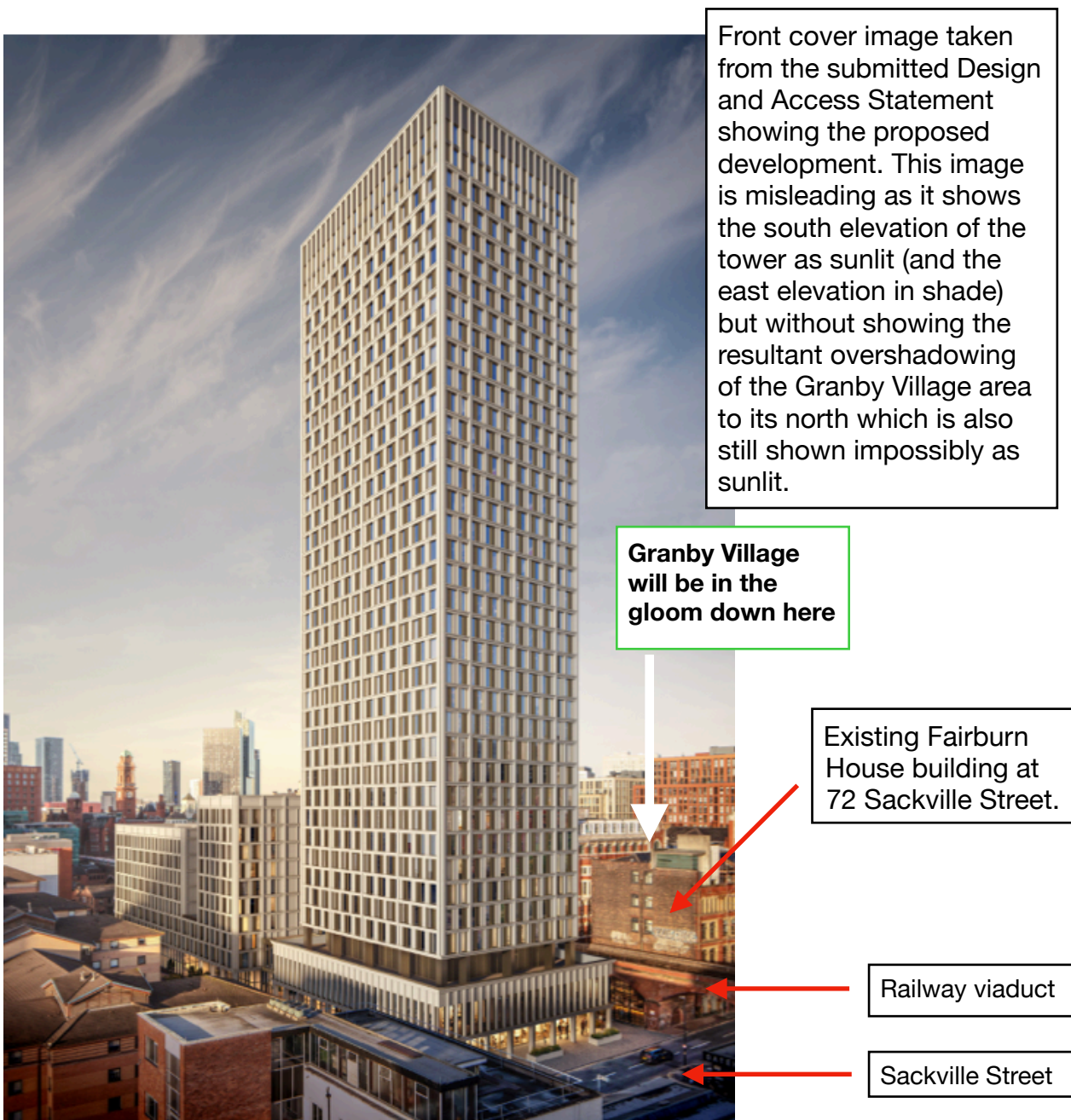


TALL BUILDING PROPOSAL ON SISTER PLOT H (Charles Street car park)

- Directly south of Granby Village and less than 60 metres away.
- Three linked towers including one of 38 storeys (plus roof-top building services structure) of over 148m high.
- Purpose built student accommodation for 1,041 students

Want to object? - Here are some notes to help you.



KEY POINTS

- (1) The site is within the SISTER (formerly I.D. Manchester) Strategic Regeneration Framework (SRF) area which, against local opposition, showed three new taller buildings on the application site when these could have been placed elsewhere in the wider SRF area (e.g. by Mancunian Way) to avoid their harmful impacts on our area. Residents were assured that future planning applications for the site would protect out amenity. We are now faced with an application - evolved with the support of the City Council's Planning Service - that does not do this.
- (2) The proposal will also cause harm - often great harm - to amenity (including residential amenity), the environment (including townscape and heritage), health and well-being and to the existing community. These harmful impacts are very much related to the height, massing, siting and orientation of the proposed buildings within the site.
- (3) The impact on sunlight and daylight will be very considerable and harmful. The application site is immediately to the south of the railway viaduct and the proposal would overshadow large parts of the area around it in an arc on the north side of the railway viaduct:
- All parts of Granby Village will be affected during the day as the sun moves around impacting the amount and quality of sunlight and daylight - including reflected light - in our homes and our outside private and communal spaces as well as adjacent streets. Some residents will experience, in the words of the applicant, a "major impact" in terms of their daylight and sunlight.
 - The tallest tower will close the gap between existing buildings that has always allowed direct sunlight to reach Sackville Gardens especially during Winter months. It will also greatly overshadow the closer Vimto Park. These are our only two nearby public, green, open spaces serving many 1000's of people every year - both residents and other city centre users.
- The applicants have manipulated their assessment of daylight, sunlight and overshadowing so the impact seems less than it will be in reality. They variously claim these harmful impacts do not exist, are negligible or, where harmful, only affect a smaller number of residents so they don't matter.
- (4) The planning process is a plan-led system relying on planning policies and guidance intended to be used to achieve sustainable development and good design while protecting amenity (including residential amenity), the environment (including the townscape, quality of spaces and heritage), health and well-being and communities. The applicants are using policy and guidance selectively and partially to support their proposal at the expense of the area and community outside the site.
- (5) The SRF is being used to justify the quantum (or amount) and height of the proposed development. The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process. Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area and people.

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

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

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

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

INTRODUCTION TO THESE NOTES

These notes are to assist local residents with responses to the formal consultation by Manchester City Council's Planning Service on Planning Application Ref. No. PLA-2026-000312 for the proposed demolition of the existing building and a new development on the site of the Charles Street Multi-storey Car Park (SISTER Plot H), Charles Street, Manchester, M1 7AR. They have been put together by a Granby Village resident with a professional background in planning, urban design and conservation of the historic built environment.

The planning application contains over a 100 documents and is available to view on the City Council website at www.manchester.gov.uk/planning/publicaccess under application reference number PLA-2026-000312. Many of these documents are drawings but there are a significant number of written documents containing literally 1000's of pages of text. As a way in, it is suggested the following items would be a useful starting point and to give a good understanding of the proposal and its impacts and how existing residents (and their views expressed in the applicant-led consultation exercise) have been treated:

- (1) The various layout drawings (for the site and each internal floor type) and the four proposed elevation drawings entitled: 'North Elevation', 'South Elevation', 'East Elevation' and 'West Elevation'.
- (2) Design and Access Statement. A useful front cover illustration (above) showing how nearby buildings including Granby Village will be overwhelmed by the proposal but it should be noted that this illustration has been manipulated as it manages to show the south elevation of the proposed development sunlit while also - impossibly - showing the existing residential area (including Granby Village) immediately behind and to the north also bathed in sunlight.
- (3) Planning and Tall Building Statement
- (4) Statement of Consultation. This shows how are comments made by residents to date have been largely glossed over or disregarded with the proposal made to sound as if it has taken the comments on board.

