



Supporting Planning Statement including Heritage Assessment and Design and Access Statement

Proposed subdivision of offices to provide independent
unit of office accommodation – 28 St John Street,
Manchester, M3 4DJ

for St John's Building Limited

Emery Planning project number: 20-605



Project : 20-605

Site address : 28 St John Street,
Manchester, M3 4DJ

Client : St John's Building Limited

Date : 02 March 2021

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1. Introduction

- 1.1 This planning statement is submitted in support of a combined planning and listed building application to support the subdivision of a large office building into two separate offices units at 28 St John Street, Manchester.

2. Context

Site location and description

- 2.1 St John Street is believed to be the only surviving Georgian terraced street in central Manchester and forms the heart of the St Johns Conservation Area which was designated on 4th November 1970. The properties date from the 18th and 19th centuries and are located between Deansgate and Bryon Street. Please see location plan at appendix **EP1**.
- 2.2 The application building has historically been a single unit of office accommodation but was at some point incorporated into one larger office building by joining with no's 24A and 26, which has included minor internal works to allow for easy movement within the building. It is not known when the conversion of the three buildings into one took place. Permission is now being sought to separate No.28 back into a separate unit of office accommodation over the four floors.
- 2.3 These offices are currently used as Barristers Chambers.

Relevant planning history

- 2.4 The property has a long and detailed planning history dealing with a number of planning and listed building applications for the conversion and subdivision of the buildings into office accommodation along with applications for internal modifications and extensions to the building.
- 2.5 The most recent application in 2010 sought listed building consent for internal and external works associated with providing improved office accommodation (application reference 094678/LO/2010/C1). This included the removal of internal walls, creation of glazed partitions, insertion of suspended ceilings and installation of air conditioning units within the rear internal courtyard. This application was approved on 3rd February 2010. The supporting historic building report with this application provided a comprehensive list of the planning history for the property and will not be repeated here. This report is provided at appendix **EP2**.

- 2.6 As referred to at paragraph 2.2 above it is unclear when the three properties (No's. 24A, 26 and 28) were joined together. Given current restrictions relating to the Coronavirus it has not been possible to view hard copy planning history files for the properties. We have reviewed the City Council's on-line planning records however, the planning application descriptions on the website do not specifically refer to the buildings being joined together and due to the age of the planning applications listed before 2010 there are only limited historical documents available to view.

3. Policy context

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the relevant development plan:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

- 3.2 The application must (in part) also be considered in the context of the legal duty as conferred by S72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, which states:

"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under the provisions mentioned in subsection (2), special attention must be given to the desirability of preserving or enhancing the character and special appearance of that area."*

(* includes the Planning Acts)

Development plan context

Manchester Development Plan

- 3.3 The development plan comprises the Manchester Core Strategy, which was adopted in 2012, and the saved policies of the Unitary Development Plan, which was adopted in 1995.
- 3.4 Manchester City Council's (MCC) heritage policies focus on the fundamental importance of *"preserving or, where possible, enhancing the historic environment"*. This same focus is reflected within the National Planning Policy Framework.
- 3.5 Core Strategy Policy CC9 (Design and Heritage) states that development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including Listed Buildings, Conservation Areas and Scheduled Ancient Monuments. The policy also establishes that new development must support the range of uses the Council expects in the City Centre and contribute to a coherent and integrated physical environment.

- 3.6 The Council's key regeneration objective is tempered by the need to ensure that: *"historic sites and areas of particular heritage value should be both safeguarded for the future and, where possible, enhanced for their own heritage merits and as part of wider heritage regeneration proposals"* (paragraph 12.21, Core Strategy Policy EN3). The policy thus evidently requires development proposals to be sensitive to the inherent values of the designated heritage asset, with any impact justified by clear, documentary evidence.

Material considerations

Emerging Development Plan

Greater Manchester Spatial Framework

- 3.7 The Publication GMSF was approved at the AGMA Executive Board on 30 October 2020. The document then required the approval of the ten Greater Manchester Councils prior to the launch of the formal period for consultation. Following the decision of Stockport Council on 3rd December to not approve the Publication GMSF for consultation the formal public consultation period did not commence. No weight can be attached to this document at present.

Emerging Manchester Local Plan

- 3.8 The council is currently undertaking a review of the Core Strategy and the saved policies from the Unitary Development Plan. The first stage of the consultation process began in January 2020 and is still considered to be in its early stage due to delays being experienced during the current pandemic. It can carry no significant weight in decision making

National planning policy and guidance

National Planning Policy Framework (the Framework)

- 3.9 The revised Framework was published in February 2019 setting out the Government's planning policies for England and how they expect these to be implemented.

