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Dear Angela

CIS Tower, Manchester
Listed Building Consent for asbestos removal and strip out works

Please find enclosed an application for Listed Building Consent for asbestos removal and strip out works to four floors within the Grade II Listed CIS Tower. The applicant is Devonshire (CIS Tower) Ltd.

The CIS Tower (Co-operative Insurance Society), is located on Miller Street and covers an area of c. 0.62 ha. The building is bound by Miller Street to the north, Dantzic Street to the west, Hanover Street to the south and a temporary car park to the east. It is a building of significant scale rising to a height of 118 metres, comprising of ground plus 25 storey tower and connecting service tower, a 5 storey podium and three basement levels, together with an atrium and an outdoor plaza.

Background

Planning Permission and Listed Building Consent for the Grade II Listed CIS Tower was granted on 24 March 2020 (LPA reference 126118/FO/2020 and 126119/LO/2020) for the full refurbishment and extension of the building for office use including retail and leisure provision at ground floor. The description of development granted is as follows:

Planning Permission for the construction of a 3-storey extension to the Podium for additional office accommodation (Use Class B1) and refurbishment of the CIS Tower (to include the refurbishment of single glazed façade; replacement of solar panels on the service tower; creation of new entrances on Dantzic Street and on the eastern elevation of the building; provision of cycle storage, showers and refuse areas; alongside external plant and plant screen at roof level) and change of use to basement and ground floor from B1 office to Class A1 (Shop), A3 (Food and Drink), B8 (Storage and Distribution), D1 (Non Residential Institutions) (flexible events and conference facility or medical centre) and D2 (Assembly and Leisure) (gym or cinema), and the provision of new landscaping and associated works

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“Listed Building Consent for wholesale internal and external refurbishment of the building for office accommodation on level 1-25 (to include demolition of existing recreational space on the fifth floor, refurbishment of single glazed façade; replacement of solar panels on the service tower; creation of new entrances on Dantzic Street and on the eastern elevation of the building; and works associated within the construction of a 3-storey extension to the Podium for additional office accommodation (Use Class B1) provision of cycle storage, showers and refuse areas; alongside external plant and plant screen at roof level) and removal of external signage and associated works”

Following approval for the refurbishment scheme, the applicant seeks to commence a package of enabling works comprising asbestos removal and internal strip out works. The proposed works are required ahead of the main works which will allow the applicant, design team and potential main contractors to further understand the condition and construction of the existing building fabric, removing any design and cost assumptions made during the planning submission stage.

This Listed Building application seeks approval for the removal of existing fabric and services within the internal areas of the building on levels 2 to 3 of the podium and levels 14 to 15 of the tower in accordance with the approved Planning and Listed Building Consent. This includes office floor areas, lift lobbies, back of house risers and corridor. Due to the significant scale of the existing building, the relatively small area of proposed works at this stage, will provide significant insight that is replicated across the entire building, due to the repetitive nature of the original design, therefore providing the level of certainty needed to progress to the next design stage, ahead of discharging all the required pre-commencement conditions.

It is proposed that on completion of the removal works, the internal spaces will be left as a shell and core, in anticipation of the implementation of the permitted scheme. The proposed works will be carried out in a sensitive manner to areas of architectural and historical significance. This in turn will ensure an office fit out can still be achieved in the event the consented scheme is not brought forward.

This letter and its enclosures sets out the context and rationale for the proposals, assess the proposal against relevant planning policies, and address Manchester City Council’s planning application validation requirements.

Description of Development

The description of development, as stated on the Application Form, is as follows:

“Listed Building Consent for asbestos removal and strip out works to levels 2, 3, 14 and 15 of the CIS Tower and associated works”

Proposals

The proposed removal of internal fabric and services across floors 2, 3, 14 and 15 will comprise the following:

- Removal of the carcass of the Weathermaster system and associated services within it.
- Removal and dismantling of the telelift at a suitable joint within the riser. Associated equipment in the riser itself will be retained as part of the overall system, for removal at a future date.