Please bear in mind that the application documents have all been prepared by or for the applicant to support the application so you won't find anything critical. Also, the Planning Service/City Council is not an impartial arbiter. The proposal we now see has been evolved in discussion with Planning Service officers almost certainly in consultation with senior councillors. The applicants, architects and (some of) their other advisors have been behind other schemes implemented in the city over many years and, therefore, there will be a working relationship between these people and those within the City Council. The Planning Service/City Council will have difficulty pursuing a meaningful reconsideration of the proposal as they - and others involved in the process - will have their (professional) credibility on the line.

The planning process is a 'plan-led' system which means decision-making has to be undertaken in the context of a hierarchy of documents - legislation, national policy, local policy - where each has to comply with the preceding type. Similarly with guidance where national guidance is given more weight than local but usually reflect each other. The main national policy is the National Planning Policy Framework (NPPF). The main local policy is the Development Plan which is made up of several documents including the Core Policy and part of the 'Guide to Development in Manchester'. The part of the Guide to Development which is not specifically identified as policy remains as guidance.

The Planning Service will only consider comments that relate to 'material planning considerations'. The City Council provides general guidance on this on their website at www.manchester.gov.uk/planning/publicaccess . This note aims to provide further guidance specific to this proposal. Although I would not deter people from making any comments they believe are relevant, the Planning Service may disregard those that they do not consider to be material planning considerations.

While objections can be a series of bullet points it is best not to just object (or comment) on an issue without explaining why. It is even better if you can show your objection has a basis in policy (but don't worry if you cannot). This all means that the Planners cannot merely put ticks in boxes against headings of objection types but are presented with real reasons to challenge the proposal that they have been working on. If you are objecting to issues remember to state the word "objection" otherwise it will not be treated as such either now or in the Planning Service report that will go to the Planning Committee for a decision to be made.

The notes are set out with the objection shown in **bold black text** followed by supporting comments (not in bold). This is the important text. Additional background information is in **green text** but does not need to form part of any objection. If you want a quicker read then skip the green text! Feel free to cut and paste at will and to make changes to make it more personal to your particular circumstances. Specific policies have been referred to where relevant otherwise comments are covered by the policy appendix at the end of the note.

Please remember to object where matters will impact your neighbours even if they will not directly impact you. Your comments should be with the Planning Service by the end of the official consultation period on 9th July 2026 but they will take comments after that date. If you can't make the 9th July deadline it is best to get comments to the Planning Service as soon as possible afterwards. The Council website allows you to make comments/objections but I suggest you also email your comments directly to Jennifer Atkinson as the Planning Officer dealing with this application: Email: jennifer.atkinson@manchester.gov.uk

I would strongly advise that you also write directly to your Piccadilly Ward ward councillors - and possibly also those on the Planning & Highways Committee. They will need to make decisions based on planning matters but can inject a 'political' view into this process and represent the lived experience of their constituents. Letters to councillors can be more emotive and can usefully include lived experience and examples. Our ward councillors are:

- (1) Councillor Jon-Connor Lyons (Labour Party)
Email: cllr.jon-connor.lyons@manchester.gov.uk
- (2) Councillor Sam Wheeler (Labour Party)
Email: cllr.sam.wheeler@manchester.gov.uk
- (3) Councillor Ross Steven (Green Party)
Email: cllr.ross.steven@manchester.gov.uk

Councillor Jon-Connor Lyons is the Chair of the Planning Committee but he has volunteered not to deal with this application as the Chair of the Planning Committee in order that he can support the objections of us, his local Piccadilly Ward constituents.

NOTES FOR USE IN CONSULTATION RESPONSE

Overarching comment

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

Misrepresentation of the public consultation exercise

OBJECTION

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

- (a) Objection was raised again to the SISTER SRF ‘illustrative’ proposal for the application site, Plot H, particularly regarding the height and massing, by resident representatives in a meeting with SISTER on 10th October 2024.
- (b) The application proposal was presented to resident representatives in a meeting with SISTER on 26th November 2025. Objections were raised to the height, massing and Purpose Built Student Accommodation (PBSA) use. Despite this and the subsequent developer-led public consultation process the actual proposed design has not evolved in any discernible way to take concerns into account.
- (c) The applicants note the various reasons for objection and state mitigation they consider necessary and/or have actioned. For the key issue of overshadowing the applicants openly state that by lowering the height of built form on the western half of the site they have mitigated against the impacts on sufficient residents to make the proposal acceptable while not admitting that a not insignificant number of residents remain harmfully impacted by the 38+ storey tower that has now appeared at the eastern end of the site.

Additional background information:

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

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

- (1) At a separate meeting on 10th October 2024 with Ian Thompson of Counter Culture acting for SISTER prior to the selection of a development partner for the application site. The residents were subsequently advised in November 2025 of the selection of RG Real Estate to deliver PBSA within a tall building proposal.
- (2) At a presentation of the proposal to these two residents by the design team for the development on 26th November 2026. This was not part of evolving the design but purely one of presenting the proposal that was then put out to a developer-led consultation.

Planning policy and guidance

OBJECTION

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

- (a) The following objections will assist to demonstrate this to be the case.
- (b) The Planning Service has confirmed the SRF is **not** planning policy and that it has an extremely low status as a 'material planning consideration' in decision-making. National and then local planning policy takes precedence - followed by national guidance and then local planning guidance that (unlike an SRF) has been through a rigorous consultation and adoption process.
- (c) Instead of the approach taken by the applicants, policies and guidance should be used to achieve a more appropriate form of development on the site in balance with the all relevant policy and guidance objectives intended to protect the local area, people and community. The National Planning Policy Guidance (NPPG) explicitly states that it should be read holistically. This approach should be taken more broadly when applying relevant policies and guidance with their due weight as 'material planning considerations'.

Strategic Regeneration Frameworks (SRF's)

OBJECTION

Objection continues to be raised to the SISTER (formerly I. D. Manchester) SRF. Those people living in and using the existing locality around the application site foresaw the inevitable harm that would be caused to amenity (including residential amenity) and the environment (including townscape and historic environment) by the SISTER SRF proposing to site three taller buildings on the northern boundary of the SRF area. This is where this harm would be most keenly felt by those northwards of the site. Objection is also raised to the reliance by the applicants on

the SRF to justify a particular quantum of development within the site and the continued inclusion of tall built form within the proposal when considerable harm has been identified. It has also been established that SRF's do not constitute planning policy and are a very low level of material consideration subservient to national and local planning policy which includes policy or caveats within policies intended to protect amenity, communities and the environment. In support of this objection the following points are particularly noted:

- (a) SRF is not planning policy but only a form of guidance. The Planning Service has confirmed it carries very low weight as a 'material planning consideration' unlike national and local planning policy.
- (b) The three taller buildings were only shown on an "illustrative masterplan" drawing without any storey heights or floorspace measurements. It has been confirmed this was only intended to be indicative and existing local residents were assured that any planning application process for the site would address the planning issues to avoid harm to the amenity (including residential amenity), local environment (including townscape and heritage), health and well-being, and community within the adjacent area. This should be achieved by having full regard to all relevant national and local planning policy and guidance with their due weight as 'material planning considerations'. The planning application does not meaningfully achieve this and the SRF should not be driving any need or desire to achieve a particular quantum (or amount) of development or design outcome on this site. On this basis the application should be refused planning permission.

