

HERITAGE STATEMENT

June 2021

**On behalf of Cornerstone Telecommunications
Infrastructure Limited and Telefónica UK Limited**

Planning application relating to the upgrade of existing base station to allow for installation of 18 no. new antennas onto existing and new 5m high support poles on roof (following removal of 6 no. existing antennas). To a maximum height of 46.0m AGL (top of support poles) together with works to existing plant room and ancillary development.

**Existing Base Station Alberton House St Marys
Parsonage Manchester M3 2WJ**

LPA REF: 129301/TEL/2021

OUR REF: CTIL_126856_29_VF_23216_TF_09537

1.0 INTRODUCTION

This Heritage Statement has been prepared in connection with the upgrading of the existing telecommunication radio base, providing new 5G services into the network as well as improved 2G/3G/4G coverage.

The site is located at Alberton House, which lies just outside the Parsonage Road Conservation Area.

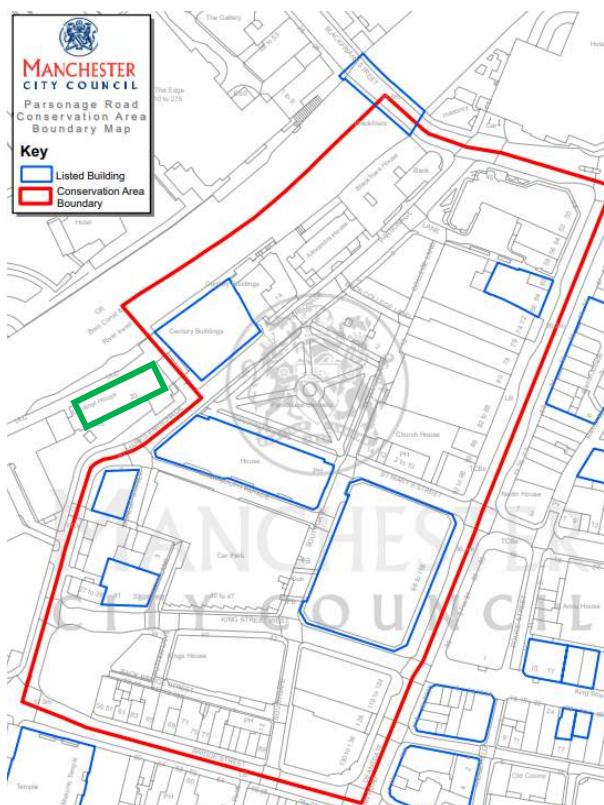


Figure 1: Parsonage Road Conservation Area Boundary Map (Source: Manchester City Council). Conservation Area boundary outlined in red, listed buildings outlined in blue. Application site outlined in green.

This Heritage Statement provides information regarding the significance of the built historic environment to fulfil the requirement given in paragraph 189 of the Government's National Planning Policy Framework (the NPPF¹) which requires:

"an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."

¹ NPPF, MHCLG, 2019

Given the sites location on the boundary of the conservation area, it is required by paragraph 189 of the NPPF that the detail and assessment in this report is considered to be *“proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*

2.0 METHODOLOGY

In order to relate to key policy, the following levels of harm may potentially be identified when assessing potential impacts of development on heritage assets, including harm resulting from a change in setting:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013² that this would be harm that would *'have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced'*;
- **Less than substantial harm.** Harm of a lesser level than that defined above;
- **No harm (preservation).** A High Court Judgement of 2014³ is relevant to this, in which it was held that with regard to preserving the setting of a listed building or preserving the character and appearance of a Conservation Area, preserving means 'doing no harm'.

It is important to note that preservation does not mean 'no change'; it specifically means 'no harm'. Historic England's *Historic Environment Good Practice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment* (referred to as GPA 2⁴) states that *"Change to heritage assets is inevitable but it is only harmful when significance is damaged"*. Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. The factor that matters is whether such change is neutral, harmful or beneficial to the significance of an asset.

² EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council

³ EWHC 1895, R (Forge Field Society, Barraud and Rees) v. Sevenoaks DC, West Kent Housing Association and Viscount De L'Isle

⁴ Historic England, *Historic Environment Good Practice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment* (Swindon, 2015).

3.0 PLANNING POLICY CONTEXT

3.1 Planning (Listed Buildings and Conservation Areas) Act 1990

Legislation relating to the Historic Environment is primarily set out within the Planning (Listed Buildings and Conservation Areas) Act 1990 which provides statutory protection for Listed Buildings and Conservation Areas.