Achieving sustainable development

3.10 Paragraph 8 states that achieving sustainable development means that the planning system has three overarching objectives, which are independent and need to be pursued in mutually supportive ways:

- An economic objective
- A social objective
- An environmental objective

The presumption in favour of sustainable development

3.11 Paragraph 11 states that “Plans and decisions should apply a presumption in favour of sustainable development.”

3.12 It also states that for decision-taking this means approving development proposals that accord with the development plan without delay; and where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Determining applications

3.13 Paragraph 47 states that planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

Design

3.14 Section 12 of the Framework seeks to achieve well-designed places. Paragraph 124 recognises that 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. Paragraph 127 of the Framework also reinforces the good design principles of paragraph 124 and provides guidance on how this can be achieved.

Heritage

3.15 Section 16 of the Framework provides details on assessing, conserving, and enhancing the historic environment in respect of designated and non-designated heritage assets. In particular, paragraphs 189 states that: -

"The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance"

3.16 Paragraph 192 of the Framework states 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.
- The desirability of new development making a positive contribution to local character and distinctiveness.

3.17 The Framework confirms that in 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 (paragraph 193). The designated heritage asset in this case is the host building itself and the St John Conservations Area. Clearly it is desirable to sustain and enhance these heritage assets.

Other material considerations

Supplementary planning guidance documents

3.18 The following supplementary planning guidance document is relevant to the determination of this planning application:

- Guide to Development in Manchester Supplementary Planning Document (SPD) (Adopted April 2007).

4. Heritage Assessment

The Heritage Asset

- 4.1 As set out above, the Framework states at paragraph 189 that:-

"In determining applications Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected including any contribution made by their setting. The level of details should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposals on their significance"

- 4.2 The application buildings are Grade II listed and also lie within the St John Street Conservation Area, both of which are designated heritage assets. The building was listed in 1974 and the conservation area designated in November 1970.

Designated Heritage Asset – The Listed Building and the St Johns Street Conservation Area

- 4.3 Section 72 (1) of the Planning (Listed Building and Conservation Areas) Act (1990) states that special attention must be paid to the desirability of preserving or enhancing the character and appearance of the Conservation Area. The test can be met by either development which makes a positive contribution to an area's character or by development which leaves the character and appearance unharmed.
- 4.4 The Framework confirms that in 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 (paragraph 193). The designated heritage asset in this case is the host building i and the St John Conservations Area. Clearly it is desirable to sustain and enhance these heritage assets.
- 4.5 In this instance this application is seeking to subdivide the building to provide a completely independent unit of office accommodation and return this element back to its original size. This subdivision will require internal works only and will follow the line of the subdivision of the original buildings. As such, it is considered that the proposed development would have no impact upon the character or appearance of the conservation area or result in any harm to it as a designated heritage asset.

- 4.6 With regard to the impact of and potential for harm to the listed building it is appropriate to consider the scope of the proposed works.
- 4.7 The works involves the subdivision of the basement with a new brick wall, the filling in of doorways and the subdivision of landing space with the introduction of new stud walls on the ground, first and second floors. For ease of reference the proposed alterations are listed below by floor levels.

Basement – The line of the subdivision is assumed to previously to have been a solid brick wall in the basement and currently consists of 3 exposed brick arches. It is proposed to fill these arches in with reclaimed brick to match the existing in terms of size and colour to produce one continuous brick wall.

Ground Floor – the small landing area will be subdivided equally with a new stud wall and the 3 doors along the corridor will be removed and blocked up using stud walling. The external finish of the new wall will include matching timber skirting boards, dado rail and cornice detailing. These will be decorated to match the surrounding wall treatments. All existing door surrounds will be removed carefully.

Due to the existing ground floor layout and the closing up of the doors along the corridor, it will be necessary to undertake minor modifications in No. 26. This involves the creation of a new single doorway between room G8 and G1 to allow access to the remainder of number 26. The new wall is a modern stud wall so will not involve the removal of any historic fabric. The doorway surrounds will be constructed with matching timber to that of the existing door surrounds and one of the existing doors from the corridor will be re-used. All decorating will match the existing.

First Floor – the small landing will be subdivided with a new stud wall and the two doors on the corridor and opening will also be blocked up with stud walling. The external finish of the areas of new wall will be finished to match the existing walling including skirting boards, dado rails and cornice and will all be decorated to match. All existing door surrounds will be removed carefully.

As with the ground floor it will be necessary to introduce new doorways within unit No.26 between rooms 1F.7 and 1F.8 and to the landing outside the toilet facilities at 1F.9. These sections of wall are all understood to be later additions thus meaning that no historic fabric will be removed. The new door surrounds will be constructed with matching timber to that of the existing door surrounds and doors from the existing corridor will be re-used. All decorating will match the existing.

Second Floor – As with the first floor below, new stud walling will be used to subdivide the landing and fill in the existing doors and opening with external fixings and decoration to match. All external door surrounds will be removed carefully.

