

18 September 2025

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Dear Jennifer

**Plot C Sister - Planning Application Ref: 143024/FO/2025 & LBC Ref:143025/LO/2025
Response to Historic England and C20 Society**

A Listed Building Consent application was submitted in May 2025 for works to the Grade II Listed Hollaway Wall (reference: 143025/LO/2025). This forms part of the wider Plot C Sister redevelopment, which is subject to a planning application submitted concurrently (reference 143024/FO/2025).

A further Listed Building Consent application was submitted concurrently for works to the Grade II Listed Viaduct (reference: 143060/LO/2025).

Historic England (HE) and the Twentieth Century Society (C20 Society) have been engaged throughout the design process, at both the ID Manchester Strategic Regeneration Framework (the SRF) stage and subsequently on Plot C specifically. HE's advice during the production of the SRF informed the Place-Based Principles and Illustrative Masterplan captured within the endorsed SRF, and has informed the detailed plans for Plot C. The C20 Society has also been consulted throughout the pre submission process, including at SRF stage.

In June 2025, representations on the proposals were submitted to the Local Planning Authority (LPA) from HE (received via the LPA on 20 June 2025) and C20 Society (received via the LPA on 23 June 2025).

HE has advised that they do not wish to comment on the planning application or the LBC for the viaduct (reference: 143024/FO/2025 and 143060/LO/2025, respectively), with the focus of their concerns being on the Hollaway Wall LBC application (reference: 143025/LO/2025). The whole focus of C20 Society's representations is also on the Hollaway Wall (the 'Wall').

This letter responds to comments made by HE and C20 Society in relation to three principal areas of concern raised in their representations regarding the Hollaway Wall:

- (i) enclosing the Wall,

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- (ii) the level of intervention to the Wall, and
- (iii) weathering and conservation of the Wall.

This response addresses inconsistencies in the advice provided by statutory consultees. It further clarifies points where the Applicants' submissions have been misrepresented.

This response references the submitted Heritage Impact Assessment (HIA), Planning and Tall Building Statement (PTBS), and Design and Access Statement (DAS), Environmental Statement (ES) and where appropriate includes further commentary.

A full appraisal of how the Proposed Development addresses the specific planning policy considerations and other material considerations (including the principles established within the SRF) has been undertaken as part of the submission.

It is acknowledged that since the time of receiving HE and C20 Society representations on Plot C Sister, the Renold Building (located immediately to the west of the Plot C site, within Sister), has been listed by HE. This is not addressed within the scope of this response but is addressed accordingly within the submitted Environmental Statement Addendum (Chapter 6 Heritage) and updated Heritage Statement (Environmental Statement Volume 2 – Appendix 6.2).

Summary Comments and Position

A summary of the comments raised and position of both HE and C20 Society, within representations, is provided below.

Historic England

- Do not object to the application but do raise concerns on heritage grounds.
- Identified “*less than substantial harm*” (at the higher end of) to the built historic environment. Do not consider harm clearly or convincingly justified.
- Principal concern is identified as being over the “*extent of removal of sections of the wall*”.
- Consider “removal” of sections, relocation of other sections and enclosure of the main part of the Wall within the building, to harm the significance of the Hollaway Wall.
- Note, enclosing the Wall would “largely remove it from the public domain” but recognise the proposals will allow continued public access to the wall, albeit at certain times of day.
- “*Welcome the plans to conserve and clean the wall and to make enhancements to its current setting*”.

Use the term “*removal*” when making reference to sections of the Hollaway Wall which are to be folded down and set within the public realm and floor of the Manchester Room.

C20 Society

- “*Strongly objects*” to the proposals for the Hollaway Wall.

- C20 consider the proposals to cause “*substantial harm*” to the Grade II Listed Hollaway Wall.
- Discusses the significance of the Hollaway Wall, including as a “*sculptural wall and sound buffer*”, and “*artwork*”, that should be read as a “*coherent sculpture*”, and should be treated as such.
- Note the reasons for their objection were raised with the Applicants during pre-application consultation.
- State the Wall “*should be read as a coherent sculpture...the act of folding and flattening areas of the wall is highly destructive*”.
- “*Disagree with the claim made in this part that ‘folding’ sections of the wall will not impact the legibility of the wall*”.
- Consider the “*folding down*” of the Wall to be unacceptable and would result in a “*high loss of the significance*”.
- Take issue with the partial enclosure of the Wall, which “*would alter the understanding of the wall as a whole and result in uneven weathering*” and will “*harms its heritage significance*”.
- Reference to para.212 of the National Planning Policy Framework 2024 (NPPF), stating that “*great weight should be given to the assets conservation*”, going on to suggest “*these proposals cannot be regarded as conservation of the heritage asset that is the wall*”.
- Take issue with the discounting of Option A (Strategy A - new build set back from Wall) and B (Strategy B - new build against Wall) in the DAS stating this was due to not meeting project brief requirements only, and these options “*ought to be reconsidered*”.
- “*Accept the principle of enclosing the wall within a new building*”, stipulating “*only on the condition that the wall is fully enclosed but would rather the Wall remains outside*”.