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

Judgement in the Court of Appeal ('Mordue') has clarified that, with regards to the setting of listed buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 196 of the revised NPPF), this is in keeping with the requirements of the 1990 Act⁵.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

“In the exercise, with respect to any buildings or other land in a conservation area... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

3.2 National Planning Policy Framework

National policy and guidance is set out in the Government's National Planning Policy Framework (NPPF), published in February 2019. This replaced and updated the previous National Planning Policy Framework 2018, which in turn had replaced the previous 2012 version. The NPPF should be read as a whole and is intended to promote the concept of delivering sustainable development.

The NPPF sets out the Government's economic, environmental, and social planning policies for England. Taken together, these policies emphasise the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The NPPF recognises that the planning system is plan-led and that Local Plans and, where relevant,

⁵ Jones v Mordue [2015] EWCA Civ 1243

Neighbourhood Plans, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy applicable to the proposed development is the presumption in favour of sustainable development. This 'presumption' sets out the tone of the Government's overall stance and operates with and through the other policies of the NPPF. The NPPF sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the NPPF. The presumption is set out in full at paragraph 11 of the NPPF.

Heritage Assets are defined in Annex 2 of the NPPF 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. It includes designated heritage assets and assets identified by the local planning authority (including Local Listing)."

The NPPF goes on to define a Designated Heritage Asset as a:

"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation.⁶"

Significance is also defined, as:

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment'. Paragraph 190 states:

"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise. They

⁶ NPPF Annex 2, MHCLG, 2019.

should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

Paragraph 192 goes on to state that:

"In determining planning applications, local planning authorities should take account of:

The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

The desirability of new development making a positive contribution to local character and distinctiveness."

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 193 and 194 are relevant and read as follows:

"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."

"194 – Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

Grade II listed buildings, or Grade II registered parks or gardens should be exceptional;

Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, Grade I and II listed buildings, Grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

In the context of the above, it should be noted that paragraph 195 reads as follows:

"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 loss is necessary to achieve substantial public benefits that outweigh harm or loss, or all of the following apply:

The nature of the heritage asset prevents all reasonable uses of the site; and

No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

The harm of loss is outweighed by the benefit of bringing the site back into use.”

Paragraph 196 goes on to state that:

“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.”

3.3 National Planning Guidance

The Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled. This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important, and states:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”⁷

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

⁷ MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723

"In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed [emphasis added]. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."

3.4 Local Planning Policy

Planning applications within Manchester are currently determined in line with the 'Saved Policies' of the Manchester Unitary Development Plan (July 1995) and the Manchester Core Strategy DPD July 2012.

The Manchester UDP contains Policy 18.1, which states that the Council will give particularly careful consideration to development proposals within Conservation Areas. It stresses the importance of the Council's aspiration to preserve and enhance the character of designated Conservation Areas.

The UDP also contains Policy 19.1, which states that the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of listed buildings, and to protecting their general setting. The Council will seek to preserve and enhance the settings of listed buildings by appropriate control over the design of new development in their vicinity.

The Manchester Core Strategy DPD July 2012 contains Policy CC9, which relates to Design and Heritage. It provides guidance in relation to the design of new buildings and development in the context of heritage assets. The policy states that:

"development in the City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings, conservation areas and scheduled ancient monuments".

4.0 THE SITE

The Site is located on the rooftop of Alberton House, St Mary's Parsonage. The host building is located just outside the Parsonage Road Conservation Area and is not a listed building, although it neighbours one to the East.

The general character of the surrounding area in this location is one of mixed-use, mixed architectural nature. Nearby Deansgate is a busy street in the city centre of Manchester, comprising of predominantly retail, commercial and leisure uses. Alberton House is a utilitarian typically mid-20th century office block with a maximum of 12 stories. It comprises of a brick façade with numerous windows and is located within a row of discordant and diverse buildings running from the junction of Bridge Street and St Mary's Parsonage to the junction of St Mary's Parsonage and Back South Parade.

4.1 Setting Assessment

Step 1 of the methodology recommended by the Historic England guidance *GPA 3: The Setting of Heritage Assets*⁸ is to identify which designated heritage assets might be affected by a proposed development.

Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.

Consideration was therefore made as to whether any of the built heritage assets present within the surrounding area may include the Site as part of their setting which contributes to their overall heritage significance, and therefore may potentially be affected by the proposed scheme.

