

The Department of Listed Buildings
Planning and Building Control
Manchester City Council
Town Hall Extension
Albert Square
Manchester
M60 2LA

2nd February 2022

Dear Sir or Madam,

Application for listed building consent as per the Planning (Listed Building and Conservation Areas) Act 1990 – proposed telecoms works to be undertaken at 20 Dale Street, Greater Manchester, Manchester, M1 1EZ.

Heritage Statement in respect of proposed minor telecommunications upgrade works upon and within the building.

1. Introduction

The following Heritage Statement (Statement) has been prepared in connection with the proposed minor upgrade of an existing telecommunications radio base station on behalf of Everything Everywhere – better known as EE.

The following document should be read in conjunction with the Site Specific Supplementary Information and Planning Justification Statement which forms part of this application for Listed Building consent. The works themselves involve removing and replacing the existing 3no. wall-mounted support poles and radio antennas with 3no. new radio antennas. Note, the position of the new support poles (inc. antennas) will remain unchanged. The installation/replacement of equipment upon the rooftop and the installation/replacement of equipment within the internal equipment room on the rooftop.

Understanding the significance of a historic asset, and the possible impact of the proposed scheme is the key to good conservation practice. Good, clear information, available from the outset, can speed up the processing of applications, reduce costs and lead to better overall design. If the significance of a site has been clearly understood from the outset (based on how the site has changed through time and what survives today), then both the applicant and the Local Planning Authority (LPA) can better understand the impact of the proposal and seek to minimise any impact. As a result, it is important to understand the



significance of a heritage asset when considering proposals to alter, demolish or extend the asset, or develop within its setting. An early understanding of the significance will inform the direction of an application and help provide a clear and convincing justification of the proposed scheme (as required by paragraph 187 of the National Planning Policy Framework (NPPF)).

2. Building subject to this Heritage Statement

The building is Grade II listed office building, situated in Manchester's Northern Quarter on the corner of Lever Street and Dale Street.



3. Relevant Planning Policy

The revised National Planning Policy Framework 'NPPF' was published by the Government in July 2021. The document sets out the Governments planning policies for England and how these should be applied. Section 16 of the NPPF – Conserving and enhancing the historic environment – details the national planning policy context for the assessment of proposals that affect listed buildings or conservation areas and other (non-designated) heritage assets.



The importance of conservation of the historic environment is highlighted at paragraph 190 which sets out a requirement for an LPA to develop a positive strategy for conservation of the historic environment, that includes taking account of the desirability of sustaining and enhancing the significance by putting them viable uses consistent with their conservation.

Paragraphs 190 – 193 specifically address conserving the built historic environment. Paragraph 195 highlights that the significance of a heritage asset should be explained by an applicant at a level of detail proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on the asset.

Paragraph 197 sets out factors that should be taken into account by an LPA in determining an application. These reflect the considerations outlined in paragraph 190 and underlines the positive contribution that conservation of heritage assets can make to sustainable communities including economic vitality. In considering the impact of a proposed development on the significance of a heritage asset paragraph 199 notes that

“great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).”

Where proposals are considered to lead to harm of an asset’s significance, paragraph 201 sets out circumstances in which such harm, substantial or less than substantial, could be considered acceptable, including situations where public benefit out-weigh such harm. This is set out at paragraph 202 which states;

“where a development proposal will lead to less than substantial harm to the significance of a designed heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.

The test of whether any harm is “substantial” or “less than substantial” is for the decision maker. The NPPF states that substantial harm is a high test, so it may not arise in many cases.

Public benefits are defined with the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be considered as genuine public benefits.

4. The Development Plan

As defined by the Planning and Compulsory Purchase Act 2004, the development plan for this application is the Manchester Local Development Frameworks Core Strategy Development Plan Document.

The Local Plan is part of the Local Development Framework (LDF) for Manchester.

