and use of site for 64 additional recycled shipping containers (114 no. in total) to provide co-working space (sui generis) for a temporary period of up to 5 years, with associated car parking, portable toilets and servicing from Pollard Street East	Approved	12 Sep 2019
7 127505/FO/2020	Erection of a first floor extension to existing building to provide 880 sqm of additional office accommodation (Use Class B1) together with elevational alterations and other associated works	Approved	14 Oct 2020
8 123735/FO/2019	Erection of 13 residential properties with a mix of two and three storey semi-detached / terraced properties with associated road access, parking, landscaping and boundary treatment.	Semi-Approved	08 Nov 2019
9 123887/FO/2019	Erection of 37 dwellinghouses with a mix of two and three storey semi-detached / terraced properties with associated road access, parking and landscaping.	Approved	11 Nov 2019
10 126630/FO/2020	Erection of two storey side extension to existing office, together with the inclusion of a mezzanine floor and associated car and cycle parking.	Approved	02 Dec 2020



Summary

2.30. The Site has a rich history and is an iconic of Manchester's industrial heritage. The proposals seek the long terms prosperity for the Grade II listed building to bring a new lease of life to the mill and complement the existing residential neighbourhoods and key location within New Islington.

3. Strategic Context

Core Strategy

- 3.1. Manchester's Core Strategy (2012) sets out the long term strategic policies for Manchester's future development and forms the framework that planning applications will be assessed against.
- 3.2. The Core Strategy emphasises that the East Manchester Regeneration Area has long identified as a priority area for the City. New East Manchester (NEM) Limited, established in October 1999, was charged with leading the regeneration of the area. The successful delivery of the 2002 Commonwealth Games has left a legacy of infrastructure at Eastlands and has acted as a catalyst for a comprehensive regeneration programme.
- 3.3. New housing developments are changing the profile of the area through high density housing and apartments being developed in the neighbourhoods of Ancoats, New Islington, Holt Town and Lower Medlock Valley.
- 3.4. The Core Strategy notes the historic mill and warehouse buildings which have been brought back to use in the adjoining Ancoats area and the overarching Core Strategy Vision for 2027 (Section 4.1) includes *“a City defined by excellence in urban design and environmental quality, where its distinctive historic environment is understood, valued, cared for and its potential fully realised”*.
- 3.5. A large proportion of East Manchester falls within the Regional Centre (including the Application Site). Policy EC3 notes that the Regional Centre is an appropriate location for high density housing, although this should complement the development of mixed use employment areas, and the supporting policy text continues to acknowledge the requirement for housing within the Regional Centre and a location where apartment development is appropriate.
- 3.6. Policy EC5 (East Manchester) notes the Council will promote development including those which:

“creates links to the Rochdale and Ashton Canals and links to the open space network including the Rochdale and Ashton Canals and the Medlock Valley, providing opportunities for walking and cycling to economic development opportunities; has regard to listed buildings and conservation areas including Ancoats and the industrial heritage of the area.”
- 3.7. Furthermore, Policy H4 identifies East Manchester is to accommodate around 30% of new residential development over the lifetime of the Core Strategy. Priority will be given to family housing and high value, high quality development where this can be sustained. High density housing will be permitted within the parts of East Manchester that fall within the Regional Centre which are adjacent to the City Centre – including New Islington and Holt Town.

Regional Policy and Strategic Regeneration Frameworks

- 3.8. East Manchester has been identified for a long time as a regeneration priority and has been on a tremendous journey over the last 30 years of regeneration and transformation. Historically the home to traditional manufacturing industries in the nineteenth and early decades of the twentieth century on which the wealth of Manchester was founded.
- 3.9. In the second half of the twentieth century, much of area's economic base, and the employment that accompanied it, was decimated by successive economic recessions and intensive competition from increasingly global markets. Between 1970 and 1985 some 60 per cent of its economic base was lost, leading to the loss of over 33,000 jobs in that period, along with a collapse in the skill base, the area's

population and the demand for housing. The decline continued beyond 1985, albeit less dramatically. Over a fifty year period the area's population fell from 164,000 in 1951 to 62,000 in 2001.

- 3.10. This combination of employment and population loss left the area with significant amount of brownfield, vacant, and underused land and buildings along with a low value, low demand housing market operating in a less than ideal physical environment.
- 3.11. The impacts on the communities and those who could not exercise a choice to leave was profound with high levels unemployment, poor service provision and significant levels of crime and anti-social behaviour prevalent across this part of the City.
- 3.12. In October 1999, New East Manchester (NEM) Limited, was formed and charged with leading the regeneration of the area.
- 3.13. The regeneration strategy pursued from 1999 onwards, enshrined in the first Strategic Regeneration Framework for the area - "New East Manchester: A New Town in the City", recognised the need to tackle a broad range of inter-related issues – social, environmental and economic – that had a negative impact on the area. The approach to regeneration critically recognised, however, that the origins of the multi-faceted deprivation which East Manchester was experiencing at that time lay in the serious decline of the area's manufacturing base over the latter half of the 20th Century. The most fundamental component of the strategy to transform East Manchester was the restructuring and diversification of the area's economic base to attract businesses in the City's economic growth sectors which offered the best prospects for future job growth and to ensure that this growth was accompanied by a range of measures to secure benefit – particularly employment – for all local people.
- 3.14. The first Strategic Regeneration Framework for East Manchester set out a very clear and ambitious template for the transformation of the area. Over and above the range of social, environmental and economic interventions needed to transform East Manchester the Framework delineated a set of comprehensive Neighbourhood Development Frameworks that sought to shape the physical transformation of a series of neighbourhoods and guide principally public and private sector investment to create sustainable places to live, work and visit. The successor Regeneration Framework - "The East Manchester Strategic Regeneration Framework 2008 – 2018" - broadened and deepened the approach to regeneration adopted by its predecessor.
- 3.15. The two East Manchester Strategic Regeneration Frameworks clearly set out a long-term, integrated regeneration strategy for East Manchester. The City Council, through New East Manchester, focussed on the physical, economic and social transformation of the area. This delivered an agenda for restructuring the area and supporting the community so that the area and its residents could make a more effective contribution to the economy of the wider city region.

East Manchester Strategic Regeneration Frameworks

- 3.16. The Eastlands Regeneration Framework (ERF) was originally endorsed in 2011 which shaped and guided investment and development in East Manchester, and updated in 2017.
- 3.17. For clarification, the ERF sets out environmental, social, design and economic objectives which are relevant to the attainment of the regeneration of the East Manchester area which is supported by existing planning policy. It is not a planning policy document and it is not a site allocations document. As such this document has the status of a "Local Development Document" but not a "Development Plan Document" and should not be considered or viewed as planning policy, and does not set out a series of tests to be passed.
- 3.18. The role of the ERFs has been to seek to guide the content of planning applications so that they have in mind the objectives for East Manchester. Throughout the various iterations of the ERF, and through the thirty-year journey of transformation of East Manchester, the Etihad Campus has consistently been a major economic driver in its own right within a city region and national context. Successive Regeneration

Frameworks have identified the Etihad Campus as a place to drive forward the development of a globally competitive sport, leisure and recreation offer. Over the last ten years' significant new investment has been made to deliver new facilities that benefit the community with new local leisure and educational developments being part of an integrated approach to the transformation of the area.

- 3.19. The fully endorsed 2017 ERF has been prepared principally to guide the next phases of identified projects and development activity in and around the Etihad Campus as well as the westward expansion of activity along the Ashton Canal Corridor, joining up with the eastward expansion of the City Centre taking place in Ancoats and New Islington.

Eastlands Regeneration Framework 2017

- 3.20. The 2017 ERF builds on the transformation of the area with the creation of the Etihad Campus. The 2008 acquisition of Manchester City Football Club by the Abu Dhabi United Group (ADUG) was the start of a major new phase of regeneration. The club's new owners and the City Council formed a partnership based on a shared commitment to continue the regeneration of the area, with the immediate priority to transform the 200 acres surrounding the Etihad Stadium, in order to accelerate the regeneration of east Manchester, thereby increasing the area's economic contribution, driving further employment and economic growth throughout the city and beyond, and critically, helping to develop hope and aspiration in the communities of east Manchester.
- 3.21. Regeneration work since 2008 has transformed much of the area around the Etihad Campus and has been the catalyst for the eastward expansion of the city centre.
- 3.22. The 2017 ERF emphasis is on guiding development activity westwards along the Ashton Canal Corridor to connect the Etihad Campus with the established eastward expansion of the city centre. Expanding the City Centre Eastwards - Ancoats and New Islington, to the west of Eastlands and on the eastern fringe of the city centre are two communities that are undergoing significant regeneration into important new residential neighbourhoods. As with the progress being made around the Etihad Campus there is now huge potential to extend the development of successful mixed use residential led neighbourhoods eastwards from Great Ancoats Street along the Ashton Canal Corridor, thereby creating new places to live and new places to work.
- 3.23. The ERF recognises that the Ashton Canal Corridor, represents a primary opportunity for expanding the city's urban core, building on the Metrolink asset, and exploiting assets of historic mills, the Ashton Canal, and the green corridor either side of the River Medlock. Recent developments at New Islington and Ancoats and similar neighbourhoods demonstrate the demand for continued provision of high-quality housing in the Ashton Canal Corridor. The Eastlands area offers the scope to broaden out the housing offer and to provide a range of housing for families, downsizing households, younger age cohorts working in and around the city centre, and students.
- 3.24. The ERF contains a number of development principles which include the importance of the dominant mill buildings which are to continue to set the height and massing for structures in the Holt Town area, with new development supporting their regeneration, status and place-making potential. Their relationship with the canal and its infrastructure as well as the surrounding streets should be read together as a set piece informing townscape character and development. In addition, the ERF notes the development principle highlighting the importance of the Ashton Canal as the primary feature of the corridor and the principal route through the historic core of the Eastlands area and the higher density neighbourhoods.
- 3.25. Within the ERF further details are provided on specifics attributed to the Holt Town area; including the potential of listed former mill buildings offering commercial or residential conversion opportunities, as well as providing the iconic image of the area. In line with the overarching development principles, the ERF recognises density of development should allow the existing mill buildings to be the dominant urban form and infill development around the mills should be encouraged. Furthermore, it is noted additional canal towpath access for cyclists and pedestrians is required, together with security and lighting improvements. Within the Holt Town Area regeneration is to be underpinned by the reuse and

preservation of historic mill buildings fronting onto the canal. Infill developments on adjoining undeveloped sites should be of a scale and character to complement these buildings, reinforcing the respective identities of the old and the new. Development should bring natural surveillance and new activity to the streetscape and towpath and should build on the existing gridded network of streets to re-establish Holt Town's urban grain and support a critical mass of new development around the canal and its listed buildings.

4. The Proposed Development

4.1. This section provides a summary description of the key elements of the Proposed Development and is to be read in conjunction within the supporting Design Access statement and plans prepared by Hodder and Partners.

Overview of the Proposals

4.2. The Proposed Development will secure the long-term sustainable use of the Grade II Listed Brunswick Mill, including its repurposing, refurbishment and repair together with redevelopment of land to the south for new homes and work spaces; alongside landscaping, cycle and car parking.

4.3. The application proposals have been considered over a number of years, taking into account the immediately adjoining land and how the new build elements sit within both the heritage and surrounding land use / development context. Key principles have included the following:

- A comprehensive design response, allowing for the proper planning of the site as a whole, including adjoining land.
- Respecting existing and future residential amenity with regard to sunlight, daylight, overshadowing and privacy.
- Conservation-led refurbishment and viable re-use of Brunswick Mill with a mix of workspaces and new homes.
- A balance in terms of the scale and quantum of new development, including that which is appropriate to the Listed Building and its setting.
- The creation of high-quality public realm and private amenity spaces for occupiers and residents with carefully integrated strategies around car parking, cycle parking, servicing and waste collection
- The creation of a new pedestrian connection to the canal towpath from the main road and an enhanced boundary treatments and pedestrian environment with activity and natural surveillance on adjoining routes.

4.4. As noted earlier within this Statement, the land adjoining the proposed development falls within a separate ownership. The application retains the existing lines of ownership - access from Bradford Road to the canal site is retained and it separates the application site into a corner plot at the junction of Bradford Road and Beswick Street and an intermediate 'middle block' of residential development proposed between the access to the canal plot and Brunswick Mill. The intention is for each of the site ownerships to be constructed independently to deliver the comprehensive development of the site. In this regard, analysis has been undertaken by Hodder and Partner in discussion with the adjoining landowner to show that the site as a whole can be developed comprehensively. This information is provided within the Design and Access Statement accompanying this application.

The Proposals – Application for Planning Permission

4.5. The development proposals consist of:

1. The refurbishment and conversion of the existing seven storey Brunswick mill with work spaces at ground and part level 1, capable of being used for a variety of creative, community and employment uses together with residential accommodation from level 1 above.
2. A part 8 and part 6 storey intermediate block with townhouses at ground and first floor level and residential apartments above.

3. A 5 storey building on the corner plot with a commercial unit at ground level and residential accommodation above.

4.6. Although the total number of floors in parts of the new build element are greater than in the existing mill, the floor to floor storey heights in the existing mill are greater. The existing mill building is therefore taller than the adjacent new build blocks and remains the dominant building in the streetscape. The roofline of the proposed new build blocks steps up and down which, in conjunction with the facades that step in and out, fragment the new-build block into separate elements that echo the massing of the existing mill and helps maintain the visual dominance of the existing mill.

Use

4.7. The scheme proposes the following use:

- Residential (Use Class C3)
- Workspaces and other commercial and retail uses along with community facilities (Use Class E and F2) – To complement the residential use the units within the mill building are expected to include community spaces consisting of creative, workshop, retail and commercial type use. The units within the corner building are expected to consist of retail/coffee shop type uses benefitting from the location of the units fronting onto Beswick Street.

Amount

4.8. The combined site area of the proposed application is 0.87 ha. The site of the existing mill is 0.47 ha, the land to the west of the existing mill that forms the site for the intermediate block is 0.34 ha and the corner plot is 0.06 ha.

4.9. The development includes a total of 2,034 sq m of work spaces and 277 new homes. This is divided as follows:

	Mill Building	Mid Building	Corner Building
New Homes (Class C3)	1 bed apartments: 57 2 bed apartments: 89 3 bed apartments: 3 Total: 153	13 townhouses: • 2 bed: 10 • 3 bed: 2 • 4 bed: 1 1 bed apartments: 32 2 bed apartments: 55 Total: 100	1 bed apartments: 8 2 bed apartments: 16 Total: 24
Work Spaces and amenities (Class E and Class F2)	1,891 sq. m over the ground and first 0 floor		143 sq. m at the ground floor
Car Parking Spaces	32	49	0

	Mill Building	Mid Building	Corner Building
Cycle Parking Spaces	153 (resi) 40 (commercial)	100	24

Mill

4.10. Within the mill conversion the one bed apartments make up 37% of the overall mix. It is acknowledged this is slightly in excess of the 33% maximum number of one bed residential units that would normally be permitted in a development; however, it should be noted that a number of the one bed units are significantly in excess of the Manchester Space Standards for one bed apartments and in fact are consistent with the space standards for two or in some cases three bed apartments. These unusual sizes are dictated by the existing structure and in some locations the opportunities to divide spaces around the existing fenestration are limited which results in some particularly spacious one bed apartments. In this regard, of the 1 bedroom apartments there are:

- 5 of 60-68 sq. m – The Manchester Space Standards specifies 61 sq m is the base for a 2 bed 3 person apartment
- 2 in excess of 85 sq. m – The Manchester Space Standards specifies 70 sq m is the base for a 2 bed 4 person apartment; 74 sq. m is the base for a 3 bed 4 person apartment; and 86 is the base for a 3 bed 5 person apartment

4.11. If these 7 apartments are excluded from the housing mix calculation then the scheme otherwise provides 33% one bed apartments. In addition, there are a further 16 one bed apartments in excess of Manchester Space Standards for 1 bed 2 person apartments ranging between 50-60 sq. m.

4.12. The existing building is arranged around an 800 sq. m courtyard that is landscaped to provide external amenity space for residents and tenants of the commercial units.

Mid Building

4.13. The intermediate new build block comprises 100 residential units within a part 6, part 8 storey block. These include 13 town houses at ground and first floor level. One town house is a 4 bed unit, two have 3 bedrooms and the remaining 10 all have two bedrooms. The remaining apartments include 32 one bed and 55 two bed apartments. 32% of apartments are 1 bedroom dwellings. Two residential roof terraces of 190 m² and 160 m² are located at level 6 providing communal external amenity space for residents.

Corner Building

4.14. The corner block includes ground level commercial spaces with four floors of residential apartments above. Again, the split is 33% 1 bed, 66% 2 bed.

Layout

Mill Building

4.15. Ground Floor - Accommodation in the existing mill is organised around the existing courtyard. The loading bays and former transformer house that was introduced when the mill was converted to electrical power are proposed to be removed to allow the courtyard to be opened up and landscaped. Both these elements have been identified within the Heritage Statement as low significance, and their removal will allow the western elevation of the engine house to become exposed again and will allow the dimensions of the original windows to be re-established. The newly landscaped courtyard acts as both an external amenity space for the building's users as well as a circulation space, linking the two residential circulation cores and providing access to commercial units that face the courtyard. The concierge that serves the commercial units is located at ground level opposite the two-storey high arch that links the

courtyard to Bradford Road. The ground floor of the existing mill is primarily divided into works space / commercial units. The division between units follow the lines of structure that support the masonry jack arches that make up the intermediate floor construction above. Units facing the courtyard are accessed directly from the courtyard through new door openings that are formed within existing window openings by removing brickwork beneath the windows. The units facing the canal are accessed from the concierge space.

