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Our ref 54 Princess Street

10 December 2021

Dear Sir/Madam

54 Princess Street, Manchester
Application for Listed Building Consent for Internal Fire Safety Works

We have been instructed by the building owner, The City of Edinburgh Council (acting in its capacity as Administering Authority of the Lothian Pension Fund) ('the applicant'), to submit an application for Listed Building Consent for internal works throughout the building required to make the building compliant with fire regulations at 54 Princess Street, Manchester (the 'Site'). The site comprises of a Grade II Listed Building and as such Listed Building Consent is required.

An application has been submitted today via the Planning Portal (PP-10479210), which comprises the following supporting information:

- Application Form;
- Location Plan;
- Site Plan;
- 1244-0B-SW-01 REV D BASEMENT LEVELS SCOPE OF WORKS 02.12.21;
- 1244-0G-SW-01 REV E GROUND FLOOR LEVEL - SCOPE OF WORKS 11.11.21;
- 1244-01-SW-01 REV F FIRST FLOOR LEVEL - SCOPE OF WORKS 17.11.21;
- 1244-02-SW-01 REV E SECOND FLOOR LEVEL - SCOPE OF WORKS 17.11.21;
- 1244-03-SW-01 REV D THIRD FLOOR LEVEL - SCOPE OF WORKS 11.11.21;
- 1244-04-SW-01 REV C FOURTH FLOOR LEVEL - SCOPE OF WORKS 11.11.21;
- Heritage Statement; and
- Design and Access Statement

Site Description

54 Princess Street lies to the west of Princess Street, to the north 56 Princess Street which lies to the north of the Rochdale Canal, to the south of Bloom Street and to the east of Winsor Street. The site lies within Manchester City Centre and falls within the Whitworth Street Conservation Area.

54 and 56 Princess Street were built together during the second half of the nineteenth century during which the Princess Street area underwent a period of significant change, resulting in its current form. The area is dominated by Victorian and Edwardian commercial buildings arranged to the east and west of Princess Street, occupying a full block or half a block. 54 and 56 Princess Street together occupy a full block.

Background to Proposals

54 Princess Street previously benefitted from a sprinkler system fed from the water main however this system was decommissioned at some point in the past. In the interim, various fit-out works have been undertaken across the building as part of landlord or tenant projects. These works have ensured that most of the tenant demises comply with fire safety regulations including compartmentalisation, fire alarms, smoke detectors etc. However, as these works have been undertaken on a piecemeal basis over the course of a number of years, the communal areas, such

as reception, staircases and communal corridors have not received the same level of scrutiny. The landlord has been made aware that a number of communal areas no longer meet the requirements of fire safety regulations.

While a compliant building-wide fire plan is in place to protect the occupants of the building, there are a number of areas which are not fully protected by fire suppression measures and as such, the building is at risk of collapse in the event of a fire. The existing fire safety plan ensures the safety of occupants by means of an alarm and an 'everyone out' policy. However, without further fire safety work, the fire brigade may not enter the building protect the building from structural collapse in the result of a fire. As a Grade II Listed Building, any delay in intervention from the fire brigade could result in partial or complete loss of the building and with it a significant amount of physical and cultural heritage.

Proposed Works

The works proposed as part of this application cover the basement, ground, first, second, third and fourth floors and are set out in detail within the application plans and associated Heritage Statement. The proposed works are summarised below by area.

Basement

- Car park area. The existing fibrous fire retardant materials on the columns will be left; exposed steel/metalwork will be treated with 60 minute fire-rated intumescent paint.
- Common parts, comprising showers, toilet, corridor and storerooms/facilities. The existing suspended ceiling of the corridor will be replaced with board with a 60-minute fire rating. Access panels of 60-minute fire-rated board will be introduced to provide access to services. Showers, toilet and storeroom/facilities: these areas with flush ceilings will be replaced with fire board to give a 60-minute fire rating.
- Half-basement facilities area adjacent to the ramp (the former boiler area). In this smaller area (Basement Level 2) all exposed steel/metalwork will be treated with 60 minutes fire-rated intumescent paint (grey).