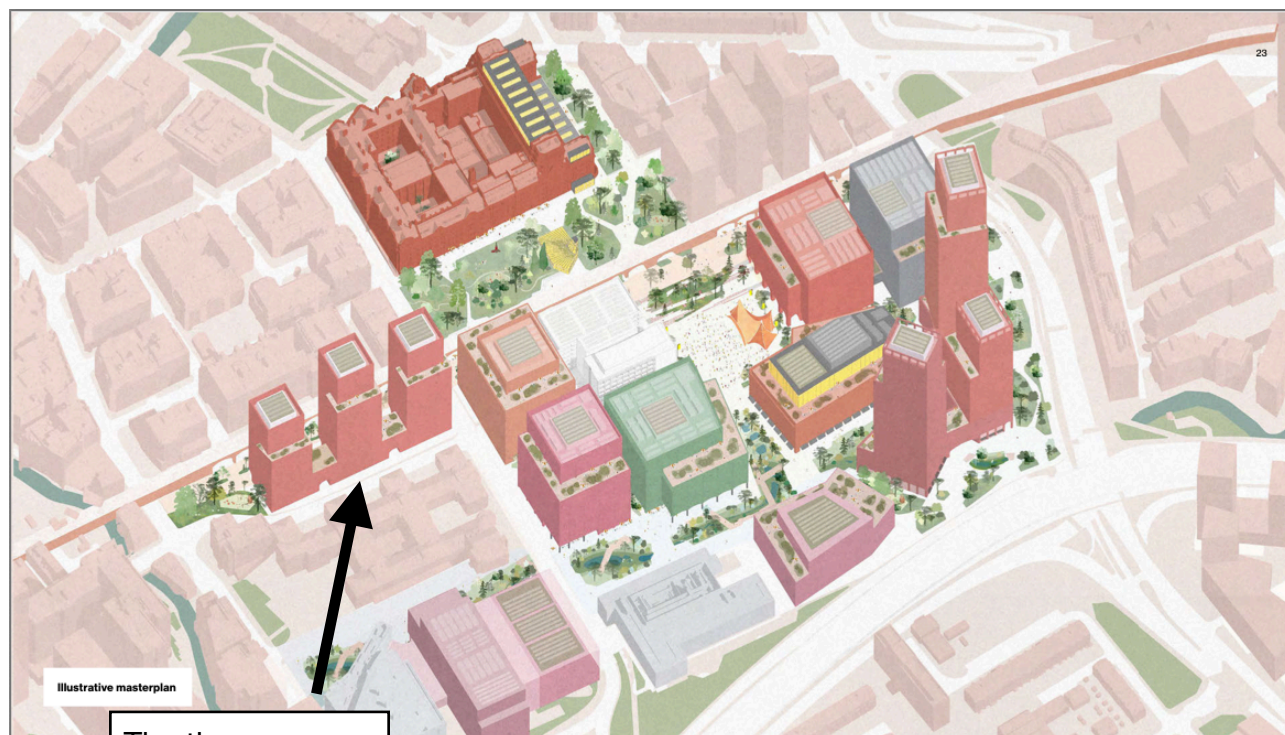
Additional background information:

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

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

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

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



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

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

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

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

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

Existing urban townscape context

OBJECTION

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

- (a) The site contains a low level multi-storey car park and a small landscaped area of incidental, land that was left-over once the car park had been sited on an irregular shaped site. This open space has been poorly used/mis-used and maintained over many years and not perceived as a leisure space. This development does not make a positive contribution to the local townscape other than, possibly, part of the grouping of modernist buildings associated with the rest of the SISTER SRF area.
- (b) The application site is set within an expansive area of some low but mostly moderately high built form where care has been taken in past planning decisions to step more recent, taller built form down in order to respond to this change in scale and character.
- (c) The ‘Southern Arc’ is the name that has been given to an area of land sweeping around the southern side of the city centre along Mancunian Way. It is not a formal designation. It is an area that has seen incremental redevelopment often with tall buildings. The applicant wants to associate the application site and rest of the SISTER SRF with the Southern Gateway to suggest the character of the area is one of modern tall buildings. While this may be their aspiration it is not the reality of the existing urban context of the site.
- (d) Contrary to statements made in the application, the proposal has failed to have meaningful regard to all relevant planning policy and guidance and has failed to show meaningful regard to and respect the existing urban context. The proposal is contrary to planning policy and guidance.

Additional background information:

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

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

The application site and its actual existing urban landscape context

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

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

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

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

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

- (2) The landscaped area of the existing application site is on the north-eastern corner of the Princess Street/Charles Street junction. On the north-western and south-western corners of the junction are modest, two-storey Victorian buildings which (along with the Grade II listed red brick railway viaduct crossing Princess Street) provide a characterful gateway to the conservation area and the context for the two-storey, Grade II listed Lass O'Gowrie public house and several small scale Edwardian former warehouses behind along the north side of Charles Street. The modern eight storey IBIS hotel stands on the south-eastern corner of the junction directly opposite the site without visually over-powering the nearby historic buildings. The historic buildings are red brick (some with terracotta) and slate and the hotel is red brick and lead-like elements.
- (3) Moving southwards along Princess Street away from the conservation area and the Princess Street/Charles Street junction, the built form on the west side steps up in height to c.13 storey modern buildings next to the recent Circle Square development and then to a c.15-storey building immediately next to Mancunian Way. The height of built form markedly steps down moving eastwards across Princess Street to the 5-storey University Life Sciences building, a small surface car park and hard landscaped area associated with the River Medlock culvert. The part 8/part 5 storey Pendulum Hotel Weston Halls building (in mostly yellow brick with pitched tile roof) extends along Charles Street opposite the application site to about the IBIS Hotel in the west and Sackville Street in the east.
- (4) Elsewhere around the application site is the former University North Campus. The applicant fails to note this was identified by the 20th Century Society in its 'Potential Conservation Areas Scoping Report' (December 2017, funded by Historic England) as one of only its two potential conservation areas with a predominant twentieth century character in Greater Manchester. It is characterised by well spaced white painted or exposed concrete modernist education buildings arranged around a series of privately controlled but publicly accessible soft landscaped open spaces including the Vimto Park. These buildings are mostly relatively low in height in a mix of 1, 2, 5 and 6 storeys but interspersed with moderately high buildings such as the recently listed Renold Building but includes the tallest building near the application site, the University's Faraday Tower. This in height terms (c.14 storeys) stands in isolation and has a slender rectangular floorplan on a north-south axis minimising the shadow it casts to the north. The various spaces including Sackville Street and Charles Street in the vicinity of the site are full of sunlight and daylight.

Southern Arc

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

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

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

Heritage

OBJECTION

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

- (a) The application site is outside but immediately adjacent to the conservation area. There remains a need to ensure development within this setting assists to preserve or enhance the character and appearance of the conservation area. The proposed development adversely affects the settings of a number of listed buildings but the application uses an assessment methodology to arrive at a conclusion that the harm it causes to the historic environment is acceptable. This is not the approach sought by policy and guidance which should be to assess the historic environment and then evolve a proposal to avoid harm to it.
- (b) The application fails to acknowledge that the character of the conservation area partly derives from the quality and quantity of sunlight and daylight reaching the buildings and spaces between them. This quality of light is an intrinsic part of the historic character of the area as the warehouses required good levels of natural light to function including for the inspection and sale of textiles. Similarly for the nearby

Sackville Gardens as an intentionally laid out public space at the heart of the conservation area.

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

Additional background information:

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

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

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

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

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

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

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

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

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

Proposed design and impact on amenity

OVERARCHING OBJECTION

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

represent good or exceptional design in terms of policy. In support of this objection the following points are particularly noted:

- (a) The application has selective and partial regard to planning policy and guidance and fails to have regard to the National Design Guide (NDG) as required by the National Planning Policy Framework (NPPF), and particular regard, has for example, to NDG Paragraphs 42, 43, 48, 67 and 71.
- (b) There is failure to appreciate that policy documents including the NPPF need to be treated holistically rather than cherry picking policies to support a desired outcome.
- (c) NPPF (Paragraph 135) requires developments that “are sympathetic to local character and history while not preventing or discouraging appropriate innovation or change” but the latter is not expected to be at the expense of the former. In any event, the proposal is not innovative nor does it represent “appropriate change”.
- (d) The proposal inappropriately refers to unadopted, draft policy to support their application.
- (e) The applicants should be designing a built form that appropriately responds to the existing context in accordance with policy and guidance.