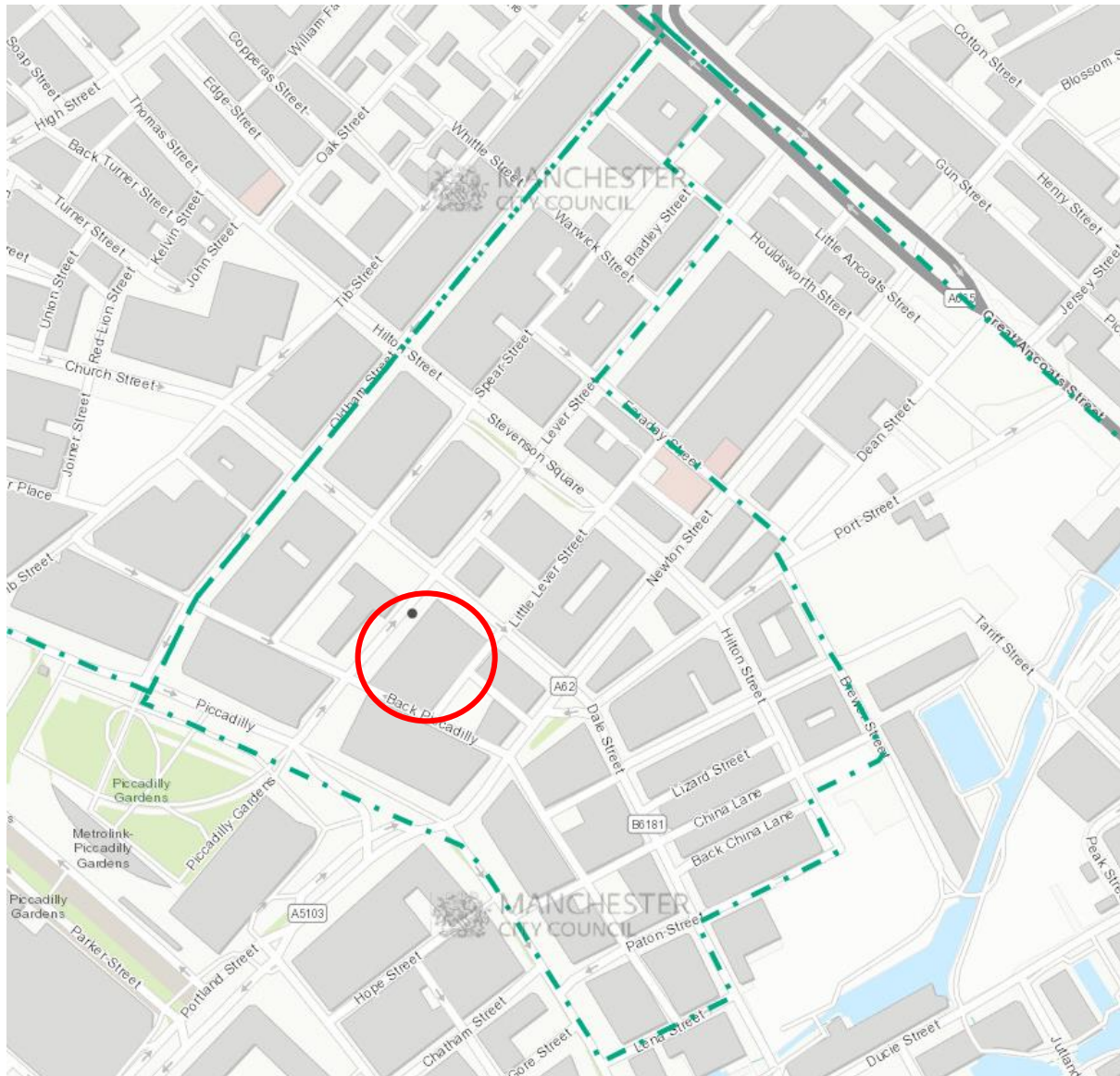
The Local Plan was adopted in July 2012 and is the key Development Plan document in the Local Development Framework (LDF). The Local Plan is the name for the portfolio of planning documents, that together provide the framework for guiding development in Manchester.

Place making and design is of the upmost importance to Manchester City and in accordance with PPS1 and its companion guide, 'By Design – Urban Design in the Planning System: Towards Better Practice', seeks to contribute to the character and setting of heritage assets.

