



17th March 2025

Hotspur Press: Heritage Addendum Note

Introduction:

The following Addendum Note has been prepared by Heritage Architecture Ltd in relation to the undetermined planning application submission for the Hotspur Press site, ref: 138805/FO/2023.

The proposed changes include:

- Reduction in the height of the proposed tower element from 116m to 110m (37 to 35 floors)
- Slight increase in Tower width (15.6m from 15.0m)
- Slight movement of Core impacting Ground & Lower Ground Floor Arrangements
- Change to Façade from Brick to Glass & Aluminium
- Change from Wet to Electric Heating (will need PVs on roof)

The Site comprises the former c.1801 cotton mill known as Medlock Mills and is now known as Hotspur Press. The building is not statutorily listed but has been identified as a non-designated heritage asset (NDHA) by Manchester City Council. The Site is not located within a conservation area but is located close to the boundary of the Whitworth Street Conservation Area.

A Heritage Statement was submitted as part of the planning application to assess the potential heritage impact upon the significance and setting of the Site and on the settings of surrounding identified designated heritage assets which have the potential to be indirectly impacted by the Proposed Development.

Consequently, there is a requirement to assess the perceived change / magnitude of impact of the revised proposals upon the identified heritage assets. The effects are considered as direct or indirect changes resulting from the development which may be either *adverse*, *beneficial*, *negligible* or *neutral*.

Updates and Clarifications:

Reference has been made to the revised drawings by Hodder and Partners and updated CGIs produced by Ambiente.

The submitted Heritage Statement considered all the heritage assets identified in Section 3.12 of the DAS.

Since the Heritage Statement was submitted, the NPPF has been updated (December 2024). The changes to the relevant paragraph numbering is highlighted below:

Paragraph ~~200~~ 207 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”*.

Paragraph ~~209~~ 216 states that, *‘the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’*.

Paragraph ~~211~~ 218 states that *‘Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted’*.

Paragraph ~~206~~ 213 states that *‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’*.

Paragraph ~~207~~ 214 states that *‘Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- 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 through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use’*.

Paragraph ~~208~~ 215 states that *‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’*.

Paragraph ~~209~~ 216 states that *‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’*

Assessment:

It is considered that the changes to the height of the tower element of the Proposed Development will be largely imperceptible compared to the previous proposals, in terms of affecting potential visual impact.

Regarding the changes to the footprint of the tower, it is considered that this will not change the level of potential direct impact on the Site as a non-designated heritage asset.

Although the change in façade material from brick to aluminium and glass will change the appearance of the tower this will not change the level of potential visual impact caused by the Proposed Development.

The Visual Impact Assessment (VIA) in Section 7 of the previously submitted Heritage Statement demonstrated that the Proposed Development would enhance the currently dilapidated character of the streetscape and introduce a sense of cohesion into the area, which is currently defined by the Site's historic lack of connectivity to Whitworth Street West, and westwards across the river. The overall impacts were assessed as resulting in a negligible -to- minor adverse impact on designated heritage assets within the setting of the Site and a moderate adverse impact on the NDHA. The revised design changes have not resulted in any changes to these impact levels.

Conclusion:

In summary, the revised design changes will not cause any changes to the levels of impact previously identified in the Heritage Statement.