#1 Enclosing the Hollaway Wall

HE states the following:

“The wall was conceived as a continuous structural barrier and has a distinct interrelationship with traffic and the outdoors; enclosing the wall within a building would involve dividing it into six separate parts through the removal of panels. The proposal to divide and enclose the main part of the wall within a building would physically and visually sever these links and alter that relationship, which would be harmful to its significance. It would no longer be a physical boundary feature, as the eastern boundary of the developed area would shift beyond the limits of the wall. The aim of Hollaway and his contemporaries was to integrate art into people’s lives by making it readily accessible day and night. The idea of enclosing the wall would also largely remove it from the public domain and alter the public’s day to day experience of it.”

C20 Society state the following:

“... the partial enclosure of the wall would result in a high loss of significance for the same reason: by dividing the wall into an interior and exterior component it will alter the understanding of the wall as a whole. It will also result in uneven weathering, damaging the appearance of the wall.”

“Both options A and B of the Hollaway Wall Strategies, provided in part 3.2.8. of the Design and Access Statement, which involve retaining the wall in-situ, whole and outside, were discounted as strategy options for not meeting a ‘c20,000 sq ft net area brief requirement’. While ‘typical floorplates’ of this scale are recommended in the brief to meet the c. 500,000 sq ft net office space required by the brief, it is by no

means a requirement. Clear and convincing justification that this office area cannot be accounted for elsewhere in the site is not provided, contrary to the requirements for NPPF 213. The Planning and Tall Building Statement states on page 2 that 'this phase of development will deliver 72,928 sq m Grade A office space across two buildings'. This is equivalent to approximately 785,000 sq ft of Grade A office space – over one and-a-half times as much floor space as required to meet the 500,000 sq ft net office space of the brief. As such, there is no clear and convincing justification for options A and B of the Hollaway Wall Strategies to have been discounted, contrary to the requirements of NPPF 213. These options which are more sympathetic to the wall, retaining its significance as a heritage asset, ought to be reconsidered."

"While the Society would rather that the wall remains outside, we accept the principle of enclosing the wall in a new building, on the understanding that the room is fully publicly accessible."

"However, this would be on the condition that the wall is fully enclosed, rather than partially as currently proposed. This is to allow the structure to remain legible as a complete and continuous work."

Differing Views

The proposed enclosure of the Hollaway Wall has generated differing opinions between the C20 Society and HE. The C20 Society supports full enclosure, stating, "we accept the principle of enclosing the Wall within a new building, only on the condition that the Wall is fully enclosed" (within representations). HE's position, however, has evolved.

Initially, during pre-application consultation (March 2025), HE expressed no specific objections to enclosing the Wall within a building, noting in a letter dated 14 March 2025 that they did "*not have specific concerns over the principle of containing the wall within the atrium of a building*". This followed early consultation with HE on the SRF, when noted that: "*The sculptural wall appears to be in poor condition and has an unattractive setting*".

Based on this initial positive feedback, the design team progressed an approach which sought to enclose the Wall within the building, creating a controlled environment for its preservation and enhancing its setting with the creation of "The Manchester Room," a publicly accessible space.

However, subsequent pre-application advice from HE (25 April 2025) expressed concern that enclosing the Wall would "*physically and visually sever...links and alter that relationship, which would be harmful to its significance*," contradicting their earlier position.

This discrepancy, coupled with the C20 Society's preference for full enclosure of the Hollaway Wall, highlights the subjective nature of the partial enclosure decision. This decision, however, is a result of an exhaustive options appraisal process, which has been presented and discussed during pre-application stakeholder engagement and is summarised in the submitted DAS (section 3.2.5 to section 3.2.15), and DAS Addendum (section 2).

Office Areas

There are errors in C20 Society's representations when referring to floorspace areas. C20 Society confuse Gross External areas (GEA) with Net Internal areas (NIA) and therefore make incorrect comparisons and observations. For the avoidance of doubt, the areas referenced are clarified below:

- Brief:
 - o C. 20,000 sq ft (net area - NIA) for 'typical' Grade A office floorplate.
 - o C. 500, 000 sq ft (net area - NIA) of Grade A office floorspace.
- Proposed Floorspace:
 - o C. 785,000 sq ft (GEA) of Grade A office floorspace.
 - o C. 72,928 sq m (GEA) of Grade A office floorspace.
 - o C. 530,000 sq ft (NIA) of Grade A office floorspace
 - o C. 20,000 sq ft (NIA) for 'typical' Grade A office floorplate.

It is acknowledged that the proposed Grade A office floorspace (c. 530,000 sq ft NIA) is greater than the brief (c. 500,000 sq ft (NIA)), however only by c. 30,000 sq ft (NIA). The proposed office floorspace is therefore considered to be in line with the project brief, and thus reasonable and justified.

In the context of the above, C20 Society's assertions that a: "*Clear and convincing justification that this office area cannot be accounted for elsewhere in the site is not provided*"; and that "*there is no clear and convincing justification for options A and B of the Hollaway Wall Strategies to have been discounted*" are incorrect.