Policies EN 1, EN 2, EN 3 (Manchester Local Development Frameworks Core Strategy Development Plan Document) covers development affecting heritage assets.

The location of the site 20 Dale Street, Greater Manchester, Manchester, M1 1EZ is situated within Stevenson Square Conservation Area, as per the Manchester Local Development Framework Area Map.

Location of the site is circled in red.



DM1 (Development Management) of the Core Strategy for the City of Manchester recognises the importance of development, visual amenity and sympathetic development of an area:

“13.7 The Council's approach to Development Management is intended to ensure that new developments contribute to the overall aims of the Core Strategy. The issues which should be considered are those which will ensure that the detailed aspects of new development complement the Council's broad regeneration priorities, in particular by contributing to Neighbourhoods of Choice. This



Dot Surveying Ltd is a company registered in England and Wales: Company Number 12401570
Registered Office Address: 8 Blandfield Road, London, England, SW12 8BG
VAT Registration 345 2850 00



includes protection of amenity and local character, environmental standards and practical matters such as access and safety. These issues will be considered in more detail through the Supplementary Planning Document, the Guide to Development in Manchester.”

The Manchester Local Development Frameworks Core Strategy Development Plan Document does not appear to have specific telecommunications policy, however the plan does recognise the importance of accessibility and good communication in respect of economic growth through the saved policy DC17.1 (Telecommunications) of the Unitary Development Plan for the City of Manchester:

“17.TELECOMMUNICATIONS

DC17.1 Applications for telecommunications developments will normally be approved if the Council can be satisfied that the development has been sited and designed to minimise its impact on residential amenity and in environmentally sensitive areas. Wherever possible, the Council will expect the potential of existing buildings and masts, including the sharing of such facilities, to be fully explored before agreeing to additional separate development.

Reasons:-

:-

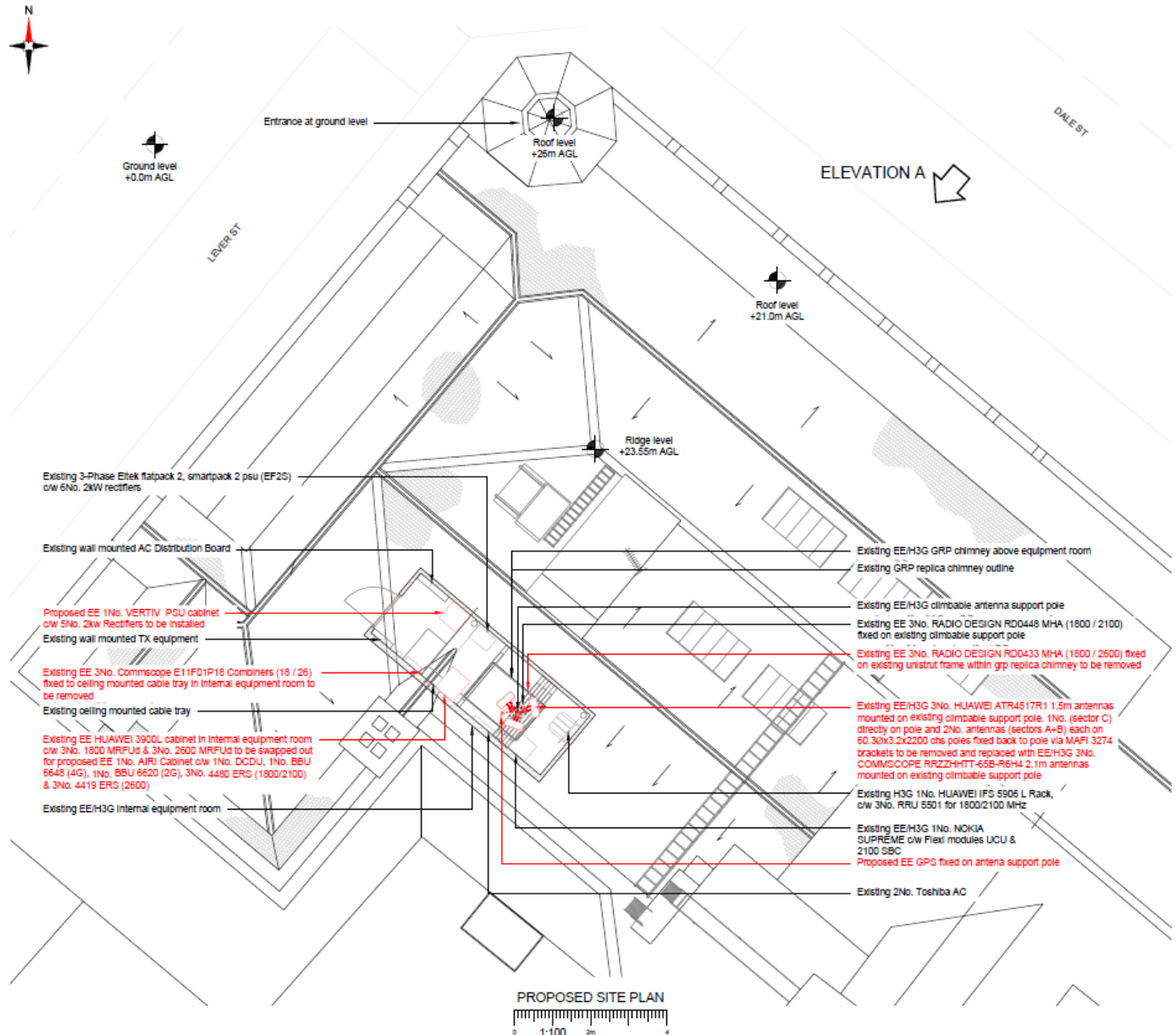
The Council recognises the need for Manchester to be at the forefront in the field of telecommunications. The Council therefore starts from a presumption in favour of new development and investment in the telecommunication systems serving the City. Equally, it wishes to ensure that new developments are brought forward in a way which protects residential amenity and minimises the visual impact of such equipment, particularly in Conservation Areas and other environmentally sensitive areas in Parks and the river valleys. The Council is also concerned to make maximum possible use of existing buildings and facilities by encouraging operators to share facilities wherever possible in order to avoid unsightly duplication and clutter.”