Ground Floor Common Areas

- Street level entrance area. The flush board underdrawing of the ceiling will be stripped out and replaced with 60-minute fire-rated board, to be painted with emulsion paint. The existing downstand of the perimeter bulkhead will be replicated. Existing lighting will be reinstalled.
- Mezzanine lobby with lift. The flush ceiling of the mezzanine lobby will be stripped out and replaced with board with a 60-minute fire rating. The existing square surround and treatment of the column head will be replicated. The recessed LED lighting will be fitted with a firebox to give 60 minutes fire-resistance. The door and frame of the riser cupboard beyond the lift shaft will be replaced with an FD-60 door and frame, to fit the existing opening. Fire resistant board to be introduced at ceiling level of the cupboard.
- Staircase. The later-inserted staircase (green) is fitted with tongue-and groove board to the ceiling, which will be stripped out and the existing framework used to support 60-minute fire rated board which will be painted.
- Cupboard under Stairs. This dates from the 1960s insertion of the staircase. The flush ceiling will be stripped out and replaced with board with a 60-minute fire rating.

First Floor Common Areas

- Staircase. The later-inserted staircase is fitted with tongue-and groove board to the ceiling (green), which will be stripped out and the existing framework used to support 60-minute fire rated board which will be painted.
- First floor lobby with lift. The area of ceiling with the Lincrusta paper (yellow) will be treated with 60-minute clear intumescent paint which will allow the detail to be retained. In other areas without Lincrusta (grey) where the ceiling is flush, it will be replaced with fireboard. The timber beams, currently painted white to blend with the Lincrusta ceiling, will be painted with clear intumescent paint. The grey areas include the existing ceiling downstand detail around the edge of the lobby which will be replicated like-for-like with 60-minute fireboard, fixed to the existing subframe. To the corner of the lobby near the staircase to the

second floor is a boxed in steel column; the boxing will be removed and the column treated with intumescent paint and re-boxed with 60-minute fireboard. As on the mezzanine lobby, the door and frame of the riser cupboard beyond the lift shaft will be replaced with an FD-60 door and frame, to fit the existing opening. Fire resistant board to be introduced at ceiling level of the cupboard.

Second Floor Common Areas

- Staircase. The later-inserted staircase is fitted with tongue-and groove board to the ceiling (green), which will be stripped out and the existing framework used to support 60-minute fire rated board which will be painted.
- Second floor lobby with lift. The flush ceiling (grey) will be replaced with 60-minute rated fireboard and the existing ceiling downstand detail around the edge of the lobby which will be replicated like-for-like with 60-minute fireboard, fixed to the existing subframe, as on the first floor. Similarly, the boxed-in steel column will have the boxing removed and the column treated with intumescent paint and re-boxed with 60-minute fireboard. As on other floors, the door and frame of the riser cupboard beyond the lift shaft will be replaced with an FD-60 door and frame, to fit the existing opening. Fire resistant board to be introduced at ceiling level of the cupboard.
- L-shaped Corridor. The flush plasterboard ceiling on the section near the lobby will have this removed and, if the timber above is in sufficiently good condition, it will be exposed, sanded and coated with the intumescent product already approved for use on the second-floor suite, to give the same appearance as the rear section of the corridor. Should poor condition render this impractical, the ceiling will be replaced with 60-minute fireboard on a like-for-like basis. The longitudinal timber beam and the timber floorboards to the rear will be stripped back and coated with clear intumescent product. Exposed steel surfaces will be sanded back and coated with intumescent paint then painted to give a light-grey eggshell finish. Any ceiling gaps in the boards or between the boards and beams will be stopped with the appropriate material to provide fire integrity at this level. A new fire door will replace the existing door to the rear staircase to match in design.
- Toilet Block. The toilet block was inserted into the former open plan floor in the 1960s. The ceiling will be replaced with 60-minute rated fireboard, with the cubicle partitions being dismantled during the process and rebuilt.

Third Floor Common Areas

- Staircase. The staircase is open to the ceiling of the 4th floor lobby.
- Third floor lobby with lift. As on the second floor, the flush ceiling (grey) will be replaced with 60-minute rated fireboard and the existing ceiling downstand detail around the edge of the lobby which will be replicated like-for-like with 60-minute fireboard, fixed to the existing subframe, as on the first floor. Similarly, the boxed-in steel column will have the boxing removed and the column treated with intumescent paint and re-boxed with 60-minute fireboard. As on other floors, the door and frame of the riser cupboard beyond the lift shaft will be replaced with an FD-60 door and frame, to fit the existing opening. Fire resistant board to be introduced at ceiling level of the cupboard.
- L-shaped Corridor. The ceiling is formed by the timber floorboards, painted white. The boarding will be stripped of all paint and taken back to bare boards which will be painted with clear intumescent paint, as will the longitudinal timber. Exposed steel surfaces (beams and a column) will be sanded back and coated with intumescent paint, then painted to give a light-grey eggshell finish. Any ceiling gaps in the boards or between the boards and beams will be stopped with the appropriate material to provide fire integrity at this level. A new fire door will replace the existing door to the rear staircase to match in design.
- Toilet Block. The toilet block was inserted into the former open plan floor in the 1960s. The ceiling will be replaced with 60-minute rated fireboard, with the cubicle partitions being dismantled during the process and rebuilt.