As with the ground and first floor, it will be necessary to introduce new doors ways in No. 26 from the landing into room 2F.8 then between room 2F.8 and 2F.9 and again onto the landing between room 2F.9 and 2F.11. The sections of walls are all modern additions and do not involve the removal of any historic fabric. The new door surrounds will be constructed with matching timber to that of the existing door surrounds and doors from the existing corridor will be re-used. All decorating will match the existing.

- 4.8 The proposed changes, referred to above, do not involve removing any historic fabric of the building. Instead, the proposed work involves restoring both no's 28 and 26 back to their original historical layout with the re-installment of the new sections of wall to recreate the original layout/subdivision. The proposed works are minimal and do not involve any further alterations to the historic fabric of the building. Consequently, we consider any perceived harm to be low and is far outweighed by the benefits of providing a smaller unit of office accommodation within the City Centre. This assessment accords with the balanced judgement required by paragraph 196 of the Framework, where if the development leads to a less than substantial harm to the significance of the heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

5. Planning considerations

- 5.1 In this instance the building in question is currently used as office accommodation albeit being part of a larger office building. The current proposal is seeking consent to subdivide the wider unit (No's. 24A, 26 and 28) back into two individual units of office accommodation.

Principle of the development

- 5.2 The Core Strategy, through policies CC1 and C1 encourage office development within the City Centre. As this proposal is seeking consent for subdivision of an existing office into two smaller offices, the proposal is clearly acceptable in principle and warrants no further discussion on this point. It is however recognised that as the application building is a listed building within a Conservation Area, the heritage implications of the proposed subdivision require further consideration.
- 5.3 It has therefore been necessary to assess how the subdivision will be carried out and the works involved in achieving the proposed separation and any impact the proposed subdivision will have on the listed building.
- 5.4 As referred to in Section 4 above, the proposal involves the reinstatement of walls along the lines of the original subdividing walls which separated no 28 from 26, along with the blocking up of doorways on each floor where necessary. No external modifications are proposed as part of this application. The original doorway to no 28 will be utilised to gain entry into the building. The proposed alterations are considered to be fully policy compliant.

Waste Storage

- 5.5 The waste storage for the property will continue to be in the existing waste storage area provided at the rear of No. 26. Access to this area will be via the existing external yard onto Byron Street with all waste being moved externally via Bryon Street and Artillery Street.

Design and Access

- 5.6 The design of the proposed subdivision is simple and follows the line of the original subdivision of the property when it was three individual units of accommodation. No physical alterations to the exterior of the building are proposed nor to any of the original internal historic fabric of the building.

- 5.7 As set out above, the principle of creating a new unit of office accommodation is acceptable in principle within the City Centre and accords with both national and local planning policies.
- 5.8 The proposed internal subdivision will be provided by using similar materials to those that already exist within the building in terms of the construction methods, such as reclaimed brick work, stud walling, timber details and decoration.
- 5.9 The proposed subdivision will involve reusing the original main door to no 28 from St Johns Street, which currently has 4 shallow stone steps at the entranceway. Due to the building being listed it is not considered appropriate to seek any permanent physical alterations to the exterior of the building. Therefore, it is proposed to use a temporary ramp at the entrance to the building which will be stored in the entrance and be used to provide a ramped access into the building when required. It is also proposed to install a sign at the entrance way indicating to any visitor who requires assistance to ring a bell and assistance will be required. Details for the access arrangements are provided as part of the drawing package.

Other matters

- 5.10 The building is already in use as office accommodation within the City Centre, consequently there are no new highway issues created by the development. As the proposals are completely internal there are no ecology issues. It is noted that other properties on St John Street have recently been converted to residential accommodation, however as the office accommodation already exists it is not considered that any amenity issues will arise.

6. Summary and conclusions

- 6.1 This statement is submitted in support of an application for the proposed subdivision of this existing office building into two separate units of office accommodation.
- 6.2 The proposed alterations are required to separate No.28 from 26 and 24A which currently operate as one large unit of office accommodation. This will involve the re-instatement stud walls along the line of the original walls on the ground first and second floor as well as new brick walls in the basement. It will also be necessary to introduce new internal doors in No. 26 to allow continued access throughout the remainder of numbers 26 and 24A.
- 6.3 It has been demonstrated through careful positioning of the new subdivision along the line of the original walls separating the units and the proposed materials that the planned alterations will be fully compliant with Policies, CC1, CC9, C1 and EN3 of the Manchester Core Strategy and the Framework.
- 6.4 We conclude that there is no harm to the designated heritage asset of the St Johns Conservation area and that any perceived harm to the designated heritage asset of the listed building is low and far outweighed by the benefits of providing a smaller unit of office accommodation within the City Centre. This assessment accords with the balanced judgement required by paragraph 196 of the Framework where if the development leads to a less than substantial harm to the significance of the heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

7. Appendices

EP1 – location plan

EP2 – Historic Building Report from application 094678/LO/2010/C1