Initial consideration has concluded that there are six heritage assets which have the potential to be sensitive in regards to development proposal. These comprise:

- The Parsonage Road/Parsonage Gardens Conservation Area
- Grade II Listed National Buildings

⁸ Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd edition, Swindon, December 2017)

- Grade II Listed Arkwright House
- Grade II Listed No 3 St Mary's Parsonage

4.2 The Parsonage Road Conservation Area

Manchester City Council refer to the Conservation Area under two names: the Parsonage Road Conservation Area, and the Parsonage Gardens Conservation Area.

The Conservation Area was first designated in June 1985. Its boundaries are Blackfriars Street, Deansgate (a common boundary with the St Ann's Square Conservation Area), Bridge Street (a common boundary with the Deansgate/Peter Street Conservation Area), and St Mary's Parsonage. The River Irwell forms the western boundary of the area along the line of the administrative border of the City of Salford.

The Council do not have an adopted Conservation Area appraisal for Parsonage Road/Parsonage Gardens. However, the Council website does contain information about the Conservation Area, its history, and guidance on control of development within it.

Manchester City Council's website provides the following information on the history of the area:

"The first recorded reference to the plot of land now known as Parsonage Gardens was in 1066 when, after the Norman Conquest, William granted tenancies to Albert Greslet, then Baron of Mamecestre. Along with the manor house this land was transferred to the La Warre family in 1309.

Thomas La Warre succeeded as the twelfth baron in 1398 and later became the parson of St Mary's, the parish church. The church, subsequently rebuilt, is now Manchester Cathedral. La Warre was responsible for elevating it to a collegiate church by procuring a license in 1421 from King Henry V.

Extensive gardens were needed to cater for its pupils and consequently the area now known as Parsonage Gardens was cultivated to provide food.

In 1547 the college was dissolved. The wardens were provided with a college house in 1578 and in 1635 they were further provided with the two-acre parcel of land known as Parsonage Croft, now called Parsonage Gardens. Kite-shaped in plan, it is easily identified on old maps of Manchester.

During the 18th century the increase in population led to pressure for development, and a new church was built on the site of Parsonage Gardens and consecrated in 1756. This was St Mary's Church, a building which reflected the cultural elegance and proportions of the period...

Despite its architectural merit, the church was demolished in 1891 and Parsonage House, the residence of Thomas La Warre, was demolished in 1987. The site then became Parsonage Gardens, which has changed little up to the present day.⁹

Therefore, the Conservation Area is considered a heritage asset of reasonable significance.

4.3 National Buildings

Grade II listed, Historic England List Entry Number 1254470, Date first listed 6th June 1994

National Buildings at 14 St Mary's Parsonage is an office block from 1905-6 designed by Harry Fairhurst for the Boiler and Generator Insurance Company. The building is five stories with buff and white terracotta and some red brick described as an eclectic style¹⁰.

4.4 Arkwright House

Grade II listed, Historic England List Entry Number 12146660, Date first listed 9th March 1982

Overlooking Parsonage Gardens, the 5 storey neo classic style office building is also designed by Harry Fairhurst. Cladded in Portland stone the building is also noted for its large trapeziform on island site.¹¹ It is considered that Arkwright House is a heritage asset of reasonable significance.

⁹ Taken directly from Manchester City Council website – Parsonage Gardens Conservation Area History - https://secure.manchester.gov.uk/info/511/conservation_areas/1100/parsonage_gardens_conservation_area/2 Accessed January 2021

¹⁰ Taken from Historic England website – 14 St Mary's Parsonage Details - <https://historicengland.org.uk/listing/the-list/list-entry/1254470> Accessed June 2021

¹¹ Taken from Historic England website – Arkwright House Details - <https://historicengland.org.uk/listing/the-list/list-entry/1246660> Accessed June 2021

4.7 Number 3 St Mary's Parsonage

Grade II listed, Historic England List Entry Number 1283044, Date first listed 6th June 1994

Number 3 St Mary's Parsonage was a textile warehouse designed by Clegg and Knowles in 1868. The building is now used for office uses and is red brick with sandstone dressings. Being the oldest building in the locality the building is of significant heritage value.¹²

¹² Taken from Historic England website – 3 Parsonage Road Details - <https://historicengland.org.uk/listing/the-list/list-entry/1283044> Accessed June 2021

5.0 ASSESSMENT OF IMPACT

The application proposal relates to the upgrade of the existing telecommunications site located on the rooftop of Alberton House. The scheme involves the upgrading of the existing base station to allow for the installation of 18 no. new antennas, and new 5m support poles. The proposals will be located to the west of the rooftop. The approximate locations of these positions are denoted by the yellow dot on the image below. The amount of equipment is not more than is required. This multi-technology service will be enabled from one radio base station, thus minimising the number of telecommunications installations in the area and ensuring the minimum consistent with efficient network development as required by para 113 of NPPF.

