



Town Planning Bureau

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HERITAGE, PLANNING, DESIGN AND ACCESS STATEMENT

Site: 17 Piccadilly, Manchester, M1 1LS
Application by: the Thackeray Estate.
Date: 22nd June 2021.
Our Ref: URB-658-ST1b.

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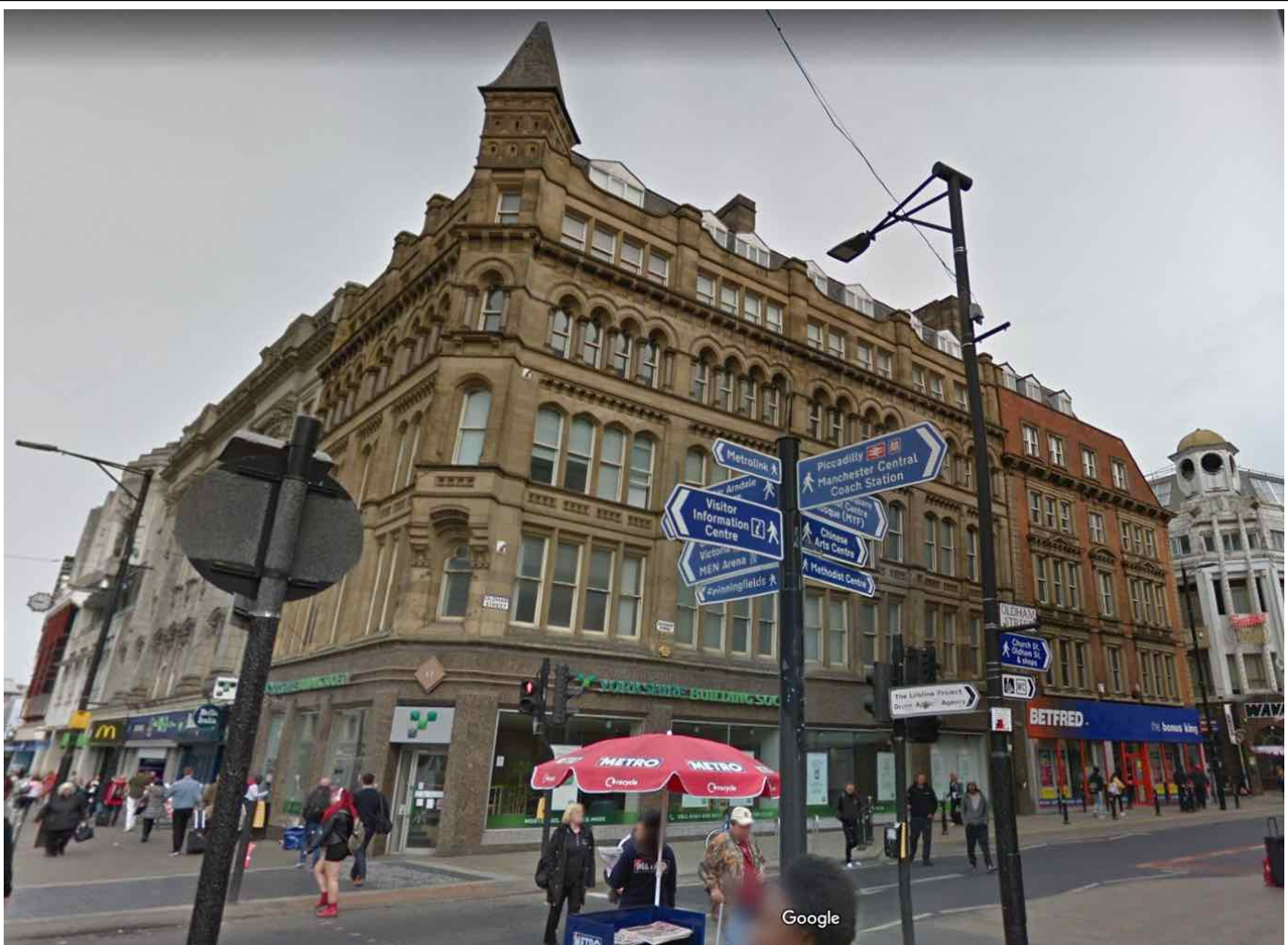
1.0 Introduction

1.1 This heritage, planning, design and access statement is prepared by Town Planning Bureau.

- Applicant: The Thackeray Estate.
- Site: First Floor, 17 Piccadilly, Manchester, M1 1LS (“No.17”, “the site”).
- LPA: Manchester City Council (“the Council”/ “MCC”).
- Listed: the building is Grade II listed.

Proposal

1.2 Planning permission and listed building consent is sought for the change of use and conversion of the first floor of No.17 from Class E (Class A2) to four self-contained flats including internal alterations.



- 1.3 The proposed units would comprise:-

Flat No.	Type	Size (sqm)
1	Two-bedroom - three-person	75
2	Two-bedroom - four-person	112
3	One-bedroom - two-person	53
4	Two-bedroom - four-person	74

- 1.4 To facilitate the new use, the existing listed building would be retained, and modest internal changes made. There are no external works to the building.
- 1.5 Internal works comprise the reorganisation of the internal layout to facilitate the new proposed use in residential. Access to the flats will be directly from Piccadilly via an existing ground floor reception area and then in turn via existing stairs and passenger lift, these are a communal stair and no alteration to this arrangement is proposed.
- 1.6 The six flats benefit from a communal bin store and bike store. There is also a second emergency means of escape.

Applicant

- 1.7 The Application is submitted on behalf The Thackeray Estate who are working with their RSL partner to provide single person accommodation within Manchester City Centre. Accordingly, the needs to the RSL are presented in connection with the need of one-bedroom accommodation.

Listed Building - External Design

- 1.8 Externally the existing building is quite splendid and the scheme does not propose to alter nor change the external appearance of the main building.

Listed Building - Internal Design

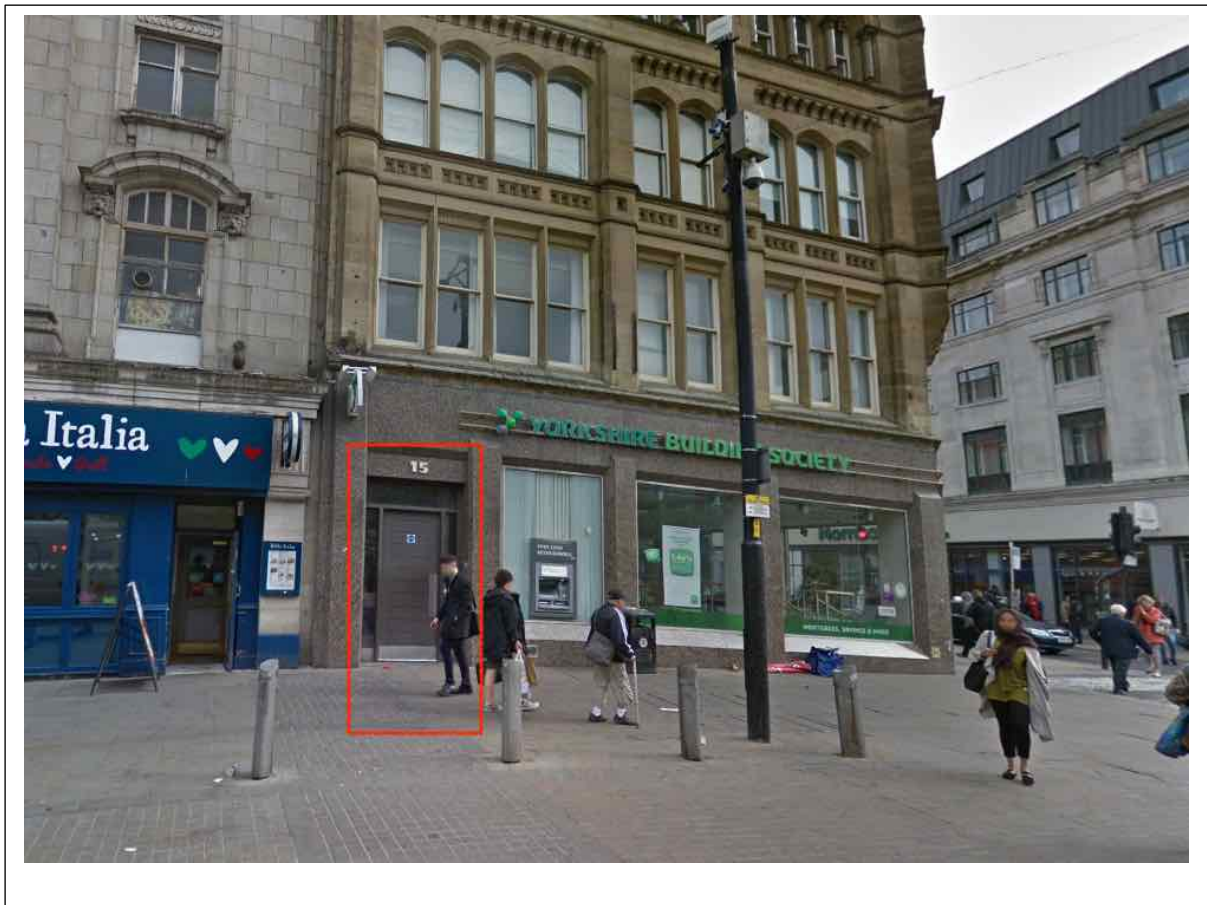
- 1.9 Internally the building has been subject to significant change as per its use as ancillary floor to the ground floor use as a building society in Class E (A2).
- 1.10 The works propose to strip back this non-original fabric and partitions and present the new layout, whilst ensuring that all existing windows, original walls, floor boards and ceilings are retained.

Flat Layout

- 1.11 The flats have been designed to achieve the optimum layout that works best for the future 'Owner' and have therefore been designed accordingly. The scheme makes no alterations to the external appearance and changes are limited to the internals only.

Access

- 1.12 The primary point of access is from Piccadilly as show below, which is via a level threshold.