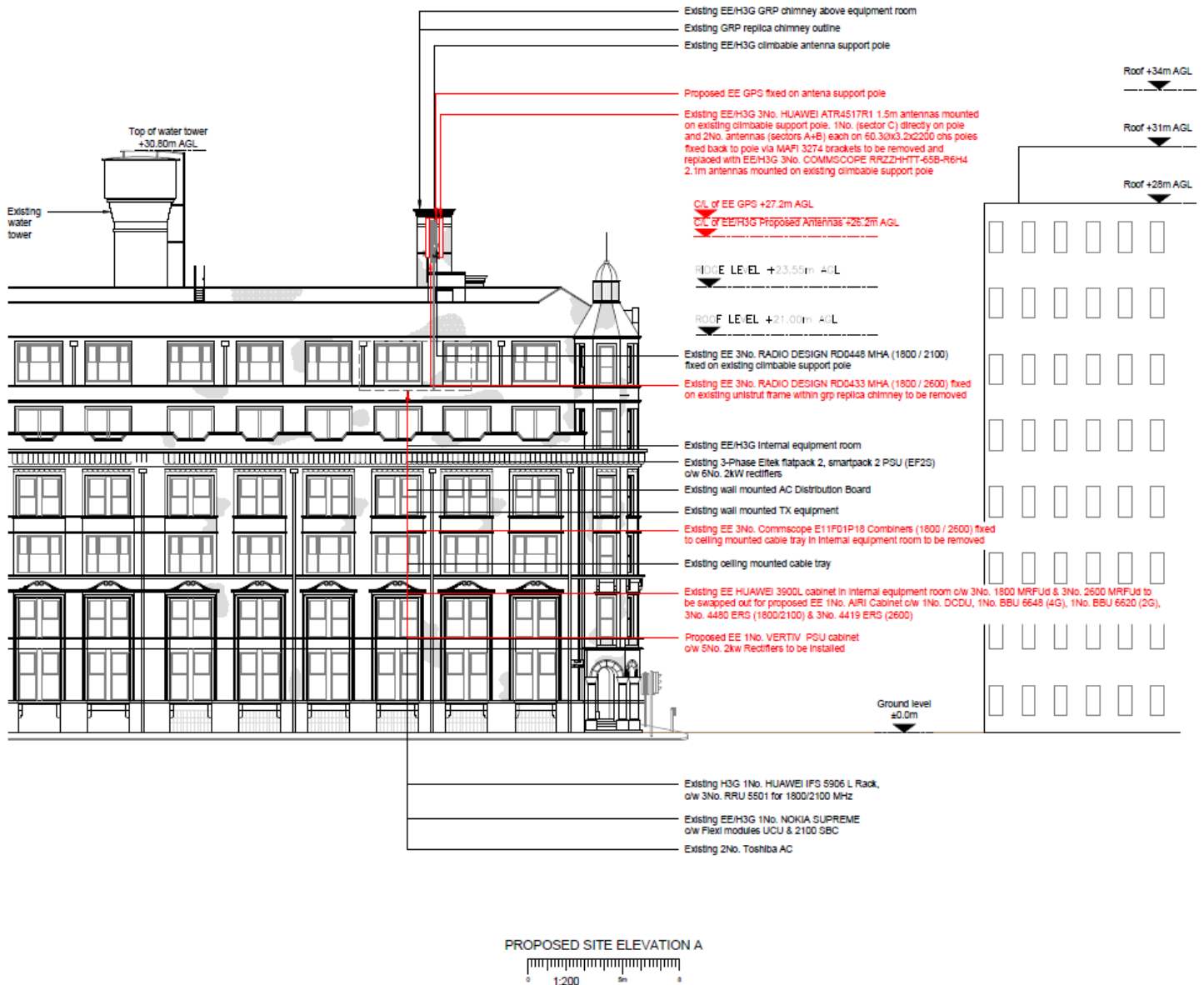
5. Proposed Development

The development relates to the upgrade of an existing radio base station to facilitate new Fifth Generation '5G' network coverage. A summary of the works are outlined:- the works themselves involve removing and replacing the existing 3no. wall-mounted support poles and radio antennas with 3no. new radio antennas. Note, the position of the new support poles (inc. antennas) will remain unchanged. The installation/replacement of equipment upon the rooftop and the installation/replacement of equipment within the internal equipment room on the rooftop.

We do not believe that any undue harm would be felt upon the building as the proposed upgrades are minimal and sympathetic to the character of the building. We have ensured that our proposed works are in alignment with this historic asset and we have made every effort to safeguard the building.

Please find below extracts from the planning drawings submitted as part of this application for Listed building consent:-





6. Assessment of Significance

6.1 Designated Heritage Asset

The proposal involves very minor alterations to the Grade II listed, primarily involving the removal and replacement of existing telecommunications equipment and supporting apparatus.

6.2 Listed Description

From the Historic England website, the description for the site is:-

Overview