Additional background information:

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

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

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

The applicants state in the Environmental Statement (ES Vol 1, Paragraph 11.59) that it is unrealistic for existing surrounding residential properties to maintain similar levels of daylight to those currently experienced. This is without acknowledging that there has not been a suggestion by resident representatives there should be no redevelopment of the site but that such development should appropriately respond to the existing character of the area in order to avoid harm and be compatible with the character of the area.

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

OBJECTION 1

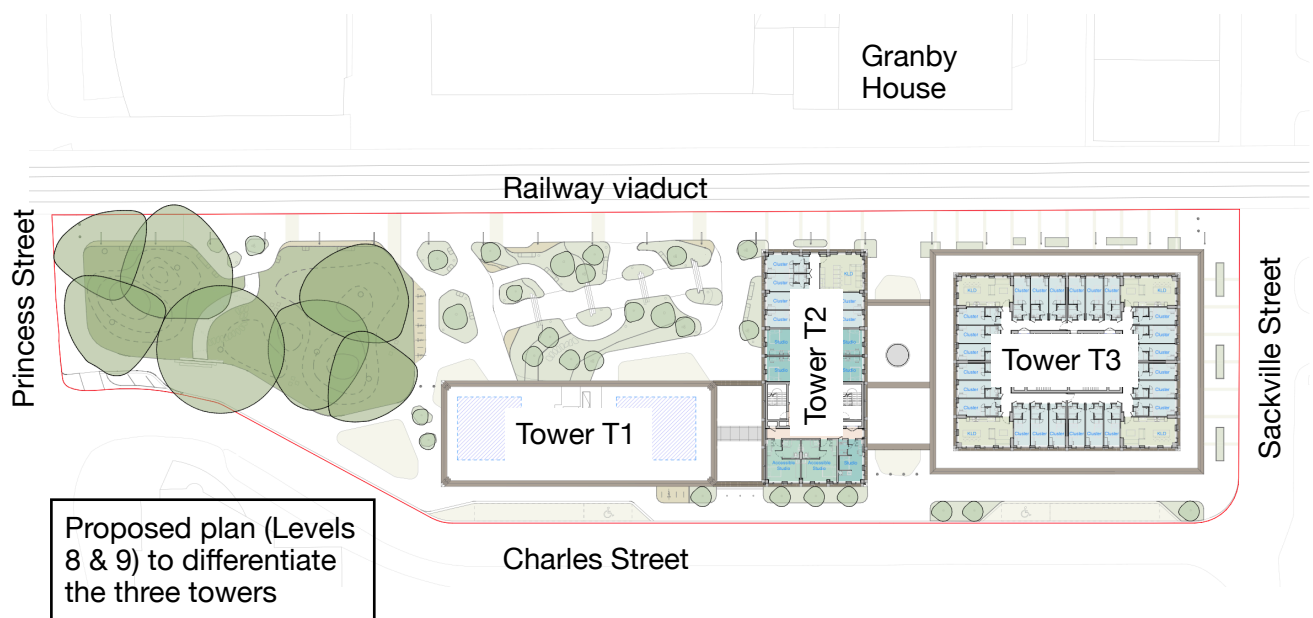
The proposed incorporation of a tower (tower T3) of 38 storeys (plus rooftop plant) results in a proposed design which is not just uncharacteristic of the surrounding townscape context but would be overwhelming within this context and give rise to significant disamenity to residents and other users of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

- (a) The proposal has taken the SISTER SRF suggested approach of three linked towers of approximately equal height and size and redistributed the floor space so that one tower, tower T3, now contains some 75% of the floorspace. In terms of height the impact of towers T1 and T2 are more acceptable in terms of the existing urban context than tower T3 which is wholly out of context and unacceptable. The applicants claim this arrangement mitigates against the impact of the proposal on sunlight, daylight and overshadowing but without clearly stating that the mitigation only benefits a proportion of the area north of the viaduct but makes it worse for the area around tower T3.
- (b) Given its footprint and height tower T3 has has significant mass - it is not the “slender” tower the applicants describe. It is sited close to the northern site boundary. The combination of height, massing, siting, orientation give rise to extreme harm to the amenity (including residential amenity) and environment within the nearby area on the northern side of the viaduct. It will not only affect daylight and sunlight (including reflected sunlight) through overshadowing but will give an oppressive outlook for many nearby homes and give rise to considerable overlooking.
- (c) In relative terms tower T2 may be far more acceptable than T3 in terms of height but it is sited even closer to the railway viaduct than T3. This will exacerbate the harmful impacts it has on the neighbouring area. However, the cumulative impact of towers T2 and T3 will be all the greater.
- (d) It is evident that placing a large scale development including a massive 38+ storey tower against the south side of the railway viaduct will bring harmful - often extremely harmful - impacts on amenity (including residential amenity) within the primarily residential area immediately to the north of the railway viaduct. Within Granby Village this impact will be to internal living environments, private external amenity spaces (including Orient Square, courtyards, balconies and roof terrace) which help provide light to internal spaces. In the wider area it will similarly affect homes and also streets and other open spaces including the nearby Sackville Gardens and Vimto Park.

- (e) Sackville Gardens and Vimto Park are the two small public/publicly accessible green open spaces serving this locality and a wide area of the city centre and the applicants claim these spaces will not be affected to any notable extent by the proposal. However, common sense and the daily experience of residents and users suggest that (1) the March SHOG Assessment Results for Vimto Park (Table 11.19 of the Environment Statement) showing a less than 1% reduction in 2 hours of Sun Hours on Ground is misleading for the effects at other times of year; and (2) the prediction of a “negligible” increase in shadow over the park (Table 17.8) is simply not credible for the winter months. It is clear that the applicant’s assertions are incorrect and the proposal will cause significant harm to these open spaces. By failing to acknowledge this harm the proposal will radically diminish the quality of Sackville Gardens and Vimto Park despite recognition in policy and guidance that access to good quality open space and nature is vital to physical and mental health and well-being.
- (f) The narrative to Core Strategy Policy EN2 (specifically regarding tall buildings) acknowledges that some parts of the City Centre are less likely to be suitable for tall buildings. If there are any areas in the city centre where this would apply it is here.