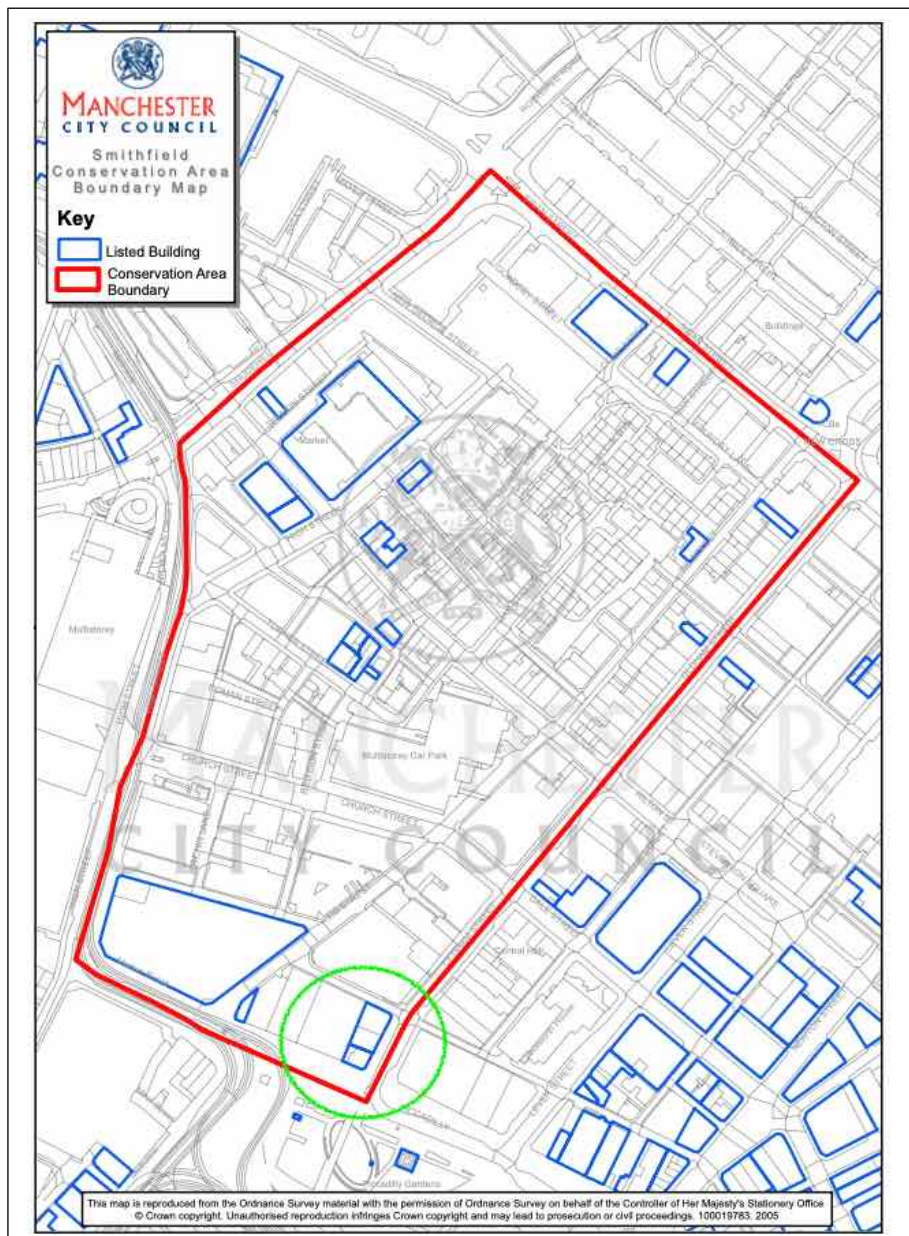
Restrictions

- 1.13 The site is in the Smithfield Conservation Area and is Grade II listed.
- 1.14 The scheme is limited to the first floor only.

2.0 Site Location & Description

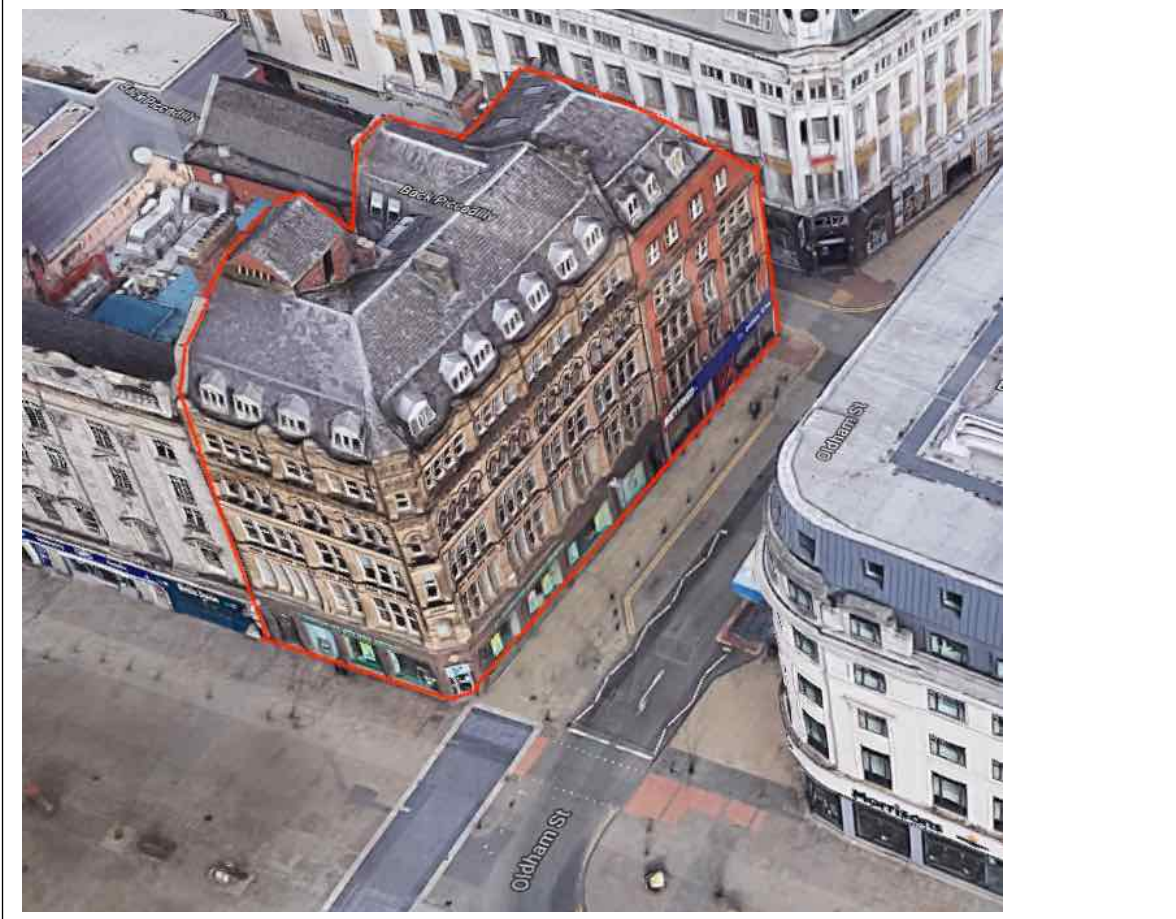
Site location

- 2.1 The application site (“the site”) is located at the heart of Manchester City Centre, the site sits at the corner of Piccadilly (to the south) and Oldham Street to the east. The site is in a highly sustainable location, which benefits from retail, entertainment, leisure, residential, cultural and transport connections.
- 2.2 Piccadilly Gardens is a part pedestrianised road, fronting the application site.
- 2.3 The site fronts on to Piccadilly Gardens and falls within the Smithfield Conservation Area, an area that lies on the north-eastern edge of the city centre of Manchester and was designated by the City Council in February 1987. The area is bounded by Swan Street, Oldham Street (a common boundary with the Stevenson Square Conservation Area), Market Street, High Street and Shudehill (a common boundary with the Shudehill Conservation area).



The Site

- 2.4 The site comprises the first floor of this existing building, which is five plus a mansard. The ground floor is occupied by Betfred and the YBS, albeit this is now vacant is subject to change to a commercial use. The upper four floors are in residential use with access taken from via 15 Piccadilly.

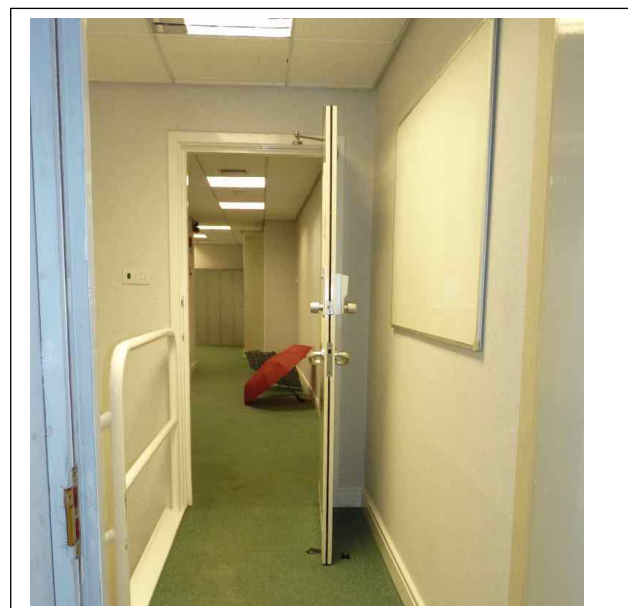
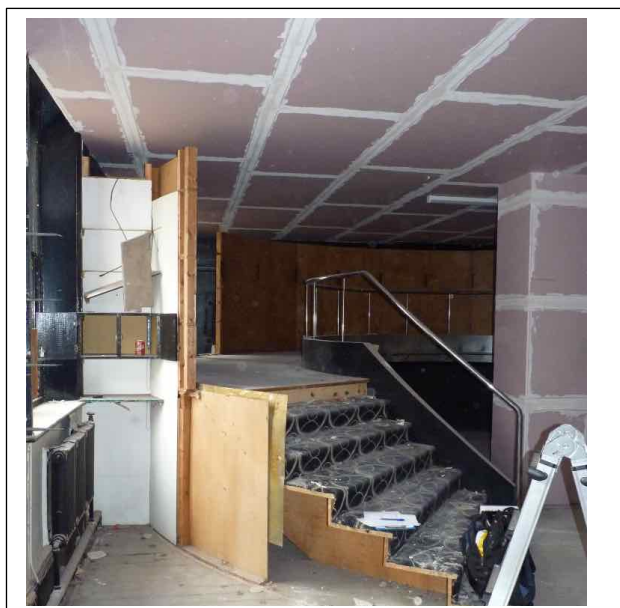
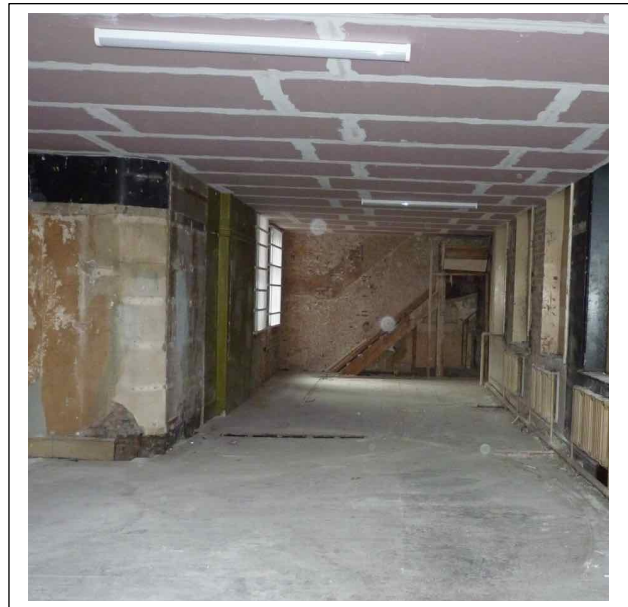


- 2.5 The building is an Eclectic style with some Gothic features of a sandstone ashlar with slate roof.
- 2.6 The statutory list forms listing entry is 1271118, it was listed 20th June 1988 and the statutory address is 1-3 Oldham Street, 15-17 Piccadilly and includes 5-11 Oldham Street, with a description of:

Offices. 1881, by Royle and Bennett; altered. Probably iron-framed, with cladding of sandstone ashlar, slate roof. Trapeziform plan on corner site. Eclectic style with some Gothic features. Five storeys and attic, 3 bays to Piccadilly, plus a narrow canted corner, 4 wide bays to Oldham Street. Ground floor altered. Chamfered piers to most upper floors, panelled friezes between 1st and 2nd floors, stylised Lombard friezes over 2nd floor, bracketed cornice over 3rd floor, ramped parapets over 4th floor, steeply-pitched roof with gable dormers; square corner oriel tiered above 1st floor and finished as a small turret with slated spirelet. Each floor has full-width multiple-light windows in each bay (4, 2 and 3 lights to the front, 4, 4, 2+2 and 2+2 in the return side to Oldham Street), those at 1st and 4th floors with square-headed lights, those at 2nd floor with arched lights, and those at 3rd floor with recessed trefoil-headed lights in arcades of 2-centred arches which have polished granite shafts with stiff-leaf capitals; all these windows sashed without glazing bars. Multiple-flue chimney stacks. Interior not inspected.