Heritage Category: [Listed Building](#)

Grade: [II](#)

List Entry Number: [1283060](#)

Date first listed: [06-Jun-1994](#)

Location

Statutory Address: [22, DALE STREET](#)

District: [Manchester \(Metropolitan Authority\)](#)

Parish: [Non-Civil Parish](#)

National Grid Reference: [SJ 84532 98355](#)

Details

[SJ8498SE DALE STREET 698-1/29/78 \(South West side\) No.22](#)

[GV II](#)

Textiles warehouse, now garment showrooms etc. c.1900. Cast-iron frame, cladding of blood-red brick in Flemish bond with dressings of red sandstone and some polished grey granite (side and rear of glazed white brick), roof concealed. L-plan formed by front ranges to Dale Street and Lever Street hinged on a canted corner finished as a turret, plus a rear wing to the Dale Street range; with loading bay at the south end. Eclectic style. Basement and 2+2 storeys with 2-storey attic, 8 bays to Dale Street and 4 bays to Lever Street. Plinth (interrupted by sloped basement windows), sill-band between 2nd and 3rd floors, prominent bracketed cornice, parapet to Dale Street and attic storey with gables to Lever Street. The 3-sided corner has a canted 3-bay open arcade of round-headed and banded arches on polished granite columns, sashed windows on each floor above, and a hexagonal 2-stage attic turret with smaller sashed windows on both levels and an apex finial. The Lever Street facade to the right