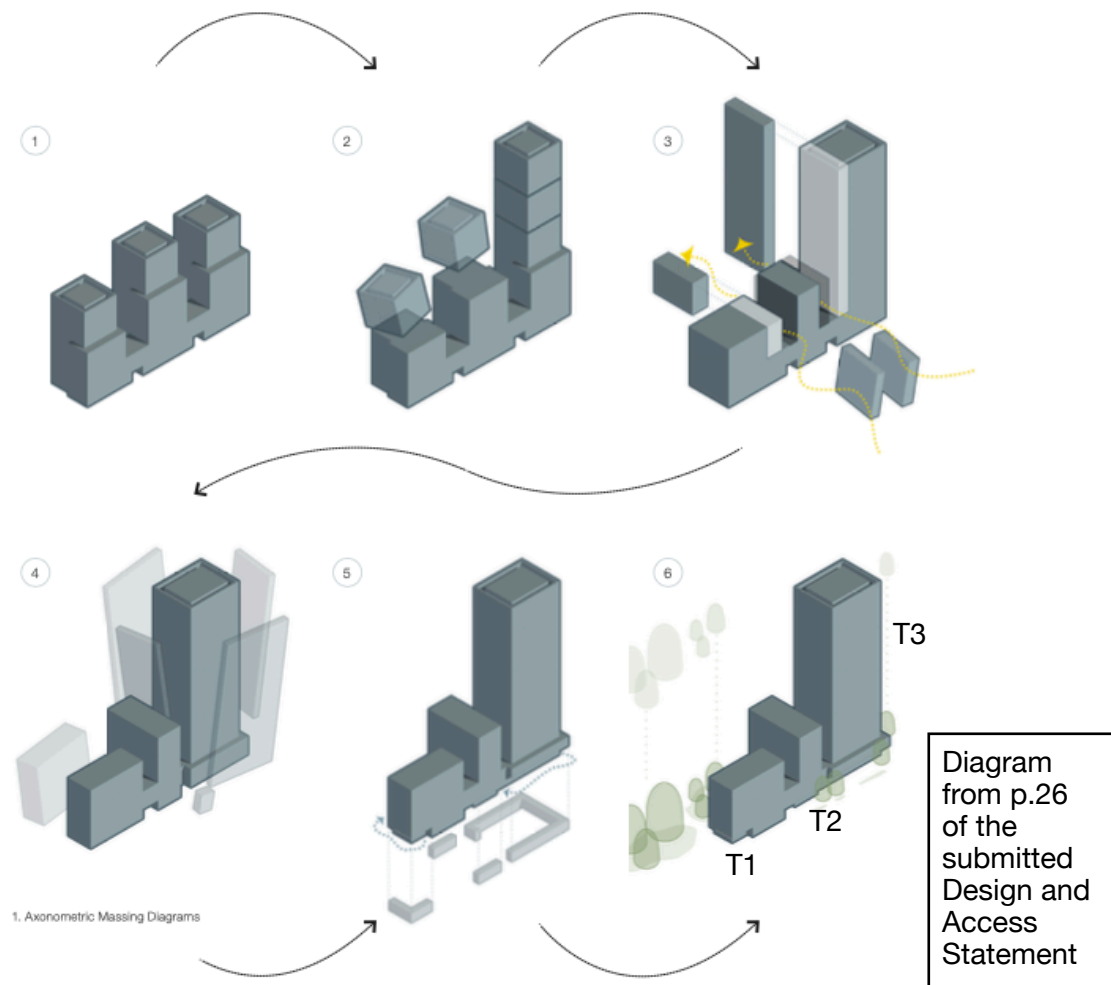
Additional background information:

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



The development as now proposed consists of three linked towers: T1 of 8-storeys, T2 of 10 storeys and T3 of 38 storeys each with the additional height of a rooftop plant (building services) structure taking them to stated heights of 62.25m, 67.95m and 148.75m respectively. In terms of height alone towers T1 could be seen to be

akin - and to respond appropriately to both the existing adjacent historic built form such as Orient House and Granby House and the more recent IBIS Hotel. Tower T2 begins to exceed the height that has this obvious relationship with the adjacent built form but could be considered as not excessive in this regard in townscape terms. Tower T3, however, is wholly out of context in with the surrounding context due to its height and massing.



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

Despite this change in design the application proposal still leaves a large area around tower T3 that remains extremely harmed - probably more so than by the SRF envisaged development to which residents raised considerable objection. It is unclear why the applicants consider residents in neighbouring buildings towards the

western end of the site require a good standard of residential amenity (by avoiding/ minimising overshadowing and the harmful impact on daylight and sunlight) whereas a large number of other neighbouring residents towards the eastern end of the site do not. The applicants constantly and incorrectly stress the 'slender' nature of tower T3 to somehow suggest a reduced visual impact and impact in the local area on overshadowing, daylight and sunlight. Tower T3 is not slender. It is sited with the widest elevations running east-west (parallel to Charles Street) and is close to the northern site boundary all of which maximises this overshadowing on the area northwards. The scale, massing and siting will give rise to an overbearing presence both for those using the area but also within the outlook from many existing apartments.

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

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

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

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



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



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

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

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

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

OBJECTION 2

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

- (a) The Head and Deputy of the City Council’s Planning Service has noted that the assessment of sunlight, daylight and overshadowing is a complex matter and it has been confirmed that there are no specialists within the City Council in this matter. This can only mean the Planning Service has been taking the assessments made by applicants/developers at face value.
- (b) The submitted information contains no readily understood visual information that would show the development and the overshadowing it would cause on key dates of the year (Summer and Winter Solstices and Spring and Autumn Equinoxes) and at one hourly intervals throughout these days to track the change during the hours of daylight.
- (c) The submitted application advises that its assessment has departed from the British Research Establishment (BRE) standards normally used as they felt the existing light standards around the application site were too good and overly emphasised the harmful impact the proposal would have. This seems to have involved benchmarking to set a lower baseline light quality by taking instead the environment around recent “successful” developments elsewhere in the city centre. The applicants do not define how they measure success and they

openly confirm that many of these supposedly successful developments do not meet BRE standards. This approach is unacceptable.

- (d) The outcome of the assessment is to suggest that the proposal causes harm - including in some cases a “major impact” - on the quality of light reaching a not insignificant number of homes in the area. The applicants merely state that the change in design from the SRF illustration to their proposal has mitigated against this harm although clearly this mitigation has only been to a proportion of the windows. The homes closest to towers T2 and especially T3 continue to be harmed in a major way. This is unacceptable and appropriate mitigation should benefit all the residents which would be expected to involve decreasing the height and massing of built form and to revise siting to something more akin to tower T1.
- (e) Granby Village should be disaggregated into its five consistent buildings to more clearly show that certain parts will be far more affected than others especially by tower T3.
- (f) Having shown that a not insignificant number of existing homes will experience a “major impact” on their sunlight and daylight due to overshadowing the applicants average out their findings across the wider area to reach an overall conclusion that the impact on surrounding properties is “negligible to minor adverse”. This suggests that the extreme harm caused to some homes is somehow, therefore, considered acceptable.
- (g) The assessment unbelievably determines that for surrounding areas of amenity space (by which is means Vimto Park and Sackville Gardens as no other spaces appear to have been assessed) the impacts would be “negligible and considered non-significant requiring no mitigation measures”.
- (h) It is unacceptable that the local residents have had to employ their own daylight, sunlight and overshadowing specialist to counter the application assessment. The citizens of Manchester should be able to depend on the City Council to check submitted information with appropriate independent expertise.

Additional background information:

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

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

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

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

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

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

A further means of presenting the impacts in as positive a light as possible has been to treat Granby Village as a single entity whereas in fact it is a group of five buildings which would be harmed to different extents by the proposal. Without disaggregating

the buildings the harm appears to be to a limited number of apartments across Granby Village whereas, in fact, the greatest harm is concentrated on Velvet House and Velvet Court which due to their location relative in particular to tower T3. While the harm may be more concentrated in some parts of Granby Village and the wider area than in others, there will be widely felt adverse impacts as, for example, all five Granby Village buildings have south facing windows and many apartments rely on light (including reflected light) from streets and external amenity areas within the complex including courtyards. The application documentation does not appear to give any consideration to the impacts on these public and private external spaces where achieving a high quality environment makes a significant contribution to the amenity, health and well-being of people using the area including the existing residents.

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

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

OBJECTION

The retention of an existing soft landscaped area at the Princess Street end of the site and its extension to create what is still a relatively small open space ("Princess Square") that nevertheless takes a significant proportion of the overall area of the site does not achieve the efficient use of land. It also results in a built form that fails to accord with the Guide to Development in Manchester regarding the demarcation of street corners and frontages with built form. In support of this objection the following points are particularly noted:

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

- (b) The existing incidental landscaped area landscaped area contains seven Category B trees which means they are of moderate value. The Planning Service has previously given planning permission on city centre development sites for schemes that require the removal of trees (subject to replacement trees being planted elsewhere) to ensure both the efficient use of the site and an appropriately designed built form (including the response to adjacent streets) to accord with policies and guidance including in The Guide to Development in Manchester. Planning Permission was recently granted for a development site elsewhere in the SISTER SRF boundary (Plot C) that will involve the removal of 21 Category B trees. The need to retain trees on the application site is inconsistent with an approach of making efficient use of land and achieving a built form that would appropriately respond to the visually important Princess Street/Charles Street junction. In this way the proposed development leaves this visually prominent corner area undeveloped and fails in its aim of creating a notable gateway from Princess Street into the SISTER SRF area and does not accord with policy and guidance.
- (c) The gateway into the SISTER including street streets
- (d) Contrary to the claim by the proposers, in a skyline already crowded by tall buildings of questionable design quality, the proposed development can surely not be thought of as a landmark.

