Consultancy for the Historic Built Environment KMHeritage

Rooms 41-51, Royal Exchange, Manchester

Historic Building Appraisal: Addendum

Introduction 1
Planning Policy Statement 5: Planning for the Historic Environment 2
The heritage significance of Rooms 41-51 5
The revised scheme proposals 6
Compliance with Planning Policy Statement 5 7
Conclusion 9

Introduction

1 In 2009, a listed building consent application (LPA ref: 090198/LO/2009) was made for the refurbishment and upgrading to current commercial standards of Rooms 41-51, Royal Exchange, Manchester M2 7EF.

2 Since then Planning Policy Statement 5: Planning for the Historic Environment ahs replaced Planning Policy Guidance 1, and changes have been made to the design of the proposed scheme.

3 KMHeritage prepared a historic building appraisal (dated April 2009) that formed part of the listed building consent application. It assessed the proposed scheme against national and local policies relating to urban design and the historic built environment. It is referred to here as the 'KMH 2009 report'.

4 This report is an addendum document to the KMH 2009 report. It provides an assessment of the revised scheme, and how this varies the effect of the scheme in heritage significance terms. It should be read with the KMH 2009 report, and with the other revised drawings, and other supporting information accompanying the revised submission.

5 This is because, after changes to the design of the scheme, the KMH 2009 report remains valid to a considerable degree. The description and analysis of the site and its context contained in Section 3 is as before, and the local policy described in Section 5 remains current. Notwithstanding the changes to the scheme, the broad thrust of the argument contained in Section 5 regarding the proposed scheme and its effects also remains as it was in the KMH 2009 report.

6 As the effect of the key change to the scheme - revealing the roof lights - results in a more favourable effect on heritage significance than the previous version of the scheme, the proposed scheme enhances to a greater degree its significance, and is inherently more compliant with policy than indicated in Sections 4 and 6 of the KMH 2009 report.

7 At the outset, though acknowledged as a completely new piece of national planning policy guidance, it must be emphasised that PPS5 echoes much of Planning Policy Guidance 15's guidance. The underlying principles remain as they were in the PPG, and the statutory context – the Planning (Listed Buildings and Conservation Areas) Act 1990 – remains the same. The 'Planning for the Historic Environment Practice Guide' issued by English Heritage makes clear that:

> *'Nothing in the PPS changes the existing legal framework for the designation of scheduled monuments, listed buildings, conservation areas, registered parks and gardens or protected wrecks. Existing law also sets out the basis on which scheduled monument consent, listed building consent, conservation area consent or licences to deal with protected wrecks may be required. Again, nothing in the PPS changes those requirements and the interpretation of the words and phrases used'.*

Planning Policy Statement 5: Planning for the Historic Environment

8 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990.

9 On Tuesday 23 March 2010, the Government published the new Planning Policy Statement 5: Planning for the Historic Environment, which replaces Planning Policy Guidance 15 (Planning and the Historic Environment, 1995) and Planning Policy Guidance 16 (Archaeology and Planning) with immediate effect.

10 The PPS sets out planning policies on the conservation of the historic environment. It is accompanied by a 'Planning for the Historic Environment Practice Guide', published by English Heritage 'to help practitioners implement the policy, including the legislative requirements that underpin it'. The PPS consists of an introductory section called 'Planning for the Historic Environment' and a 'Policies' section. The 'Policies' section is divided into 'Plan-making policies' and 'Scheme Management'.

11 The 'Government's Objectives' in respect of the historic built environment are defined as

- To deliver sustainable development;
- To conserve England's heritage assets in a manner appropriate to their significance; and

- To contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available, particularly where a heritage asset is to be lost.

12 The 'Planning for the Historic Environment Practice Guide' urges local planning authorities and applicants to consider 'the embodied energy within existing buildings and the whole-life costs of any new scheme or proposed alterations'.

13 Policy HE7 is entitled 'Policy principles guiding the determination of applications for consent relating to all heritage assets'. Paragraph HE7.2 says:

> *In considering the impact of a proposal on any heritage asset, local planning authorities should take into account the particular nature of the significance of the heritage asset and the value that it holds for this and future generations. This understanding should be used by the local planning authority to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.*

14 Paragraph HE7.4 says:

> *Local planning authorities should take into account:*
>
> *– the desirability of sustaining and enhancing the significance of heritage assets, and of utilising their positive role in place-shaping; and*
>
> *– the positive contribution that conservation of heritage assets and the historic environment generally can make to the establishment and maintenance of sustainable communities and economic vitality by virtue of the factors set out in HE3.1*

15 Paragraph HE7.5 says:

> *Local planning authorities should take into account the desirability of new scheme making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use.*

16 The 'Planning for the Historic Environment Practice Guide' gives, at Paragraph 79, a number of 'potential heritage benefits that could weigh in favour of a proposed scheme' in addition to guidance on 'weighing-up' [sic] proposals in Paragraphs 76 to 78. These are that:

- It sustains or enhances the significance of a heritage asset and the contribution of its setting;

- It reduces or removes risks to a heritage asset;
- It secures the optimum viable use of a heritage asset in support of its long term conservation;
- It makes a positive contribution to economic vitality and sustainable communities;
- It is an appropriate design for its context and makes a positive contribution to the appearance, character, quality and local distinctiveness of the historic environment;
- It better reveals the significance of a heritage asset and therefore enhances our enjoyment of it and the sense of place.