Justification

The partial enclosure of the Hollaway Wall, detailed in the submitted PTBS and DAS (section 3.2.5 to section 3.2.15), and DAS Addendum (section 2) -], resulted from a robust optioneering process summarised in the DAS (section 3.2.5 to section 3.2.15), and DAS Addendum (section 2). This decision aligns with the Sister Strategic Regeneration Framework (SRF)'s vision and place-based principles, enabling the delivery of a critical mass of commercial floorspace and achieving key place-making objectives, including transforming London Road and creating a new civic square. Further details are provided below.

Critical Mass

The Proposed Development aligns with key SRF place-based principles (PTBS, paragraph 6.37), requiring a "critical mass" to establish a successful innovation district—a common feature of such districts globally, vital for maximising Sister's potential and benefits for Manchester.

Within the SRF, there is an identified opportunity for Plot C to deliver a landmark building at the north-eastern corner of the SRF Area, signifying arrival into Sister and the Oxford Road Corridor from Piccadilly Station. The locational necessity for a large footprint office and landmark building in this part of the Sister masterplan is established by the SRF, and the Proposed Development seeks to deliver on this.

The SRF highlights the need for flexible floorplates and large-scale Grade A office space to attract anchor tenants and create a thriving innovation district at Sister. The proposed development, facilitated by the partial enclosure of the Hollaway Wall, delivers this "critical mass" of flexible space, enabling the attraction of global HQs and supporting the SRF's vision [(SRF Principle 1: A Human Collider page 48 and SRF Principle 7: Critical Mass page 73). Large, adaptable floorplates are crucial for attracting major tenants, fostering collaboration, improving efficiency, and establishing Sister as a leading global innovation district:

- **Adaptability to evolving needs:** Major anchor tenants often require adaptable spaces that can be easily reconfigured to meet their changing operational needs. Large floorplates provide the flexibility to create bespoke layouts, accommodating different team sizes, work styles, and technological advancements. This adaptability is particularly important in the dynamic environment of an innovation district, where entrepreneur, SMEs and businesses are constantly growing, evolving and innovating.
- **Enhanced collaboration and innovation:** The ability to accommodate large, open floorplates promote collaboration and knowledge sharing. They allow for the creation of collaborative workspaces, meeting areas, and breakout zones, fostering a culture of innovation and creativity. This is considered key in attracting anchor tenants, that value a dynamic, innovative and collaborative work environment.
- **Improved efficiency and productivity:** Efficient space planning is critical for anchor tenants, particularly large occupiers. Large floorplates allow for optimised layouts that minimise wasted space and maximise workflow efficiency, leading to improved productivity and growth.
- **Attracting and retaining talent:** The workforce values modern, flexible workspaces. Large, well-designed floorplates with amenities and collaborative spaces are considered essential for attracting and retaining top talent, a key factor for success in a competitive innovation district.
- **Scalability and future growth:** Large floorplates provide the scalability needed for future growth. As companies expand, they can easily adapt their space to accommodate increasing headcount and operational needs without relocating. This long-term perspective is crucial for attracting companies that plan for sustained growth and success.

Place-Making

As referenced in the PTBS, the Proposed Development contains significant new elements of landscaped space and public realm, in line with the SRF vision and place-based principles. This includes Plot C delivering a civic square at the heart of the Sister masterplan, and transforming London Road into a welcoming, outward looking space. These are both key priorities identified in the SRF which have been considered within the Hollaway Wall optioneering process (see paragraph 6.39 of PTBS for further details).

The aspiration to transform London Road into a city street and the delivery of a new civic square are central objectives of the SRF. Along London Road it is considered that it would be a fundamental missed opportunity not to seek to look forward to, and facilitate, a more humanised future context of London Road. The design team detailed the constraints imposed by the Wall and the limits that this places on the ability to create connections to surrounding areas, including Piccadilly. The SRF also identifies the important role this part of the masterplan plays interconnecting two high quality emerging districts (Mayfield and Sister) that are driving significant transformational regeneration in this part of the city, whilst also transforming London Road from a car-dominated road into a pedestrian-friendly environment. Addressing the physical and perceptual barrier created by the Wall is considered a critical aspect of achieving this.

The creation of a new civic square (Sister Square) at the heart of the innovation district, is identified as a key area of public realm within the SRF. In line with the SRF aspirations Sister Square has been designed as a vibrant multifunctional civic space, of sufficient scale to host a variety of public activities. The aspirations for the civic square play an important role in establishing Sister as a destination that draws in a diverse population by serving the needs of people that work and live within Sister, as well as existing local communities and other visitors, to support the establishment of a vibrant, welcoming and accessible ecosystem. The scale of the proposed civic square is critical in achieving this, and so has informed (and limited) the extent of the building floorplate to the west. In addition, the building line of Plot C mirrors that of Barnes Wallis, taking a compensational arrangement with Renold (to the west), and maintaining a comparable scale between the existing public realm (Bowling Green) and Sister Square.