- 4.16. Utility spaces are also accommodated at ground level with bin stores located in the former Engine House and a residential cycle store and water tanks are provided at ground level within the former Waste House. Electric plant rooms are located at the south western end of the courtyard with access to the proposed substation from the access road between the mill and intermediate new-build block. In the external space adjacent to the former Waste House that was previously occupied by ancillary one and two storey buildings of poor quality, the space will be landscaped with provision being made for 32 parking spaces. The proposals will include 20% EVC points with the remaining car parking spaces having the infrastructure in place to allow the scheme to be future proofed. The existing boundary wall against Bradford Road will be rebuilt with salvaged and re-claimed bricks from the site. Two vehicular entrances with gates are proposed to provide access in and out of the site onto Bradford Road.
- 4.17. Level 1 is partially occupied by 6 two storey work space / commercial units that face the south eastern side of the courtyard. The level one work space / commercial units are entirely separate from the adjacent residential accommodation. The remainder of the floor is split into residential apartments with a mixture of one, two and three bedroom homes. The residential accommodation is served by two circulation cores at the south west and north eastern ends of the courtyard. The cores are linked by a communal corridor.
- 4.18. Level 2's layout is similar to the floor below; however, the block against Bradford Road is now continuous, so the communal corridor links the two stair cores in both directions in a racetrack arrangement. The masonry external walls reduce in thickness higher up the building so although the apartment layouts tend to follow those below, the areas sometime increase as a result of the decreasing wall thickness.
- 4.19. Level 3 - The Engine House at the south western end of the mill terminates at level 3 so the apartments in the south western corner are re-arranged accordingly. Otherwise the layout is as level 2 below.
- 4.20. Levels 4-6 - The Waste House at the north eastern end of the mill, as well as the four-storey block facing Bradford Road terminate at level 4. From level 4 upwards, the accommodation is arranged around a horseshoe shaped block.

Mid Building

- 4.21. Bedroom accommodation for the townhouses is located at level 1 and the townhouse accommodation extends across what is the communal corridor that links the two service cores at other floor levels. This provides useful additional storage space for those units that face Bradford Road. Two, 2 bed apartments are located at the south western end of the block and four 1 bedroom homes are provided at the south eastern end of the block.
- 4.22. Level 2-5 - From level 2 up to level 5 the floor plate is split into 16 apartments served from a central corridor that links the two circulation cores. Linking the cores is beneficial to provide a level of redundancy in the event of a lift breakdown or maintenance. Like the corner block, the mid building is fully sprinklered, which allows the open plan layouts proposed, which helps increase the useable space within the apartments. There is a mixture of apartment types across the floor plate: 3 x 1 bedroom 1 person; 4 x 1 bedroom 2 person; 3 x 2 bed 3 person; and 6 x 2 bed, 4 person. The open plan arrangement allows the smaller 64 sq m 2 bed, 3 person apartments (as defined by national space standards) to be designed with two double bedrooms, both served with en-suite bathrooms, as per the arrangement in the 4 person apartments. This arrangement suits residents sharing apartments who both prefer an en-suite. Alternative layouts are also provided with bedrooms to one side of the living space.

This increases the separation between the bedroom and living space, which some residents prefer, but in these layouts, only one bathroom tends to be en-suite. In effect there are a range of different apartment layouts that suit a number of different living arrangements.

- 4.23. Level 6-7 - At level 6 the accommodation steps back to provide communal roof gardens and private terraces. Four apartments are clustered around each circulation core so above level 6 the building fragments into two separate blocks with a communal roof garden at the eastern end of each block. The communal corridor continues to link both blocks so all residents have access to either one of the two communal gardens. The north and south elevations of the two apartments at the eastern end of the two blocks step back from the elevations below. This allows space for a private external terrace to these apartments at level 6. The elevations of these apartments are clad with standing seam zinc rather than masonry, which helps to further fragment the massing at the top of the building with a change of material, as well as massing.

Corner Building

- 4.24. Levels 1-4 - Six residential units are provided in the corner block, which is repeated at each level up to the top floor at level 4. The 2 bed apartments at the southern end of the building and the north east corner are built tight up to the site boundary, which prevents openings from being provided in these elevations. For this reason, the floor plate steps back from the boundary to form two lightwells effectively that provide daylight and ventilation to the bedroom accommodation within the apartments as well as the communal corridor. Smoke vents are provided in the large window to the communal corridor to assist fire escape from the end apartments. With top floors more than 10m above ground, all apartments are sprinklered, which allows the layouts to be open plan. This provides flexibility to locate bedrooms off living spaces and helps reduce circulation space within the apartments, increasing useable space.

Height and Scale

- 4.25. A principal objective of the new-build design was to maintain the dominance of the existing mill within the streetscape. In terms of the number of storeys, the eight storey new-build block is greater than the seven storey existing mill; however, the floor to floor heights in the existing mill however are greater than the new build storey heights, so the mill remains the tallest element within the streetscape.
- 4.26. The massing of the existing mill is defined by a taller, seven-storey block adjacent to the Ashton Canal. Two wings of the taller canal facing block extend to Bradford Road in a horseshoe arrangement that wraps three sides of the central courtyard and bookend a lower four storey block that infills the fourth side of the courtyard against Bradford Road. The roofline of the existing mill within the Bradford Road streetscape steps up and down providing a fragmented frontage to the street.
- 4.27. The massing of the new-build intermediate block reflects this fragmented massing with two eight storey masonry blocks that bookend the south western end of two six storey elements. These elements are separated further by a recessive element that is set back from the street and finished with standing seam zinc cladding in contrast to the brickwork elevation against the footpath edge. A glazed element set back in line with the recessive zinc clad element splits the intermediate block into two halves, de-fragmenting it further.
- 4.28. The corner block is lower in height at five storeys, which relates to the lower of the masonry elements that form the mid-block. The overall appearance when viewing the new build elements within the context of the mill is of a series of lower horizontal masonry blocks that are framed by intermittent taller, narrower blocks.
- 4.29. In summary:
- Mill Building – 7 storeys
 - Mid Building – 8 storeys

- Corner Building – 5 storeys

Appearance

- 4.30. The appearance of the existing mill is dominated by the regularity of the fenestration within a robust masonry facade. This aesthetic is reflected in the new-build facades that are formed from a regular masonry framework within which are set recessed hit and miss brickwork panels and glazing. The zinc clad element at levels 6 and 7 is stepped back from the masonry as a recessive element. The lighter coloured zinc is a complementary material to the masonry that helps define the zinc block as a recessive element that helps fragment the facade of the new build intermediate block in a manner that is sympathetic to the form and appearance of the existing mill but allows the robust appearance of the mill to remain the dominant element within the streetscape.
- 4.31. The new build facade is dominated by a regular framework of masonry piers and horizontal bands within which recessed hit and miss panels and glazing are set. Behind the hit and miss brickwork panels are concealed floor to ceiling opening vents that provide fresh air into the apartments behind. The townhouses at ground level are recessed further still, which acts as a buffer, providing a deeper threshold between the public street and the private space of the dwelling behind the facade. Floor to ceiling glazing maintains the proportion of the fenestration within the existing mill and helps to maximise daylight and sunlight within the proposed dwellings.

Access

Vehicular and Cycle Access

- 4.32. There are three proposed vehicular access points to the development, all located off Bradford Road.
- 4.33. The two access points to the north provide access to the refurbished Mill Building car park and are located in the vicinity of Layton Street junction.
- 4.34. The proposed access to the south will provide access to the proposed car park for the new building and is located circa 30m to the east of Halmore Road junction.
- 4.35. Cycle access will be provided via several access points either directly off Bradford Road or the proposed car parks onto the different cycle stores.

Pedestrian Access

- 4.36. The refurbished Mill Building residential foyer will be accessed off the proposed landscaped area within the mill courtyard, which will retain the existing arched access off Bradford Road. The proposed work spaces / commercial units at the ground floor will have independent accesses off the same landscaped area.
- 4.37. The proposed Mid-Block building will have two pedestrian access points off Bradford Road and another two access points onto the car park.
- 4.38. The new Corner Block building at the eastern corner of the site will have an access off Bradford Road to the residential foyer and a separate access off Beswick Street will be provided for the commercial unit at ground floor.
- 4.39. These access points have been designed to be suitable for all types of user regardless of the level of mobility or visual impairment.

Inclusive Access

- 4.40. The proposals will create an inclusive environment by ensuring the following:
- Disabled people will use the same entrances as other users of the building.

- Level access to the main communal entrances and provisions of fully accessible lifts will mean that all apartments will be universally accessible without the need of supervision or assistance.
- All new build apartment and townhouse layouts are designed to be accessible and adaptable.
- 5% of parking spaces are allocated accessible spaces.

Landscaping

- 4.41. The landscape concept plan for Brunswick Mill builds on the relationship between the existing historic Mill and the emerging new built form. The landscape at ground level consists of three individual spaces: a space to the north east of the existing mill that was formally occupied by one and two storey ancillary buildings that are to be removed as part of the demolition, the courtyard of the existing mill and the space between the proposed new build blocks and the neighbouring land to the rear against the Ashton Canal.
- 4.42. Whilst car parking and maximising numbers have been a consideration, it was felt that a more sympathetic arrival space was needed. This 'knuckle' between the buildings greets the visitor, predominantly consisting of a high-quality hard materials, including reclaimed cobbles as a nod to the existing uses. Several feature semi-mature trees bound the arrival space, with limited parking in permeable green-gap paving and feature detail paving bands that provide direction; through into the existing Mill and also the new pedestrian route to the Ashton canal.
- 4.43. An important public realm intervention has been to create a pedestrian route from Bradford Road through to the Ashton Canal. This route is reinforced by a stripe of contrasting paving materials that runs from Bradford Road to the steps down to the canal.
- 4.44. The car parking serving the new building is proposed to consist predominantly as green gap paving, further 'greened' and visually interrupted with feature hedge and tree planting. Further new planting is provided to the south-west boundary, with species selected to increase biodiversity and promote ecology. The same aesthetic is continued within the 'northern' car park promoting SUD's permeable paving and tree planting.
- 4.45. The courtyard around which the existing mill was constructed is currently paved with the original stone cobbles. The surface is uneven and the general strategy will be to retain but re-lay the existing cobbles to improve and level the surface. The individual commercial units, commercial concierge and the two residential communal entrances are all accessed directly from the courtyard. Level differences between the commercial units against Bradford Road and the courtyard mean that a raised deck and ramp is required to provide level access to the units in the south west corner. The intention is that this deck would be fabricated from galvanised steel to retain an industrial aesthetic. Areas of soft landscaping and seating have been created in the areas where the two loading bays and transformer house are to be removed. The existing cobbled paving in these areas has already been disturbed by these former structures. Low walls that follow the outline of the previous structures define these spaces and provide informal opportunities for sitting. The axis through which the three landscape spaces are connected is defined by a contrasting stripe that runs through the courtyard from the car park in the north to the southern car park.
- 4.46. Access from Bradford Road to the southern car park is formed between the new build block and the existing mill. Loading bays and drop off areas are provided by the vehicular entrance in close proximity to both the new build mid-block and existing mill refuse stores. An amenity area for sitting is provided where the pedestrian route to the canal crosses the longitudinal axis that runs through the development. The trafficked areas are paved with macadam whilst parking bays are defined with green gap paving; low hedges and trees break up the parking bays and provide further greenery. Northern car park Like the southern car park trafficked areas are surfaced with Macadam, whilst parking bays are defined with green gap paving with low level planting and trees between bays.

Comprehensive Development

- 4.47. Feasibility studies have been carried out by Hodder and Partners which demonstrate that the proposed development does not prejudice the ability to develop out the immediately adjoining land within separate ownership in a way that would achieve comprehensive development.
- 4.48. As such, the Design and Access Statement presents an indicative development on the canal side site which consists of a part six, part seven and part eight storey development, which includes a basement level with car-parking and utility space. This represents one way in which the adjacent land could be developed.
- 4.49. The indicate development option comprises blocks which are configured as a series of three pavilions that step upwards in one storey increments from Beswick Street to the existing mill building. Between each pavilion are landscaped areas at ground and first floor level. The proposed option arrangement includes new development of consistent and equitable height across the two land ownerships, in support of a central design and masterplanning objective to respect the height of the listed mill building, respecting its setting and retaining it as a dominant element within the overall masterplan.
- 4.50. Gaps between the proposed pavilions shown in the option, including the taller elements of the Bradford Road block, form a chequer board arrangement that permits views through to the canal from the rear of the Bradford Road block as well as daylight and sunlight into the courtyard between the blocks. The opposing Bradford Road and Canal side blocks are spaced between 17m and 24m apart. This spacing is sufficient to achieve adequate privacy between apartments facing one another.
- 4.51. The basement level car park shown in this option includes parking spaces to one side of a circulation aisle that is accessed from a vehicular ramp that is linked to the access road in between the Bradford Road and the corner blocks

Waste Management and Servicing

- 4.52. It is the intention that the development will be served by council bin collections. The bin stores to the mill conversion and intermediate new-build block will be serviced from a service bay with turning head at the vehicular entrance to the southern car-park. The corner block would be serviced from Beswick Street.
- 4.53. There is a single loading bay located centrally within the development, within the southern car park. All service vehicles can access and exit the development in forward gear.
- 4.54. It is envisaged that this loading bay will serve deliveries and waste collection of the refurbished Mill Building and the new Mid-Block building.
- 4.55. The Corner Block building at the eastern side of the development will be served by informal kerbside on-street deliveries and collections along Beswick Street.
- 4.56. The total residential waste storage area at the three buildings are as follows:
- Mill Building: 71.25m²;
 - Mid-Block: 42.18m²; and
 - Corner Block: 26.49m².
- 4.57. These areas comply with the storage area requirements set by MCC, albeit the Mid-Block is slightly under by 0.72m². Any additional space in the stores will be dedicated to improving accessibility to the bins and manoeuvrability of them. The Mid-Block will require management of how the bins are stored and distributed within the store to maximise the available space. This will also be achieved by the management company moving bins between the three waste stores depending on space availability and

actual waste generation, as this may vary between the different buildings. MCC Highways have been contacted with regard to the vehicular movements of the bin lorries and the proposals have been acceptable in principle. On bin collection day bins will be brought out to the loading bay area allocated within the development prior to the collection of bins. For further details please refer to the Waste Management Strategy.

The Proposals – Application for Listed Building Consent

- 4.58. The proposals will deliver the re-purposing, refurbishment and repair of the Grade II Listed Mill, securing its long term sustainable future use. The current proposals aim to minimise the loss or compromise of the building’s significance. However, it is evident that (in accordance with Historic England guidance) the sustainable re-use of a building requires a degree of intervention and change. Consequently, in evaluating the overall impact of the works, careful consideration has been given to the balance of benefits in order to reach a proportionate and justifiable conclusion. The proposals are designed to put the Grade II listed building in sustainable, active use. These works will see the minimal amount of alterations necessary and ensure the areas which contain architectural features of interest are preserved and or enhanced.
- 4.59. Section 7.3 of the accompanying Heritage Statement sets out the conservation led approach that has been adopted in relation to the listed Mill, explaining where proposed interventions are necessary and proportionate in terms of re-purposing the building and properly classifying the level of proposed impact of each intervention and any mitigating circumstances.
- 4.60. Exterior works include replacement of rainwater goods, replacing/ reintroducing windows (see paragraph 4.61 below), cleaning and repairing brickwork, and demolition of the later additions. The result of these works includes: to in part return the exterior back to its original appearance, removing inappropriate later additions, allow the original dimensions of the courtyard space to be re-established.
- 4.61. The Heritage Statement identifies the exterior works ranging from a minor/moderate adverse impact to moderate beneficial.
- 4.62. Interior works include new risers, repair of staircases and the creation of apartments. The Heritage Statement identifies the interior works ranging from a minor adverse impact to moderate beneficial impact. It is acknowledged that although some of the interventions such as the introduction of openings throughout the building and new lifts will result in the removal of areas of historic fabric, this is necessary to allow the building to be successfully used for residential purposes. It is also noted that works including those to the original staircases and walls will return the features back to their original appearance.
- 4.63. The proposals reflect the works required to introduce and accommodate new uses to the Site. Where areas of alteration or demolition are proposed, these physical interventions to the historic fabric are necessary to enable the successful and viable reuse of the Site, whilst retaining and enhancing the retained buildings and significant elements.
- 4.64. The proposals for the building ensure that all significant building elements, such as the jack-arched ceilings, cast iron columns and structural supports, and the two original stone staircases and handrails are retained and restored to enhance the spaces within the proposed apartments and circulation spaces.
- 4.65. The green and white tiling to the former Edwardian staff canteen will also be retained as feature walls within the proposed apartments to the third-floor level. Other areas of restoration include reforming the original dimensions of the tall engine house window openings and repairing and replacing the surviving areas of original stuccoed eaves cornice and banding to the engine house.
- 4.66. The central courtyard will be returned to its original dimensions and appearance with the removal of later, low significance extensions, and the removal of layers of modern paint, bitumen and cement to the perimeter. The original stone cobbles/setts will be lifted and re-laid to form a level surface, with the addition of a number of new landscape features. The introduction of new windows throughout will

enhance the character of the building by returning the exterior of the building to its late 19th century appearance. Although the replacement of all windows with modern examples will result in the loss of historic fabric, all existing windows largely date to the late-19th century, with other windows being of a more recent date or being blocked/removed.

- 4.67. Mitigation in respect of any adverse impact upon the setting, and / or the context of the identified listed buildings is formulated upon the overall benefits of the Proposed Development. Benefits relate to both the place in which the development will be constructed, as well as benefits to the wider community or society as a whole.
- 4.68. Overall, it is considered that the instances of physical alterations resulting from the proposed works to the buildings that form the Site are necessary to ensure a sustainable use for the Site, which is outweighed by the heritage benefits of returning a longstanding, semi-derelict site back into an active use. The beneficial impacts across the Site are seen to enhance the appreciation, understanding and character of the former mill, and are thus considered to result in an overall beneficial impact.

5. Development Plan, Material Considerations and Relevant Legislation

5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

5.2. This section therefore details the documents that make up the Development Plan and the material considerations in the determination of the application as well as other relevant legislation.

5.3. In this regard, it provides a balanced policy assessment of the Proposed Development, principally focused on Manchester’s Development Plan together with an assessment against the National Planning Policy Framework.