17 Policy HE9 provides 'Additional policy principles guiding the consideration of applications for consent relating to designated heritage assets'. It sets out a basic presumption in favour of the conservation of designated assets, and says that 'the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be'. Significance can be 'harmed or lost through alteration or destruction of the heritage asset or scheme within its setting. Loss affecting any designated heritage asset should require clear and convincing justification.

18 Paragraph HE9.2 provides guidance for local planning authorities in instances where 'the application will lead to substantial harm to or total loss of significance' of a heritage asset or assets. It says that:

Where the application will lead to substantial harm to or total loss of significance local planning authorities should refuse consent unless it can be demonstrated that:

(i) the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss; or

(ii) (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 that will enable its conservation; and

(c) conservation through grant-funding or some form of charitable or public ownership is not possible; and

(d) the harm to or loss of the heritage asset is outweighed by the benefits of bringing the site back into use.

19 HE9.4 deals with 'a harmful impact on the significance of a designated heritage asset which is less than substantial harm', and says that local planning authorities should:

> *(i) weigh the public benefit of the proposal (for example, that it helps to secure the optimum viable use of the heritage asset in the interests of its long-term conservation) against the harm; and*
>
> *(ii) recognise that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.*

20 Paragraph 111 of the Guide sets out the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 that local planning authorities when making decisions must 'have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses' and 'pay special attention to the desirability of preserving or enhancing the character or appearance' of a conservation area.

The heritage significance of Rooms 41-51

21 Policy HE6 of Planning Policy Statement 5: Planning for the Historic Environment, requires applicants 'to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance' so as 'to understand the potential impact of the proposal on the significance of the heritage asset'. This information 'together with an assessment of the impact of the proposal' should be incorporated in applications. The Royal Exchange is designate heritage asset, as defined in Annexe 2

22 That information was contained in the April 2009 report. Section 3 of the report describes the history and architecture of the Royal Exchange and specifically the special architectural and historic interest of Rooms 41-51.

23 Rooms 41-51 form a relatively small part of the overall special architectural and historic interest or significance of the Royal Exchange. The overall building is undoubtedly of great special architectural and historic interest. As is the case with any listed building, the architectural interest of the building is not uniform. The exterior of the building and its great hall are certainly architecturally magnificent, and at this overall level the building is an impressive example of early twentieth century civic/commercial architecture in a neo-classical style.

24 It is clear that the special architectural and historic interest of the Royal Exchange does not exist principally in Rooms 41-51 or the corresponding spaces on the floors above, but rather in the exterior of the building, its overall planning, and its spectacular hall. The area of Rooms 41-51 is plain, unadorned and does not have

architectural features that would distinguish it from very many commercial buildings from the same period.

25 The internal space in Rooms 41-51 contributes little to the overall special interest of the Royal Exchange, other than by being generic office space in an interwar office building. The office space in the Royal Exchange is a neutral backdrop to the shops and hall of the building, and form a mass of accommodation that forms the rest of the building alongside these things, behind the elaborate façade.

26 These rooms are characterised by modern partitions, doors, suspended ceilings, heating and ventilation. The layout of this part of the building is defined by relatively recent partitioning. The rooflights, in the form of small-cell metal pavement lights set into the asphalt roof above the existing suspended ceiling, are covered by asphalt. They are a feature, purely functional in character, of the original design, and they certainly are an element, albeit minor, of its significance.

27 Rooms 41-51 have been heavily altered. The space is not, in any sense of the word that is central to any understanding of listing, 'special'. The presence of very simple and unremarkable roof lights, simple 20th century cornicing or the entirely utilitarian layout of internal walls – many of which are later insertions – does not make this space 'special', and these thing should not be accorded importance that is incommensurate with their significance. The beam arrangement is clearly not intended to be seen as a primary architectural element.

28 'Significance' is defined in the PPS as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic'. The 'Planning for the Historic Environment Practice Guide' puts it slightly differently – as 'the sum of its architectural, historic, artistic or archaeological interest'.

29 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (English Heritage, April 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.

30 The Royal Exchange as a whole certainly possesses these qualities in considerable quantity, and Rooms 41-51 to a much lesser degree.

The revised scheme proposals

31 In a letter from Drivers Jonas Deloitte to Anthony Mitchell of Manchester City Council dated 11 March 2011 (ref. C-0154719-02), Eve Bailey describe dhow the scheme had changed since submitted as an listed building consent application in 2009. The principal changes are:

- The revealing as part of the scheme of all roof lights;
- The insertion of a new raised floor;
- The creation of a plaster painted ceiling in limited areas; and
- The installation of suspended lighting.