Summary

In line with the SRF's 'sustainable and regenerative' place-based principle the Hollaway Wall optioneering process includes a rigorous, holistic assessment for the potential adaption of existing structures on the Site, including: consideration of placemaking priorities: supporting the delivery of a critical mass and flexible floorspace to make Sister a successful innovation district; historical and architectural significance; feasibility of re-purposing for viable long-term uses; and embodied and operational carbon.

HE and C20 Society have been engaged throughout the process, including the production of SRF and at pre-application stage for Plot C. HE in particular have previously noted support for the SRF place-based principles, namely in November 2022 and February 2023 which focused on the on the principles and illustrative masterplan (as captured within the SRF); HE explicitly sought to add to the notes : *"our supportive position on the principles as introduced to us of this SRF. Not only is it important in its own right but it could also be a key to unlocking the potential connections in a wider context"*, in relation to the IDM/ Sister Masterplan (email: ID Manchester - Meeting 111022 -draft minutes - 7th November 2022).

The C20 Society's concern regarding the dismissal of Strategies A and B for the Hollaway Wall in the DAS is unfounded. These options were discounted early in the design process due to factors beyond simply not meeting the project brief, including the significant structural challenges of Strategy B's proximity to the Hollaway Wall, as referenced in the submitted DAS (section 3.2.8) and informed by the Hollaway Wall

Structural Appraisal and Outline Methodology Report (prepared by Civic Engineers). Further details on the wall's structural composition are provided below.

In summary, the Hollaway Wall optioneering process has been informed by the SRF vision and place-based principles, which HE was fully and expressly supportive of at SRF stage.

Optioneering - Retaining and/or Moving the Wall

In response to C20 Society's primary preference for the Hollaway Wall to remain outside, it should be noted that the option of a new build set back from the Wall (Strategy A), has been discounted, as referenced within the DAS. Furthermore, options such as: (i) Hollaway Wall moved wholesale eastwards towards London Road, located outside and separate to 'new build' (Strategy E in DAS); and, (ii) new build against the Hollaway Wall, and therefore partially outside (Strategy B), have been discounted, due to a greater understanding of the structural composition of the Wall following survey's undertaken by Civic Engineers.

Of relevance to the structural composition, is the erroneous note in the listing description that the Wall is constructed of pre-fabricated panels. The detailed analysis of the Wall undertaken by Stephen Levrant Heritage Architecture (SLHA) and Civic Engineers, and discussed in the planning submission, demonstrates that the Wall was cast in situ as one piece.

Principally relocating the Wall (Strategy E, detailed with DAS) would be technically challenging due to intrusive investigations establishing that the Hollaway Wall is a piled structure rather than pre-fabricated. Any option to move the Wall wholesale would therefore present a very high-risk of substantial and irreparable damage. This would also result in it being removed entirely from its original setting and context, causing harm in heritage terms. This option was considered to have the potential to give rise to impacts that would result in substantial harm to the heritage asset.

Relocating the Wall eastwards towards London Road (Strategy E) and having the new build against the Wall (Strategy B) would also not derive the public benefits of knitting Sister back into the city centre urban fabric as it would impinge on east-west connections, nor support the placemaking objectives (including those outlined above). The relocation the Wall eastwards would also necessitate the loss of additional mature trees. Furthermore, if the Wall was to be relocated southwards or south-eastwards it would not be possible to deliver the proposed servicing tunnel, which would also not derive the benefits and placemaking objectives of Sister (utilising level changes to introduce a concealed service tunnel to service buildings, out of sight of the public realm, so deliveries and servicing is limited to the periphery of the Sister area).

Full Enclosure of the Wall

C20 Society concludes their representations stating, "we accept the principle of enclosing the Wall within a new building", stipulating "only on the condition that the Wall is fully enclosed". In response to C20 Society's representations, an additional detailed exercise has been undertaken by AAM on the extent of the Hollaway Wall to be enclosed (see Appendix A – Additional Hollaway Wall Study). This exercise concludes that the full

enclosure of the Hollaway Wall is not possible is not compatible with the objectives of the project brief and SRF because:

Northern Extent of Hollaway Wall

- **Hollaway Place and Altrincham Street:** Encapsulating the northern section would obstruct Hollaway Place, a key public space and arrival point defined in the SRF. This would also block access and visibility to building entrances and the Oxford Road Corridor.
- **Future Viaduct Extension:** Extending the building footprint to enclose the wall conflicts with the potential future expansion of the viaduct (Northern Powerhouse Rail), potentially severing Altrincham Street from London Road.
- **Arrival Views:** Encapsulation would block the key arrival space into Sister from Piccadilly and Mayfield (at the northeastern corner), contradicting the SRF's vision for a welcoming arrival space.
- **Tree Removal:** Extending the building would necessitate the removal of three existing trees.