5.4. Other relevant legislation in respect of this application refers to Section 66 of the Listed Building Act 1990 which provides that in considering whether to grant planning permission for development that affects a listed building or its setting, the Local Planning Authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses

Development Plan

5.5. The Local Plan is a collection of statutory Development Plan Documents (DPDs) that together set out the vision and spatial strategy for the future development of Manchester. Within the context, the adopted plan for Manchester, as relevant to this application, comprises:

- Manchester Core Strategy (2012);
- Manchester Proposals Map (2012);
- Saved Policies of the Manchester Unitary Development Plan (2005);

Manchester Core Strategy (2012)

5.6. The Core Strategy was adopted on 12 July 2012. It sets the overall strategic direction for planning in Manchester over the plan period from 2012 to 2027. The policies of the Core Strategy establish where major development and other forms of investment should be located in order to be sustainable, meet local needs and take full advantage of opportunities.

5.7. With regard to the application site, the Core Strategy’s ‘Vision’ identifies the importance that the *‘distinctive historic environment is understood, valued, cared for and its potential fully realised.’* Policy EC3 notes that the Regional Centre is an appropriate location for high density housing and Policy H5 additionally Policy H4 identifies that high density housing will be permitted within the parts of East Manchester that fall within the Regional Centre which are adjacent to the City Centre – including New Islington and Holt Town.

5.8. Policy EC5 (East Manchester) notes the Council will promote development including those which:

“creates links to the Rochdale and Ashton Canals and links to the open space network including the Rochdale and Ashton Canals and the Medlock Valley, providing opportunities for walking and cycling to economic development opportunities; has regard to listed buildings and conservation areas including Ancoats and the industrial heritage of the area.”

Saved Policies of the Unitary Development Plan (1995)

- 5.9. The Unitary Development Plan was adopted in July 1995. Coinciding with the adoption of the Core Strategy in 2012 significant proportions of the UDP have been replaced, however, a number of policies were saved on 11 July 2012 and remain extant.
- 5.10. The proposed development is assessed against relevant provisions of the Development Plan as a whole in the following table:

The Saved Policies of the Unitary Development Plan (1995)

Saved Policies of the Manchester UDP (1995)	Contribution and Benefits
<p>DC26.1 Development and Noise - The Council intends to use the development control process to reduce the impact of noise on people living and working in, or visiting, the City. The Council will consider both the effect of new development proposals which are likely to be generators of noise and the implications of new development being exposed to existing noise sources which are effectively outside planning control.</p>	<p>The proposals are supported by a full Noise Impact Assessment by Azymuth Acoustics UK , which assesses the impact of the proposals upon the local environment, recommends mitigation measures where necessary, and concludes that the operational phase of the proposals will not have an adverse impact on the amenity of surrounding users. For the construction phase, a Construction Management plan has been provided with the planning application which explains how noise will be managed and mitigated throughout the construction period. It is anticipated that there will be a planning condition attached to any permission requiring the submission of a more detailed construction management plan, prior to the commencement of development, and once a Main Contractor for the proposed development is on board.</p>

Manchester Core Strategy (Adopted 2012)

Core Strategy Policy	Contribution and Benefits
<p>Policy T1 Sustainable Transport - To deliver a sustainable, high quality, integrated transport system to encourage modal shift away from car travel to public transport, cycling and walking, to support the needs of residents and businesses. Details of the types of measures to achieve this are outlined in the policy.</p>	<p>A Travel Plan has been prepared by Curtins which describes initiatives aimed at reducing car reliance and engaging residents and employees with using sustainable forms of transport, of which the site has excellent access to. There will be 100% cycle provision, furthermore, the proposals include a connection to the towpath further enhancing the pedestrian and cycle linkages through the site to the city centre and out towards Eastlands.</p>
<p>Policy T 2 Accessible areas of opportunity and need - The Council will actively manage the pattern of development to ensure that new development: -</p>	<p>The application is supported by a Transport Statement, prepared by Curtins, which concludes that development will not adversely affect the operation of the highway and is highly accessible by a choice of non-car modes. The Proposals are not expected to create significant vehicle movements and do fall within the Regional Centre as defined in Manchester’s Core Strategy.</p>

Core Strategy Policy	Contribution and Benefits
<p>Is located to ensure good access to the City's main economic drivers, including the Regional Centre, the Oxford Road Universities and Hospitals and the Airport and to ensure good national and international connections</p> <p>Is easily accessible by walking, cycling and public transport; connecting residents to jobs, centres, health, leisure, open space and educational opportunities. Particular priority will be given to providing all residents access to strategic employment</p>	<p>A Framework Travel Plan has also been included which notes the proximity of sustainable transport measures including bus, Metrolink and rail, and the 100% cycle provision to be delivered as well as enhanced connectivity to key pedestrian and cycle routes including the Ashton Canal towpath.</p>
<p>Policy CC5 Transport - The Transport Strategy for Manchester City Centre will be delivered to ensure that transport is managed in a way which supports the projected growth of the City Centre. Proposals will be supported that improve pedestrian safety, improve air quality and increase the scope for accessible public realm improvements. The Council will seek to ensure that development includes adequate parking provision for cars and bicycles</p>	<p>The proposed development will regenerate a dilapidated site, improving natural surveillance and will enhance cycling and walking connections, providing new public realm and enhanced boundary treatments to the site. The Site is highly accessible by a choice of means of transport. The Proposed Development includes capacity for 81 vehicles. 71 of these spaces will be designated to the residential uses, whilst 10 spaces will be dedicated to the commercial uses. The car park to the north will have a total capacity of 32 vehicles, which will primarily serve the refurbished Mill Building, whilst the car park to the south will serve the Mid-Block building and will have capacity for 49 vehicles. Cycle parking would be catered for through the provision of a total of 317 secure and sheltered cycle parking spaces across the development – 277 for the residential uses (100%) and 40 for the commercial uses.</p> <p>The Transport Assessment by Curtins confirms that the vehicle and cycle parking numbers are acceptable for the Proposed Development.</p>
<p>Policy EC3 Regional Centre - Within the Regional Centre development for employment generating uses including offices and other commercial development will be encouraged. Housing will also be an appropriate use within the Regional Centre, although this should complement the development of mixed use employment areas. Subject to site and location details, the Regional Centre will generally be a location where higher density residential development is appropriate.</p>	<p>The Proposed Development is a mixed-use development which features a higher density residential aspect comprising 277 new homes plus 2,034 sq. m of commercial space.</p>

Core Strategy Policy

Contribution and Benefits

Policy H1 Overall Housing Provision - Approximately 60,000 new dwellings will be provided for in Manchester between March 2009 and March 2027. This equates to an average of 3,333 units per year, however the rate of delivery of units will vary across the lifetime of the Core Strategy. Based on the availability, suitability and achievability of developing capacity sites in Manchester's Strategic Housing Land Availability Assessment, and the current economic situation, the trajectory overleaf provides an indication of the timescale over which development is likely to come forward

The proposals will make a valuable contribution to Manchester's overall housing provision, in a highly sustainable location. In so doing, the proposed development will regenerate an underutilised Mill which is only partially occupied and allow the redevelopment of a brownfield site that has been vacant for decades and will restore an important heritage asset. The proposed development provides a wide range of apartment sizes and types expanding Manchester's housing choice.

Policy H4 East Manchester - East Manchester, over the lifetime of the Core Strategy, will accommodate around 30% of new residential development. Priority will be given to family housing and other high value, high quality development where this can be sustained. High density housing will be permitted within the parts of East Manchester that fall within the Regional Centre which are adjacent to the City Centre. These neighbourhoods include Ancoats, New Islington, Holt Town and Chancellor's Place; to the west of Alan Turing Way, and within Eastlands, Newton Heath, Openshaw and Gorton district centres as part of mixed-use schemes.

The Site falls within Holt Town and is part of the Regional Centre. As part of its mix, it will support new homes including larger 2 and 3 bed units as well as town houses that will provide accommodation that is suitable for families. The Site will contribute to Policy H4's East Manchester target of accommodating around 30% of new residential development by the end of the Plan period.

Policy H8 – Affordable Housing - The following requirements for affordable housing or an equivalent financial contribution currently apply to all residential developments on sites of 0.3 hectares and above or where 15 or more units are proposed.

New development will contribute to the City-wide target for 20% of new housing provision to be affordable. Developers are expected to use the 20% target as a starting point for calculating affordable housing provision. It is envisaged that 5% of new housing provision will be social or affordable rented and 15% will be intermediate housing, delivering affordable home ownership options.

The proportion of affordable housing units will reflect the type and size of the development as a whole; and where appropriate provision will be made within Section 106 agreements to amend the proportion of affordable housing in light of changed economic conditions, subject to a financial viability assessment.

Affordable housing units will be inclusively designed to reflect the character of development on the site.

The policy is clear that Affordable Housing requirements should reflect the development as a whole and that economic conditions are a relevant factor to consider. It also clear that exemption from Affordable Housing provision is acceptable in certain circumstances where specific material considerations are relevant.

The Applicant believes that these material considerations are evident in the scheme, as outlined below:

- A Financial Viability Assessment has been submitted as part of this planning application, which shows that the scheme is not viable with an Affordable Housing contribution. This will be independently reviewed by the Local Authority.
- The Proposed Development will ensure the future long-term security of the Grade II Listed Mill, a key objective of the Eastlands Regeneration Framework and a key component of its place based regeneration strategy. The inclusion of Affordable Housing would not support a viable scheme and therefore prevent the refurbishment, repair and long term sustainable future of the Mill which has been identified as an important aspiration for the city, and, more specifically, the Framework Area.

On this basis, it is considered that the Proposed Development is in accordance with Policy H8.

Core Strategy Policy

Contribution and Benefits

Either an exemption from providing affordable housing, or a lower proportion of affordable housing, a variation in the proportions of socially rented and intermediate housing, or a lower commuted sum, may be permitted where either a financial viability assessment is conducted and demonstrates that it is viable to deliver only a proportion of the affordable housing target of 20%; or where material considerations indicate that intermediate or social rented housing would be inappropriate. In the latter case, such circumstances could include:

- There is a very high level of affordable housing in the immediate area;
- There is either a high proportion of social rented (35%), or low house prices in the immediate area compared to average incomes;
- Affordable housing would be prejudicial to the diversification of the existing housing mix.
- The inclusion of affordable housing would prejudice the achievement of other important planning or regeneration objectives which are included within existing Strategic Regeneration Frameworks, planning frameworks or other Council approved programmes;
- It would financially undermine significant development proposals critical to economic growth within the City;
- The financial impact of the provision of affordable housing, combined with other planning obligations would affect scheme viability;
- There is a need for additional housing provision for older people or disabled people either as affordable or market housing dependent on the results of a financial viability assessment of the scheme.

Policy DM1 Development Management - All development should have regard to the following specific issues for which more detailed guidance may be given within a supplementary planning document: -

- Appropriate siting, layout, scale, form, massing, materials and detail.

Each of these matters are comprehensively addressed within the information submitted in support of this application including the Design and Access Statement, Construction Methodology Statement, Daylight and Sunlight Surveys, Air Quality Assessments, Waste Management Strategies, Flood Risk Assessments, Transport Statement, Crime Impact Assessment, Ground Conditions and Contamination, Archaeology, Heritage and other reports and strategies have been commissioned from consultants in compliance with Policy DM1.

Core Strategy Policy	Contribution and Benefits
<ul style="list-style-type: none"> • Impact on the surrounding areas in terms of the design, scale and appearance of the proposed development. Development should have regard to the character of the surrounding area. • 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. • Accessibility: buildings and neighbourhoods fully accessible to disabled people, access to new development by sustainable transport modes. • Community safety and crime prevention. • Design for health. • Adequacy of internal accommodation and external amenity space. • Refuse storage and collection. • Vehicular access and car parking. • Effects relating to biodiversity, landscape, archaeological or built heritage. • Green Infrastructure including open space, both public and private. The use of alternatives to peat-based products in landscaping/gardens within development schemes. • Flood risk and drainage. • Existing or proposed hazardous installations. Subject to scheme viability, developers will be required to demonstrate that new development incorporates sustainable construction techniques 	<p>These reports assess the impact of the Proposed Development upon the local environment, recommends mitigation measures where necessary and conclude that the Proposals address the requirements of Policy DM1.</p>

Policy EN 15 Biodiversity and Geological Conservation -

The Council will seek to maintain or enhance sites of biodiversity and geological value throughout the City. Developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to linkages between valuable or potentially valuable habitat areas where appropriate

A Habitat Survey and Daytime Bat Survey has been prepared by Rachel Hacking Ecology. Several recommendations are proposed to bring biodiversity gain to the site such as landscaping and the provision of bird and bat boxes.

Core Strategy Policy

Contribution and Benefits

Policy EN 9 Green Infrastructure - New development will be expected to maintain existing green infrastructure in terms of its quantity, quality and multiple function. Where the opportunity arises, and, in accordance with current Green Infrastructure Strategies, the Council will encourage developers to enhance the quality and quantity of green infrastructure, improve the performance of its functions and create and improve linkages to and between areas of green infrastructure. Where the benefits of a proposed development are considered to outweigh the loss of an existing element of green infrastructure, the developer will be required to demonstrate how this loss will be mitigated in terms of quantity, quality, function and future management.

The requirements of Policy EN9 are covered within the Green and Blue Infrastructure Statement provided at Appendix C of this document.

Policy EN19 Waste – the Council will require all developers to demonstrate the proposals consistency with the principles of the waste hierarchy. All developers will be required to submit a waste management plan to demonstrate how both construction and demolition waste will be minimised and recycled wherever possible and how the sustainable waste management needs of the end user will be met.

The application is supported by a Site Waste Management Strategy prepared by Curtins and a Construction Statement by CIVIC, which details how residential waste and refuse will be managed, as well as how waste during construction will be dealt with.

The Strategy also describes the waste hierarchy and arrangements for recycling as well as how the proposed development addresses Manchester’s required standards.

Policy EN 17 Water Quality - With reference to the Manchester-Salford-Trafford SFRA and other relevant documents:

- Development should avoid any adverse impact on water quality, including during the construction phase, and wherever possible should seek to enhance water quality, both chemical and ecological;
- Development should minimise surface water run-off from development and associated roads, and maximise the use of appropriate sustainable drainage systems, to minimise groundwater contamination, and to avoid pollutants reaching watercourses;
- Development close to a watercourse should also ensure that waste or litter cannot enter the watercourse from the site;
- Development should, where feasible and appropriate, seek to open up any culverted or hidden watercourse beneath the site to improve the ecological status of that watercourse.

The Site is located within Flood Zone 1 and therefore deemed to have a low probability of flooding.

A Flood Risk Assessment and Drainage Strategy Report has been prepared by Civic Engineers which details how surface water and foul sewage will be disposed of from the site.

Core Strategy Policy

Contribution and Benefits

Policy EN 16 Air Quality - The Council will seek to improve the air quality within Manchester, and particularly within Air Quality Management Areas, located along Manchester's principal traffic routes and at Manchester Airport. Developers will be expected to take measures to minimise and mitigate the local impact of emissions from traffic generated by the development, as well as emissions created by the use of the development itself, including from Combined Heat and Power and biomass plant. When assessing the appropriateness of locations for new development the Council will consider the impacts on air quality, alongside other plan objectives. This includes cumulative impacts, particularly in Air Quality Management Areas.

An Air Quality Assessment has been undertaken by Ensafe.

The results of the assessment suggested the development and its construction would accord with EPUK guidelines, and that it is compliant with NPPF and MCC policy.

Policy EN 14 Flood Risk - In line with the risk-based sequential approach contained within PPS25, development should be directed away from sites at the greatest risk of flooding, and towards sites with little or no risk of flooding; this should take account of all sources of flooding identified in the Manchester-Salford-Trafford Strategic Flood Risk Assessment (SFRA).

- In addition to the requirements for site-specific Flood Risk Assessments (FRAs) set out in PPS25, an appropriate FRA will also be required for all development proposals, including changes of use, on sites greater than 0.5ha within Critical Drainage Areas (CDAs) and Canal Hazard Zones identified in the SFRA.
- All new development should minimise surface water run-off, including through Sustainable Drainage Systems (SUDS) and the appropriate use of Green Infrastructure. Developers should have regard to the surface water run-off rates in the SFRA User Guide. In CDAs, evidence to justify the surface water run-off approach / rates will be required.
- The City of Manchester contains many sections of rivers which are culverted or 'hidden'; where these are indicated in the SFRA beneath the proposed development site, further investigation will be required and the development proposal should take this into account; where feasible and appropriate development should seek to open up culverted/hidden rivers to reduce the associated flood risk and danger of collapse, taking advantage of opportunities to enhance biodiversity and Green Infrastructure.

The Site is located within Flood Zone 1 and therefore deemed to have a low probability of flooding.

A Flood Risk Assessment and Drainage Strategy Report has been prepared by Civic Engineers which details how surface water and foul sewage will be disposed of from the site Including through the use of SuDs.