Internal

- 2.7 The building can be split into two distinct parts, the area above the former Yorkshire Building Society (“YBS”) and a second area above Betfred.
- 2.8 As noted in the accompanying photos, the area above Betfred is in a ‘stripped’ state of repair with a plasterboard dropped ceiling and timber circular podium type feature, these non-original features will be removed.
- 2.9 The first floor above ‘YBS’ is currently in use as ancillary to the ground floor, it is laid out as a modern office, which benefits from dropped ceiling and is drylined. However, it is noted that it benefits from secondary glazing.
- 2.10 The attached photos clearly display, the first floor has been subject to significant changes and alterations, there are little to no period features retained, save for windows the floor boards where still in place and ceilings above the dropped false ceilings.





3.0 Planning Policy

3.1 The principal documents for the consideration of this application comprise national and local planning policy guidance.

- The National Planning Policy Framework (“NPPF”)
- Manchester City Council Development Plan.

NPPF

3.2 The NPPF establishes the government’s planning policies for new development within England and how these are expected to be applied. ‘At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking’. In July 2018 the Ministry of Housing, Communities and Local Government published the revised NPPF incorporating around 85 reforms. The sections most relevant here are outlined below:

Section 12 - Achieving well-designed places (formerly Section 7 - Requiring Good Design)

3.3 Paragraph 124: The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

3.4 Paragraph 127: Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

3.5 Section 16 - Conserving and Enhancing the Historic Environment (formerly Section 12)

- 3.6 Paragraph 189: Requires that the significance of any heritage assets affected by development proposals, including any contribution made by their settings, should be described by an applicant. The level of detail should be proportionate to an asset's importance.
- 3.7 Paragraph 190: Local planning authority to identify and assess the significance of heritage assets affected, including by development affecting the setting of a heritage asset.
- 3.8 Paragraph 193: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 3.9 Paragraph 195: Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 3.10 Paragraph 196: 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.

The National Planning Practice Guidance

- 3.11 On March 6th 2014 the Department for Communities and Local Government (DCLG) launched the Planning Practice Guidance website which includes the section 'Conserving and enhancing the historic environment'. The guidance is a live document intended to provide further detailed information with regard to the implementation of the NPPF.

English Heritage, Conservation Principles

- 3.12 The Principles, Policies and Guidance for the sustainable management of the historic environment were produced to strengthen the credibility and consistency of decisions taken and advice given by Historic England staff (formerly English Heritage). The guidance is intended to be read by local authorities, property owners, developers and professional advisers and is fully aligned with the NPPF and many Local Plans refer to it as important policy.

Historic England, Good Practice Advice In Planning Note 2 - Managing Significance In Decision-Taking In The Historic Environment

- 3.13 The purpose of this note is to provide information on good practice to assist local planning authorities, consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and the related guidance contained within the National Planning Practice Guidance.

Historic England, Good Practice Advice In Planning Note 3 - The Setting Of Heritage Assets

- 3.14 This note provides guidance on managing change within the settings of heritage assets and supersedes 'The Setting of Heritage Assets', English Heritage, 2011

Manchester City Council Development Plan.

- 3.15 Core Strategy objectives and policies of particular relevance to the proposed scheme include:
- Spatial Objective SO1 (Spatial Principles) asserts that the sustainable development of the City can contribute to halting climate change.
 - Spatial Objective SO3 (Housing) provides for a significant increase in high quality housing provision at sustainable locations, to address demographic needs and support economic growth.
 - Spatial Objective SO5 (Transport) improves the physical connectivity of the City, through sustainable and accessible transport networks.
 - Spatial Objective SO6 (Environment) protects and enhance the natural and built environment of the city and ensure the sustainable use of natural resources.
- 3.16 Policy SP 1 (Spatial Principles) The Regional Centre will be the focus for economic and commercial development, retail, leisure and cultural activity, alongside high quality city living.
- 3.17 Policy EC 3 (The Regional Centre) within the Regional Centre housing including high density residential development will also be an appropriate use.
- 3.18 Policy CC 3 (Housing) the City Centre is expected to provide a minimum of 16,500 new units from 2010-2027. Key locations for residential development include Piccadilly, which comprises apartment schemes.
- 3.19 Policy CC 5 (Transport) proposals will be supported that increase the scope for accessible public realm improvements. Development should include adequate cycle parking provision.
- 3.20 Policy CC 6 (City Centre High Density Development) City Centre development will generally be high-density. It is a location where land should be used to maximise the efficiency. Appropriate scale, massing and height of development in the City Centre will significantly exceed what is appropriate elsewhere in the City.

- 3.21 Policy CC 7 (Mixed Use Development) the City Centre presents the most viable opportunity for mixed-use development. Active ground floor uses (shops, food and drink and leisure) will be appropriate in locations which have an established public function, or as part of a development which will create such an environment.
- 3.22 Policy CC 8 (Change and Renewal) states that the approach to development and redevelopment in the City Centre will be to welcome large-scale schemes.
- 3.23 Policy CC 9 (Design and Heritage) the design of new buildings will need to be of the highest standard in terms of appearance and function. Development in Manchester City Centre should preserve or enhance heritage assets including listed buildings and conservation areas. The Council will support high density and mixed use development in the City Centre.
- 3.24 Policy CC 10 (A Place for Everyone) the City Centre will develop as a location which appeals to a wide range of residents/visitors.
- 3.25 Policy H 1 (Overall Housing Provision) 60,000 new dwelling will be provided over the plan period in Manchester. High density developments (over 75 units per hectare) are appropriate in the City Centre given its accessible location. Within the City Centre there will be a presumption towards high density housing development, within mixed use schemes which contribute to regeneration initiatives or niche housing markets by providing sustainable, well-designed accommodation which meets the needs of workers moving to Manchester. 90% of residential development will be on previously developed land. The re-use of vacant housing, including the renewal of areas characterised by poor quality housing, will be prioritised. New developments should take advantage of existing buildings where appropriate through refurbishment or rebuilding works. If this is not possible, development schemes should contribute to renewal of adjacent areas which contain vacant or derelict buildings.
- 3.26 Policy H 5 (Central Manchester) central Manchester, over the lifetime of the Core Strategy, will accommodate around 14% of new residential development.
- 3.27 Policy T 1 (Sustainable Transport) deliver a sustainable, high quality, integrated transport system to encourage modal shift away from car travel to public transport, cycling and walking, to support the needs of residents and businesses and to prepare for carbon free modes of transport.
- 3.28 Policy EN 1 (Design Principles and Strategic Character Areas) the City Centre contains a rich legacy which reflects its urban evolution to the current day and includes listed buildings, conservation areas, archaeological remains and an historic street pattern. Its core area presents a particularly dense environment that accommodates a wide and closely integrated range of uses including commercial, civic and residential activities.
- 3.29 Policy EN 3 (Heritage) proposals which enable the re-use of heritage assets will be encouraged where they are considered consistent with the significance of the heritage asset.

- 3.30 Policy EN 4 (Reducing CO2 Emissions by Enabling Low and Zero Carbon Development) all developments must follow the principle of the Energy Hierarchy; being designed to reduce the need for energy through energy efficient design and features and meet residual energy requirements through the use of low or zero carbon energy generating technologies.
- 3.31 Policy EN 6 (Target Framework for CO2 Reductions from Low or Zero Carbon Energy Supplies) residential development of 10 or more units and all other development over 1,000 sqm to meet a minimum target. Developments smaller than the above threshold but involving the erection of a building or substantial improvement to an existing building will be expected to meet the minimum target where viable.
- 3.32 Policy EN 8 (Adaption to Climate Change) developments will be expected to be adaptable to climate change in terms of design, layout, siting and function of buildings and external spaces.
- 3.33 Policy EN 16 (Air Quality) developers should take measures to minimise and mitigate the local impact of emissions.
- 3.34 Policy EN 19 (Waste) developers to submit a waste management plan to demonstrate how both construction and demolition waste will be minimised and recycled on site wherever possible and how the sustainable waste management needs of the end user will be met.
- 3.35 Policy DM 1 (Development Management) developments should have regard to the following specific issues for which more detailed guidance may be given within a supplementary planning document including: appropriate siting, layout, form, massing, materials and detail. Impact on the surrounding areas in terms of the design, scale and appearance of the proposed development. Development should have regard to the character of the surrounding area. Effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise. Accessibility: buildings and neighbourhoods fully accessible to disabled people, access to new development by sustainable transport modes. Community safety and crime prevention, design for health, adequacy of internal accommodation and external amenity space. Refuse storage and collection. New residential development to meet as a minimum Code for Sustainable Homes standards.

Extant (remaining) Unitary Development Plan (UDP)

- 3.36 Many of the UDP policies were replaced by the Core Strategy, however, the following policies have been saved:
- 3.37 Policy DC5.1 (Flat Conversions) planning applications to convert property to flats, the Council will have regard to the standard of accommodation for the intended occupiers of the premises; effects on adjoining dwelling; general effects on the character of the neighbourhood, including

the extent to which flat conversion schemes are a new or an established feature of the immediate area; the desirability of achieving easy access for all, including disabled people; the satisfactory provision of refuse storage and collection facilities.

- 3.38 Policy DC5.2 there will be a general presumption in favour of flat conversions on the upper floors of businesses within commercial areas and in properties on main road frontages, subject to other relevant policies of the Plan. They will be particularly welcome where large, old, difficult to re-use properties are involved, and where proposed schemes provide investment enabling the retention and improvement of housing stock.
- 3.39 Policy DC18 (Conservation Areas) states that the Council will seek to preserve and enhance the character of its designated conservation areas.
- 3.40 Policy DC19 (Listed Buildings) 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 not permit a change of use of a listed building, where it would have a detrimental effect on the character or appearance of the building; not permit any external or internal alteration or addition to a Listed building where it would be an adverse effect on its architectural or historic character; and seeks to ensure that development does not have a detrimental impact upon the setting of listed buildings.
- 3.41 Policy DC26 'Development and Noise' aims to minimise the adverse impact of noise on noise-sensitive developments.