Southern Extent of Hollaway Wall

- **Structural Columns and Foundations:** The location of structural columns and foundations coincides with the southern return of the Hollaway Wall, influencing the building's footprint. A 9m x 9m grid was used for efficiency and adaptability. The eastern extent is set by the Hollaway Wall's main section, optimising the size of the Manchester Room. The western extent aligns with the Barnes Wallis building to maximise basement reuse and reduce piling needs. The northern extent is determined by the service tunnel.
- **Service Tunnel Access:** The southern return of the Hollaway Wall obstructs direct access to the service tunnel, which seeks to deliver on the SRF principle to limit vehicle movements to the edge of the masterplan. Enclosing the Hollaway would severely compromise vehicle access, forcing vehicles into Mill Lane and requiring the relocation of the service ramp, whilst also rendering the auditorium space above unfeasible.
- **Mill Lane:** Extending the building footprint would compromise Mill Lane, an important east-west connection.

In summary, fully encapsulating the Hollaway Wall on either the northern or southern side is incompatible with the project's objectives and the SRF due to various constraints related to public realm design, infrastructure, access, and service requirements.

On balance, it has been clearly demonstrated that partially enclosing the Wall is the preferred solution because it allows for a range of public benefits associated with the development whilst minimising harm to the asset. This balance is clearly set out in the submitted DAS.

#2 Level of Intervention

HE state the following:

“We are concerned over the extent of removal of sections of the wall, which would disrupt its rhythm and would be harmful to its artistic value. The wall was designed in a specific way from varying sized blocks of concrete, to create shadows and allow shafts of light through. It was also conceived as a solid barrier; a function which is reinforced by its blocky and robust construction and appearance.”

“The enclosure of the wall inside a building and the removal of ten sections of the wall and relocation of two sections at the southern end will fundamentally alter the way the wall is experienced and understood.”

C20 Society state the following:

Level of Intervention

“The Hollaway wall must be read as a coherent sculpture, the strength of which is derived, at least partially, from its length and scale. As a singular, monumental artwork, the act of folding and flattening areas of the wall is highly destructive. This proposal is not comparable to, for example, introducing limited new openings to a listed boundary wall. By reading the wall solely as a boundary structure, as opposed to an artwork by a major twentieth century artist, the understanding of the wall as a solid demarcation line is lost. The alteration and ‘folding’ of this wall would result in a high loss of the significance of the sculpture, by altering its monumentality and dissolving its clear demarcation of the boundary of the UMIST site.”

Significance

“The wall was the Society’s ‘building of the month’ in January 2009. Professor Richard Brook, author of the entry, wrote that ‘the work is certainly of national importance insofar as it reflects a particular condition and set of circumstances that uniquely afforded a large number of artists significant funding into material research and development’. Designed as a sculptural wall and sound buffer by the artist Antony Hollaway, it was produced in collaboration with Harry M Fairhurst, of the important and locally significant practice Fairhurst and Son. Hartwell, Hyde and Pevsner’s Lancashire: Manchester and the South-East (2004) from the Buildings of England series, says of the Hollaway wall: ‘the universities are the best places to see PUBLIC ART of the early-mid 1960s. At UMIST, Antony Hollaway’s highly unusual sculptural wall defines the E edge of the campus’. The significance of the Hollaway wall, not only as a sculpture but as a demarcation of the existing UMIST campus, is well understood, with that definition and demarcation key to the significance of the wall. Statutorily listed at Grade II in 2011, the wall was designated for its design quality, the relationship between Hollaway and Fairhurst, and its functional role ‘separating people from the noise and visual and physical intrusion of vehicular traffic’, as well as its high standard of construction. The Society regards it as an important twentieth century work of public sculpture and function.”

“To reiterate, the sculptural wall must be treated as an artwork, rather than as simply a boundary wall (although it achieves both, aligning with Hollaway’s artistic philosophy of combining public art with function). The significance of the wall lies, to a great degree, in its intactness, scale, and length. Importantly, the wall was always intended to be read as a public sculpture from a specific vantage point: the public realm to the east of the wall that it helps to delineate from the university campus.”

Significance

C20 Society’s comments regarding the significance of the Wall, including its artistic value are noted. The significance of the Grade II Listed Hollaway Wall is appropriately considered within the submission, including the submitted HIA (ES Volume 2 – Appendix 6.1) and Heritage ES Chapter (Volume 1), both prepared by SLHA.

This includes recognising the Hollaway Wall as a sculptural piece of public art; within the submission the historic interest, the architectural and artistic interest of the Hollaway Wall, and the contribution of its setting to significance are clearly detailed and robustly considered. This includes noting its dual purpose as a sculptural buffer and functional retaining wall and recognising that “*the significance of the asset derives from its expression as a piece of sculptural art*”, as well as the negative contribution the existing setting (e.g. existing fence) makes to the ability to appreciate the special interest of the Wall (HIA – page 58).

It should also be acknowledged that during SRF engagement with HE it was acknowledged that there was an inherent conflict between the Wall’s significance as a physical barrier and the place-making priority of improving access to the site and knitting the framework area back into the surrounding urban grain. HE noted that, while the Wall is a listed structure, it does not need to be frozen in time. It was accepted that some level of intervention could be acceptable in order to bring this part of the site back into active use.