Core Strategy Policy	Contribution and Benefits
<p>Policy CC 9 Design and Heritage - Design of new buildings will need to be of the highest standard in terms of appearance and function. The standards and guidance explained in other LDF policies should be the basis for the approach to design, with particular attention to be given to the City Centre context and character.</p> <p>Development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings, conservation areas and scheduled ancient monuments.</p> <p>The Council will support high density and mixed use development in the City Centre, but developers must recognise the specific design challenges that must be overcome to ensure complementarity of function and form. New development must support the range of uses the Council expects in the City Centre and contribute to a coherent and integrated physical environment.</p>	<p>The University of Salford has conducted a desk-based archaeological study of the Site.</p> <p>The Report appraised the likely impact of the Proposed Development on below ground archaeology and includes a scheme of further potential investigation prior to commencement which we expect will form a condition of any planning permission.</p> <p>The Heritage Statement provides an assessment of the significance of the Mill building and identifies the areas of intervention, concluding that the greatest levels of intervention relate to the areas of low significance. Overall, it is considered that the instances of physical alterations resulting from the proposed works to the buildings that form the Site are necessary to ensure a sustainable use for the Site, which is outweighed by the heritage benefits of returning a longstanding, semi-derelict site back into an active use. The beneficial impacts across the Site are seen to enhance the appreciation, understanding and character of the former mill, and are thus considered to result in an overall beneficial impact.</p>
<p>Policy CC10 A Place for Everyone - The City Centre will develop as a location which appeals to a wide range of residents and visitors. Development which promotes this objective will be supported, particularly through increasing the diversity of activity in the City Centre and high standards of accessibility to buildings and across spaces.</p>	<p>The building is designed to be fully inclusive in terms of access, with step-free access. All floors above ground level will be accessed via lift as well as stairs. The design has been developed to provide a simple and clear layout which is easy to use for all regardless of disability, age or gender. For further information regarding accessibility through design, please refer to the Access Chapter in the Design and Access Statement.</p>
<p>Policy EN1 Design Principles and Strategic Character Areas - All development in Manchester will be expected to follow the seven principles of urban design and have regard to the strategic character area in which the development is located.</p> <p>The Site is located within the ERF (2017) area in which it is stated Regeneration of the area will be underpinned by the reuse and preservation of historic mill buildings fronting onto the canal. Infill developments on adjoining undeveloped sites should be of a scale and character to complement these buildings, reinforcing the respective identities of the old and the new.</p>	<p>The proposed mixed use development for residential and commercial uses support the viability of sensitive, conservation led refurbishment proposals. In addition, proposals to redevelop the adjoining land have been carefully considered to ensure that the Mill remains the dominant building and local amenity issues have been fully addressed, whilst being intrinsically linked to bridging the viability deficit that would otherwise effect the Mill proposals in isolation.</p> <p>Further information on the approach taken to design the scheme is provided within the accompanying Design and Access Statement prepared by Hodder and Partners.</p>

Core Strategy Policy

Contribution and Benefits

Policy EN 4 Reducing Carbon Emissions by Enabling Low and Zero Carbon Developments - The Council will seek to reduce fuel poverty and decouple growth in the economy, growth in CO2 emissions, and rising fossil fuel prices. Wherever possible new development and retrofit projects, including energy generation plant, must be located and designed in a manner that allows advantage to be taken of opportunities for low and zero carbon energy supplies.

Where possible new development and retrofit projects will be used as a mechanism to help improve energy efficiency and provide low and zero carbon energy supplies to existing buildings. Where appropriate new development and retrofit projects will be required to connect to and/or make contributions to low or zero carbon energy schemes and/or to incorporate provision to enable future connection to any existing / potential decentralised energy schemes. The use of building materials with low embodied carbon in new development and refurbishment schemes.

An Environmental Standards, Energy and Sustainability Statement has been prepared by Clancy Consulting.

The development will be compliant with Policy EN4 and Building Regulations Approved Document L 2013. Analysis shows that the proposed all-electric building takes advantage of decarbonisation. In addition, the development excludes the use of combustion equipment.

The Statement concludes the detailed design of the development supports the MCC target of 2038 carbon neutrality.

Policy EN 6 Target Framework for CO2 reductions from low or zero carbon energy supplies - Applications for residential development of 10 or more units and all other development over 1,000 sq m will be expected as a minimum to meet the target shown in Tables 12.1 or 12.2, unless this can be shown not to be viable. This should be demonstrated through an energy statement, submitted as part of the Design and Access Statement. Such a statement will be expected to set out the projected regulated energy demand and associated CO2 emissions for all phases of the development.

Developments smaller than the above threshold, but involving the erection of a building or substantial improvement to an existing building will also be expected to meet the minimum target, where viable, but will not be expected to submit an energy statement

An Environmental Standards, Energy and Sustainability Statement has been prepared by Clancy Consulting.

The development will be compliant with Policy EN6 and Building Regulations Approved Document L 2013. Analysis shows that the proposed all-electric building takes advantage of decarbonisation. In addition, the development excludes the use of combustion equipment.

The Statement concludes the detailed design of the development supports the MCC target of 2038 carbon neutrality.

Policy EN 8 Adaptation to Climate Change - All new development will be expected to be adaptable to climate change in terms of the design, layout, siting and function

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

The Green and Blue Infrastructure Statement contained at Appendix C of this document and the Environmental Standards Statement submitted in support of the application set out in detail how the Proposals will be adaptable to climate change in terms of its sustainable design and construction.

- 5.11. In conclusion, the above table shows that the proposal complies with the relevant policies of the Development Plan and therefore with the Development Plan read as a whole. It consequently satisfies the presumption in Section 38(6), and planning permission should be granted unless material considerations indicate otherwise.

Material Considerations

- 5.12. The following published policy, executive reports and guidance documents are relevant material considerations:
- National Planning Policy and Guidance:
 - National Planning Policy Framework (NPPF) – July 2019, and
 - National Planning Practice Guidance (PPG) - online.
- 5.13. The following local guidance documents are also material considerations in the determination of the application:
- Our Manchester Strategy 2016-2025;
 - Guide to Development in Manchester Supplementary Planning Document (2007) and Technical Guidance (2015);
 - Climate Change Emergency and Playing Our Full Part on Climate Change (2018);
 - Manchester Climate Change Framework: 2020-2025 (2020);
 - Manchester’s Green and Blue Infrastructure Strategy;
 - Eastlands Regeneration Framework (2017);
 - Design for Access 2 (2003);
 - Manchester Residential Quality Guidance (2017).

National Planning Policy Framework

National Planning Policy Framework

- 5.14. The revised National Planning Policy Framework (NPPF) was published in July 2018 and subsequently updated in February 2019 and June 2019. The NPPF sets out the government’s planning policies for England and how these are expected to be applied and is a material consideration in the determination of all planning applications.
- 5.15. The Proposed Development is considered in detail against the relevant policies within the NPPF as a whole later within this section.
- 5.16. At the heart of the 2019 revised NPPF lies the ‘*presumption*’ in favour of sustainable development, which supports proposals that are in accordance with policies in an up to date Development Plan. Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.
- 5.17. The NPPF states that ‘*the purpose of the planning system is to contribute to the achievement of sustainable development*’ (paragraph 7). It summarises the objective of sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 5.18. Section 11 of the NPPF ‘Making effective use of land’ supports the remediation and redevelopment of brownfield land, by stipulating:

“Planning policies and decisions should: ...

b) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land” (paragraph 118).

5.19. The purpose of the planning system is to achieve sustainable development. Paragraph 8 of the NPPF states that to achieve this, there are three overarching objectives, which need to be pursued mutually. Firstly, the economic role should contribute to sustainable development by building a strong, responsive and competitive economy and ensuring the sufficient amount of and right type of development to support growth. Secondly, the social role is required to support communities by creating a high-quality built environment with accessible local services to reflect the needs of the community. Lastly, the environmental role should protect and enhance the natural, built and historic environment.

National Planning Practice Guidance

5.20. The National Planning Practice Guidance (NPPG) was introduced in March 2014 and sets out advice, information and best practice on a wide range of planning issues with the overall objective of becoming a single source for planning guidance which will be maintained as a live resource. The principle behind the NPPG fits in the wider objectives of the government’s attempt to make the planning system simpler, clearer and easier for people to use.

Our Manchester Strategy 2016-2025

5.21. The Our Manchester Strategy 2016-25 was published by MCC in January 2016 and sets the ambitions for the City for the next decade. The Strategy sets out a vision for Manchester to be in the top-flight of world-class cities by 2025, when the City will:

- Have a competitive, dynamic and sustainable economy that draws on our distinctive strengths in science, advanced manufacturing, culture, and creative and digital business – cultivating and encouraging new ideas;
- Possess highly skilled, enterprising and industrious people;
- Be connected, internationally and within the UK;
- Play its full part in limiting the impacts of climate change;
- Be a place where residents from all backgrounds feel safe, can aspire, succeed and live well; and
- Be clean, attractive, culturally rich, outward-looking and welcoming.

5.22. The Our Manchester Strategy also commits to giving the local community and other stakeholders the opportunity to be involved in decision making, with a primary focus on a continuous approach to engagement.

5.23. The ‘Our Manchester’ approach seeks to build a different relationship with residents and communities, recognising that this also means undertaking a different approach to engagement; engagement that is sustainable and driven by the City’s communities.

5.24. The proposals will secure the long-term sustainable use of a nationally important heritage asset and important and will act as a beacon of and further catalyst for regeneration within the Holt Town Central and wider Eastlands area. The proposed development will create new homes, work spaces and community facilities.

5.25. The proposed development is inherently sustainable – recycling brownfield land and working with existing buildings will enhance the local environment and reduce embodied energy consumption. The site has excellent accessibility to public transport and is within a short distance of Manchester City Centre and the Etihad Campus, offering a plethora of services and opportunities for leisure, culture,

employment. The proposed development has been designed in accordance with policy and best practice with regard to safety and security, energy efficiency and energy in use, drainage including use of SuDs, and will provide enhanced public realm, pedestrian connections and high levels of amenity for future occupiers.

- 5.26. The applicant has been liaising with the existing occupiers of the Mill and is taking a responsible and proactive approach to ensuring they are able to secure alternative accommodation whilst also providing the option to stay in the Mill for as long as possible prior to development, should they wish.
- 5.27. The Applicant is committed to MCC’s local labour objectives through the construction and operation of the development and has signed up to the Local Labour Agreement. It is anticipated that the LPA will secure this commitment through an appropriate planning condition, should they be minded to grant planning permission.
- 5.28. A Construction Method Statement has been prepared by CIVIC which provides details of the construction methodology including the sequence of demolition, proposed construction methodology, an assessment of the site’s opportunities and constraints as well as site access options and site storage and facilities.

Supplementary Planning Documents and Guidance

Guide to Development in Manchester Supplementary Planning Document (2007) and Technical Guidance (2015)

- 5.29. The Guide to Development in Manchester - Supplementary Planning Document and Planning Guidance (SPD) was originally adopted on 11 April 2007. The document reflects and provides guidance on the importance of creating attractive, well designed, well maintained neighbourhoods. It includes a set of reasoned principles which will guide developers, designers and residents to the sort of development which is anticipated in Manchester.
- 5.30. In addition, technical guidance for developers was published in December 2015. It is composed of two documents, GD03 Environmental Protection and GD05 Planning and Noise. A series of technical documents have been prepared which accompany the application including a Waste Management Plan, Noise Assessment and Ecological Survey.
- 5.31. The documents reflect and provide guidance on the importance of creating attractive, well designed, well maintained neighbourhoods. It includes a set of reasoned principles which will guide developers, designers and residents to the sort of development which is anticipated in Manchester.
- 5.32. Furthermore, a TV Reception has been undertaken which concludes that the proposed development may cause some highly localised disruption to the reception of digital satellite television services to the immediate northwest of the site (particularly adjacent buildings along Bradford Road and Halmore Road). However, should interference occur, moving satellite dishes to new locations out of any signal shadows should restore good reception conditions. In addition, the Broadband Assessment notes that the scheme proposals will facilitate the requirements of Data Ducting Infrastructure for New Homes.
- 5.33. The Guide to Development and associated technical documents are addressed within the supporting application information as detailed in the following table:

Guide to Development in Manchester SPD (2008)	Contribution and Benefits
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Buildings height should be carefully considered

The Proposed Development ensures the Mill building remains the dominant structure within the proposals.

Guide to Development in Manchester SPD (2008)	Contribution and Benefits
<p>It is important that new developments are of an appropriate height having regard to location, character of the area and specific site circumstances and local effects, such as microclimatic ones.</p>	<p>The Design and Access Statement fully justifies the height of the building in terms of its relationship with the surrounding area. It is not envisaged that there will be any significant effects in relation to microclimate, or local amenity, and the relevant consultants' reports in this regard are included within this application submission.</p>
<p>New developments should maximise access for disabled people</p> <p>The Council will expect developers to comply with the standards detailed in its "Design for Access 2" Manual, and to produce an access statement, which identifies their philosophy and approach to inclusive design.</p>	<p>The design of this building has developed from first principles with an inclusive approach to allow easy, safe and secure access to all areas of the building for disabled guests. Further information is provided within the supporting Design and Access Statement.</p>
<p>Buildings should relate well to each other</p> <p>The scale, position and external appearance of new buildings should respect their setting and relationship to adjacent buildings, enhance the street scene and consider their impact on the roof line and skyline. Buildings should recognise the common building line created by the front face of adjacent buildings.</p>	<p>The buildings have been designed to respect the existing and emerging built environment. The DAS provides full details of the relationship of the proposal in its context.</p>
<p>Development should help sustain local neighbourhoods</p> <p>The Council will encourage the most appropriate form of development to enliven neighbourhoods and sustain local facilities. The layout of the scheme and the design, scale, massing and orientation of its buildings should achieve a unified urban form which blends in with, and links to, adjacent areas. Increased development density can be appropriate where it is necessary to reinforce community identity, promote a more economic use of land, increase demand for local facilities and contribute to safer, self-policed streets. However, density levels must be informed by the character of an area and the specific circumstances of a proposal.</p>	<p>The Proposed Development is located within the Holt Town Area of the wider ERF which establishes the guiding principles The essence of regeneration of the historic mills and their importance on the landscape and townscape intertwined with 'new' development is identified within the 2017 Eastland's Regeneration Framework stating, 'Regeneration of the area will be underpinned by the reuse and preservation of historic mill buildings fronting onto the canal. Infill developments on adjoining undeveloped sites should be of a scale and character to complement these buildings, reinforcing the respective identities of the old and the new'.</p> <p>The Proposed Development responds to the surrounding development context and the ERF context. The proposals provide a new lease of life to the Mill providing a long term use and the creation of a high quality mixed use destination</p>

and will improve connections to the city centre and beyond.

Playing our Full Part on Climate Change and Manchester Climate Change Framework: 2020-2025 (2020)

- 5.34. There is increasing evidence of global temperature rises and the prospect therefore of increasing incidences of extreme weather as well as risk of water and food shortages and flooding, all causing increasing insecurity. Whilst Manchester may not feel these effects as severely as other areas globally, there is an identified urgent need for all cities to consider what they need to do to play their full part in addressing climate change.
- 5.35. In November 2018, Manchester City Council made a series of commitments, informed by the Manchester Climate Change Agency's (MCCA) work with the world-renowned Tyndall Centre for Climate Research based at University of Manchester. On 10 July 2019, Manchester City Council debated a motion to declare a climate emergency, declaring that climate change is a serious risk to Manchester's future. The Council committed to embedding the issue as an integral part of council decision-making, making sure that all key decisions are taken with the City's target of becoming zero-carbon by 2038 in mind.
- 5.36. An update on Manchester Climate Change was discussed at the MCC Executive on 12 February 2020. The report provides an update on the Tyndall Centre for Climate Change Research review of targets and an update on the development of a City-wide Manchester Climate Change Framework 2020-25.
- 5.37. Measures to address the effect of climate change have been considered and addressed throughout the preparation of the planning application and the proposed development's response is embedded within the application technical reports identified at table 1.1 including the Environmental Standards and Energy and Sustainability Statement prepared by Clancy Consulting.

Manchester's Green and Blue Infrastructure Strategy

- 5.38. Manchester's Green and Blue Infrastructure Strategy (2015) has the overall vision of:
- "By 2025 high quality, well maintained green and blue spaces will be an integral part of all neighbourhoods. The city's communities will be living healthy, fulfilled lives, enjoying access to parks and greenspaces and safe green routes for walking, cycling and exercise throughout the city..."*
- 5.39. The Green and Blue Infrastructure Strategy also sets out a number of objectives to enable the vision to be achieved:
1. Improve the quality and function of existing green and blue Infrastructure, to maximise the benefits it delivers.
 2. Use appropriate green and blue infrastructure as a key component of new developments to help create successful neighbourhoods and support the City's growth.
 3. Improve connectivity and accessibility to green and blue infrastructure within the City and beyond.
 4. Improve and promote a wider understanding and awareness of the benefits that green and blue infrastructure provides to residents, the economy and the local environment.

- 5.40. The development incorporates the reinvigoration of the courtyard area within the Mill Building plus 2 roof top terraces with the Mid Building. Furthermore, the Proposed Development provides a key pedestrian connection to the towpath through the development from Bradford Road. The link will benefit the future residents and occupiers of the Site and also seeks to improve pedestrian and cycling connectivity beyond the Site.
- 5.41. The proposal will bring a new lease of life into a currently underutilised Site will support the creation of a new residential and commercial destination. The enhancement of the courtyard area will provide additional green and landscaped areas for local communities to come together, interact and play, thus improving community cohesion.
- 5.42. By enhancing the green and blue infrastructure and improving the quality of pedestrian and cycling routes to other areas of open space in the City, local communities will benefit from activated streets, thereby enhancing the vitality of the local area. The inclusion of public realm may increase passive surveillance, making a positive contribution to reducing localised crime and increasing safety.
- 5.43. Furthermore, by improving and enhancing the safety and provision of the public realm, members of the community will be more attracted to these spaces and to undertaking sustainable modes of travel, such as walking and cycling, to access the City. This has the potential to reduce reliance on private car journeys and generate health benefits associated with walking and cycling.
- 5.44. A full response is provided at Appendix C of this document.

Eastlands Regeneration Framework (2017)

- 5.45. The area falls within an area defined by the Eastlands Regeneration Framework (most recently endorsed by MCC in 2017), which has seen significant development over the last 30 years. The ERF has been through several iterations, and following the successful development of the Etihad Campus the 2017, this most recent version ERF provides a guide for the next phase of regeneration; putting in place the conditions to project the development energy created there westwards along the Ashton Canal Corridor to connect with the established eastward expansion of the city centre. Creating places for new jobs and new homes is placed at the heart of the Ashton Canal Corridor development area.
- 5.46. For clarification, the ERF sets out environmental, social, design and economic objectives which are relevant to the attainment of the regeneration of the East Manchester area which is supported by existing planning policy. It is not a planning policy document and it is not a site allocations document. As such this document has the status of a “Local Development Document” but not a “Development Plan Document” and should not be considered or viewed as formal planning policy and does not set out a series of tests to be passed. The role of the ERFs has been to seek to guide the content of planning applications so that they have in mind the objectives for East Manchester. It should be afforded some weight accordingly in the determination of the applications.
- 5.47. The proposals are fully aligned with the ERF in this regard, being located on the Ashton Canal corridor with the proposals including an enhanced connection to this key corridor and providing new homes together with creative workspaces, convenience retail amenities and community space.
- 5.48. The range of homes proposed by the development creates a broad mix and choice for future residents from one bedroom apartments to townhouses.
- 5.49. A number of ambitions for Eastlands are set out with the ERF including:
- To capitalise on regeneration investment: The proposals align in building on and support neighbouring regeneration activity, bringing a new lease of life the mill.
 - To support Manchester’s Green City initiatives: Through the towpath connection and landscaping proposed the proposals further reinforce the health and fitness focus of Eastlands facilitating

pedestrian and cyclist movement, utilising the canals as a key part of Manchester’s green and blue infrastructure.