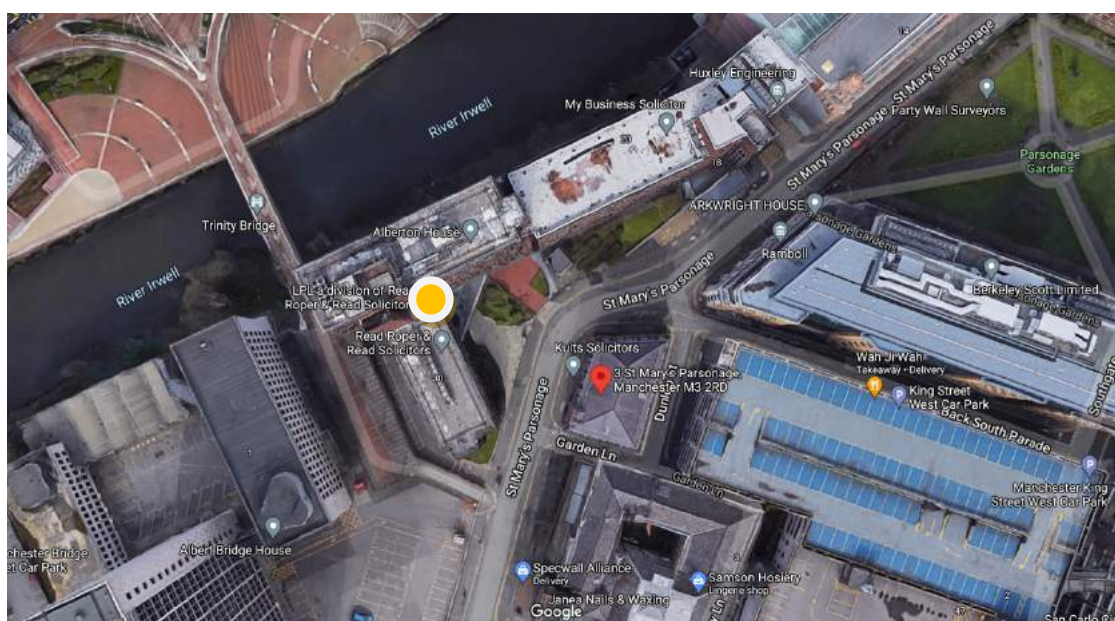


Figure 2: Screenshot of satellite view of Alberton House (Source: Google Maps). Approximate new antenna locations denoted by blue dot.

5.1 Parsonage Road Conservation Area

The proposed equipment is located on a rooftop that is predominantly 27.5 metres above ground level. There is also an upper roof level which sits 41 metres above ground level. Given the height above ground level and the building mass of the host property, it is not considered that the proposed equipment will appear prominent in the streetscene as it will be out of the general eye-line of casual passers-by and people entering/travelling through the area and through/into the Conservation Area.

The proposed equipment will have limited visual impact on the Conservation Area. Shown below in figure 3 is the view from the Conservation Area boundary east of the site on St Mary's Parsonage, it is clear the proposed antennas will be largely obscured from the conservation area and to pedestrians and as such will have minimal impact on the appearance of this street scene from the conservation area. Accordingly, the siting and appearance of the additional antennas has been minimised.



Figure 3: Photo taken from the boundary of the conservation area towards Alberton House.

Highlighted with a yellow box, the area of the proposed telecommunications equipment is unlikely to alter the experience and appreciation of the heritage asset from within its immediate surrounds, or from views through the Conservation Area from outside it. Only glimpses of the antennas would be noticeable for a very brief period whilst travelling west along St Mary's Parsonage, and even then, only if people crane their necks to look upwards. The proposed antennas will be located as close as possible to the existing and their proposed material and colour will match that of the existing equipment. The antennas and associated steelwork are proposed to be grey, which will blend with the predominantly grey/white Manchester skyline. Accordingly, the siting and appearance of the additional antennas has been minimised.

As such, it is considered that the proposal will cause less than substantial harm (lower end) to the significance of the Conservation Area.

5.2 National Buildings

This heritage asset is located on the same side of the road as the application site, where the buildings are all in alignment with each other. Alberton House is set further back in the street than the national buildings which helps to obscure Alberton House and this proposal from the view west down St Mary's Parsonage, as shown in figure 4.