- Across the office floorplate, flooring and ceilings, wall and column finishes, such as non-original wallpaper, timber trims and metal panelling are to be removed, whilst skirting will be retained. Walls and partitions that were proposed to be removed under permission 126119/LO/2020 are also proposed for removal.
- Within the back of house spaces, the approach is again to remove the ceiling, flooring and services including lighting and surface mounted fixtures.
- As a result of the removed fabric and services, there will be instances where a temporary installation of plasterboarding or other suitable fire protection material will be required to infill openings or holes, to provide continuity of fabric.

It should be noted that the implementation of the 2020 consented development requires the removal of some extant building features within the building. These include the Weathermaster air-conditioning system; the Telelift document distribution system; the existing ceiling grid; and office partitions.

The Listed Building Consent (reference:126119/LO/2020), provides the approval for the removal of these redundant features subject to recording. We have taken this in to consideration in the preparation of this application and for reference only, we enclose a 'Building and Photographic Record' prepared by Stephen Levrant Heritage Architecture which records these features on the relevant floors in line with LBC Condition 10 and Planning Condition 29. The full discharge of this condition will be made at a later stage.

Accordance with Planning Policy

The proposals have been assessed in the context of planning and heritage policies at national and local level. The primary consideration for the proposals is their adherence to Planning Policy in regard to the historic environment, and local amenity.

Paragraph 185 of the NPPF states 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 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.

Paragraphs 193-196 place great weight on the conservation of designated heritage assets, emphasising the need to avoid "substantial harm" unless that harm is clearly justified (via four specific tests) or there are substantial public benefits that outweigh that harm. 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.

A Heritage Statement has been prepared by Stephen Levrant Heritage Architecture to assess the impact the proposals will have on the Grade II Listed CIS Tower. It notes that the CIS Tower has been heavily altered from its original design, with the interiors of the 2nd, 3rd, 14th and 15th floors, as a consequence the interiors as a whole are of low heritage significance.

In summary, the heritage impact assessment found, 2 negligible adverse impacts, 3 minor beneficial impacts and 1 neutral impact. Collectively the proposed works are considered to be beneficial and will neither diminish the character of the building nor result in any unmitigated or significant harm to its historic fabric.

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.”

This approach is reflected in Policy CC9 – Design and Heritage within the adopted Manchester Core Strategy (2012). This policy states that development in Manchester City Centre should protect or enhance the heritage assets that have been identified, including listed buildings.

The proposed works are necessary to understanding the building further and providing design and costs assurances which will help inform detailed design and deliver a refurbishment proposal. Therefore protecting and enhance an important heritage asset through its reuse in the long run.

The Council's approach to Development Management is intended to ensure that new developments contribute to the overall aims of the Core Strategy - this includes protection of amenity and local character. Policy DM1 outlines that development should have regard to issues including:

- 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.

The proposals have been designed to be respectful of the building's listed status. The accompanying Heritage Statement states that the majority of the original Design Research Unit (DRU) designed interiors have been removed, with few significant, original features surviving across office floors, with the exception of the executive floors. The majority of the fabric items across the building, including the ceilings and the Telelift document system are non-original replacements from the 1980s refurbishment works.

Following careful removal of the redundant features including the perimeter system and its safe disposal, the floor gaps will be sealed, and the walls will be made good limiting the impact on the remaining internal areas of the building. This application is supported by a methodology report prepared by BandK which demonstrates how works will be carried out to minimise damage.

Supporting Documentation

This application for Planning Permission is accompanied by the following plans and documents:

- Application Forms and Cover Letter prepared by Deloitte Real Estate;
- Conservation Impact and Specifications Report prepared by Stephen Levrant Heritage Architecture;
- Building and Photographic Record prepared by Stephen Levrant Heritage Architecture;

- Design and Access Statement prepared by SimpsonHaugh Architects;
- Existing and proposed drawings prepared by SimpsonHaugh Architects; and
- Methodology of Works prepared by BandK

We trust that you will find this application in order and we look forward to receiving written confirmation of registration.

If you require any further details please contact my colleagues Katie Wray (kawray@deloitte.co.uk / 0161 445 6350) / Lerato Marema (lmarema@deloitte.co.uk/0161 455 6665).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J Cooper', with a stylized flourish at the end.

John Cooper
For and on behalf of Deloitte LLP