- Create a distinctive ‘sense of place’: The proposals celebrate the Ashton Canal as key local amenity and provide a broad mix of residential types with the community/commercial spaces providing appropriately scaled supporting uses.
- Deliver improved social and economic outcomes: The proposals will create new local employment which will be implemented by way of the local labour agreement to increase the prospects of local residents securing jobs.

5.50. Within the broader mixed-use development of the Etihad Campus and the Ashton Canal Corridor, there is a desire to bring forward a number of distinct development themes that will underpin the new economy of the area and which recognises the unique character and potential of this part of Manchester. The proposals align with the theme regarding provision of a high quality residential community. Recent developments at New Islington and Ancoats and similar neighbourhoods demonstrate the demand for continued provision of high-quality housing in the Ashton Canal Corridor. The establishment of a vibrant growing residential population, with a wide choice of housing, underpinned by good schools, social and cultural facilities will be a core component of creating a successful urban district. The Eastlands area offers the scope to broaden out the housing offer and to provide a range of housing for families, downsizing households, younger age cohorts working in and around the city centre, and students.

5.51. The ERF highlights much of the remaining historic buildings, canals, streets and parks have been preserved because they are of great quality and have huge potential. Restoring and reusing the area’s historic assets will underpin a sense of place and community longevity. Their presence will underpin a future urban environment that is distinctive and characterful. Furthermore, the response to place is highlighted as essential in the Eastlands area; with iconic assets and places, including the historic mills, the Ashton and Rochdale canals. The Holt Town area is identified for future development and notes a number of principles to consider when redeveloping the area including the preservation of the historic mill buildings and the importance of the Ashton Canal linking the Eastlands area to the city centre.

5.52. The proposals ensure the refurbishment and repair of the mill are at the forefront of the development, being the dominant feature and bringing a new lease of life to the building to secure its long-term use. The new build element of the scheme ensures the overall success and viability of the scheme bringing forward high-quality housing including a range of size and types, with landscaped areas and an enhanced connection to the towpath.

Design for Access 2 (2003)

5.53. The Design for Access Manual was published in January 2000, it provides a practical guidance to inclusive design. It requires developments to be fully inclusive and accessible and the Council’s vision is for Manchester to be recognised as the most accessible City in Europe. MCC recognises that inclusive design needs to take account of cross-impairment and community based issues.

- Design principles that will help to achieve accessible development that are relevant to the Proposed Development include:
- MCC has agreed a hierarchy of road users, which prioritises the needs of pedestrians and disabled people, cyclists, public transport and finally other users. This hierarchy should be respected in the design and layout of all new developments.
- Streets should be designed for local people to use. They should be attractive, accessible social spaces, which encourage use by all sections of the local community. Street furniture

must be well designed, with clear function and positioned to avoid the creation of obstacles, clutter or confusion.

- Whatever form of car parking takes, adequate provision is required for disabled people with clear, safe, accessible footways leading to the main door.

- 5.54. The Design for Access Manual provides further details and design standards for external areas and for within buildings.
- 5.55. The Design and Access Statement states that the site is well served by public transport with bus stops directly outside the site in Bradford Road and the Holt Town Metrolink a short walk away. The site is also ideally located for residents to cycle or walk into the city centre.
- 5.56. The proposals will create an inclusive environment by ensuring that disabled people will use the same entrances as other users of the building. The main entrance vestibule is to be levelled and universally accessible without supervision or assistance.
- 5.57. The Transport Assessment prepared by Curtins highlights there are two car parks provided within the development, with combined capacity for 81 vehicles. 71 of these spaces will be designated to the residential uses, equating to approximately a 26% ratio, whilst 10 spaces will be dedicated to the commercial uses. The car park to the north will have a total capacity of 32 vehicles, which will primarily serve the refurbished Mill Building, whilst the car park to the south will serve the Mid-Block building and will have capacity for 49 vehicles.
- 5.58. There will be seven accessible parking spaces distributed across both car parks, equating to a c.9% provision. There are 16 EV active charging parking spaces proposed as part of the development, equating to approximately 20% of the proposed 81 spaces. The remainder will be passive spaces needing to be converted to active provision in the future. During scoping discussions with MCC in early April 2021, this provision and approach was considered acceptable in principle.
- 5.59. Cycle parking would be catered for through the provision of a total of 317 secure and sheltered cycle parking spaces across the development.
- 5.60. For further details on how the proposals align with the manual, please see the Design and Access Statement and Transport Assessment accompanying this application.

Manchester Residential Quality Guidance

- 5.61. The Manchester Residential Quality Guide was published in 2017. The Guide requires proposals for residential development to demonstrate the highest quality of design in accordance with its recommended approach. If a Proposed Development does not comply with the design principles the developer is required to provide robust justification, evidence and options analysis.
- 5.62. The Manchester Residential Quality Guidance 2017 states that applications for residential developments should include a Residential Management Strategy, which should address:
- 5.63. The management and legal structure, identifying which party is responsible for each part of operational management;
- Waste – storage, access, recycling and frequency of collection;
 - Car parking;
 - Cycle parking;
 - Residential networks, for ease of communication among residents;

- On site energy generation; and
 - Landscape and Green Infrastructure.
- 5.64. Several documents have been prepared which address the overall residential management including a Management Strategy has been prepared by JLL and a Waste Strategy and Transport Assessment prepared by Curtins.
- 5.65. A robust management regime will be established for the maintenance and administration of the community which is being created at Brunswick Mill. The responsibility for the long-term stewardship of all shared and public areas of the scheme not otherwise demised or allocated to individual tenants, will be granted to the management regime.
- 5.66. The Site management team will deliver the majority of “soft maintenance services” to the development under the site supervision and overall direction of JLL.
- 5.67. An overview of the directly delivered services is as follows:
- Cleaning of the communal areas.
 - Refuse and waste management in line with the scheme refuse management strategy.
 - Non-specialist hard and soft landscape maintenance.
 - Litter patrols.
 - Porterage.
 - Control of site deliveries and other site access arrangements.
 - General security and CCTV monitoring.
- 5.68. Careful consideration has been given to the communal estate regime and the service charge budget. This will deliver a 24/7 staffing regime, with concierge services catering to all buildings jointly, suitably skilled to deal with resident issues, antisocial behaviour, and general building issues. The location of the development does not necessitate separate concierge services for each building. Both buildings will feature an entrance area and the concierge will be stationed within the Mill Building enabling them to also service both new blocks and the commercial elements within the Mill.
- 5.69. Security is a main priority for residents and commercial tenants and therefore forms a core part of the management strategy and scheme design. There will be an on-site management team, fob access and CCTV.
- 5.70. With regard to the commercial element, commercial tenants will be responsible for ensuring that the outside of their units remain clean and presentable. Leases will be drafted to ensure the management team can enforce this and step in should occupiers fail to comply with the lease.
- 5.71. For further details please see the accompanying supporting documentation.
- 5.72. Space standards are highlighted within section 4 of this Statement and detailed further within the Design and Access Statement and also how the proposals align with the RQG.

Detailed Consideration of the Proposed Development against the NPPF

- 5.73. This section provides an assessment of the Proposed Development against the key relevant planning policies and priorities set out within the NPPF with the exception of heritage and affordable housing which are dealt with in relation to the NPPF and its broader policy and legislative context in the subsequent sub section of this chapter
- 5.74. The introduction to the NPPF confirms that it should be read as a whole (including its footnotes and annexes) and hence this section provides a balanced assessment of the proposals against the policies of the NPPF as a whole.

Achieving Sustainable Development

- 5.75. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 5.76. The proposals will contribute to the achievement of sustainable development, delivering the following three overarching and interdependent objectives of the planning system:
- **Economic** – the Proposed Development will help to build a strong, responsive and competitive economy. The proposals include the provision of units at the lower levels for creative occupiers, work space, retail and community uses which complement the residential use above.
 - **Social** – the proposals include community spaces with regard to the courtyard and roof top terraces, further to the units at the lower floors which will support health, social and cultural well-being. Furthermore, the re-use of the Listed Mill will ensure the historic building has a long term use and secure its longevity.
 - **Environmental** – the Proposed Development will contribute to protecting and enhancing the natural, built and historic environment, through making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low / zero carbon economy.
- 5.77. So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development (NPPF Paragraph 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan (paragraph 11 c) without delay.
- 5.78. The remainder of this section goes on to demonstrate that there is accordance with an up-to-date Development Plan and therefore the presumption in favour of sustainable development applies by virtue of paragraph 11 (c).

Decision-making: Pre-application engagement and front-loading

- 5.79. NPPF Paragraph 39 notes that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.
- 5.80. As set out on Section 1 and in the accompanying Statement of Community Involvement, local people and business have been engaged in the development process. The online public consultation have given local people the opportunity to comment on the development proposals. Through this process, key issues have been identified and addressed through the design evolution process.
- 5.81. For their role in the planning system to be effective and positive, paragraph 41 states that statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. The Proposed Development has also evolved through early consultation with various key stakeholders and the team has worked closely with these groups to deliver a development that meets the ambitions of the Applicant and the local authority and makes a significant contribution to the local community.

Delivering a sufficient supply of homes

- 5.82. Paragraph 56 of the NPPF emphasis the need to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The proposals will provide high

quality residential homes in a strategically important growth area for the City as identified within the ERF.

- 5.83. The NPPF acknowledges to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. As explained in the submitted Viability Appraisal prepared by Cushman and Wakefield, the proposed development is focused on the conservation led restoration and reuse of a Grade II Listed heritage asset and redevelopment of brownfield land and does not, from a viability perspective, support the additional provision of affordable housing.

Building a strong, competitive economy

- 5.84. Section 6 of the NPPF (Paragraphs 80 to 84) emphasises that planning decisions should help to create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 5.85. Throughout the various iterations of the ERF, the preservation of the historic mills alongside new development and the addition of residential units has remained consistent and has attracted significant and important investment over the years.
- 5.86. During construction, assuming a 1.5 year build period, there will be 152 full time equivalent construction jobs supported on-site during the build period and a further 224 off-site indirect FTE jobs. The GVA associated with these jobs will be £24.2m per year. A high proportion of the jobs and GVA will be retained in the North West.
- 5.87. The additional housing is estimated to accommodate 637 additional residents with 449 additional working age residents and an additional £5m of expenditure to the local economy. This could directly support 40 full time equivalent jobs within local shops in Manchester. The GVA associated with these jobs will be £0.95m per year.
- 5.88. Assuming Band D Council tax the 277 new homes will generate £0.5m per annum for the Council. New homes bonus will provide an additional £1.9m over 4 years.
- 5.89. The commercial elements of the scheme will create 156.5 jobs in total with annual GVA of £5.8m per year. An estimated 88 jobs and GVA of £1.67m will be lost from the site based on its current occupation. Therefore, the net jobs (new jobs less those lost on site) will be 68.5 with annual GVA of £4.1m.

Promoting healthy and safe communities

- 5.90. NPPF Paragraph 91 sets out that planning decisions should aim to achieve healthy, inclusive and safe places which:
- promote social interaction – the landscape areas of the courtyard and roof top terraces will promote social interaction and include opportunities for meetings between people who might not otherwise come into contact with each other.
 - are safe and accessible –the proposed development has been designed to provide a safe, secure and enjoyable environment for all residents, occupiers and visitors.
 - enable and support healthy lifestyles – the proposals will offer a high-quality environment for living and working and provide spaces capable of being used for active community uses. They will also provide access to green and blue infrastructure for local residents and encourage active modes of travel, including walking and cycling.

- A Crime Impact Statement has been prepared by Wardell Armstrong which concludes the detailed design for the proposed development responds well to the opportunity to regenerate the rundown Brunswick Mill and adjacent vacant land by creating a safe and secure new development. Including positive design elements such as well-lit areas, CCTV and fob access.

Promoting sustainable transport

- 5.91. NPPF Paragraphs 102 to 111 seek to promote sustainable transport, specifically outlining that transport related issues should be addressed early on in the design development process to reduce the need to travel and offer a genuine choice of transport modes.
- 5.92. The Site is located within close proximity to various modes of public transport and the proposals also include a connection to the towpath, promoting pedestrian and cycle accessibility to the city centre and beyond.
- 5.93. The accompanying Transport Assessment has demonstrated that residents, staff and visitors of the site would not travel by car and would most likely arrive on foot, cycle or public transport. Modelling in the Transport Assessment suggests that the proposed number of car parking spaces provided is appropriate to the scale of the development.
- 5.94. As well as the Transport Assessment, Curtins also prepared an Interim Travel Plan, which details initiatives aimed to reduce car reliability. The Transport Plan is to be monitored and reviewed by a dedicated Travel Plan Co-Ordinator (TPC).
- 5.95. When considered against the requirements of Paragraph 110 for applications for development, the proposals have been designed from the outset to address the following points:
- Plan effectively in relation to existing and proposed patterns of movement taking into account existing streets and connections, parking and the promotion of sustainable transport modes.
 - As highlighted within this Statement the location of the development benefits from excellent public transport links; furthermore the enhancement to the towpath encourages further pedestrian and cycle use.
 - The proposed development is accessible for all and is clearly set out within the Transport Assessment and Design and Access Statement which form part of this submission.
 - The proposed access and egress arrangements have been specifically designed to minimise the scope for conflicts between pedestrians, cyclists and vehicles and ensure that the proposals and its surrounding environs are a safe, secure and attractive place. There is no unnecessary street clutter, and, as demonstrated in the accompanying Design and Access Statement, the proposals respond to local character and design standards to provide a new lease of life to the Listed Mill alongside new development.
 - The proposals include 20% EVC points plus the remaining parking to be future proofed by way of the necessary infrastructure in place to allow 100% in the future.
- 5.96. Based on the assessment outlined in this and the accompanying transport reports, it is concluded that the proposals accord fully with prevailing transport policy guidance and that the development proposals are appropriate for the location.

Making effective use of land

- 5.97. NPPF Paragraphs 117 to 123 state planning policies and decisions should promote an effective use of land, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 5.98. Paragraph 118(c) notes that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes. The Proposed Development will secure the long-term use

of the historic mill building through a mixed use scheme providing residential and community space in a strategically important location within the Regional Centre.

Achieving well-designed places

- 5.99. Section 12 of the NPPF emphasises that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 5.100. When considered against the requirements of Paragraph 127, the proposals:
- Will secure the long-term function of the mill building to ensure the mill does not fall into disrepair.
 - The form of the new buildings is simplistic, to allow the mill building remain the dominant feature.
 - Is appropriate for its setting and sympathetic to local character and history, including the surrounding built environment and landscape setting.
 - Will establish a strong sense of place, creating a quality residential development preserving a historic building within the city.
 - Optimises the potential of the Site to accommodate and sustain an appropriate amount and mix of development (including green and other public space), through the use of effective landscaping, public realm and retail and amenity uses. The Proposed Development will act to activate the Ashton Canal, increasing the pedestrian and cycle use of this key link to the city centre.
 - Creates a place which is safe, inclusive and accessible and which promotes health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
 - A Daylight and Sunlight Report has been prepared by AA Projects which assesses the impacts on the nearby residential receptors in relation to the BRE guidelines on daylight and sunlight for the selected windows to the adjacent residential accommodation. The results of this assessment are tabulated within the accompanying report. Overall, AA Projects conclude that the impacts to the surrounding residential properties are extremely good and are in line with those of other Manchester City Centre developments. All windows assessed achieved 100% compliance with regard to APSH, which relates to sunlight, against the BRE criteria in both summer and winter. With regard to the assessments relating to daylight from the sky, (VSC and NSL) while there were 11% of windows which experienced a moderate or higher adverse effect for VSC, and 7% of rooms which experienced a moderate or higher adverse effect for NSL, the majority of the rooms affected are bedrooms (which the BRE guide states are to be treated with less importance). AA Projects conclude given the existing built urban context, the impacts to the surrounding residential properties are entirely reasonable.
- 5.101. In determining applications, NPPF paragraph 131 states great weight should be given to outstanding or innovative designs which promote high levels of sustainability. As set out below, the proposals will promote sustainability and make a positive contribution towards Manchester's climate change ambitions.
- 5.102. Further information about the design intent and design development is detailed within the Design and Access Statement submitted in support of this planning application.

Meeting the challenge of climate change, flooding and coastal change

- 5.103. Section 14 of the NPPF deals with meeting the challenge of climate change, flooding and coastal change, stating that the planning system should support the transition to a low carbon future in a changing climate, reducing greenhouse gas emissions, minimising vulnerability, improving resilience, and encouraging the reuse of existing resources.