(the architectural front) is a symmetrical 4-bay composition with a 2-bay centre which has coupled giant round-headed arched windows with banded pilastered surrounds and carved spandrels, a panelled band above these, shallow canted 3-light windows at 2nd floor and 2-light windows at 3rd floor, recessed under corbel-tables; 3-light stone mullioned windows in the outer bays, those on the 2 lower floors taller and with triple-arched cornices at 1st floor; an attic storey with 3- and 2-light mullioned windows, and pedimented gabled 3-light dormers over the outer bays. The Dale Street facade to the left has 8 regular bays (except over the loading-bay entrance at the end), with a vertical division between the 2 lower and the 2 upper floors: the lower half has tall coupled windows on both floors linked by 2-storey architraves with swan-neck pediments, and decorated panels between the floors; the upper half has shallow canted tripartite windows at 2nd floor and coupled windows above, recessed under corbel-tables; the end bay has a shallow canted 2-storey oriel over the loading entrance. Low parapet ramped between piers; set-back attic with altered windows on the lower level and 3-light mullioned windows above. Most windows sashed without glazing bars. Interior not inspected. Included for group value.

Listing NGR: SJ 84532 98355

7. Impact of the Proposals

The proposed development relates to a very minor upgrade of an existing radio base station – the removal and replacement of existing 3no. radio antennas with supporting apparatus and the installation/replacement of ancillary equipment both internally (within an internal equipment room) and externally (rooftop support frames). The works are required to facilitate a high-speed 5G telecommunications network.

The Council will, no doubt, be aware of the importance of such upgrades, particularly during the current circumstances, when the ability of people to work from home and rely on a robust telecom network has become vital to the economic and social well-being of society.

It is considered that the very minor development subject to this application, and described and illustrated herein, will have no detrimental impact upon the character, setting and fabric of the listed building, given the existing base station is an established part of the building.

As detailed herein, it is considered that the scheme takes a form which is sympathetic within the context of the immediate street scene and area. Accordingly, the proposed removal and replacement of existing radio antennas and support poles (note, the new support poles and antennas will be situated in the same position as the existing), along with additional minor works upon the external rooftop (installation/replacement of ancillary equipment attached to existing 2no. support frames) and installation/replacement of equipment internally, will



have very little impact on this designated heritage asset. As a result, we consider this is in accordance with the NPPF.

The NPPF at paragraph 202 notes that where a development proposal will lead to less than substantial harm to the significance of the designated assets, this harm should be weighed against the public benefits of the proposal.

The benefits of the proposed scheme are substantial, particularly the improvements it will bring to communications within the local area at this crucial time and shall outweigh the very limited impact to this listed building. Furthermore, it is considered the requirements accord with the National Planning Policy Framework 'NPPF' and the benefits of providing the latest technologies within this cell area, allowing the operator to ensure high quality communications infrastructure.

We consider the works subject to this application will not detract from the historical importance of and will preserve the Grade II Listed Building.

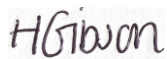
Conclusion

The proposed scheme includes minimal upgrade works where there is existing telecommunications infrastructure already in situ. Details of this are provided within the submitted drawings and other supporting information.

The impact of the proposed development involves retaining the significance of the wider heritage asset, preserving its appearance and setting, while delivering widespread social and economic benefits in the form of a modern and reliable high-quality communications system to the local area – which is of vital importance as we emerge from the full impact of the pandemic.

In line with the NPPF guidance, it is considered the economic and social benefits will outweigh the very limited impact of the proposed works.

Yours faithfully,



Hannah Gibson BSc (Hons)
Planner

Dot Surveying - For and on behalf of Everything Everywhere (EE)