Additional background information:

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

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

The provision of publicly accessible open space within this application is well intended but takes a significant proportion of this site which is nevertheless relatively small in area, amounts to no more than a small 'pocket park', and could in no way

expect to meet the needs of a fraction of the proposed 1,041 students plus visitors, staff and public. A more effective approach would be for the developer to contribute towards the provision of a more meaningfully sized public open space on nearby land - perhaps as a part of a re-imagined SISTER SRF masterplan - that could begin to address the deficiency of such space for the existing city centre population as augmented by their new residents. Pocket parks will not achieve this.

Effectively sterilising the eastern end of the application site from built form has resulted in this current SISTER Plot H proposal failing to provide a built form that either appropriately responds to/demarcates the lost building line to the principal Princess Street highway frontage or demarcates the Princess Street/Charles Street corner. Without such built form the proposal does not accord with the Guide to Development in Manchester and references made in the application to the development providing a gateway from Princess Street into the SRF area is largely meaningless especially as the tallest element of built form is at the far eastern end of the site. Most critically, however, the exclusion of this part of the site from built development also means that it can not make a contribution to achieving a more lower built form that responds appropriately to the surrounding urban context while maximising the quantum of new development to make efficient use of the site. This would not preclude the provision of some open space and proposed Altrincham Street route behind street frontage development.

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

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

OBJECTION

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

Additional background information:

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

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

OBJECTION

A degree of overlooking is expected within the city centre. Within the nearby existing, principally residential, area to the north of the railway viaduct residents and other building users do experience overlooking but from a number of potential sources that are not excessive and are proportionate to the human scale of the existing buildings. The height, massing, siting and orientation of the proposed built would dramatically and unacceptably increase this potential for overlooking and from a vast number of anonymous windows. This will be particularly the case from towers T2 and T3 which are close to the northern boundary of the site and exacerbated by tower T1

Additional background information:

The north elevation of tower T3 directly facing existing residential properties will alone contain windows serving 156 student rooms, 48 studio apartments and 52 communal living spaces. All these communal living spaces are located on the corners of the building and also have windows to the east and west elevations allowing oblique views northwards. The north elevation of T2 which is even closer to the site boundary will contain windows serving an additional 9 student rooms, 9 communal living spaces and 9 communal corridors. All windows are full length and fill the majority of the elevation so looking out is not a case of making a conscious effort of walking up to a raised window cill but having an expansive view from anywhere within the internal space. Tower T1 is lower in height and further away from existing buildings but with a long north elevation facing these neighbouring existing buildings will only exacerbate the extent of overlooking.

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

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

OBJECTION

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

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

OBJECTION

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

- **Servicing**

OBJECTION 1

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

Additional background information:

All servicing would be from two lay-bys on the Charles Street highway. The capacity of two lay-bys to meet the needs of the likely high number of vehicle arrivals/departures including for postal and food deliveries (including online purchases), taxis, and for more general operational needs. It seems that the loading bays are not expected to cope with the significant vehicle movements associated with student move-in/move-out. The proposed on-street servicing would cause inconvenience and safety issues for those using the highway including pedestrians and cyclists. Both the site and amount of development is large enough to warrant the provision of dedicated on-site vehicle area for deliveries/loading/unloading. This could take the form of a basement space or well designed, appropriately located and landscaped area within the site that could also be used by taxis and assist with student move-in/move-out.

- **Elevation design considerations**

OBJECTION

The proposed elevation design (including materials with an emphasis on light coloured concrete and finishes) has no resonance with the character of the immediately adjacent Whitworth Street Conservation but is intended to respond to the nearby modernist 1950's/60's university architecture elsewhere

in the wider SISTER site. However, this is merely a means of window dressing a development that in every other regard such as height, massing and siting fails to have any regard to the existing character of either of these areas and fails to acknowledge decisions already made within the area. In support of this objection the following points are particularly noted:

- (a) The proposal fails to acknowledge that many of the existing former university buildings within the SISTER SRF site including those along the east side of Sackville Street are proposed to be demolished as a part of the SRF masterplan.
- (b) The proposal fails to acknowledge that the University already has planning approval for the demolition of the modernist Faraday Tower and the future of other modernist buildings around it on the west side of Sackville Street is uncertain.
- (c) It is likely that a lighter elevation finish has been selected in the knowledge it can reduce the adverse impact on daylight of the proposed built form and its overly dominant height and massing.
- (d) The separate planning application (awaiting a decision) for the iQ development on the Weston hall/Pendulum Hotel site proposes a brick elevation as a means of relating to the conservation area but this site is more distant from the conservation area than this SISTER Plot H proposal. While both proposals are out of context and unacceptable due to height, massing and siting, an argument could be made for either approach to elevation design including materials for a more appropriate built form. However, any developments on these two sites should have a coordinated approach towards their context and materiality.
- (e) A high quality elevation design could be achieved with a scale, massing and siting of built form that more appropriately and meaningfully responds to the townscape context with the necessary regard to national and local policy and guidance.
- (f) If an out-of-context, overly tall building continues to be proposed on the SISTER Plot H site, a lighter finish to elevation materials (together with appropriate articulation) has the potential to reduce the overbearing visual impact and a lighter finish would provide some reflection of daylight.

- **External on-site open space**

OBJECTION 1

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

Additional background information:

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

OBJECTION 2

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

Additional background information:

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

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

OBJECTION 2

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

Additional background information:

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

- **Design and health**

OBJECTION

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

- (a) The design of development has been shown to have a link to physical and mental health and a sense of well-being.
- (b) A range of Planning policies and guidance aim to protect health and well-being when new development is proposed including, for example, the NPPF

(Paragraph 135) and the Greater Manchester Combined Authority's Places for Everyone Policy JP-P2.

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

Additional background information:

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

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

- **Design and lessons learned**

OBJECTION

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

Additional background information:

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

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

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

OBJECTION 1

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

- (a) Policy requirement No. 3 of H12 that requires any new development to be sited where this is compatible with existing developments. There is no suggestion that this requirement does not include existing developments such as Granby Village and the proposal would clearly be contrary to this policy due to the harm it would cause to amenity, including residential amenity of those within these existing developments.
- (b) Policy requirement No.6 of H12 that aims to ensure there is no unacceptable impact on residential amenity from the proposed development through increased noise, disturbance or impact on the streetscene. The proposed development would have an unacceptable impact on the streetscene through excessive overshadowing and the consequential impact this would have on residential amenity.

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

Additional background information:

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

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

“6. Consideration should be given to the design and layout of the student accommodation and siting of individual uses within the overall development in relation to adjacent neighbouring uses. The aim is to ensure that there is no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the streetscene either from the proposed development itself or when combined with existing accommodation.”

The statutory local development plan makes no specific land-use allocation for this site or quantum of development. The policies within this plan, together with relevant national

policies and guidance, should be fully informing the approach that is taken to the site with full regard not only to the site itself but also, as seen above, to its existing wider townscape context.