Guide to Development in Manchester Supplementary Planning Document (SPD)

- 3.42 Section 1 (Creating a Sense of Place) aims to provide guidance which will help to develop and enhance an environment within Manchester which is visually attractive, has a unique and positive sense of place
- 3.43 Section 2 (Design) quality is much more than aesthetics. There should be no conflict between good design and buildings that function well and meet the needs of their occupants. There are seven key matters to address.
- 3.44 Section 3 (Accessibility) developments to be fully inclusive and accessible and the Council's vision is for Manchester to be recognised as the most accessible City in Europe.
- 3.45 Section 4 (Environmental Standards) aims to improve general understanding and to promote transparency and consistency in achieving sustainable developments.
- 3.46 Section 7 (Housing Density & Mix) the character and identity of an area that will determine appropriate densities and form, and clearly this will vary across the City.
- 3.47 Section 8 (Community Safety and Crime Prevention) promotes a safer environment.

- 3.48 Section 10 (Internal Design Principles) the Council will work with developers to promote a high standard of internal design for new and converted housing, to encourage and support innovation, and to improve internal space standards
- 3.49 Section 12 (The City Centre) not all new buildings can, or should be iconic but new developments will be expected to contribute positively to the identity and quality of the City Centre.
- 3.50 The proposed redevelopment scheme has been designed in accordance with the design guidance outlined within this document.

Providing for Housing Choice Supplementary Planning Document (SPD)

- 3.51 The SPD provides planning guidance about the mix of new housing provision required in Manchester to meet the requirements of the City's planning policies and government guidance about planning policies for housing provision

Manchester Residential Quality Guidance

- 3.52 The Manchester Residential Quality Guidance does not seek to replicate existing policy and regulations that will continue to apply to all new residential development. In addition it provides the baseline minimum requirements and mandatory standards that all new residential proposals will be required to satisfy or exceed in order to be considered sustainable development. New development is expected to comply with the following guidance. Where a proposal does not, thorough justification will need to be provided. Typical justification for exception will be in order to produce exemplary and innovative design and/or projects that provide overriding public benefit

4.0 Relevant Planning and Site History

15 - 17 Piccadilly

- 4.1 054064/FO/CITY1/98: Conversion of floors 2-5 to 18 self-contained flats, elevational alterations including new entrance and installation of plant in basement.
- Approved 20th January 1999.
- 4.2 054065/LO/CITY1/98: LISTED BUILDING CONSENT Alterations in connection with proposed change of use.
- Approved 20th January 1999.

5.0 Access & Servicing Considerations

Approaching horizontal building access

- 5.1 Pedestrian access to the site is directly from Piccadilly via a level access that will make use of the existing residential access.

Vertical Circulation/ Disabled Use of the Building

- 5.2 The six flats are located at first floor, however, there is step and lift access to the first floor, therefore providing a level access to allow disabled and persons with mobility constraints to access the flats.

Car Parking

- 5.3 There is no car parking on site at present and none proposed.

Cycle Parking

- 5.4 Cycle parking would be provided on site by means of a cycle store located within the first floor demise - cycle spaces will be Sheffield type to allow both wheels and cross bar to be locked.

Servicing

- 5.5 The site does not benefit from car parking and it is not possible for any to be accommodated given the listed status of the building. Due to the City Centre location car parking provision is not necessary due to the highly sustainable nature of the site.
- 5.6 Given the location it is anticipated that future residents will travel by public transport particularly the Metrolink and railway. Should future residents require access to a car then car clubs provide a sustainable option, whilst there are numerous public car parks within the City Centre which offer contract parking options.
- 5.7 Vehicle movements associated with the flats will be minimal and will not have a material impact on the highway network.
- 5.8 Where deliveries are made, it is anticipated that as there are already 18 flats, any deliveries will be combined to not result in a material increase in trips.
- 5.9 A Waste Management Strategy Pro-forma has been submitted as part of the application and available details known at this stage are provided.
- 5.10 During the refurbishment works any waste generated will be stored within the building/site. This will be transferred to contractor vehicles which will park in the identified loading bay. Contractor vehicles will only park temporarily within this bay and will use nearby on street and public cars parks at other times. It is anticipated that a Construction Management Plan will be provided subject to a planning condition before the development commences.

6.0 Planning Considerations

- 6.1 The proposal that we seek planning permission for is the conversion of the first floor into four self-contained flats.
- 6.2 We consider the key issues to be:-
1. The principle of the development in land use terms.
 2. Need for use.
 3. Reuse of the listed building.
 4. Residential amenity.
 5. Standard of accommodation.
 6. Highway and accessibility.
 7. Energy and sustainability.
 8. Waste.
 9. Disabled access.
 10. Cycle parking.
 11. Crime.
 12. Ecology.
- 6.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the T&CPA 1990 require planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Principle of Development

- 6.4 The NPPF sets out a presumption in favour of sustainable development unless the development would result in demonstratable and significant effects.
- 6.5 The NPPF states these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (para.184).
- 6.6 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (para.197)
- 6.7 Policy CC 3 (Housing) the City Centre is expected to provide a minimum of 16,500 new units from 2010-2027. Key locations for residential development include Piccadilly, which comprises apartment schemes.
- 6.8 Policy CC 6 (City Centre High Density Development) City Centre development will generally be high-density. It is a location where land should be used to maximise the efficiency. Appropriate scale, massing and height of development in the City Centre will significantly exceed what is appropriate elsewhere in the City.

- 6.9 Policy CC 7 (Mixed Use Development) the City Centre presents the most viable opportunity for mixed-use development.
- 6.10 Policy CC 9 (Design and Heritage) development in Manchester City Centre should preserve or enhance heritage assets including listed buildings and conservation areas. The Council will support high density and mixed-use development in the City Centre.
- 6.11 Policy H 1 (Overall Housing Provision) within the City Centre there will be a presumption towards high density housing development, within mixed use schemes which contribute to regeneration initiatives or niche housing markets by providing sustainable, well-designed accommodation which meets the needs of workers moving to Manchester.
- 6.12 Policy H 5 (Central Manchester) central Manchester, over the lifetime of the Core Strategy, will accommodate around 14% of new residential development.
- 6.13 Policy DC5.2 there will be a general presumption in favour of flat conversions on the upper floors of businesses within commercial areas
- 6.14 Policy DC19 (Listed Buildings) seeks to ensure that development does not have a detrimental impact upon the setting of listed buildings.
- 6.15 The proposal seeks the change of use of the vacant first floor of a building that the upper four floors are already in residential use whilst the ground floor will remain in a commercial use.
- 6.16 The site is located in a highly sustainable location with a number of residential uses in close proximity.

Summary

- 6.17 Against this policy context, the reuse of this vacant first floor building within an existing mixed-use building, which benefits from access via an existing residential access fully accords policies CC3, CC7, CC9, H1, H5, DC5.2 and DC19 of the adopted development plan.

Need for use

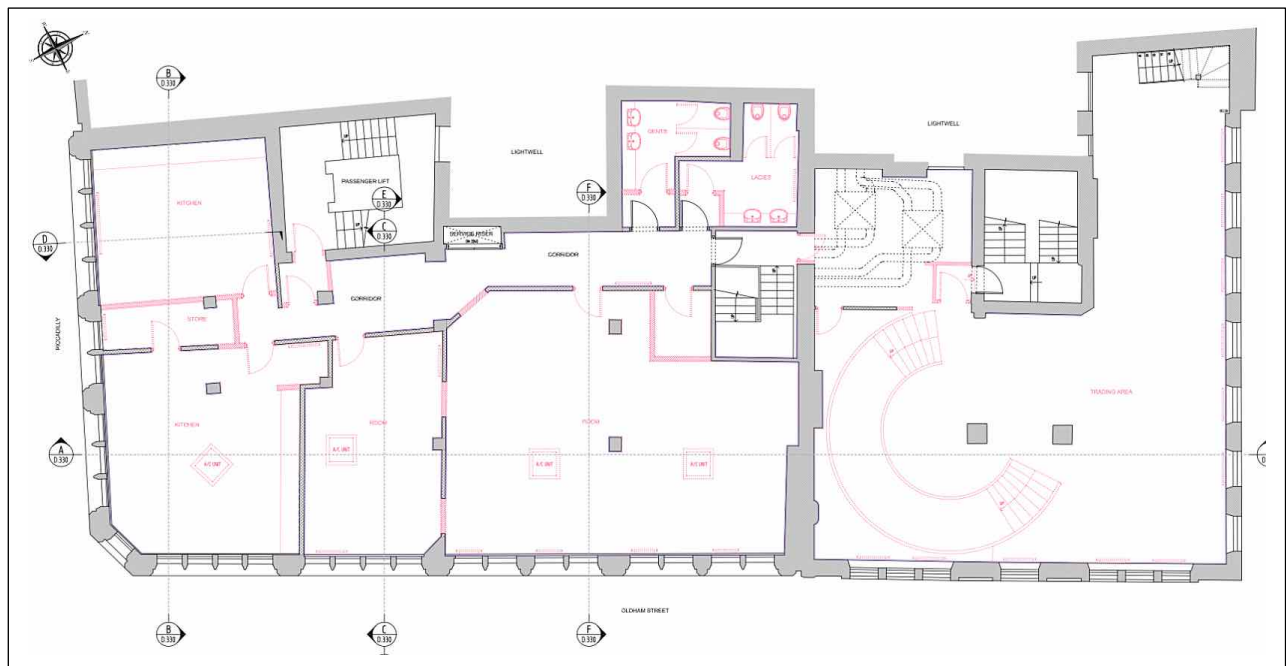
- 6.18 The site can be split into two parcels, one is the area above Betfred that has been vacant for a number of years. The ground floor former YBS is due to be re-occupied and as part of the new tenancy, they have relinquished the first floor as it is not required for the new operator. As such, the first floor is completely vacant. The first floor would only be accessible via the existing residential access point from Piccadilly. The combining of a commercial and residential access is not considered acceptable.
- 6.19 The proposed change of use from commercial to residential is an appropriate reuse of this first floor and will facilitate the repair, refurbishment and use for residential, which is deemed to be an appropriate use in the city centre.

Summary

- 6.20 The first floor is completely surplus to requirements and is in need of re-occupation, this proposal will safeguard the heritage asset whilst yielding an appropriate use for this vacant first floor.