Principle of Folding

HE states the following:

“By removing sections of the wall, its legibility as a functioning structure and as a piece of art are both diminished, and the level of resulting harm to its significance would be very high. The removal of a continuous run of seven sections of the wall at its northern end would be particularly harmful to its significance. The resulting gap between the external corner piece of the wall and the main part of the wall inside the building would be too great to enable an understanding of it as a continuous piece.”

C20 Society states the following:

“The proposed ‘folding down’ of the Grade II listed Antony Hollaway wall is unacceptable. The Society strongly objects to this proposal.”

“The alteration and ‘folding’ of this wall would result in a high loss of the significance of the sculpture, by altering its monumentality and dissolving its clear demarcation of the boundary of the UMIST site.”

“The claim made in part 3.2.10 of the Design and Access Statement that retaining the wall as-is will result in it being unable to ‘be appreciated in the round without leaving the building and walking round it’ does not address this one-sided public character of the wall. We disagree with the claim made in this part that ‘folding’ sections of the wall will not impact the legibility of the wall. The wall’s legibility is derived from its completeness, and the lack of permeability along its primary length.”

“We object strongly to the proposals to ‘fold’ sections of the wall, due to the impact that the ‘folding’ would have on the understanding of the artwork, and subsequently on its significance as a Grade II listed heritage asset.”

It is acknowledged that C20 Society raised concerns regarding ‘cut throughs’/ ‘fold down’ of the Hollaway Wall at pre-application consultation stage, including during the IDM SRF (2022 and 2023) and Plot C consultation processes. This is referenced and echoed within C20 Society’s representations.

The proposed interventions to the Hollaway Wall, including the cutting and folding of elements, seek to integrate the Hollaway Wall within the Proposed Development. These are necessary to deliver a number of the key SRF principles by creating a permeable and engaging feature, enhancing connectivity and contributing to the creation of an enhanced, welcoming public realm at a key entrance point to the site.

The proposed interventions involve a carefully considered sequence of cuts and folds to the existing Hollaway Wall structure. These interventions are strategically limited to:

- **Create a defined entrance:** Sections of the Hollaway Wall will be folded to reveal clear access points to the Manchester Room and wider Site, improving legibility for pedestrians approaching the Site from the east.
- **Establishing the Manchester Room:** The interventions will help to facilitate the development of the Manchester Room, a publicly accessible community space located at the base of the C2 Building. The Hollaway Wall will run through the middle of the room. The design of the Manchester Room has been developed through engagement with Historic England to be deferential to the Wall, making that the focal point of the space, to be appreciated by all future users. The interventions to the Hollaway Wall within the Manchester Room have been carefully coordinated to minimise their number whilst allowing people to move into the spaces created, including spaces created specifically to meet the needs of local people as defined through the Community and Youth Panels undertaken through the pre-application engagement process. These spaces are considered integral to the successful realisation of a community asset with genuine utility to the people that will use it.

Segments will be ‘folded down’ in-situ to form seating elements within the landscaping scheme, while others will be set level within the flooring to create a clear marker to where they previously stood. This approach retains the Hollaway Wall and by cutting and folding elements allows it to still be read as whole, by maintaining a level of understanding and ensuring it can be read as a continuous and coherent piece.

In HE’s representations the term ‘removal’ is used when referring to the sections of the Hollaway Wall proposed to be folded down. It is important to note that six of the eight sections are not being removed from their original position. These sections are being altered and folded down, and so the term ‘removal’ suggests a more significant level of intervention than proposed.

The project structural engineer, Civic Engineers, has confirmed that the folded down sections of the Wall could be re-instated vertically in the future, and therefore reversible. Civic Engineers have advised that it is entirely achievable to re-erect the folded sections in the future; with the necessary reinforcement (dowelled reinforcement could be resin fixed into the base/ ‘stump’) these elements can be lifted back up into position with a (similar) fixing to the base. This would require the horizontal and vertical cut joints to be grouted to reinstate the continuous length and height of the Wall. In the final condition this would appear as a formwork or day joint as can be seen on the face of the Wall currently. This evidences that the folding of sections of the Hollaway Wall can be reversed in the future, and so further reiterates that references to ‘removal’ are disingenuous.

Minimum Interventions

In HE's representations, the principal concern is the "extent of removal of sections of the Wall", with the response going on to state: "which would disrupt its rhythm and would be harmful to its artistic value".

In HE's advice letter (dated March 2025), concerns were raised over the extent of sections of the Wall for removal, including removing large portions of the Wall at its northern corner on the approach from Piccadilly Station detracting from its prominence and make it less legible. HE also noted that they did not feel that this is fully justified.

Following HE's formal advice and comments, a number of design changes were made to the Plot C proposals prior to submission, which reduced the level of intervention, and is reflective of the as submitted scheme (please refer to Section 3.2.10 – 3.2.15 of the DAS for detail).

The proposals for the Hollaway Wall have been subject to extensive optioneering to find the optimum solution which is proportionate in terms of harm required to unlock the significant public benefits. The number of interventions have been carefully considered to balance harm, and represent the minimum number of interventions required.