Figure 4: Photo taken from outside the National Building westbound on St Mary's Parsonage, Alberton House is obscured behind the building and cannot be seen from this area of the conservation area.

As you progress further westbound on St Mary's Parsonage the view of Alberton House continues to be obscured by Cardinal House, offering further mitigation against the proposal and views from the conservation area including almost the entirety of Parsonage Gardens as shown in figure 5.



Figure 5: Photo taken down St Mary's Parsonage, again showing how Alberton House and its roofline remain obscured.

Due to the limited potential views of the proposed equipment, it is not considered that the proposal will impact upon the manner to which this heritage asset of National Buildings is experienced or appreciated, nor that it will alter the understanding of the historic and artistic interest of the building. Thus, it is not considered that the proposed equipment will cause harm to the Grade II listed building.

5.3 Arkwright House

This heritage asset is located to the south east of the application site, on the opposite side of St Mary's Parsonage. The buildings primary elevation overlooks Parsonage Gardens, its rear overlooks the King Street multistorey car park, this restricts the view of the equipment from anywhere in the building and also restricts views of Parsonage Gardens of the proposal site.



Figure 7

Figure 7 shows how Arkwright House (White, centre-left) in its height and positioning restricts any view of the proposal site from Parsonage Gardens and College Land, both major areas within the conservation area. Additionally, the principle elevation is not overlooked and neither can be seen alongside the proposal site at Alberton House.

Due to the very limited potential views of the proposed equipment with the heritage asset of Arkwright House, it is not considered that the proposal will impact upon the manner to which the heritage asset is experienced or appreciated, nor that it will alter the understanding of the historic and artistic interest of the building. Thus, it is not considered that the proposed equipment will cause harm to the Grade II listed building.

5.4 No 3 St Mary's Parsonage

The heritage asset is located opposite Alberton House which the application site is located upon.

There is co-visibility of the heritage asset and the application site looking down St Mary's Parsonage however given the height differences between No 3 and Alberton House, the views are not coherent, and pedestrians would have to look rather high up to see what limited amount of the proposal can be seen, by which point the 5 storey no 3 is out of sight. Figure 8 shows how the width of the street, positioning and height disparity ensure that the view of No 3 is not diminished by these proposals.



Figure 8: Image of Century Buildings (Source: Google Streetview)

Therefore, it is not considered that the proposal will have any impact upon the heritage asset, the way the heritage asset is experienced or appreciated, and it will not alter the understanding of the historic and artistic interest of the building. Thus, it is not considered that the proposed equipment will cause any harm to the Grade II listed building.

SUMMARY CONCLUSIONS

In summary, the proposed development is not considered to result in a change that would impact upon the overall heritage significance of the listed buildings located near to the application site that are identified in this Statement. The proposals are thus in accordance with Section 66(1) of the Planning Act, Section 16 of the National Planning Policy Framework, and Policy 19.1 of the Manchester UDP with regards to the protection of listed buildings.

It is considered that, due to the historic significance of the Conservation Area and the views of the application site from within it, the proposal will cause less than substantial harm to the significance of the Conservation Area.

In this regard, Paragraph 196 of Section 16 of the National Planning Policy Framework 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.”

The proposal relates to the upgrade of the existing telecommunications site located on the rooftop of Alberton House, St Mary's Parsonage. The upgrade will improve capacity on the 2G, 3G and 4G networks for two Mobile Network Operators (Vodafone and Telefonica) and will also introduce 5G coverage for both operators to this busy city centre area of Manchester. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the Vodafone and Telefonica network which includes VOXI, Lebara Mobile and Talkmobile on the Vodafone network and GiffGaff, Tesco Mobile, Sky Mobile, and Lyca Mobile on the Telefonica network. Therefore, the proposal will not only provide a service for two operators but those who buy network space off them, which is at least 3 with Vodafone and 4 with Telefonica. Customers of all these networks will benefit from a more reliable network as a result of the proposal and will have access to the 5G network. The amount of equipment is not more than is required. This multi-technology service will be enabled from one radio base station, thus minimising the number of telecommunications installations in the area and ensuring the minimum consistent with efficient network development as required by para 113 of NPPF.

Thus, the public benefits of the proposal are very significant, and as such, it is considered that the benefits of the proposal would outweigh the less than substantial harm to the significance of the Parsonage Road Conservation Area. Further details of the extensive benefits provided by the 5G network can be found in the Supplementary Information document submitted as part of the planning application.

It is considered that there will be less than substantial harm (lower end) to, or loss of, any heritage assets as a result of the proposal.