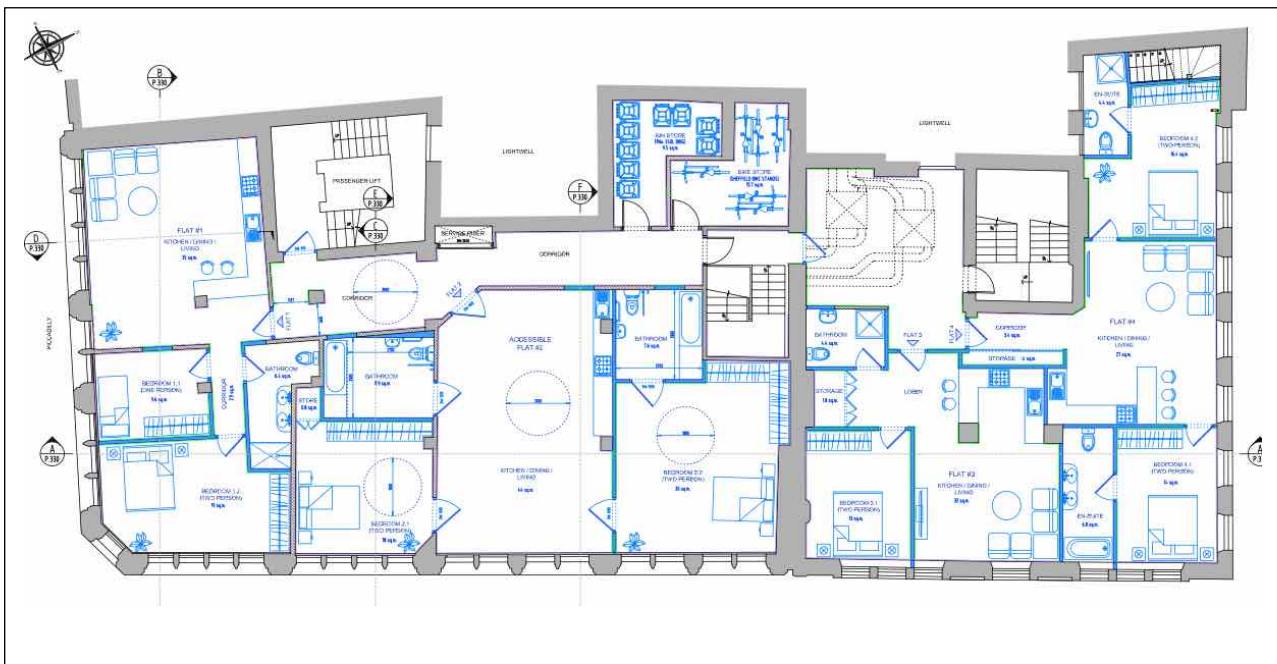
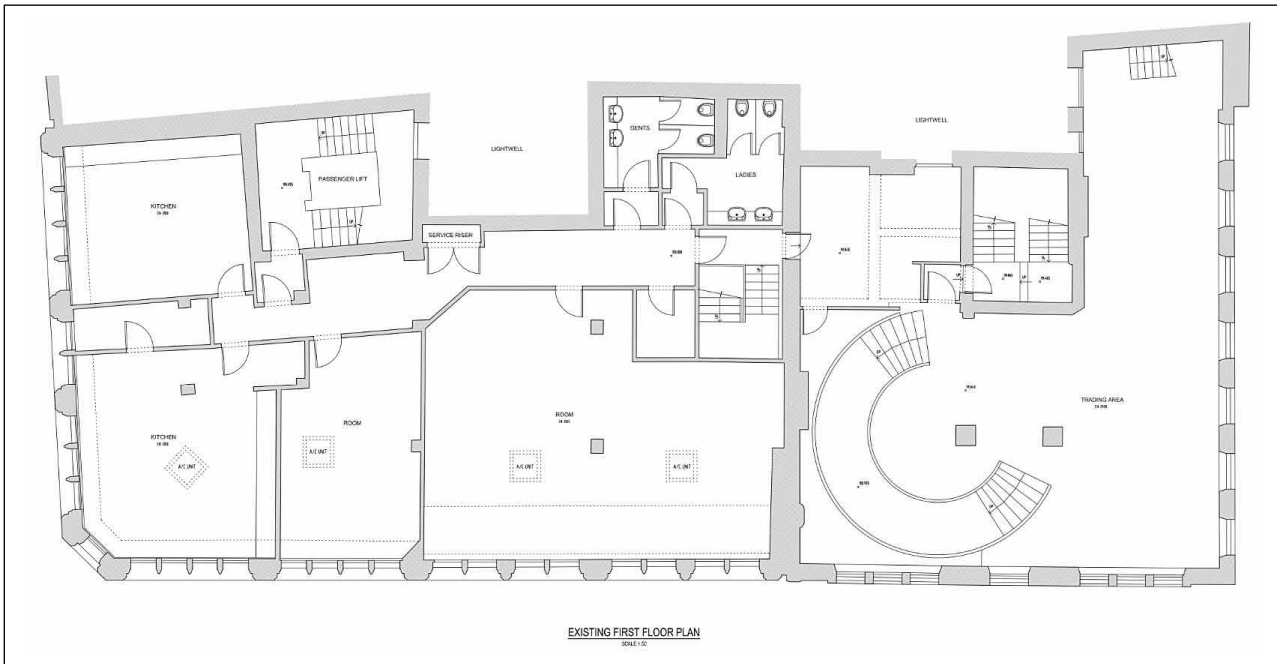
Reuse of the listed building

- 6.21 External: the scheme makes no alterations to the external appearance of the building and the existing windows will be retained. if however, repair works to the windows are required, this will be subject to a separate listed building application.
- 6.22 Therefore, the scheme has no implications on the appearance, aesthetics or visual appearance of the heritage asset or the Smithfield Conservation Area.
- 6.23 Internal: as noted in the accompanying photo schedule, the existing building has been subject to extensive internal alteration via it is use an office area and for the former use of 7-11 Oldham Street, which at the time of writing is unclear.
- 6.24 The internal features are not specified in the listing of the building, with the focus being on the external elevations of the building. It is also pertinent that the upper four floors have already been converted into residential flats.
- 6.25 As one will note below, demolition works are minimal.



- 6.26 By keeping the demolition works minimal and via the use of clever design, the Applicant has sought to keep internal changes to an absolute minimum, accordingly the existing plan form is

retained and the changes are limited to those that are essential to update, modify and present this new four flat use. Below is a comparison of the existing versus proposed.



Summary

- 6.27 The works to the internal layout retain the existing plan form with only minimal interventions. Accordingly, the proposal accords with the requirements of Policies EN3 and DC19.

Residential Amenity

- 6.28 Policy DM1 is clear that development should ensure that the amenities of existing residents and for future occupiers. The scheme will not alter the mass, bulk nor appearance of the building, therefore, we submit that the scheme will not lead to a material change in terms of the amenities of the existing residential use.
- 6.29 In terms of future occupiers, we take the principle points in turn.
- 6.30 Outlook: the property is a corner site, which has window on three elevations, which ensures that each flat has copious areas of glass that provide a good outlook. All habitable rooms are served by at least two large sash windows.
- 6.31 Light: all flats have east or south facing windows, this ensures that the said flats will benefit from sunlight.
- 6.32 Internal Noise: it is acknowledged that the flats are at first floor and sited above commercial uses, therefore the application is accompanied by a Noise Impact Assessment (“NIA”) prepared by Braiden Acoustics Ltd. The assessment measured the noise insulation between ground and first floor concluding that the noise attenuation as existing is sufficient to protect amenities.
- 6.33 It should also be noted that the future occupier of the ground has a requirement to ensure that the sound attenuation applied to the underside of their commercial ceiling ensures noise transmission to the first floor is mitigated.
- 6.34 External Noise: the NIA also assessed noise from external sources, as noted, the first floor benefits from sliding sash windows. however, the majority of the windows already benefit from secondary glazing, which will be retained. Windows that do not benefit from secondary glazing will be retro-fitted secondary glazing, however, this is subject to a separate specific LB application that will prepared and submitted separately. The NIA has accordingly concluded that the sound proofing already in place will protect the amenities of residents.
- 6.35 Ventilation: the existing first floor has operated as an office ancillary to the bank, as such, the rooms benefit from a mechanical ventilation system, which provides fresh air, heating and cooling. This system is of sufficient power and size for a busy city centre bank, therefore, with modest modification it can be updated to provide the necessary fresh air and cooling for four self-contained flats without modification to the external plant. This system therefore provides the necessary ventilation system if residents choose to not open windows.

Summary

- 6.36 The scheme will protect the amenities of existing residents and will provide a well thought out layout that provides good levels of outlook, light and noise mitigation. The proposal accordingly complies with the requirements of Policy EN16.

Standard of Accommodation

- 6.37 The scheme provides a mix of two, three and four person flats. All flats have fitted wardrobes and large open plan living rooms, together with exceeding minimum floor areas.
- 6.38 The following table provides an over-view of the accommodation have regard to the National Technical Housing Standards, which

Flat No.	Type	NTHS Size (sqm)	Size (sqm)	Living (sqm)	Bedroom (sqm)	Bedroom (sqm)
1	Two-bedroom - three-person	61	75 (+14sqm)	35	9	9
2	Two-bedroom - four-person	70	112 (+42sqm)	44	18	18
3	One-bedroom - two-person	50	53 (+3sqm)	32	10	10
4	Two-bedroom - four-person	70	74 (+4sqm)	27	13	13

- 6.39 The table demonstrates that all flats and bedrooms exceed NTHS standards.
- 6.40 Amenity Space: it is acknowledged that the flats do not provide amenity space, however, this is not possible as a result of the building being listed and there is no ability to provide balconies or a communal amenity space. However, we do note the site is centrally located and has accessed to the various open spaces of the town centre and green areas Manchester City Centre benefits from.

Summary

- 6.41 The scheme provides flats that exceed minimum space standards.

Energy and Sustainability

- 6.42 The Application is accompanied with an Energy and Sustainability Assessment prepared by Watt Energy & Consulting Engineers.
- 6.43 The statement details how the development will incorporate sustainable design and resource efficiency in line with the both the Energy Hierarchy and national sustainable design definitions, so to meet the policy requirements and council targets whilst reducing its overall environmental impact. The methodology and calculations are consistent with the MCC Appendix A EN6 Energy Target Explanation and all figures used within this report have been based on the most recent issue of drawings and modelled using SAP 2012 to accurately predict Energy Usage and CO2 reductions.
- 6.44 In relation to the planning documents and policies outlined above, the development is required to achieve a 10% reduction in carbon emissions over Part L 2013 of the Building Regulations and also aim for a status of Carbon Neutral.
- 6.45 In order to achieve compliance, the development will utilise highly efficient electric panel heaters and immersion cylinders to satisfy the heating and hot water requirements, whilst also being designed with a fabric first approach to ensure all improvement possible are undertaken.