32 The letter explains why, in order to address the Council's concern regarding the revelation of roof lights, the scheme also needs to incorporate the other three revisions.

33 The Council has expressed concern that the scheme concealed the roof lights, and the revisions now fully address this concern.

Compliance with Planning Policy Statement 5

34 As stated earlier, the net effect of the changes to the scheme is to increase the degree to which it enhances the heritage significance of the designated heritage asset that is the Royal Exchange.

35 With these amendments in mind, the commentary and assessment contained in the KMH 2009 report applies now as it did in 2009, and its conclusions regarding the acceptability of the proposed scheme are the same, but more justified by virtue of the greater enhancement provided by the revised approach.

PPS5: Policy guiding the determination of applications for consent relating to all heritage assets: Policy HE7

36 The proposed scheme is consistent with Policy HE7 of PPS5. For the reasons set out in the KMH 2009 report and in this note, it 'take[s] into account the particular nature of the significance of the heritage asset[s, in its surroundings] and the value that [they] hold for this and future generations'. The changes to the scheme are specifically aimed at ameliorating the effect of the original scheme on the heritage significance of the building, and they have resulted in a significant adjustment of the scheme to address concerns raised by the Council. The revealing of the roof lights reveals an original feature of the listed building, and in so doing permits a greater understanding of the layout and construction of the building (and similar buildings) in the early part of the 20th century.

37 The scheme therefore undoubtedly succeeds in 'sustaining and enhancing the significance of heritage assets', and helps the Royal Exchange utilise (its) 'positive role in place-shaping' (Policy HE7.4), as well as permitting the 'positive contribution that conservation of heritage assets and the historic environment generally can make to the establishment and maintenance of sustainable communities and

economic vitality'. It also clearly makes a 'positive contribution to the character and local distinctiveness of the historic environment' (Policy HE7.5).

38 The scheme still does the relevant things that the 'Planning for the Historic Environment Practice Guide' urges in its Paragraph 79. It will have regenerative benefits for Manchester by ensuring the sustainable use of commercial office space in the city centre, and a type of office space suitable to SMEs. The proposed scheme 'makes a positive contribution to economic vitality and sustainable communities', and 'is an appropriate design for its context'.

39 The revelation of the roof lights will 'better reveal the significance of [the] heritage asset', and the scheme 'secures the optimum viable use of a heritage asset in support of its long term conservation'. In doing this – by providing sensible, useable and well-located office space in central Manchester – the scheme will both sustain and enhance the 'significance of a heritage asset'.

PPS5: Additional policy principles relating to designated heritage assets: Policy HE9

40 In terms of Policy HE9, the proposed scheme very definitely conserves the heritage asset, and the alterations made to the 2009 scheme are specifically focussed in reducing the impact of the scheme assessed by the Council to be harmful.

41 The scheme will therefore not 'lead to substantial harm to or total loss of significance' (Policy HE9.2) of the heritage asset, nor, for the reasons set out in detail in the KMH 2009 report, will the scheme cause 'a harmful impact on the significance of a designated heritage asset which is less than substantial harm' (Policy HE9.4). Quite the opposite: the proposed scheme represents a very considerable improvement in the circumstances of the heritage asset described above over that which exists at present. The permitted scheme is clearly and discernibly an improvement – in architectural and vacancy terms – over the circumstances that prevail at present.

42 The scheme will return a redundant space in the listed building to use, and improve the external appearance of the building by reducing the effect of the ceiling bulkhead externally. Even if one were to test the proposed scheme against Policy HE9.4 of PPS5, by assuming that the proposed scheme caused a degree of harm to heritage significance, the harm to the overall Royal Exchange could not be considered in any way significant, and the scheme robustly passes the tests in that policy. The 'public benefit' in economic, regenerative, and architectural terms greatly outweighs any harm that might be considered to be caused.

43 However, the revelation of the roof lights, combined with the removal of later partitioning and the general improvement in the quality and condition of the space

definitively makes the proposed scheme an enhancement to the heritage significance of the Royal Exchange.

Conclusion

44 The revised scheme, by revealing the roof light feature of Rooms 41-51, represents a considerable change to that which had been proposed. It will reveal an original feature of the listed building, and in so doing permits a greater understanding of the layout and construction of the building (and similar buildings) in the early part of the 20th century.

45 Taking this into account, in our view it is clear that the effect of the proposed scheme on the heritage significance of the Royal Exchange as a designated heritage asset is consistent with Planning Policy Statement 5: Planning for the Historic Environment. For the same reasons it is also consistent with Manchester City Council's policies for listed buildings.

Kevin Murphy B.Arch MUBC RIBA IHBC
Wednesday, 15 June 2011

The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark, and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect, and has a specialist qualification in urban and building conservation. Kevin Murphy was included for a number of years on the Heritage Lottery Fund's Directory of Expert Advisers.