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

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

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

OBJECTION 2

This proposal uses national and local planning policy and guidance that seeks an increased density of new development as a part of achieving the more efficient use of land without fully acknowledging the caveats and other policies that aim to balance this approach with the impacts on the existing environment and community. There is no acknowledgement in the application that the decision on the proposed quantum of development is driving the need for a design of development which would be incompatible with, and cause great harm to, the surrounding environment and community. That harm should be being avoided through due regard to all planning policies and guidance. The decisions behind the proposal leading to the proposed quantum of development is being incorrectly determined by an illustrative axonometric drawing in the SISTER SRF that showed three taller built forms on this site but the SRF does not constitute planning policy. In support of this objection the following points are particularly noted:

- (a) The Deputy Head of the Planning Service, David Roscoe, has publicly confirmed during a recent Planning Committee meeting in November 2025 that SRF's are not planning policy and have a very low status in terms of being a material planning consideration in decision-making, and that planning policy, locally, is contained in the statutory development plan. On this basis the SISTER SRF need not drive a particular quantum of development or built form.
- (b) Attention should be placed on adopted planning policy to achieve an appropriate increased density of development on the site. Planning policy does not state what this increase should be presumably to allow local context for any site to be taken fully into account as expected under national and local planning policy and guidance.
- (c) In this instance the site is currently occupied by a now closed multi-storey car park and some incidental soft landscaping. This represents a relatively low density of development in the context of the locality around the site. However, neither the application nor SRF give any acknowledgement that even the provision of a built form consistent with the height of existing residential buildings to the north of the site would represent a significant increase in the density of development within the site. There is no need to have three towers of up to 38+ storeys to achieve a considerable increase in density.
- (d) The excessive increase in density proposed by the application is presumably driven by land value that has seen a rise in 'expectation value' due to the inappropriate SRF assumption for the site and commercial investment decisions devoid of an appreciation of the unacceptable real-world implications of the proposal.

Additional background information:

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

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

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

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

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

The proposed PBSA use including social cohesion and community stability

OBJECTION

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

- (a) Based on the submitted 'Student Need Assessment', by the end of this year there will be over 4,700 in PBSA developments around the immediate periphery of the SISTER SRF area. This application alone would bring a further 1,041 into this area (a 22% rise) and with the the neighbouring iQ proposal on the Weston Halls/Pendulum Hotel site would see a total of over 3,000 beds (a 64% rise). This does not take into account other nearby existing, approved but not built or proposed PBSA developments.
- (b) The student population is transient and, perhaps understandably, have no particular commitment to the more stable host community. Concentrations of large numbers of students, as found over the years in suburban locations, bring particular issues which do not assist with community or social cohesion. That students do not contribute in terms of Council Tax to the local area and public services weakens any local connection further.
- (c) The existing area around Granby Village is a well established, principally residential area seen as a successful example of early regeneration within the city centre. This character partly arises from a proportion of students within the area, However, the influx of students arising from a development about to be completed plus that on the application site will inevitably alter the demographic mix and character of the area considerably. This impact would only be all the greater factor in the iQ Weston Halls/Pendulum Hotel proposal.
- (d) Experience within the Granby Village area has shown that students can bring life and vitality, mostly during term times. However, also during term times, anti-social behaviour increases. While the proposed development may be well run and controlled this does not extend to the behaviour of students once outside the development.
- (e) The application makes assumptions around the ability of existing local services ability to cope with this increased and concentrated local student population. Some of these assumptions are based on students being willing/able, for example, to travel to more distant GPs and dentists and do not sit comfortably with the lived

experience of existing residents who already struggle to get to see a GP or NHS dentist.

- (f) The applicants also make claims about economic benefits to the area, mainly through an uplift in spending. There are three points here. Firstly, the local area is already well served by a wide range of retail and hospitality venues, and an increase in the transient student population living within the area is not required to support these. Secondly, many of these students would leave the area semi-deserted in university vacation time, calling into question the claims for the creation of a newly vibrant neighbourhood which could sustain local businesses all year round. The third point is that part of any uplift in spending in the local area will largely be a transfer of the same spending away from the suburban areas currently being emptied of student population. The submitted Environment Statement (Paragraph 5.119) advises that “Data from the University of Manchester estimates that first year undergraduate students spend £13,685 per annum.” But the same data (for 2026-27), excluding rent and mobile phone contracts, gives a spend of only £5,480 (<https://www.manchester.ac.uk/study/undergraduate/fees-and-funding/cost-of-living/>). This would give a much lower Total Net Expenditure figure than shown so the economic benefit to the city is more limited than is being suggested.
- (g) The City Council’s Guide to Development in Manchester acknowledges that successful neighbourhoods are partly achieved by a balance of housing types and mix of uses. The proposal will not enable the balance sought by local policy and guidance to achieve this balance.
- (h) The applicant’s own Planning and Tall Buildings Statement (Paragraph 3.11) acknowledges the need to provide balanced neighbourhoods when considering new PBSA. More importantly Policy CC10 of the Core Strategy aims to ensure the city centre attracts and retains a wide range of residents including through new development with a particular emphasis on creating a family friendly environment. This proposal will clearly exaggerate an already considerable student population living in PBSA developments in this part of the city centre where, as confirmed by the submitted Environmental Statement (Paragraph 15.59), “the Piccadilly Ward has a much higher concentration of students compared to Manchester as a whole”. As has repeatedly been said during the consultation process, residents would favour a development (of equal density) which included a mix of homes for young professionals and families, with appropriate accompanying services and local shops. It seems naive in the extreme to suppose (as does the submitted Planning Statement) that the mere proximity of students would “facilitat[e] informal interactions, knowledge exchange, and the spontaneous formation of collaborative ventures” with those based around SISTER more than would, say, the presence of actual researchers and entrepreneurs living in the neighbourhood over a period of years with their families.
- (i) On this basis the proposal does not accord with with Policy CC10 or other policy intentions to create a sustainable, stable and cohesive local community.

Additional background information:

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

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

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

Moving from 4,720 beds to 3,013 (a total of 7,733) means a 64% increase in student bed in the immediate locality of the site. This does not take into account the various other PBSA developments existing, approved or proposed in easy reach. The character of the area is already changing with this increase in student accommodation and this change will only become more noticeable as more students move in.

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

Other considerations

- **Traffic including cycling**

OBJECTION 1

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

Additional background information:

The applicants appear to down-play the number and impacts of traffic movements serving the development and their ability to control move-in/move-out days especially as there is reliance on the use of the public highway for all these traffic movements including on the busy Sackville Street. The likely number of assumed car and taxi movements is particularly low. The applicants appear to under estimate the number of vehicle movements likely to be associated with a student population of 1,041 both now and into the future and it is the local community that will pay the price in congestion, inconvenience, pollution and highway maintenance.

OBJECTION 2

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

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

Additional background information:

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

- **Biodiversity**

OBJECTION

The effect of the proposed height and massing on the potential of the development to have a positive ecological impact gives rise to objection. A “comprehensive review” by the applicants led to the development of an alternative massing strategy, moving from the three broadly uniform-height blocks shown in an illustrative SISTER SRF image to the current proposal. However, there is no indication that the review properly considered a modestly greener four-block solution, abandoning the “Princess Square” concept, using that land to build on, and distributing the proposed planting elsewhere (for example along the Altrincham Street walkway and up and down Sackville Street). In support of this objection the following points are particularly noted:

- (a) The submitted Ecological Impact Statement rightly describes the “Princess Square” location as it is now as “a small area of poor condition ... heavily shaded”; and it sits at a busy road junction. It is always going to be heavily shaded, noisy, and polluted, even if its basic condition could be improved a little.
- (b) The review of the height and massing has focussed most hope of ecological enhancements on a highly inappropriate spot, partly due to the chimerical idea of this being a favoured future route across to Oxford Road from the SISTER SRF area (the western stretch of Charles Street being notoriously uninviting, because so overshadowed by Circle Square).

- **Construction phase**

OBJECTION 1

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

should be confirmed as a part of the application and, in any event, any request for additional working should require the sign-off by the three ward councillors and the notification of those people outside the site likely to be affected in advance of the works.