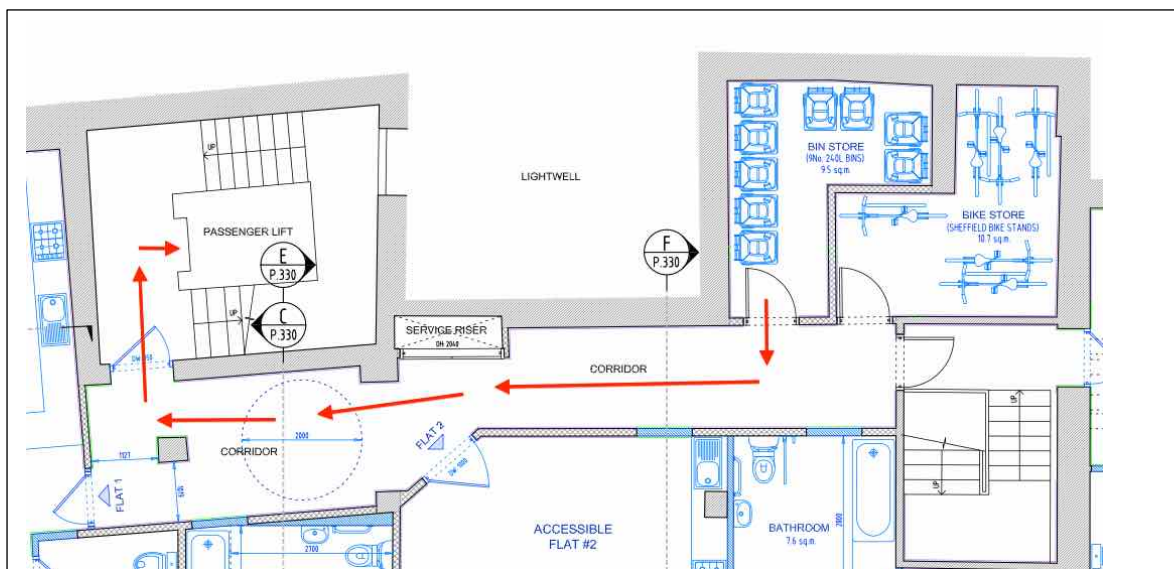
- 6.46 Following the LZC feasibility assessment, it is not proposed that any additional technologies will be proposed at this stage. This is a result of the development being a listed building and also sufficient savings in carbon emissions being experienced through efficient design measures alone.
- 6.47 As a result of the above the predicted site wide reduction in CO₂ over Part L 2013 of the Building Regulations is 15.7%.

Summary

- 6.48 The development therefore complies with Manchester City Council's current and future policy requirements and planning targets.

Waste

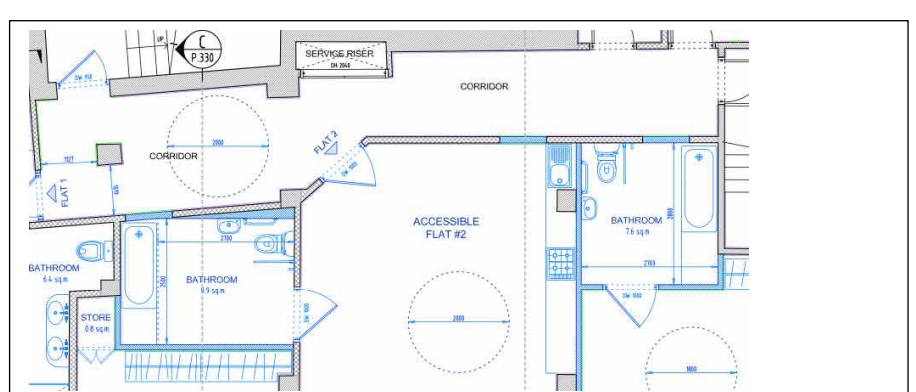
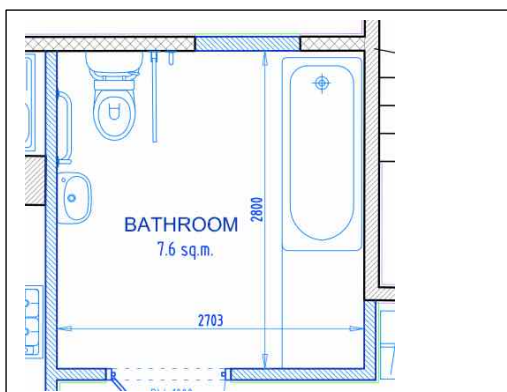
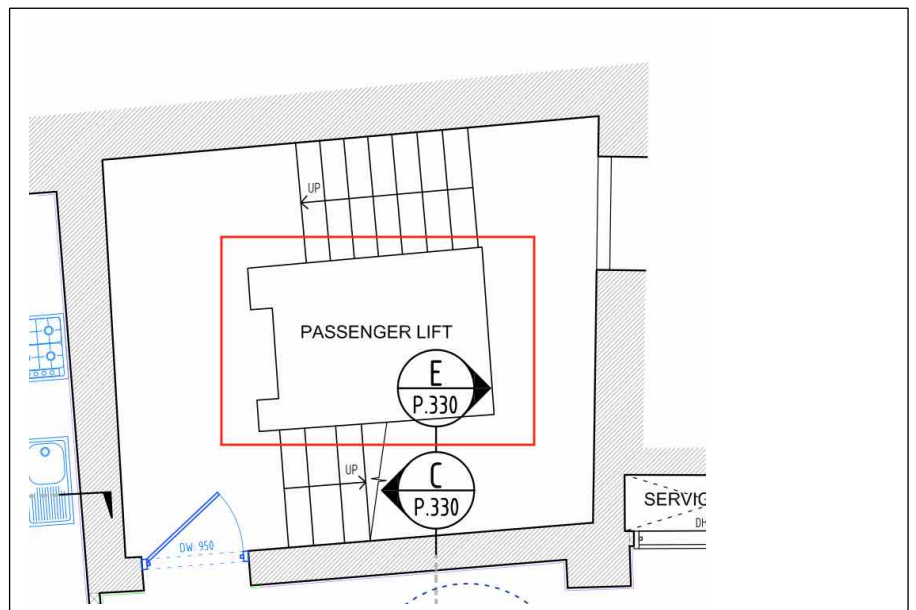
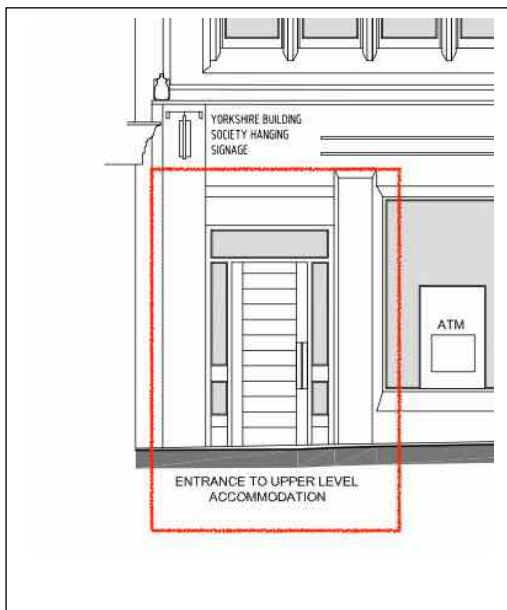
- 6.49 The bin store has been designed having regard to GD 04 - 'Waste Storage & Collection Guidance for New Developments'. Having regard to the guidance, it states schemes of 10 plus flats should provide 0.43sqm of space for bins.
- 6.50 A communal bins store is provided at first floor for the six flats that measures 9.5sqm. this bin store is able to accommodate nine 240 litre bins, which would be split to provide communal bins for residents providing:
- General Waste.
 - Pulpable Recycling.
 - Mixed Recycling.
- 6.51 Collection will be via a private waste collection on a weekly basis, the private collection will transport the bins to the highway for collection via the lift and return the said bins once collected. The contract for collection will be subject to agreement with licenced operators. Within the flats, the kitchens will be designed to allow the separation and storage of recyclables from non-recyclables to assist with sorting and to increase the instances of recycling.

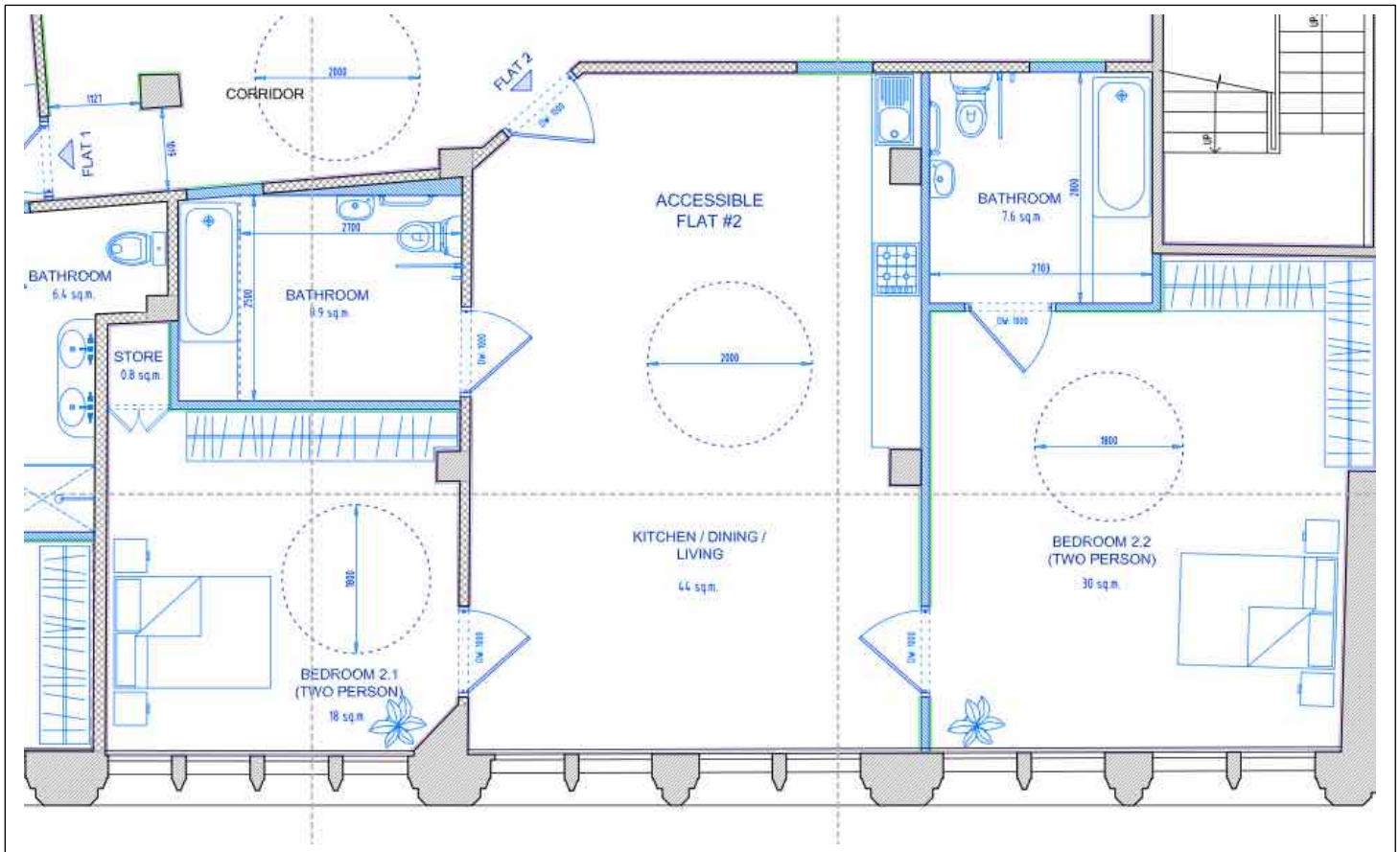


Disabled Access

6.52 The ground floor has direct level access and access to upper floors is via a lift. Disabled access is possible to all flats. Flat 2 has been designed to be full accessible and has been designed to fully comply with 'Design for Access 2' ("DA2").