- 5.104. The accompanying Environmental Standards, Energy and Sustainability Statement has been prepared by Clancy Consulting. It is noted that the development follows the principles to make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy:
- Be lean: use less energy
 - Be clean: supply energy efficiently
 - Be green: use renewable energy
- 5.105. In line with 'be lean' the intention is to adopt an enhanced building fabric for the new build areas based on values which are better than the minimum required for compliance with Building Regulations AD Part L1A 2013. This will minimise the building energy demand and contribute towards Building Regulations compliance.
- 5.106. The upgrading of the existing listed fabric within the Mill Conversion has been reviewed in terms of feasibility. The envisaged strategy is for external walls will remain as existing; windows and doors will be replaced to the standards identified with the ESS; and roof elements will be upgraded subject to heritage constraints.
- 5.107. In line with 'be clean' efficient systems will be adopted for both the new build and refurbishment elements as outlined in the ESS and include panel heaters, time/temperature controls, electric heating and low energy lighting - to minimise the building energy consumption and contribute further towards a passive and sustainable building which is compliant with Building Regulations. During the design stage, the proposals will be subject to more refined modelling based on the final building form, construction details and building services systems to optimise the design. It is proposed to fully review the scale of the photovoltaic panels to best suit the scheme.
- 5.108. In line with 'be green' renewable and Low and Zero Carbon energy sources will be incorporated where necessary and economically viable to reduce carbon emissions and energy targets.
- 5.109. SAP block compliance assessment and Part L2A modelling has been undertaken in which the results indicate that the required carbon performance can be achieved against the Building Regulations Part L 2013 in line with the National, Regional and Local Manchester City Council planning policies.
- 5.110. The ESS notes that by 2035 the all-electric building only emits 7.24% carbon emissions compared to the 2013 Part L target. However, if the building were heated by gas and electricity the carbon emissions would be 27.9%. 5.2.
- 5.111. The building is being developed with climate resilience in mind. Part of this strategy is to design the building to perform well in summer against overheating. High temperatures at night can greatly affect sleep, a time when the body repairs itself and hence can be detrimental to health and wellbeing. The apartments will include opening door to increase natural ventilation. The opening door panels will incorporate a louvre or perforated panel which will enable them to be left open at night. The opening area will provide much more ventilation than restricted opening windows resulting in the potential of large bulk air flow through each property. The louvre or panel also attenuates wind which is a consideration of more extreme climates associated with climate change. This will enable natural ventilation to be utilised in more windy scenarios.
- 5.112. There will be no energy generation from gas, fossil fuels or solid fuel (i.e. Biomass) and therefore there are no additional local pollutants generated from equipment flues associated with the building services within these buildings. There is also no gas to the site and therefore all cooking will be via electricity. This will reduce pollution within kitchen areas during cooking as there will be no combustions products.
- 5.113. As the existing structure has been partially retained on site the scheme is able to maximise the site building material efficiency and to reduce transporting building waste and spoil off site. This has been

done to also maximise and promote the site character and balance it against the new build element of the site adjacent. The new scheme elements (old and new) occupy most of the site. The scheme includes external works package which will contribute to landscaping and biodiversity such as bird/bat boxes; plus the operation of the building through proximity to sustainable transport, cycle provision, and encouragement of recycling are measures which promote the environmental accreditation to be delivered by the scheme. The building design has, where practical, considered the potential to mitigate solar gain through building orientation and façade design where this can be achieved without compromising good urban design or creating overheating issues. Where new materials are used, they shall be selected so their waste impact is considered. Also, where possible be of low embedded energy, we will work with the Main Contractor to support this where practical. Also, we will further consider the sustainability measures of this project further as we progress through the more detailed design stages.

5.114. The ESS submitted as part of this application concludes the following:

- The proposed development will be compliant with Policy EN6 and Building Regulations Approved Document Part L 2013.
- Analysis shows that the proposed all-electric building takes advantage of decarbonisations with biogas and contributes to a reduction in biogas dependence.
- The development excludes the use of combustion equipment for providing heating and hot water and therefore will be no additional local pollution sources associated with the building services.

5.115. Overall, the report concludes the detailed design of the development directly supports Manchester City Council in addressing the city's declaration of a climate emergency and will enable the building's operational carbon to continually reduce overtime in line with the 2038 net zero carbon target.

5.116. NPPF Paragraph 155 notes that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). The accompanying Flood Risk and Drainage Strategy notes the Site is in Flood Zone 1. With regard to surface water drainage for the Mill building it is proposed to discharge the proposed surface water flows into the existing combined water sewer at a 50% betterment. For the Mid building and Corner building it is proposed flows into the existing surface water sewer in Beswick Street.

5.117. Regarding foul water drainage United Utilities have confirmed in their predevelopment advice that the proposed foul water for each site can discharge at an unrestricted rate into the combined water sewer in Bradford Road.

5.118. SuDS are to be incorporated into the post development design to reduce the surface water run-off rates and to aid the above proposed the 50% betterment of the pre-development rates; reducing the volume of formal attenuation required. Various SuDS methods have been explored and implemented where viable such as permeable paving solutions along with a tanked sub-base attenuation system for the car parking aspects of the development.

5.119. For further details please refer to the Flood Risk Assessment and Drainage Strategy Report.

Conserving and Enhancing the Natural Environment

5.120. Section 15 of the NPPF deals with conserving and enhancing the natural environment stating that planning policies and decisions should contribute to and enhance the natural environment and local environment.

5.121. When considered against the requirements of NPPF Paragraph 175 for Habitats and Biodiversity, an Ecological Survey has been undertaken, which concludes:

- Will not result in any significant harm to biodiversity.
- Will not be likely to have an adverse effect (either individually or in combination with other developments) on a Site of Special Scientific Interest.

- Will not result in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees).
- Will enhance biodiversity and the natural environment through the refurbishment and repair of the existing rundown mill plus the development of land to the south with enhanced landscaping.

5.122. An Ecological Assessment has been undertaken by Rachel Hacking Ecology, which concludes the following:

Trees/scrub land

- 5.123. The Ecological Assessment found scattered trees within the area of continuous scrub and long the site boundaries. The trees are all self-seeded and of a similar semi-mature age.
- 5.124. The Proposed Development will include the removal of the self-seeded trees; however, the new landscaped areas within the courtyard and within the car parking area will contain semi mature feature trees and clear stem planting. The car parking serving the new building is proposed to consist predominantly as green gap paving, further 'greened' and visually interrupted with feature hedge and tree planting. Further new planting is provided to the south-west boundary, with species selected to increase biodiversity and promote ecology. The same aesthetic is continued within the 'northern' car park promoting SUD's permeable paving and tree planting. Please refer to the landscaping scheme which has been developed by LAYER and accompanies the planning application.

Invasive Species

5.125. No non-native, invasive species listed on Schedule 9 Part II of the Wildlife and Countryside Act 1981 are present on or immediately adjacent to the site.

Great Crested Newt

5.126. The proposed development will not involve the loss of any Great Crested Newt breeding habitat. Given the hostile habitat, it is likely that Great Crested Newts are not present on the site.

Water Vole

5.127. The adjacent Ashton Canal was surveyed for evidence of Water Vole. The water quality is deemed to be poor with no aquatic or marginal vegetation present. No evidence of Water Vole was found along either bank of the canal.

Bats

- 5.128. A day-time bat survey has been undertaken as part of the ecological investigations. The bat survey concluded that no roost Sites or bat activity have been recorded within the Site, but there exists many suitable entry and roost points.
- 5.129. Open access into the internal spaces through missing windows increases the suitability of the internal features. Due to this, and the presence of suitable foraging and commuting habitat along Ashton Canal, it is considered the mill building offers high bat roost suitability. Further bat survey work is necessary to determine presence/likely absence of bats at the mill building, and the type of bat roost present. Three bat activity surveys are required during the period May – September.
- 5.130. It is considered that the requirement to undertake further bat surveys can be dealt via the inclusion of a planning condition in relation to any planning permission which restricts any development taking place on the site, until such time as dusk emergence and/or dawn re-entry surveys have been undertaken to establish the presence / likely absence of roosting bats and the results, along with any associated mitigation measures, have been submitted for approval in writing by MCC. It should additionally be noted that these additional bat surveys have been instructed and will be supplied to the Local Planning Authority as soon as they are completed.

- 5.131. The adjacent Ashton Canal offers suitable bat foraging and commuting habitat. However, the canal is largely isolated from any other suitable bat foraging and commuting habitats. Therefore, it is considered that Ashton Canal offers low bat foraging and commuting suitability. To determine if the canal and the sites linear feature of continuous scrub are used as bat foraging and commuting habitat, it is recommended bat transect surveys are carried out. The proposed works on site have the potential to affect the adjacent Ashton Canal as bat foraging and commuting habitat during the construction/renovation phases and the post development phases. If the Canal and scrub vegetation are found to be used by foraging/commuting bats, there will be a commitment for the scheme to investigate a sensitive lighting scheme to protect the canal corridor as a dark zone.
- 5.132. No potential bat roost features were identified on any of the trees on site. Therefore, it is considered the sites trees offer negligible bat roost suitability.

Nesting Birds

- 5.133. Evidence of nesting Pidgeon was found across all the floors of the mill building. The continuous scrub and trees on site offer good bird nesting habitat. Evidence of nesting bird was also found amongst the continuous scrub.
- 5.134. It is recommended the conversion/renovation of the mill building and any vegetation clearance works is carried out outside the nesting bird season (generally March – August). If the conversion/clearance work needs to be carried out within the bird nesting season, then a nesting bird survey will be required immediately prior to work commencing. In addition, it is recommended to erect bird nest boxes on the external walls of the mill building and newly constructed buildings. The applicant acknowledges that these aspects will be secured through planning condition.

Other

- 5.135. The Ecological Assessment confirms there were no badger sett was located on the site or immediately adjacent to the site. No evidence of Badger activity such as latrines or snuffle holes was located on site. No field signs of Otter were located during the survey, such as Otter holts, spraints or footprints. The banks of the canal are not considered to be suitable Otter foraging habitat with them being man-made. Otters usually use tree roots to build their holts. No signs of a holt or any other Otter activity was found.

Ashton Canal SBI

- 5.136. Ashton Canal Site of Biological Importance (SBI) runs adjacent to the southern boundary of the site. Rochdale Canal SBI is located approximately 300metres north.
- 5.137. The Proposed Development will not impact on the Ashton Canal SBI as no water will be discharged into the canal as part of the Proposed Development.
- 5.138. When considered against the requirements of NPPF Paragraph 181 (Ground Conditions and Pollution) the NPPF notes planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- 5.139. An air quality assessment has been undertaken by Ensafe. Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of demolition, earthworks, construction and trackout activities. It is considered that the use of good practice control measures would provide

suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.

- 5.140. Dispersion modelling was undertaken in order to predict annual mean pollutant concentrations across the application site and to predicted impacts as a result of additional road vehicle exhaust emissions associated with the proposed development. Results were subsequently verified using local monitoring results provided by Manchester City Council.
- 5.141. The dispersion modelling results indicated that annual mean pollutant concentrations across the application site were below the relevant air quality objectives. The site is therefore considered suitable for proposed end use without the implementation of protective mitigation techniques.
- 5.142. Additionally, the assessment concluded that impacts on pollutant levels as a result of operational phase pollutant emissions were predicted to be not significant at all sensitive locations in the vicinity of the site, as a result of negligible and slight impacts at discrete sensitive receptor locations.
- 5.143. For further details, please refer to the Air Quality Statement submitted as part of this Application.
- 5.144. NPPF Paragraph 180 states that planning decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. The Proposed Development will mitigate and reduce to a minimum the potential adverse impacts resulting from noise and avoid noise giving rise to significant adverse impacts on health and the quality of life. A Noise Impact Statement has been prepared by Azymuth Acoustics UK.
- 5.145. The site is affected by noise from Bradford Road, with noise levels around 55-75 dB during the daytime and 44-63 dB during the night-time. Apartments fronting the Ashton Canal are not deemed to be as sensitive as dwellings along the Bradford Road, and northern and southern façades. The Brunswick Mill facades facing the courtyard are also considered to be less sensitive. As such, the findings of the assessment are that the residential development should be protected by noise mitigation measures including:
- Acoustic double glazing to rooms on all elevations. The highest level of sound insulation will be required for habitable rooms with line of sight to Brunswick Road. Similar / corresponding recommendations have been provided for other elements of the building envelope.
 - The proposal will provide mechanical ventilation with heat recovery for the areas requiring the highest levels of noise protection.
 - Noise limits and sound insulation recommendations for the separating floor between the proposed commercial spaces and the first-floor apartments are dependent on the commercial tenants.
 - Noise limits applicable to any externally mounted plant or atmosphere connections / louvres are recommended based on positioning.
- 5.146. NPPF Paragraph 181 states planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Chapter 6 of the Environmental Statement assesses the likely environmental effects of the Proposed Development with regards to Air Quality and takes into account existing conditions in the vicinity of the Site and the potential impacts during construction and operational phases of the Proposed Development. The assessment concludes that with the implementation of proposed construction mitigation measures, the Proposed Development will not have a significant effect on air quality and aligns to national planning policy in this regard.

Heritage

- 5.147. The relevant policies and legislative framework for considering the heritage aspects of the proposals include the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and the policies of Manchester’s Development Plan.
- 5.148. Section 7 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is of particular relevance as it requires the authorisation of works affecting statutorily listed heritage assets (in the form of Listed Building Consent) where works would “affect its character as a building of special architectural or historic interest”.
- 5.149. The legislation also imposes specific requirements to consider the physical and visual impact of any works which may impact on the special architectural or historic interest of the listed building, over and above that provided by development management. The Grade II listing of Brunswick Mill therefore requires evaluation of the impact of the Proposals on the fabric, and/or character and ‘setting’ of the listed building in the context of Section 66 of the Act, which states:

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- 5.150. The ‘setting’ of a listed building is not a heritage designation, it is simply defined in the NPPF as the, “surroundings in which a heritage asset is experienced”. Thus, it is important to consider the change resulting from the Proposed Development and the overall impact that this would have on the special interest of the Grade II Listed Brunswick Mill, and any neighbouring designated heritage assets identified.
- 5.151. The key test, derived from the legislation and subsequent guidance, is the effect on the significance of the asset a whole including its fabric and setting. Thus, it is important to determine the degree of change and whether the proposed physical alterations will result in a negative perception of the Grade II listed Brunswick Mill, or diminish its values as a designated heritage asset.
- 5.152. In accordance with the requirements of Section 66, if a negative impact on the identified designated heritage assets is identified, its extent must be defined to determine whether it may be defined as demonstrable ‘harm’. This is necessary because limited, or “less than substantial harm”, should not be afforded the same weight as that which is deemed to be “substantial harm”, and thus requires different considerations in terms of the NPPF and the supporting PPG (which together explain the application of the 1990 Act).
- 5.153. ‘Substantial harm’, as referenced within the NPPF and its relevant policy test, is thus interpreted as having a fundamental impact on the significance of the heritage asset by means of: total loss, profound physical harm to its fabric, or the complete compromise of its setting. It follows that “less than substantial harm” is a physical alteration or development affecting the setting of a designated heritage asset which may alter but does not fundamentally compromise its “special architectural or historic interest”. Therefore, if a negative (but not fundamental) impact is identified, the Council must determine whether the development is mitigated by its balancing planning benefits. If that is the case, and compliance with the relevant policy test in the NPPF is demonstrated, then it is sufficient to satisfy the LPA’s statutory duty as referenced in in Section 66).
- 5.154. Fundamentally, the legislation requires decision-makers to apply considerable importance and weight to the desirability of preserving the significant fabric, architectural character and historic interest of designated heritage assets when determining planning proposals, balanced against identifiable public benefits. This requires appropriate analysis of the Site as a whole, and its physical and visual relationship to neighbouring designated heritage assets.
- 5.155. The key Planning consideration is thus whether the Proposed Development would cause any demonstrable, unmitigated ‘harm’ or erosion of the values of the identified heritage assets. The Council

must, therefore, use its judgement (based on relevant material evidence) to understand and objectively define the impact on the affected designated heritage assets, noting that change does not necessarily equate to 'harm'. Therefore, the weight to be applied by the Council must be proportionate to the status of the affected heritage asset and the nature of the proposed change.

- 5.156. With regard to the NPPF, Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 5.157. The Grade II Listed Mill is a well-preserved Victorian cotton mill. It was the first mill in Manchester to be powered by electricity and benefits from original features which should be preserved and enhanced. The Heritage Statement provides details on the significance of the various elements of the mill and those areas of high significance which where possible are to be retained and restored.
- 5.158. Paragraph 192 of the NPPF states in determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness
- 5.159. Paragraph 193 states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 5.160. Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) Grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
- 5.161. Section 196 states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 5.162. Policy EN3 (Heritage) of Manchester's Core Strategy states that Manchester City Council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods. Development options must be designed to support the Council in preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance. Proposals for the Site will thus be required to positively addresses the following policy objectives, as established in Policy EN3:
- proposed alterations and extensions should complement the distinctive external aesthetic and original features of the Grade II listed building.
 - proposed alterations should enable the sustainable use of the entire listed building, while remaining consistent with the significance of the Grade II listed designated heritage asset.

- proposed works should be designed to support the Council’s objective of preserving (and where possible, enhancing) the historic environment, including the architectural character, setting, accessibility of spaces.
- 5.163. The Council’s key regeneration objective is tempered by the need to ensure that: “historic sites and areas of particular heritage value should be both safeguarded for the future and, where possible, enhanced for their own heritage merits and as part of wider heritage regeneration proposals” (paragraph 12.21, Policy EN3).
- 5.164. It should also be noted good practise guidance has been considered in the formulation of the proposals. This aspect is not considered within this document but is considered in full within the supporting Heritage Assessment prepared by Stephen Levrant Heritage Architecture.
- 5.165. The remainder of this section considers the proposals against this context including key issues relating to
- the justification for the removal of later additions to the main Mill building;
 - impact on the fabric of the building
 - demonstrating that the residential conversion proposals are the only viable option, with reference to other options that have been tested, namely offices and manufacturing, that would preserve avoid the need for internal subdivision of the building.
 - the impact of the new development on the setting of the listed Mill;
- 5.166. The impact on the local environment, the street scene and how it would add to its locality is also important.
- 5.167. The impact assessment has demonstrated that, overall, the direct and indirect impacts of the Proposed Scheme on the Grade II listed Brunswick Mill, and other identified heritage assets, will be beneficial. This will result in the ability to have a greater appreciation of the heritage interest of the heritage assets
- 5.168. Overall, the proposals will enhance and complement the character and distinctiveness of the area and would not adversely affect established valued townscapes or landscapes, or adversely impact on important views. The improvements to this prominent building would contribute positively to place making.
- 5.169. Special regard to the desirability of preserving the building through its ongoing occupation and functionality for its optimal viable use has informed the decision-making process.
- 5.170. The proposals reflect the works required to introduce and accommodate new uses to the Site. Where areas of alteration or deconstruction are proposed, these physical interventions to the historic fabric are necessary to enable the successful and viable reuse of the Site, whilst retaining and enhancing the retained buildings and significant elements.
- 5.171. The proposals for the building ensure that all significant building elements, such as the jack-arched ceilings, cast iron columns and structural supports, and the two original stone staircases and handrails are retained and restored to enhance the spaces within the proposed apartments and circulation spaces.
- 5.172. The green and white tiling to the former Edwardian staff canteen will also be retained as feature walls within the proposed apartments to the third-floor level. Other areas of restoration include reforming the original dimensions of the tall engine house window openings and repairing and replacing the surviving areas of original stuccoed eaves cornice and banding to the engine house.
- 5.173. The central courtyard will be returned to its original dimensions and appearance with the removal of later, low significance extensions, and the removal of layers of modern paint, bitumen, and cement to the perimeter walls. The original stone cobbles/setts will be lifted and re-laid to form a level surface, with the addition of a number of new landscape features.