The proposed interventions to the Hollaway Wall, allow the structure to be incorporated into the new commercial buildings, with it passing through the end structural bay of building C2, with local sections carefully cut to allow access through within the internal space. The degree of alteration is not considered to give rise to substantial effects, due to the extent of original fabric which will remain appreciable in-situ, paired with the retention of the cut sections which will be folded remain readable within the landscaping.

#3 Weathering and Conservation

HE state the following:

"We welcome the plans to conserve and clean the wall and to make enhancements to its current setting, which we feel could be improved on."

C20 Society state the following:

"It will also result in uneven weathering, damaging the appearance of the wall" [the partial enclosure of the wall]

"Paragraph 3.2.2. of the Hollaway Wall: Structural Appraisal & Outline Methodology Report (2025) states that 'The Wall is currently external... and has therefore been subject to environmental factors such as freeze-thaw, carbonation, chloride-induced corrosion and sulphate attack'. The statement implies that the weathering of an external concrete sculpture is a negative attribute that ought to be prevented through the partial enclosure of the wall. However, given that the design of the wall not only provided for expected environmental weathering ('these external conditions likely necessitated higher durability measures, such as increased concrete cover', 'the Wall was originally designed for an external environment and therefore has heightened durability'), but was designed to 'enhance weathering and texture' by the use of 'rough sawn formwork' (Brook), the removal of the wall from its designed environment (outside, next to an active road), can be regarded as harmful to the significance of the wall. The Hollaway wall is currently in-situ in its intended external location. The partial encapsulation of the wall will harm its heritage significance, both by

altering the environment in which it sits, and for which it was designed, and by leading to uneven weathering due to the partial enclosure of the wall and the partial ‘folding’ of the wall segments. As per NPPF 212, great weight should be given to an asset’s conservation. These proposals cannot be regarded as conservation of the heritage asset that is the wall.”

Representations from C20 Society make reference to paragraph 212 of the NPPF, stating that “*great weight should be given to the assets conservation*”, going on to suggest “*these proposals cannot be regarded as conservation of the heritage asset that is the Wall*’.

C20 Society, do not support the ‘partial’ enclosure of the Hollaway Wall, stating that this would “*result in uneven weathering*”. It is acknowledged that the natural weathering of the asset contributes to its significance, with the Wall originally designed for an external environment. However, as has been identified as part of the LBC submission (Hollaway Wall Structural Appraisal and Outline Methodology Report, prepared by Civic Engineers), the relative age and material composition of the Wall is reaching a point where the fabric is reaching the end of its natural life cycle, thus, repair work and intervention is required to ensure the longevity of the asset. As has been established within Civic Engineers’ report, sensitive repair works are proposed, and indeed required, to maintain the structure. The intention being for repairs to be minimal, ensuring the existing ‘cultural weathering’ to the Wall continues to be legible.

The enclosed element of the Wall, once repaired, will naturally be protected from further deterioration prolonging its life. For the external element, a Conservation Management Plan (CMP) is proposed and could be conditioned in the consent; the CMP provide guidance for the ongoing maintenance of the asset, including suitable methods for cleaning and repair. This would also prolong the life of the external elements and minimise the differences in condition between the internal and external elements.

Whilst the Proposed Development will result in alterations to the Hollaway Wall great weight has been given to the conservation of the Wall through the proposals to repair, clean it and provide a long-term vision for the setting of the listed building.

#4 Level of harm

HE states the following regarding the level of harm:

“The proposals seek to enclose the majority of the wall within the ground floor of a new 20-storey building on the site. This will require the removal of ten concrete panels from the listed structure and the relocation of two other panels, which will harm the significance of the asset. These removals constitute over a quarter of the wall’s total length.”

“We recognise that the proposals are to allow continued public access to the wall, albeit at certain times of day, and to celebrate the wider site’s important mid-20th century architectural and scientific history by integrating the wall into the proposed redevelopment plans”

“We have concerns over the proposed changes to the Holloway Wall, and that the level of resulting harm to its significance would be at the higher end of less than substantial. We do not think that this harm has been clearly or convincingly justified.”

“Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 202, 212 and 213 of the NPPF. In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.”

C20 Society states the following regarding the level of harm:

“The Society was consulted on this scheme at pre-application stage, and raised our objections at that point. The proposals were presented to the Society’s casework committee, a body of experts in twentieth century architecture. The committee regards this proposal as harmful to the significance of the designated heritage asset that is the Sculptural Wall.”

“We regard the proposed scheme to cause substantial harm to the Grade II listed wall. As per NPPF 213, substantial harm to grade II listed buildings should be exceptional. This high bar of exceptionalism has not been met. Clear and convincing justification for the proposed substantial harm has not been provided.”

C20 Society makes reference to the proposals causing ‘substantial harm’ to the Holloway Wall, which the Applicants strongly rebuts. C20 Society’s conclusion on the level of harm is not in agreement with HE and the Applicants’, with HE consider it to be at the “higher end of less than substantial harm”. This reflects SLHA’s conclusion of less than substantial harm (higher end), which is supported by the detailed HIA undertaken by the Applicants, with the public benefits considered to strongly outweigh this harm.