- Access to the building is via a level access.
- The first floor is then accessed via a passenger lift.
- The corridor door is a clear width of 950mm.
- The corridor then has clear access of 1127mm and 1019mm of the central column.
- There is sufficient manoeuvring space within the corridor of 2000mm.
- The door to Flat 2 is 1000mm clear.
- The main bathroom (8.9sqm) and en-suite (7.6sqm) have been designed to be fully accessible as per the DA2 guidance
- Bedrooms are fully accessible being 18sqm and 30sqm, meaning there is sufficient space to allow disabled users to manoeuvre and are over 4000mm x 4000mm in size.
- The kitchen will comply with the guidance in DA2 page 81 - this can be subject to agreement of a condition.
- Lighting and switches will be installed in compliance with DA2.
- Surfaces and finishes will be installed in compliance with DA2.



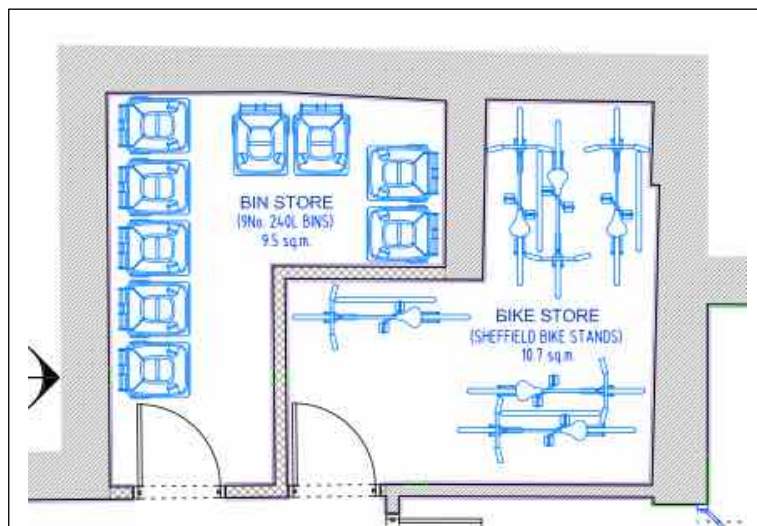


Summary

- 6.53 It is however noted that the building is listed, which does mean that the internal fabric and the changes that can be made are limited. However, we are of the view that disabled access is possible to all four flats, however, Flat 2 is designed to be fully accessible with oversized bathroom and bedrooms.

Cycle Parking

- 6.54 Policy DM1 has a requirement for one cycle space per apartment. As one will note on the drawing below, a dedicated secure bike store is provided at first floor and has capacity for 6 bicycles.



Crime

6.55 The site is located in the City Centre, however, the site is located at first floor and is accessed via secure existing residential entrance. The Crime Prevention measures proposed include:

- The communal entrance doors will be self-closing and secured with a multi-point electronic lock and capable of being operated via an electronic access control system - a fob system would be used. The entrance door would also benefit from a dusk til dawn, operated by photoelectric cell light (white light).
- The secondary access to the first floor corridor would also be operated via an electronic access control system - a fob system would be used.
- The entrance is controlled by means of a video entry phone system so that residents can confirm the identity of visitors before allowing access.
- Flats would be fitted with a wireless (BS 6799) wireless (monitored) alarm system with PIR.
- Apartment entrance doors provided with door viewers and chain limiters, doors would be certified BS PAS 24 - for avoidance of doubt, the doors would not have fixed sidelights.
- The locks of the front doors of the dwellings to be fitted with split-spindles, essentially meaning they are key only entry and are locked from the exterior of the dwelling when shut. This will ensure that they cannot unintentionally be left insecure.
- Internal doors to cycle and refuse stores to be solid-core (min. 44mm thick), with 3 hinges and an electronic lock controlled by resident key-fob.
- The communal spaces would be fitted with PIR motion sensors to activate lighting.
- The communal areas will be subject to a maintenance plan to address litter removal, cleaning and repairs to the communal areas, such as lighting, signage, access controls.
- A Construction Management plan would incorporate crime prevention, site security, the management of the access; as well as vehicle movements, protection of amenities during construction (such as dust, noise, etc), hours of working, vermin control and project timing overview.

Ecology

6.56 The site is although vacant, is sealed and the former use only recently vacated, and there are no indications of bat or bird activity within the building. Therefore, the conclusion reached is there is no requirement for a bat or bird survey.

7.0 Heritage Considerations

- 7.1 This part of this combined report deals with the significance and impact of the development on this Grade II listed building and the proposal to change the use to six self-contained flats, including their settings, as required by para. 189 of the NPPF. The conclusions will then allow the potential impacts of the proposals to be assessed.
- 7.2 Guidance for local planning authorities, property owners, and developers is provided in the NPPF, entitled ‘Conserving and Enhancing the Historic Environment’
- 7.3 Para.189: Requires that the significance of any heritage assets affected by development proposals, including any contribution made by their settings, should be described by an applicant. The level of detail should be proportionate to an asset’s importance.
- 7.4 Para.190: Local planning authority to identify and assess the significance of heritage assets affected, including by development affecting the setting of a heritage asset.
- 7.5 Para.193: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 7.6 Para.195: Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss,
- 7.7 Para.196: 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.

Assessment of Significance

- 7.8 This section assesses the significance of any heritage assets potentially affected by development proposals, including their settings, as required by para. 189 of the NPPF. The conclusions will then allow the potential impacts of the proposals to be assessed. The NPPF Glossary defines a heritage asset as:
- *A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).*

- 7.9 This assessment has been informed by English Heritage's *Conservation Principles* (April 2008) and Historic England's *Managing Significance in Decision- Taking in the Historic Environment* (March 2015).
- 7.10 The concept of 'significance' lies at the heart of English Heritage's Conservation Principles, it is a collective term for the sum of all the heritage values that society attaches to a place. Understanding who values a place and why provides the basis for managing and sustaining those values for future generations. Heritage values can be arranged into the following four groups:
- **Evidential Value:** the potential of a place to yield evidence about past human activity.
 - **Historic Value:** the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.
 - **Aesthetic Value:** the ways in which people draw sensory and intellectual stimulation from a place
 - **Communal Value:** derived from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory

Levels of Significance

- **High Significance:** A theme, feature, building or space which is has a high cultural value and forms an essential part of understanding the historic value of the site, while greatly contributing towards its character and appearance. Large scale alteration, removal or demolition should be strongly resisted.
- **Medium Significance:** A theme, feature, building or space which has some cultural importance and helps define the character, history and appearance of the site. Efforts should be made to retain features of this level if possible, though a greater degree of flexibility in terms of alteration would be possible.
- **Low Significance:** Themes, features, buildings or spaces which have minor cultural importance and which might contribute to the character or appearance of the site. A greater degree of alteration or removal would be possible than for items of high or medium significance, though a low value does not necessarily mean a feature is expendable.
- **Neutral:** Themes, spaces, buildings or features which have little or no cultural value and neither contribute to nor detract from the character or appearance of the site. Considerable alteration or change is likely to be possible.
- **Intrusive:** Themes, features or spaces which actually detract from the values of the site and its character and appearance. Efforts should be made to remove these features.

Assessment of Works

- 7.11 The application is for the change of use of the first floor from Class E (A2) to six self-contained flats, together with associated works.
- 7.12 In preparing the application, the existing layout lends it's self to conversion with minimal works and no external works are required, nor proposed.
- 7.13 Therefore, the works are limited to what is necessary to re-use the first floor. In terms of repair, these works will be subject to a separate application if deemed necessary on inspection by the dedicated window specialist.
- 7.14 The internal fabric of the building has undergone significant changes, on the basis of our inspection, the building has been stripped of the majority of the period features with only isolated pockets of historic fabric remaining. One can go as far to say, the building ha been effectively stripped of features - as shown in the photographs.
- 7.15 There is little of the interior of the architectural features of interest at first floor and note this is also the same for the ground and basement. The part of the building above Betfred is vacant ands this has the appearance of some form of club, albeit it is unknown who the former occupier was.
- 7.16 The principle aim of the scheme is to return the vacant floors to a beneficial use with minimal intervention into the existing plan form and what remaining features of value that remain.

Scope of Works

- 7.17 The scope of works proposed are modest and start with the premise, retain what remains of historic fabric and undertake the least disruptive works to ensure the existing plan form is retained. the Applicant is fortunate in that due to the significant number of windows and the current layout, the building lends itself to re-use for residential with minimal interventions. Therefore, save for the removal of the clearly modern additions, the interventions are minimal.
- Removal of the existing dropped ceilings and repair the fixings.
 - Removal of M&E that is contained within the dropped ceilings and repair the existing ceilings.
 - If coving is discovered, a separate Listed Building application will be submitted.
 - It is noted there are isolated pockets of coving, this will be retained and repaired.
 - The timber podium configuration about 7-11 Oldham Street will be removed.

- Where plaster has been removed in 7-11 Oldham Street, the walls will be repaired, made good and a lime based plaster will be re-applied consistent with Historic England guidance - the details of such can be agreed subject to a pre-commencement condition.
- All existing floorboards will be carefully removed, labelled and servicing required will be fitted between joists. The floorboards will be replaced, covered with ply to protect and new finished floor overlaid.
- The flats will be electrically heated, therefore negating need for intrusive pipe work, cabling will run between joists, existing notches and with minimal invasive works. Details of these works can be subject to a pre-commencement condition.
- The windows are timber sash with the majority being in good state of repair and not requiring works. A separate survey of the windows will be undertaken, however, that will be by a specialist historic window repair company and will, if required be subject to a separate application.
- A benefit of the existing building is the presence of secondary glazing that will be retained.
- The bin and cycle store currently comprises toilets, as such, the said features will be removed and the rooms repaired but with mechanical ventilation remaining.
- All new partition walls will be timber stud and will, if required, be scribed around existing features where appropriate.
- New kitchens will be connected to electrical supply with waste and water to be positioned between joists with minimal intervention.
- Kitchens will be modest in height and due to the significant floor-to-ceiling, will not reach ceiling level.
- The existing redundant stair above 8-11 Oldham Street will be retained and boxed in.

7.18 The scope of works, in view of the proposed development, is to demonstrate 'less than substantial harm' and that in line with paragraph 196 of the NPPF this harm be weighed in the balance against the public benefits of the scheme.