- 5.174. The building is currently c 50% occupied by organisations only capable of paying rents of c£1 to £3.00psf. This income only permits reactionary work to the building and is insufficient to bring forward any medium or long-term solution.
- 5.175. Overall, it is considered that the instances of physical alterations resulting from the proposed works to the buildings that form the Site are necessary to ensure a sustainable use for the Site, which is outweighed by the heritage benefits of returning a longstanding, semi-derelict site back into an active use. The beneficial impacts across the Site are seen to enhance the appreciation, understanding and character of the former mill, and are thus considered to result in an overall beneficial impact
- 5.176. One area of harm to the character of the listed building that has been identified is in relation to the subdivision of the internal layout to apartments.
- 5.177. In this regard, it should firstly be noted that keeping the ground floor open plan will retain a degree of the open plan nature at the building at least on this level.
- 5.178. In addition, due consideration has been given to the potential of converting the Mill into alternative uses with the immediate need to facilitate a comprehensive scheme which can secure a long term solution and stop the gradual deterioration of this substantial listed building (c170,000 sq. ft).
- 5.179. It is considered that there is little chance of finding a dominant office, light industrial or leisure use for the majority of the space which would enable a speculative scheme to be funded. Although there is interest from smaller occupiers in working from historic buildings in the city the scale of this building limits the scope for identifying a single or primary occupier.
- 5.180. Advice obtained from Skelton Property Consultancy, contained at Appendix C and summarised below, explains that there are a number of substantive reasons why alternative proposals would not be realistic:
- The scale of the building is such that a speculative developer would need to be confident in securing a number of major lettings of individual and multiple floors. Each floor in the building comprises c 30,000 sq. ft with the largest wing exceeding 15,000 sq. ft.
 - In order to ensure that the upper floors remain open plan the building would need to attract and secure at least 12 lettings of over 10,000 sq. ft; however, over the last 4 years c80% of all transactions were less than 5,000 sq ft.
 - In addition, the larger transactions of over 5000 sq. ft are generally in central locations and the majority are to financial and professional services organisations in locations such as Spinningfields and the established core. There is no historic or current evidence that major office occupiers would consider this location
 - Period buildings with character are attractive to the creative industries with the majority of these being small in scale and usually only prepared to take short term leases. Sensible conversion of listed buildings is often compromised by their configuration, difficulties in making the accommodation DDA compliant and the poor ratio of lettable space when new cores, WCs and multiple internal corridors are introduced. All these factors would affect the integrity of the original layout and may cause greater harm to the structure than the application proposals.
 - There is always concern that budgeted costs to convert buildings are not achieved due to unforeseen issues over structural issues and heritage constraints. Skelton Property Consultancy consider that the viability of conversion to offices would only be feasible with a substantial grant from the public sector.
 - It is estimated, on the basis of a budgeted build cost of c £18million, as estimated by Simon Fenton, that a developer would need to finance a total cost including a profit margin of 20% at c£30,000,000. In this case, an estimated value of a fully let office investment (assuming paying reasonable inducements to occupiers) is in the region of £17 million to £20 million. This leaves a shortfall of c

£10 million even with fairly optimistic assumptions on the speed of letting and the level of build costs.

- The nearest comparable to Brunswick Mill is the conversion of offices at Royal Mills. This is a building on 6 floors with a total of c50,000 sq. ft (over 3 times smaller than Brunswick Mill). The scheme was backed and financed by both Homes England (formerly Homes and Communities Agency) and Manchester City Council. The evidence from this scheme shows that buildings of this nature have limited appeal to larger organisations. The majority of lettings are to small companies on short leases at rents which range from as low as £10.00 to c£20.00 (with some transactions including service charge costs). The largest single available office accommodation in the building is c 8,000 sq. ft and that space has remained unlet since it was first marketed over 10 years ago.
- The location of Royal Mills in Ancoats is superior to Brunswick Mill for access to the City and has excellent local facilities, bars etc. It is in an area which has been comprehensively improved over the last 15 years. Brunswick Mill and its immediate environs cannot offer the benefits of Royal Mills and is in Skelton Property Consultancy's opinion not a suitable or desirable office location for large open plan offices.

- 5.181. In addition, Brunswick Mill has additional constraints beyond purely the considerable cost it that it lacks suitable access arrangements to the upper floors and the individual floors are incapable of subdivision without a substantial loss of lettable space. The courtyard has limited scope for deliveries and most industrial/warehouse operators want to occupy ground floor accommodation.
- 5.182. Residential values and the market for buildings of this scale for conversion to homes is the only viable solution. In reality the property when complete is a mixed-use development with over 20,000 sq. ft (similar scale to Stubbs Mill) being offered as commercial, leisure and community space.
- 5.183. With regard to windows, the introduction of new windows throughout will enhance the character of the building by returning the exterior of the building to its late 19th century appearance. Although the replacement of all windows with modern examples will result in the loss of historic fabric, all existing windows largely date to the late-19th century, with other windows being of a more recent date or being blocked/removed.
- 5.184. Furthermore, the rationale for replacement windows using the existing 6 pane format rather than the smaller panes that are thought to have been the original arrangement, is that the 6 pane format will perform better thermally (most heat loss is through the frame so the shorter the length of frame relative to glazing, the better). Thermal enhancements to the windows are one of the key moves that permits the internal faces of external walls to be left with exposed masonry, rather than to be lined with insulation and plasterboard. Further details are contained within the Design and Access Statement and SLHA has prepared a window condition report which is to be submitted with the application and is attached with this response.
- 5.185. The current proposals aim to minimise the loss or compromise of the building's significance. However, it is evident that (in accordance with Historic England guidance) the sustainable re-use of a building requires a degree of intervention and change. Consequently, in evaluating the overall impact of the works, careful consideration has been given to the balance of benefits in order to reach a proportionate and justifiable conclusion. The proposals are designed to put the Grade II listed building in sustainable, active use. These works will see the minimal amount of alterations necessary and ensure the areas which contain architectural features of interest are preserved and or enhanced.
- 5.186. The accompanying Heritage Assessment prepared by Stephen Levrant Heritage Architecture assesses the potential impact of the proposed development on the setting of Brunswick Mill and the identified surrounding listed buildings, in accordance with best practice methodologies.
- 5.187. As recommended in the revised Historic England guidance on the Settings of Historic Buildings, a Visual Impact Assessment has been undertaken comprising a long form text discussion of the potential impact upon the identified heritage assets, supported by a table containing all of the identified heritage assets

as referenced within the significance appraisal. The views considered facilitate an understanding of the potential visual impact of the proposed development on the identified heritage assets.

5.188. An extract from the supporting Heritage Assessment is provided below. This concludes that, overall, the direct and indirect impacts of the Proposed Scheme on the Grade II listed Brunswick Mill, and other identified heritage assets, will be beneficial. This will result in the ability to have a greater appreciation of the heritage interest of the heritage assets

Table 6 – Tabulated matrix of impacts of Proposed Development upon significance of setting to Listed Buildings and non-designated heritage assets identified within the visual impact assessment

Heritage asset	Listing grade or other description	Contribution of setting to significance (as existing)	Scale of impact	Significance of the effect of change, or overall impact
Brunswick Mill	II	Low-to-medium	Moderate change	Moderate beneficial
Bridge over Ashton Canal No.5	II	Low-to-medium	Minor change	Minor beneficial
Bridge over Ashton Canal No.4	II	Low-to-medium	Negligible change	Negligible beneficial
Hope Mill	II*	Low-to-medium	Negligible change	Negligible beneficial
Spectator Mill	II	Low-to-medium	Negligible change	Negligible beneficial

Source: Stephen Levrant Heritage Architecture

5.189. With regard to NPPF Paragraph 196 and LPA’s duty to consider the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses, the accompanying Heritage Assessment concludes that the heritage benefits associated with the restoration and reuse of the listed Mill outweigh any instances of harm and will enhance the ability to appreciate the heritage values of the former mill, such that there is an overall beneficial impact. These are summarised at paragraph 5.190 of this Statement. Overall, it can be concluded that the less than substantial harm to the significance of the Mill is outweighed by the heritage benefits combined with the wider public benefits listed, such that the policy test is satisfied

5.190. In addition, this report and the wider submission clearly demonstrates that the proposed development will deliver a number of broader public benefits including:

- Removing a derelict brownfield site, identified as a long-term regeneration priority, demonstrably improving the character and appearance of the local environment.
- An inclusive development that provides new homes in line with, or in excess of, Manchester’s Residential Quality Guidance provisions, together with workspaces, retail amenities and space for the local community including for creative purposes, leisure, education and social meeting.
- Utilising a highly accessible site, accessible by a range of modes of sustainable transport in order to support a sustainable pattern of development.
- Assuming a 1.5 year build period there will be 152 full time equivalent construction jobs supported on-site during this time and a further 224 off-site indirect FTE jobs. The GVA associated with these

jobs will be £24.2m per year. A high proportion of the jobs and GVA will be retained in the North West.

- The additional housing is estimated to accommodate 637 additional residents with 449 additional working age residents and an additional £5m of expenditure to the local economy. This could directly support 40 full time equivalent jobs within local shops in Manchester. The GVA associated with these jobs will be £0.95m per year.
- The new workspace and retail accommodation will create 156.5 jobs in total with annual GVA of £5.8m per year.
- In addition, the Applicant has submitted a signed form that agrees to the principle of MCC's local labour objectives and seeks that this is secured by planning condition.
- The provision of public realm within the site including a fully restored Mill courtyard and a pedestrian route from Bradford Road through to the Ashton Canal.
- Alongside ample secure cycle parking, 20% EVC points with the remaining car parking spaces having the infrastructure in place to allow the scheme to be future proofed.

5.191. In addition to the above, Paragraph 189 of the NPPF (2019) states that:

“Where a Site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”

5.192. An Archaeological Desktop Report has been prepared by the University of Salford.

5.193. The Report appraises the likely impact of the Proposed Development on below ground archaeological assets, and concludes the following:

- Baseline research indicates the Site is likely to retain the foundations of a 19th Century textile mill known locally as Pooley's Mill. Any surviving foundations of the mill will merit recording archaeologically prior to their removal.
- There is possibility that physical evidence for a Roman road may survive across some parts of the site. Any such remains would similarly merit recording archaeologically prior to their removal during the proposed construction work.
- Where the loss of the whole or a material part of a heritage asset's significance is justified by a development, the developer will record that asset and advance understanding of its significance, and to make this evidence publicly accessible.
- Further archaeological study may be required to properly inform the development proposals for the Mill.

5.194. It is expected that a programme of intrusive investigation will be required in advance of development. This will aim to establish whether any buried remains of archaeological interest survive in situ and will comprise the excavation of a series of evaluation trenches. It is acknowledged that these works will be required to be undertaken by way of a pre-commencement condition attached to any planning permission.

Affordable Housing

5.195. Manchester's Core Strategy Policy H8 sets out requirements for affordable housing or an equivalent financial contribution currently to apply to all residential developments on sites of 0.3 hectares and above or where 15 or more units are proposed.

5.196. In this regard, it is stated that new development will contribute to the City-wide target for 20% of new housing provision to be affordable. Developers are expected to use the 20% target as a starting point for calculating affordable housing provision. It is envisaged that 5% of new housing provision will be social or affordable rented and 15% will be intermediate housing, delivering affordable home ownership options.

- 5.197. In addition H8 states that the proportion of affordable housing units will reflect the type and size of the development as a whole; and where appropriate provision will be made within Section 106 agreements to amend the proportion of affordable housing in light of changed economic conditions, subject to a financial viability assessment.
- 5.198. Importantly in the context of this application, Policy H8 states that either an exemption from providing affordable housing, or a lower proportion of affordable housing, a variation in the proportions of socially rented and intermediate housing, or a lower commuted sum, may be permitted where either a financial viability assessment is conducted and demonstrates that it is viable to deliver only a proportion of the affordable housing target of 20%; or where material considerations indicate that intermediate or social rented housing would be inappropriate. In the latter case, such circumstances could include:
- There is a very high level of affordable housing in the immediate area;
 - There is either a high proportion of social rented (35%), or low house prices in the immediate area compared to average incomes;
 - Affordable housing would be prejudicial to the diversification of the existing housing mix.
 - The inclusion of affordable housing would prejudice the achievement of other important planning or regeneration objectives which are included within existing Strategic Regeneration Frameworks, planning frameworks or other Council approved programmes;
 - It would financially undermine significant development proposals critical to economic growth within the City;
 - The financial impact of the provision of affordable housing, combined with other planning obligations would affect scheme viability;
 - There is a need for additional housing provision for older people or disabled people either as affordable or market housing dependent on the results of a financial viability assessment of the scheme.
- 5.199. In the context of this application an exemption from the provision of affordable housing has been justified on the basis that the scheme will not support that provision from a viability perspective. It also follows that it would prejudice the achievement of other important planning or regeneration objectives which are included within the Eastlands Regeneration Framework and identified in an earlier section of this Chapter.
- 5.200. In this regard, a Financial Viability Assessment (FVA) has been prepared by Cushman and Wakefield for the application site, in line with accepted residual method, as advised in national guidance (PPGV). In undertaking this form of FVA, extensive works required to the listed building associated with the proposed development have been taken onto account.
- 5.201. With regard to key inputs to the FVA:
- The FVA concludes that the scheme's Gross Development Value (GDV) sits at £57,920,022 based on 100% market housing and an average sales value of £203,051 / £257 psf., a level which has been fully benchmarked and evidenced within the main body of the FVA utilising up-to-date, market evidence from existing developments as well as re-sale values within the locality.
 - The FVA is based on detailed construction costs provided by the Simon Fenton Partnership together with relevant market evidence and market knowledge gained through Cushman and Wakefield's previous viability work, Red Book valuations, and their involvement in the disposal of numerous residential development sites on behalf of both public and private sector clients.

- The FVA adopts a developer's profit (operating margin including overheads) of 18% of GDV which, in Cushman and Wakefield's opinion, reflects the minimum return a developer would seek to bring forward the proposed scheme on a vacant possession sale of the individual units having regard to the level of development risk.
- A benchmark land value of £1,200,000 has been assessed in accordance with the requirements of the PPGV and the RICS Professional Statement *Financial Viability in Planning: Conduct and Reporting* (1st Edition, May 2019). This represents the minimum incentive required for the landowner to release their site for development whilst allowing a sufficient contribution to fully comply with policy requirements.

5.202. Based on the above inputs the FVA considers a residential scheme including Nil affordable housing and no S106 contributions. This appraisal indicates that the scheme is not viable under this scenario as the residual land value of £942,697 is £257,303 below the benchmark land value.

5.203. Notwithstanding, the applicant is committed to delivering the proposed development at the subject site which would regenerate a Listed Building and significant vacant site and make a clear positive contribution in meeting local housing need and in enhancing the quality of the residential offer in the locality. The proposals would thus bring a range of social, economic and environmental benefits.

5.204. The findings do however that this will only be possible should the relevant exemption clause in Policy H8 be assessed. Without this flex in policy, there would need to be a reduction in the BLV and/or developer's profit to levels which, in Cushman and Wakefield's opinion, would not provide the landowner or developer with a sufficient incentive to bring the site forward for development. This would subsequently threaten the delivery of new housing within the local area and would undermine the supply of important new homes for the local community.

Summary

5.205. This assessment has shown that the proposals comply with the relevant policies of the Development Plan read as a whole, as well as the relevant parts of the NPPF and all other relevant material considerations. The proposals consequently satisfies the presumption in Section 38(6), and planning permission should be granted unless material considerations indicate otherwise.

6. Summary and Conclusions

- 6.1. This Planning Statement accompanies an application for Full Planning Permission and Listed Building Consent for the refurbishment, repurposing and repair of the Grade II Listed Brunswick Mill plus new development on dilapidated and unsightly brownfield land to the south on a site located part adjacent to Bradford Road and part adjacent to Bradford Road and Beswick Street. The proposed development will provide new homes together with workspaces, retail amenities and space for the local community including for creative purposes, leisure, education and social meetings.
- 6.2. It provides a balanced policy assessment of the Proposed Development, for the purposes of Section 38 (6) of the Town and Country Planning Act. As such, this principally focuses on Manchester's Development Plan as well as other material considerations including the National Planning Policy Framework and relevant City Council guidance. It also explicitly considers Section 66 of the Listed Building Act 1990 and the Local Planning Authority's duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 6.3. With regard to NPPF and particularly paragraph 196 as well as Section 66 of the Listed Building Act 1990, it has been demonstrated that the proposals will result in the long term optimum viable use of the existing Mill building and that there are no viable alternative uses that will support the ongoing repair, maintenance and refurbishment of the Mill; as set out in paragraph 5.180 of this Statement.
- 6.4. Currently, the Mill contains a number of existing occupiers who have been notified and consulted on the proposals. These existing functions do not generate sufficient income to support the long-term sustainable use of the Mill and therefore has been undertaken with existing occupiers prior to making this application and support is being provided with regard to relocation where required, to minimise impacts and seek to ensure continuity of business.
- 6.5. Having identified the optimum viable use, a conservation led design process has been addressed in the respect of the listed building and its setting informed by detailed heritage appraisals undertaken by Stephen Levrant Heritage Architecture. The accompanying Heritage Assessment concludes that the heritage benefits associated with the restoration and reuse of the listed Mill outweigh any instances of harm and will enhance the ability to appreciate the heritage values of the former mill, such that there is an overall beneficial impact.
- 6.6. These heritage benefits include the following:
 - The Development ensures that all significant building elements, such as jack-arched ceilings, cast iron columns and structural supports, and the two original stone staircase and handrails are retained and restored to enhance the spaces within the proposed apartments and circulation spaces. The green and white tiling to the former Edwardian staff canteen will also be retained as feature walls within the proposed apartments to the third-floor level. Other areas of restoration include reforming the original dimensions of the tall engine house window openings and repairing and replacing the surviving areas of original stuccoed eaves cornice and banding to the engine house.
 - The central courtyard will be returned to its original dimensions and appearance with the removal of later, low significance extensions, and the removal of layers of modern paint, bitumen, and cement to the perimeter walls. The original stone cobbles/setts will be lifted and re-laid to form a level surface, with the addition of a number of new landscape features.