Fourth Floor Common Areas

- As on the other floors, the door and frame of the riser cupboard beyond the lift shaft will be replaced with an FD-60 door and frame, to fit the existing opening. Fire resistant board to be introduced at ceiling level of the cupboard

Planning Policy

Planning policy relevant to the proposed development is included in the following documents:

- The National Planning Policy Framework (NPPF) 2021;
- The Core Strategy Development Plan Document 2012
- Retained Policies of the Manchester Unitary Development Plan as at 11th July 2012

National Planning Policy Framework 2021

Paragraph 194 of the National Planning Policy Framework 2021 states '*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary*'.

Furthermore, Paragraph 197 states '*In determining applications, local planning authorities should take account of:*

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development'*

At Paragraph 202 the NPPF states '*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*'.

Manchester Core Strategy

Policy EN 3 of the Core Strategy relates to Heritage within the city and states that '*the Council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods, including those of the City Centre. Proposals which enable the re-use of heritage assets will be encouraged where they are considered consistent with the significance of the heritage asset*'.

Manchester Unitary Development Plan

Saved Policy DC18.1 Relates to development in conservation areas and states '*The Council will give particularly careful consideration to development proposals within Conservation Areas.*

The Council will seek to preserve and enhance the character of its designated conservation areas by carefully considering the following issues:

- i. the relationship of new structures to neighbouring buildings and spaces;*
- ii. the effect of major changes to the appearance of existing buildings;*
- iii. the desirability of retaining existing features, such as boundary walls, gardens, trees, (including street trees)....'*

Saved Policy DC19.1 relates specifically to Listed Buildings and states '*In determining applications for listed building consent or planning applications for development involving or having an impact on buildings of Special Architectural or Historic Interest, the Council will have regard to the desirability of securing the retention, restoration, maintenance*

and continued use of such buildings and to protecting their general setting. In giving effect to this policy, the Council will:

....

c. not permit any external or internal alteration or addition to a Listed building where, in its opinion, there would be an adverse effect on its architectural or historic character;

d. seek to preserve and enhance the settings of listed buildings by appropriate control over the design of new development in their vicinity, control over the use of adjacent land, and where appropriate, by the preservation of trees and landscape features;...

Assessment

The proposed works seek to ensure the communal areas of 54 Princess Street, in particular the building's structure are protected from fire damage. At present, an appropriate evacuation strategy seeks to ensure the safety of the building's occupants however in order that the building is safe for the fire brigade is safe to enter to tackle fires, further fire safety measures are required. Much of the interior of the building is already protected following various landlord and tenant fitout works however some communal areas do not meet the requirements of the various fire safety regulations.

The proposed works have been developed with input from specialist engineers, fire safety officers, heritage specialists and high-level advice from Conservation Offices of Manchester City Council and the proposals have been developed to balance the need to protect the structure of the building along with the need to protect the historic fabric of the building, the building's appearance and the contribution the building makes to the surrounding area, in particular the Conservation Area. To this end, a Heritage Statement has been prepared by Kathryn Sather & Associates and is submitted in support of this application.

The Heritage Statement sets out the history of the site, provides an assessment of the significance of the asset and its special interest in line with the NPPF and provides an assessment of the proposals. The assessment finds the proposed works to have a low or neutral effect on the special interest of the Conservation Area and significance of the heritage asset, the magnitude of change of all works to be negligible and the potential impact to be neutral or slightly beneficial.

Conclusion

The applicant proposes undertaking limited internal works to 54 Princess Street to ensure the building's structure is protected in the event of a fire. The proposed works have been limited to the minimum interventions required to protect the structure and have been assessed by a heritage consultant. The Heritage Statement, submitted in support of this application concludes that the proposals will result in a neutral to low impact in heritage terms and is therefore considered acceptable.

I trust the above information is acceptable however should you require any further information, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R. Robinson'.

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