The Heritage Asset

7.19 The application site is Grade II listed and comprises 1-3 and 5-11 Oldham Street, and 15-17 Piccadilly. The building was listed 20th June 1988 (List Entry No.1271118) and is described as:

Offices. 1881, by Royle and Bennett; altered. Probably iron-framed, with cladding of sandstone ashlar, slate roof. Trapeziform plan on corner site. Eclectic style with some Gothic features. Five storeys and attic, 3 bays to Piccadilly, plus a narrow canted corner,

4 wide bays to Oldham Street. Ground floor altered. Chamfered piers to most upper floors, panelled friezes between 1st and 2nd floors, stylised Lombard friezes over 2nd floor, bracketed cornice over 3rd floor, ramped parapets over 4th floor, steeply-pitched roof with gable dormers; square corner oriel tiered above 1st floor and finished as a small turret with slated spirelet. Each floor has full-width multiple-light windows in each bay (4, 2 and 3 lights to the front, 4, 4, 2+2 and 2+2 in the return side to Oldham Street), those at 1st and 4th floors with square-headed lights, those at 2nd floor with arched lights, and those at 3rd floor with recessed trefoil-headed lights in arcades of 2-centred arches which have polished granite shafts with stiff-leaf capitals; all these windows sashed without glazing bars. Multiple-flue chimney stacks. Interior not inspected.

History

- 7.20 The building was built circa 1881, by Royle and Bennett the following mapping illustrates the changes to the surround area, whilst the building has remained relatively unaltered externally.



OS Map = 1891



OS Map = 1848



Photo = 1940s



Photo = 1930s



Archaeology Potential

- 7.21 The site has is located in the centre of Manchester City Centre and therefore there is a high likely hood of archaeological remains, however, the potential for much earlier archaeological deposits is unknown as the site is listed and the application is related to the first floor only, the works will have no bearing on such.

External Fabric

- 7.22 The listing makes no reference to the internal fittings of the building and concentrates on construction and appearance. There are no works proposed to the exterior of the building. Therefore the scheme will have no bearing on the heritage asset.

Internal Fabric

- 7.23 The proposals respect the historic floor plan by retaining the existing divide between the two buildings and the stairs. In terms of the more recent changes to layout no alterations are made.
- 7.24 All windows and doors will be retained and refurbished; and cornices repaired and respected where surviving (this applies across the building). The inappropriate modern floor coverings dropped ceilings and facilities to allow office use will be removed.
- 7.25 The plan form will therefore form the basis of the new layout with minimal partition walls being added. Where these intersect the ceiling, any existing coving or period features will be retained and scribed around. In the northern proportion of the building, the walls at some

point were stripped back to brick work, therefore, there are no features of historic value in these areas. Accordingly, coving and skirting boards will be re-introduced, which is considered a heritage gain. They will be subject to the submission of a condition and agreement of details.

- 7.26 The alterations proposed are considered modest in extent.
- 7.27 The sash windows and the generous floor to ceiling proportions will be reintroduced. These elements are all to be retained and celebrated through repair, reinstatement and redecoration.

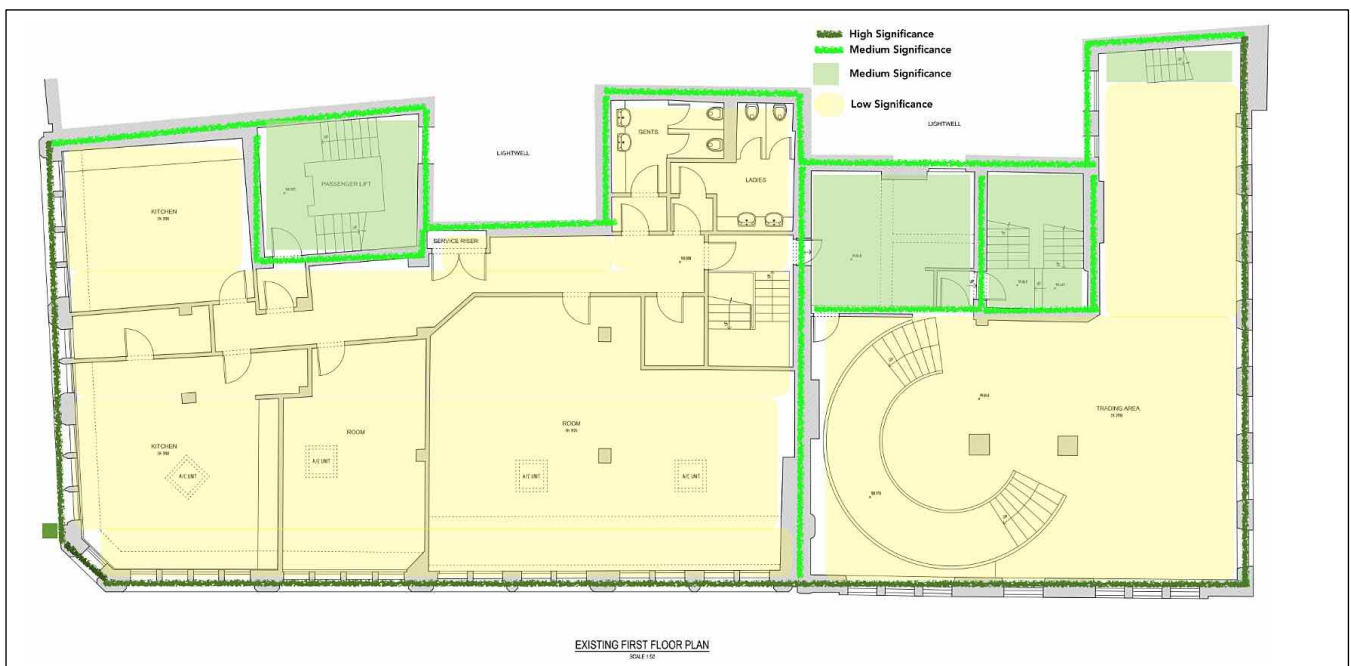
Historic Value

- 7.28 The historic value linked to the building is that it was designed by the original partners, Robert Isaac Bennett, and William Alfred Royle whose work is known locally to the wider Manchester area. The historic associative value is considered = Low To Medium.

Aesthetic Value

‘The ways in which people draw sensory and intellectual stimulation from a place’

- 7.29 The essential historic significance of the building is the external appearance. It is acknowledged that the building has been subject to change at ground floor shopfront level, however, based on the photographs accompanying this statement, the uppers remain intact and the decorative features are still in place. The significance of this building is its important central location on the edge of Piccadilly Gardens.
- 7.30 The internals however are much altered, the ground and first floors are devoid of nearly all period features except for modest pockets still in place. We have not however had access to the upper floors; however, we note these are divided into 18 self-contained flats.



- 7.31 Despite the internal alterations, the external aesthetic value is still considered = Medium.

Communal Value

'Derived from the meanings of a place for the people who relate to it, or for whom it figures in their collective memory or experience'

- 7.32 The building makes a positive contribution the appearance and character of the local townscape - its communal value is thus considered = [Medium](#).

Assessment Methodology

- 7.33 An assessment of impact measures the identified levels of significance against the degree of change proposed. High levels of change to features or fabric identified as highly significant will be at odds with national and local planning policy, and also Historic England guidance, so should not be permitted due to the high adverse impact it would entail. Where only a minor change is proposed to an element of moderate or high significance, this will generally be calculated as having a negligible or minor adverse impact on heritage value.
- 7.34 Positive changes (repairs, removal of intrusive features, etc.) are highly beneficial changes and can increase the significance of a building. Where a change is identified as having an adverse impact on the significance of a building or site, this does not necessarily mean that the proposals as a whole would be detrimental: impact is a cumulative calculation and beneficial change may substantially outweigh any adverse proposals. The degree to which the scheme beneficially or adversely impacts the identified heritage values is measured according to the criteria set out below.

Impact Assessment Criteria

Magnitude Of Impact

- [High Beneficial](#) The development considerably enhances the heritage values of the identified heritage assets, or the ability to appreciate those values
- [Medium Beneficial](#) The development enhances to a clearly discernible extent the heritage values of the heritage assets, or the ability to appreciate those values.
- [Low Beneficial](#) The development enhances to a minor extent the heritage values of the heritage assets, or the ability to appreciate those values.
- [Negligible/None](#) The development does not change the heritage values of the heritage assets, or the ability to appreciate those values.
- [Low Adverse](#) The development erodes to a minor extent the heritage values of the heritage assets, or the ability to appreciate those values.
- [Medium Adverse](#) The development erodes to a clearly discernible extent the heritage values of the heritage assets, or the ability to appreciate those values.

- **High Adverse** The development substantially affects the heritage values of the heritage assets, or the ability to appreciate those values.

Summary of Significance

7.35 In summary, we have reached categorised the works and their impact on significance.

Beneficial:

- The removal of the non-original dropped ceilings.
- The removal of the uncharacteristic podium in 7-11 Oldham Road.
- The repair and returning of plaster, skirting boards and coving to 7-11 Oldham Road.
- The provision of six flats that will safeguard the re-use and investment in their vacant first floor.
- Existing windows to be repaired.

Neutral:

- No alteration to the external appearance of the building.
- The retention of the existing floor boards and means of access to the building.
- Retention of secondary glazing.
- Retention of existing plan form.

Low Adverse:

- A new opening needs to be created in the spine wall between 1-5 and 7-11 Oldham Street.

7.36 We consider the works to create the opening will result in loss of some original fabric and minor alteration to plan form, however, this harm is less than substantial to the significance of the listed building. Therefore, the harm should be *'weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

7.37 As noted, the main public benefit of the scheme are:

- Securing a viable use for the building.
- The repair and restoration of the internal heritage asset.
- The provision of six self-contained flats to be occupied by tenants of an RSL.

7.38 In determining applications, para.192 of the NPPF states local planning authorities should take account of:

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

7.39 The Heritage Statement concludes that any harm to the significance of the Listed Buildings would be less than substantial (negligible/ low) and that this harm is weighed against the conservation, preservation and enhancement of the heritage assets that the proposals deliver, which are significant.

7.40 In addition to heritage benefits, the NPPF requires an assessment of the balance of harm against other public benefits arising from development proposals. It is clear that the repair, reinstatement and enhancement of these important heritage assets are in themselves of public benefit, but the proposals will also deliver clear public benefits.

8.0 Summary and Conclusions

- 8.1 This heritage, planning, design and access statement has been prepared in support of a planning and listed building application for the change of use and modest internal alterations for the change of use from Class E (A2) to six X one-bedroom self-contained flats at 17 Piccadilly.
- 8.2 The scheme is acceptable in principle as it complies with strategic policies of the Development Plan and national planning policy.
- 8.3 The internal works are minimal to facilities the development and will therefore not harm the special interest of the listed building.
- 8.4 The space and internal design of the flats exceed the National Housing Standards.
- 8.5 The flats would be operated by an RSL which is the reasoning for the provision of six x one-bedroom flats.
- 8.6 The flats would provide good levels of amenity with good outlook and daylight levels.
- 8.7 A noise impact assessment has confirmed the amenities of future residents will be protected.
- 8.8 The flats will benefit from mechanical ventilation and cooling, which residents can utilise as opposed to opening windows. the system is already in-situ and would be modestly revised to provide the necessary ventilation for four flats.
- 8.9 The proposal makes no external alterations to the listed building.
- 8.10 The site is in a highly accessible and sustainable location in the City Centre, close to transport links, employment opportunities, services and local amenities. The proposals are of a high quality, well- considered and respond positively to heritage significance of the buildings and conservation areas.
- 8.11 The scheme represents sustainable development that we submit can be supported by officers.
- 8.12 The policy presumption is in favour of the grant of planning permission and there are no material considerations that outweigh that presumption.