- The introduction of new windows throughout will enhance the character of the building by returning the exterior of the building to its late 19th Century appearance. Although the replacement of all windows with modern examples will result in the loss of historic fabric, all existing windows largely date to the late-19th Century, with other windows being of a more recent date or being blocked/removed.
- 6.7. The design of the new build elements, in scale and appearance are deliberately recessive, acting as a foil to the dominance of the existing Mill building and enhancing its setting. The Mill is central to the area's sense of place, and the proposals will allow it act as a beacon of regeneration and catalyst for further investment in the area. The scale of the proposals also respects existing and future residential amenity with regard to sunlight, daylight, overshadowing and privacy. As such the proposed development addresses Manchester Core Strategy's 'Vision' which identifies the importance that the *'distinctive historic environment is understood, valued, cared for and its potential fully realised.'*
- 6.8. Also with regard to the principle of land use, Policy EC3 notes that the Regional Centre is an appropriate location for high density housing and Policy H5 additionally Policy H4 identifies that high density housing will be permitted within the parts of East Manchester that fall within the Regional Centre which are adjacent to the City Centre – including New Islington and Holt Town.
- 6.9. Policy EC5 (East Manchester) notes the Council will promote development including those which:
- “creates links to the Rochdale and Ashton Canals and links to the open space network including the Rochdale and Ashton Canals and the Medlock Valley, providing opportunities for walking and cycling to economic development opportunities; has regard to listed buildings and conservation areas including Ancoats and the industrial heritage of the area.”*
- 6.10. In this regard, an important public realm intervention has been to create a pedestrian route from Bradford Road through to the Ashton Canal. This route is reinforced by a stripe of contrasting paving materials that runs from Bradford Road to the steps down to the canal.
- 6.11. The Site is a long-standing regeneration priority identified with the Eastlands Regeneration Framework document which was last endorsed in 2017 and more recently updated in 2019. It should be noted that it has the status of a “Local Development Document” but not a “Development Plan Document” and should not be considered or viewed as formal planning policy and does not set out a series of tests to be passed. It is a material consideration but should be weighed accordingly in the decision-making process associated with this application.
- 6.12. The Site is located within the 'Holt Town' Central Area as defined within the 2017 ERF update. This area is located between, and connects, the Etihad Campus and the Ancoats and New Islington neighbourhoods. The area has been seen as the 'missing link' in the regeneration of the Ashton Canal Corridor from the City Centre to the Etihad Campus.
- 6.13. The ERF 2017 set out Holt Town as a mixed-use neighbourhood anticipating higher density residential uses plus employment space for a wide variety of businesses from “makers” to tech entrepreneurs, with local retail and services to support the wider area, making maximum use of the proximity to the Holt Town Metrolink stop.
- 6.14. The ERF also highlights the potential of 'the extraordinary listed former mill buildings' offering significant potential for commercial, residential and cultural uses, creating a neighbourhood of character, similar to Ancoats. In this regard, it is additionally noted that regeneration of the area will be underpinned by the reuse and preservation of historic mill buildings fronting onto the canal and that infill developments on adjoining sites should be of a scale and character to complement these buildings, reinforcing the respective identities of the old and the new.
- 6.15. It is clear from the analysis in this document that national and local planning policies promote sustainable transport. Within this Statement the highly accessible nature of the Site by a range of modes

of sustainable transport has been highlighted together with the applicant's commitment to promoting sustainable forms of transport through the proposed development's Travel Plan. It is within easy walking and cycling distance of the city centre and is in close proximity to the Metrolink, which connects into the city centre and the national rail network as well as local bus services.

6.16. With regard to Paragraph 8 of the NPPF, the proposed development offers a range of economic, social and environmental benefits:

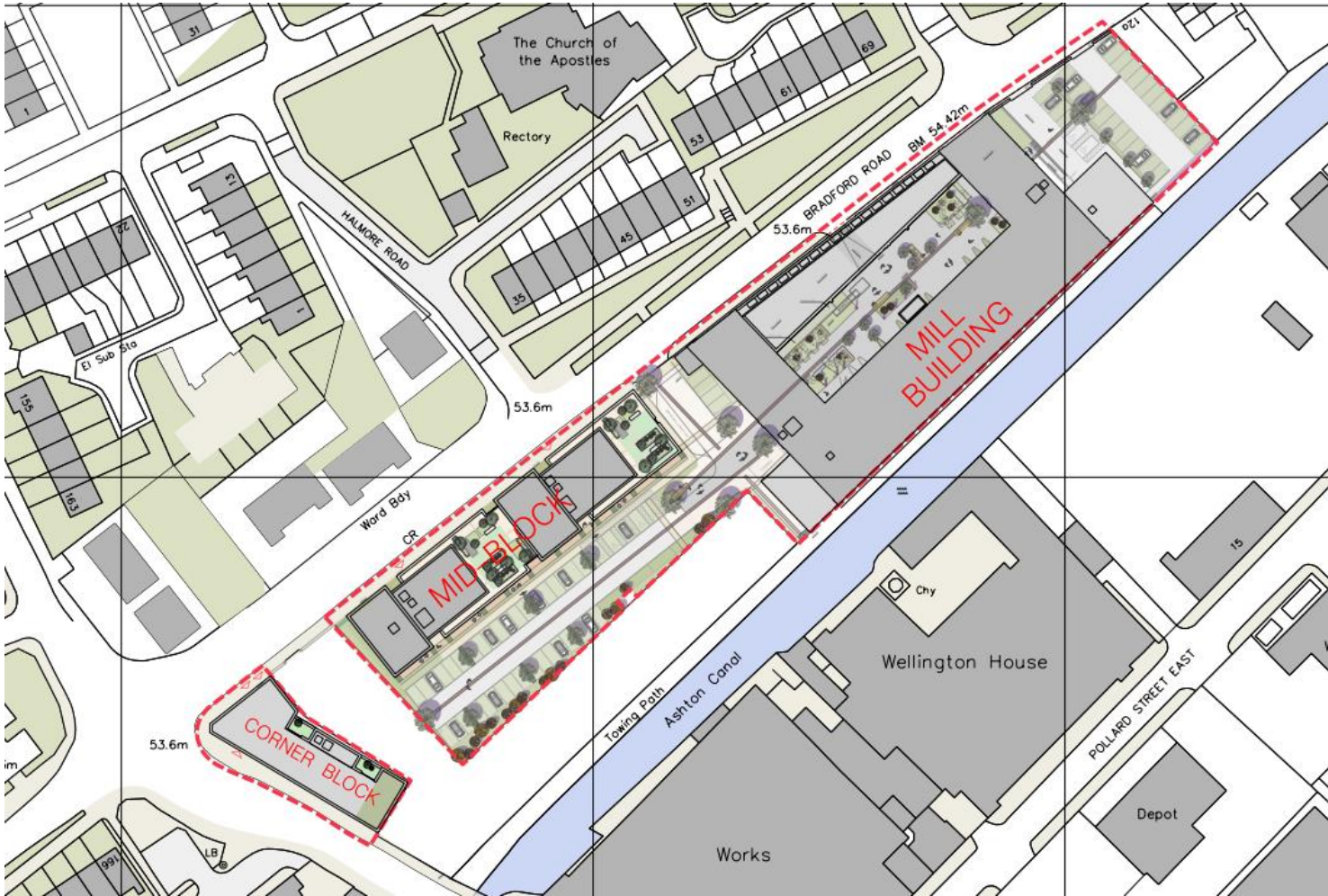
- Assuming a 1.5 year build period there will be 152 full time equivalent construction jobs supported on-site during this time and a further 224 off-site indirect FTE jobs. The GVA associated with these jobs will be £24.2m per year. A high proportion of the jobs and GVA will be retained in the North West.
- The additional housing is estimated to accommodate 637 additional residents with 449 additional working age residents and an additional £5m of expenditure to the local economy. This could directly support 40 full time equivalent jobs within local shops in Manchester. The GVA associated with these jobs will be £0.95m per year.
- The new workspace and retail accommodation will create 156.5 jobs in total with annual GVA of £5.8m per year.
- The Applicant has submitted a signed form that agrees to the principle of MCC's local labour objectives and seeks that this is secured by planning condition.
- As already referenced, central to the proposed development is the conservation led refurbishment and restoration of the existing Mill, Grade II Listed which will deliver a range of heritage benefits and secure its long term sustainable reuse.
- Including the aforementioned central courtyard, the proposed development will provide high-quality public realm and private amenity spaces for occupiers and residents with carefully integrated strategies around car parking, cycle parking, servicing and waste collection.
- The car parking serving the new building is proposed to consist predominantly as green gap paving, further 'greened' and visually interrupted with feature hedge and tree planting. Further new planting is provided to the south-west boundary, with species selected to increase biodiversity and promote ecology. The same aesthetic is continued within the 'northern' car park promoting SUD's permeable paving and tree planting.
- The proposals will include ample secure cycle parking for all uses including 1 space per new home and provide 20% EVC points with the remaining car parking spaces having the infrastructure in place to allow the scheme to be future proofed.
- The proposals will create an inclusive environment by ensuring the following:
 - Disabled people will use the same entrances as other users of the building.
 - Level access to the main communal entrances and provisions of fully accessible lifts will mean that all apartments will be universally accessible without the need of supervision or assistance.
 - All new build apartment and townhouse layouts are designed to be accessible and adaptable.
 - 5% of parking spaces are allocated accessible spaces.
- The Proposed Development has been developed in consultation with Manchester City Council Planning Officers, Conservation Officers, and a range of technical stakeholders, as well as local ward councillors, surrounding residents and local businesses.

6.17. It is noted in the analysis that the proposed development will not support the provision of affordable homes; however, it is considered that the proposed development addresses the requirements of Core Strategy Policy H8 on the basis that the scheme will not support affordable housing from a viability point

of view and should therefore be exempted. As a result, the scheme is capable of delivering a broad range of broader planning and regeneration benefits as set out within the body of this report and the wider planning submission.

- 6.18. In bringing forward the proposed development, feasibility studies have been carried out by Hodder and Partners which demonstrate that the proposed development does not prejudice the ability to develop out the immediately adjoining land within separate ownership in a way that would achieve comprehensive development.
- 6.19. Effects on the natural environment have been considered and mitigation measures, together with further seasonal survey where necessary, have been identified on the basis that they would form planning conditions of any consent.
- 6.20. An Environmental Standards Statement has been submitted which includes a development life cycle assessment of the scheme's carbon credentials and demonstrates that it is a progressive scheme, support the Council's Net Zero Carbon ambitions.
- 6.21. It is not considered that the proposed development will have any adverse effects on local amenity during its operation and the construction of the scheme will be managed in line through best practise and that will also be controlled via an appropriate condition to any planning permission.
- 6.22. In conclusion, a detailed assessment of the proposals has been undertaken against planning policy at all levels. Taking all of this into account, it can be concluded that the Proposed Development is considered to be in accordance with the Development Plan taken as a whole. It is further supported by the assessment of other material considerations including the NPPF and it has been demonstrated that the proposed development will deliver the overarching economic, social and overarching objectives of sustainable development as a whole. As such, the proposed development therefore merits of the support of the local planning authority.

Appendix A: Site Plan



Appendix B – Green and Blue Infrastructure Statement

Green and Blue Infrastructure

The table outlines how the Proposed Development responds to the vision and objectives set out in the Manchester Green and Blue Infrastructure Strategy 2015 (and in turn Core Strategy Policies EN9 Green Infrastructure and EN15 Biodiversity and Geological Conservation). It should be read in conjunction with the Design and Access Statement, prepared by Hodder and Partners.

Assessment of Proposed Green and Blue Infrastructure

Vision:	Response:
<p>By 2025 high quality, well maintained green and blue spaces will be an integral part of all neighbourhoods. The City’s communities will be living healthy, fulfilled lives, enjoying access to parks and greenspaces and safe green routes for walking, cycling and exercise throughout the City. Businesses will be investing in areas with a high environmental quality and attractive surroundings, enjoying access to a healthy, talented workforce. New funding models will be in place, ensuring progress achieved by 2025 can be sustained and provide the platform for ongoing investment in the years to follow.</p>	<p>The proposed landscaping will provide a significantly enhanced environment, which will be attractive to future users.</p> <p>The landscaping within the courtyard including tree planting proposals add greening through the development.</p> <p>The Proposals incorporates upgrades to surface materials, new seating, the planting of semi-mature trees and the creation of a key pedestrian connection to the towpath through the development from Bradford Road. These public realm enhancements will create a welcoming space which encourages activity in the space, including staying, playing and spill out from the ground floor retail units.</p> <p>The works will create a safe, more favourable environment for both walking and cycling. The ground floor retail units will also create active frontage across the Site, and generate passive surveillance across the surrounding streets and spaces.</p>
Objectives established to enable the vision to be achieved:	Response:
<p>1. Improve the quality and function of existing Green and Blue Infrastructure, to maximise the benefits it delivers.</p>	<p>The proposed landscaping will deliver high quality public spaces, which will help to create a place where people work, relax and socialise. The proposed landscaping enhancements celebrate the area’s special assets, including the historic courtyard and the canal creating an additional direct link through the development to the towpath.</p> <p>The Proposed Development will enhance connections to the existing green and blue infrastructure through various hard and soft landscaping measures, whilst</p>

Vision:	Response:
	seeking to rebalance vehicular access, servicing and operational management.
2. Use appropriate green and blue infrastructure as a key component of new developments to help create successful neighbourhoods and support the City's growth.	The proposed landscaping seeks to create an attractive and pedestrian friendly environment that is accessible to all, including future occupiers of the proposed commercial / workspace units and community space. Through doing this the proposals will provide additional green and landscaped areas for local communities to come together, interact and play, thus improving community cohesion.
3. Improve connectivity and accessibility to green and blue infrastructure within the City and beyond.	<p>The Proposed Development will help connect the Site to with the wider ERF area. The proposals seek to improve the setting of the buildings using new hard and soft landscaping to improve the pedestrian and cycling environment.</p> <p>Overall, the Proposed Development will enhance pedestrian connectivity, access and the perception of safety, by creating a quality streetscape.</p>
4. Improve and promote a wider understanding and awareness of the benefits that green and blue infrastructure provides to residents, the economy and the local environment.	The improved pedestrian/cycle link along the towpath will encourage people to walk along the enhanced routes and pedestraised routes, which will provide improved connections to the wider green and blue infrastructure. The Proposed Development will make a valueable contribution to the regeneration of this part of New Islington, by delivering a high-quality environment for the City Centre.

Maryland Securities Ltd,
Ashfield House,
12, Ashfield Road,
Cheadle,



10th May 2021

Re Brunswick Mill, Manchester

Dear Sirs,

I have been asked to consider the possibility of converting Brunswick Mill into large open plan offices which would protect the historical relevance of the original layout. I have been actively involved in the Manchester City Centre office market for over 30 years including Head of Office Agency at Lambert Smith Hampton advising both occupiers and developers.

In my considered opinion there are a number of substantive reasons why such a proposal would not be realistic.

The scale of the building is such that a speculative developer would need to be confident in securing a number of major lettings of individual and multiple floors. Each floor in the building comprises c 30,000 sq ft with the largest wing exceeding 15,000 sqft. In order to ensure that the upper floors remain open plan the building would need to attract and secure at least 12 lettings of over 10,000 sq ft. To demonstrate the difficulty of achieving this unrealistic proposition over the last 4 years c80% of all transactions were less than 5000sq ft. The larger transactions of over 5000 sq ft are generally in central locations and the majority are to financial and professional services organisations in locations such as Spinningfields and the established core. There is no historic or current evidence that major office occupiers would consider this location

Period buildings with character are attractive to the creative industries with the majority of these being small in scale and usually only prepared to take short term leases. Sensible conversion of listed buildings are often compromised by their configuration, difficulties in making the accommodation DDA compliant and the poor ratio of lettable space when new cores, WCs and multiple internal corridors are introduced. All these factors would affect the integrity of the original layout and may cause greater harm to the structure than the proposed refurbishment to a mixed use commercial and residential conversion.

There is always concern that budgeted costs to convert buildings are not achieved due to unforeseen issues over structural issues and heritage constraints. I consider that the viability of conversion to offices would only be feasible with a substantial grant from the public sector. On the basis of a budgeted build cost of c£18,000,000 a developer would need to finance a total cost including a profit margin of 20% at c£30,000,000. I estimate the hypothetical value of a fully let office investment assuming paying reasonable inducements to occupiers is in the region of £17 to £20,000,000. This leaves a shortfall of c £10,000,000 even with fairly optimistic assumptions on the speed of letting and the level of build costs.

The nearest comparable to Brunswick Mill is the conversion of offices at Royal Mills. This is a building on 6 floors with a total of c50,000 sq ft (over 3 times smaller than Brunswick Mill). The scheme was backed and financed by both the HCA and Manchester City Council. The evidence from this scheme shows that buildings of this nature has limited appeal to larger organisations. The majority of lettings are to small companies on short leases at rents which range from as low as £10.00 to c£20.00 (some transactions including service charge costs). The largest single available office accommodation in the building is c 8,000 sq ft and this has remained unlet since it was first marketed over 10 years ago.

The location of Royal Mills in Ancoats is superior to Brunswick Mill for access to the City to attract office occupiers. Brunswick Mill and its immediate environs cannot offer the benefits of Royal Mills to office occupiers and is in my opinion not a suitable or desirable office location for large open plan offices.

I trust this is sufficient information for inclusion in the planning application.

Yours Sincerely



Peter Skelton

Deloitte.

Real Estate

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