HE and C20 Society’s continued concern over the amount of intervention to the Wall required by development is duly noted and robustly addressed in the planning submission and this letter. This is considered to demonstrate that great weight has been placed on conserving heritage assets (at both an SRF and Plot C specific level) and presents a clearly convincing justification for the works proposed.

Overall, it is acknowledged that the Proposed Development will result in less than substantial harm to the Holloway Wall’s significance albeit at the higher end. This is considered to be outweighed by the public benefits of the development. The public benefits are summarised in Section 8 of the PTBS and evidenced throughout the submissions to support the LPA in carrying out this weighing exercise.

Planning Balance

As set out above both HE and SLHA, conclude that the Proposed Development results in a high degree of ‘less than substantial harm’. As such, there is agreement between the Applicants and HE on the overall conclusions regarding the significance of the harm, in accordance with the NPPF. Therefore, in line with NPPF

paragraph 215, this harm must then be weighed against the public benefits of the proposal. Compliance with Para 215 has been clearly articulated in the PTBS with Chapter 8 providing details of the benefits.

The cumulative effect of all of these benefits will be very significant. It is clear that the Proposed Development provides a number of public benefits that will deliver economic, social and environmental benefits to the local community.

Compliance with Local Planning Policy, the Planning (Listed Building and Conservation) Act and NPPF

The Proposed Development is in accordance with Core Strategy Policies EN2 and EN3. Policy EN2 states that tall buildings should be located outside of conservation areas near transport hubs; the Proposed Development clearly meets these locational criteria. Policy EN2 also sets criteria for tall buildings, against which the proposals are considered in Section 7 of the submitted PTBS. Core Strategy Policy EN3 has largely been replaced by Places for Everyone Policy JP-P2 which seeks to positively conserve, sustain and enhance the historic environment. Development proposals affecting designated (and non-designated) heritage assets and/or their setting will be considered having regard to national policy. It further states that proposals should be informed by heritage assessments. The Proposed Development and supporting HIA has been undertaken in line with this policy.

The Proposed Development complies with sections 16(2) and 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (PLBCA) and NPPF paragraphs 208, 212, 215, 135 and 139.

The PTBS at paragraphs 6.80 to 6.111 provides a response to the heritage considerations of the application. Whilst Section 16(2) of the PLBCA and NPPF paragraph 208 and paragraph 139 are not specifically noted and NPPF paragraph 212 is not directly referenced in the heritage considerations response in the PTBS, the PTBS HIA and DAS provide a clear and convincing justification for the interventions to the Hollaway Wall as required by the PLBCA and NPPF, and the PTBS at paragraphs 6.31 to 6.36 provides a response on architectural design quality. Furthermore, the PTBS concludes compliance with NPPF paragraphs 212 and 215.

It is noted that NPPF paragraph 208 relates to LPAs identifying the significance of heritage assets and their considering of impact. As such, it is for the LPA to determine compliance with this paragraph using available information which include the submission documents and any representations.

NPPF paragraph 135 sets criteria for well-designed places, bullet (c) of which requests developments to be sympathetic to local character and history. The submitted DAS details the design evolution, which demonstrates how the criteria and guidance detailed within the NPPF, and other associated documents and guidance, has been considered. The Applicants considers that the design of the proposals is of exemplary quality, optimises the Site and will be a positive contributor to Manchester's architectural, cultural, and civic landscape.

NPPF paragraph 139 states that applications that are not a good design should be refused. Conversely significant weight should be given to applications that reflect local and government policies on design and

those that have outstanding or innovative designs that fit with the overall form and layout of their surroundings. The PTBS and DAS letter provide details of the exceptional design quality of the Proposed Development that reflects the local built context and the modern and historic context of the area.

Summary

In summary, the Applicants and their design team have proactively and openly engaged with HE and C20 Society throughout the lifecycle project to-date and will continue to do so as this and subsequent phases come forward. Both the endorsed SRF and the Plot C proposals have been shaped by these engagements and HE's advice. This has included the importance placed on enhancing access to the SRF area at its northeast corner (in Plot C) and improving London Road, on proposals to enclose part of the Wall internally, and how the proposals can improve the setting and accessibility to the Wall.

As set out above, it has been demonstrated that the very considerable public benefits of the Proposed Development considerably and demonstrably outweigh the identified instances of less than substantial heritage harm.

If any further clarification is required, please do not hesitate to contact Niall Alcock (0161 455 6787 / nalcock@deloitte.co.uk) or Jemma Brabrook (0161 455 6903 / jbrabrook@deloitte.co.uk).

Yours sincerely

A handwritten signature in dark ink that reads "Deloitte LLP". The signature is written in a cursive, slightly stylized font.

Deloitte LLP

Enc. DAS Addendum (Section 2) Additional Hollaway Wall Study) prepared by Allies and Morrison.