OBJECTION 2

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

- **Operational noise**

OBJECTION

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

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

OBJECTION 1

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

- (a) The proposal for a 2,500 room PBSA development by iQ on the Weston Halls/Pendulum Hotel site consists of four towers of 50, 33, 24 and 17 storeys with linking built form which would effectively form a wall of development along Charles Street between Sackville Street and Princess Street when seen in any oblique view. The

tallest 50 storey tower would stand at the eastern end of the site adjacent to the 38+ storey SISTER Plot H tower visually combining to give a huge and overwhelmingly harmful visual impact both generally and on the amenity of existing residents particularly those immediately northwards of them. Ironically, the taller iQ development would overshadow the SISTER Plot H proposal including the proposed on-site external area within the SISTER Plot H scheme as well as the area north of the railway viaduct. The SISTER Plot H proposal would increase the visual solidity of the iQ wall of development that would be presented to existing residents north of the viaduct by visually obstructing any particular sense of the minimal gaps between the iQ towers. The proposals have not been designed in a coordinated manner to be viewed together and the overall visual impression when viewed from the area north of the viaduct - including the outlook from many existing homes - will be of a bleak shaded wall of nondescript anywhere PBSA built form.

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

OBJECTION 2

While each application should be treated on its own merits it is clear that within planning there is an acknowledgement of setting a precedent. By granting planning permission for one of these unacceptable proposals will set a precedent and make the other more difficult to resist.

Additional background information:

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

Concluding comment

An alternative approach to the application site should be required that would have the potential to overcome the identified policy failings of this proposal. If this is not possible the proposal should be refused planning permission in accordance with Paragraph 139 of the NPPF. In support of this concluding comment the following points are particularly noted:

- (a) A PBSA development on this site gives rise to strong objection.
- (b) Paragraph 139 of the NPPF is clear that development that is not well designed should be refused. 'Well designed' is not just about the intrinsic quality of the design of the development but about achieving an appropriate response to other matters. These should include, for example, the amenity (including residential amenity) of existing residents and other users of the area, the existing townscape context

(including heritage), health and well-being and the impact on the local community. This is reflected by national and local policies and guidance including Policy H12 of the Core Strategy.

- (c) If a PBSA development on this site is considered to be acceptable in principle by the City Council, the Council should require a comprehensive redesign of the current proposal that ensures it complies with all relevant policy and accords with relevant guidance to achieve a design that responds appropriately to the existing townscape context (including heritage), avoids harm to the amenity, health and well-being of existing residents and other users of the area (now and into the future), and supports the local community.
- (d) To accept the currently proposed PBSA development on this site would be to accept the harm - the very considerable harm in some instances - that would be caused within the affected area. It would be to treat this harm to local people and environment merely as collateral damage in achieving a tall building townscape in this locality at any cost.
- (e) The Planning Service and Planning Committee should recognise that opportunities for tall buildings - including for PBSA - exist elsewhere and this is one city centre location where 'good planning' would expect adherence to national and local policy intended to protect against inappropriate development and secure a more balanced approach between redevelopment/regeneration and a local community and existing high quality environment.
- (f) So, to return to the opening part of this note: The applicants claim in their Planning and Tall Building Statement (paragraph 1.8) that "The proposed development's design and materiality have been carefully considered to provide a sensitive response to the surrounding context, complementing the existing character of Manchester City Centre.". Clearly this is not true on any level let alone in terms of the impact on the surrounding area and the application should be refused planning permission.

Appendix: Policy and Guidance documents used when preparing these advice notes

The policy and guidance documents used when preparing these advice notes have included the following:

National Planning Policy Framework (Dec 2024)

Government policy document

This describes how economically, environmentally and socially sustainable development should be brought forward. It should be read as a holistic development i.e. all policies need to be read in conjunction with each other. Regard has also been had to the relevant parts of the associated Planning practice Guidance.

Particularly relevant parts of the NPPF include:

Para 40	Pre-consultation
Para 44	EIA's
Section 12	Achieving well-designed places: Paras 131, 132, 135, 137, 138, 139, 140
Section 14	Meeting the challenge of climate change
Section 16	Conserving and enhancing the historic environment: Paras 202, 207, 208, 210, 212, 215, 219

Glossary Provides the government definition of “Brownfield land”

National Design Guide

Government document

Much of this document is relevant but particular attention is draw to the sections on “context” and “identity” which form the basis for the other subsequent considerations in the document.

The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning Note 3 (Second Edition, 2017)

Advice prepared by Historic England as the government’s principal adviser on the historic environment.

Places for Everyone 2024

A Strategic document prepared by the Greater Manchester Combined Authority.

Particularly relevant policies:

Policy JP-S1: Sustainable development

Policy JP-H3: Type size and design of new housing: Defers consideration of student housing to district local plan

Policy JP-P1: Sustainable places: Para 9.15 “All development should achieve a high design quality consistent with the ten characteristics set out in the National Design Guide”

Policy JP-P2: Heritage

Policy JP-P6: Health

The document sets out proposal for becoming carbon neutral by 2038.

Local Plan

Manchester City Council’s local development plan.

Consists of several documents and particularly relevant policies include:

Core Strategy:

CC 3 (Housing)

CC 6 (City Centre high density development - must have regard to tall buildings policy (EN2))

CC 7 (Mixed use)

CC 8 (The need for an approved development framework to guide a large scale development proposal - does not seem to be the case with the iQ proposal)

CC 9 (Design & Heritage)

H 12 (PBSA - Especially paragraphs 3 (parking), 4 (local services), 5 (safety and security), 6 (impact on local amenity))

T 1 (Sustainable transport including taking account of other road users)

EN 1 (Design principles and link back to national guidance)

EN 2 (Tall Buildings - including a need to be appropriately located with particular regard to Paragraphs 12.14 (local context) and 12.12 (the need to consider all design policies as the policy context against which tall building proposals will be considered))

EN 3 (Heritage)

EN 15 (Biodiversity)

PA 1 (Developer contributions)
DM 1 (Development management)

Extant Unitary Development Plan Policies

DC18 (Conservation Areas)
DC19 (Listed Buildings)
DC 26 (Development and noise)

Guide to Development in Manchester Supplementary Planning Document and Planning Policy Guidance (Adopted 2007)

Virtually all this document is relevant but in particular. Parts 1 and 2 are considered in turn:

Part 1 (SPD) Sections 1 - 10 inc

2.3 (Response of new development to existing context and character)
2.6 (Response of new development to heritage)
2.7 (Response of new development increasing density to existing context)
2.8 (Retaining and enhancing sense of place)
2.13 (Buildings should relate well to each other and respect their setting)
2.14 (Building height and existing context)
2.5 (Streets should be designed for people not just for vehicles to pass through)
2.31 (Need for adequate on-site servicing provision)
3.37 (Provision of street trees)
2.40 (Public realm)
2.41 (Public realm)
2.43 (Public realm)
2.45 (Mix of housing large, single tenure housing developments need to contribute to a balanced neighbourhood)
2.47 (Mix of uses)
2.49 (Safety and security)
2.56 (Impact on global environment)
4.2 (Sustainable development)
4.13 (Sustainability including reuse of existing structures)
4.15 (Biodiversity)
6.9 (Cycle parking provision)
7.2 (Response to built context)
8.3 (Promotion of informal surveillance)
9.9 (Promotion of social inclusion)
9.11 (Quality and aesthetics of the built environment to health)

Part 2 (Guidance) Sections 11 & 12

11.1 (Response of new development to context)
11.4 (Response of new development to context)
11.43 (Design)
11.45 (Response of new development to context)
12.8 (Response of new development to context including ground level treatments, servicing, microclimate (overshadowing, air turbulence))
12.10 (Sustainable development)
12.13 (Recognition of lack of open space in the city centre)
12.20 (City Centre design and the "street wall")
12.26 (Tall buildings)

30th June 2026