



Paul Butler Associates
Planning, Development & Heritage Consultants

Zurich Insurance

Freetrade Exchange

Heritage Addendum

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1. Introduction

- 1.1 This Heritage Addendum has been prepared by Paul Butler Associates on behalf of Zurich Insurance. The statement has been provided in support of an application for Listed Building Consent relating to the Freetrade Exchange building at 37 Peter Street, Manchester. The proposed scheme relates to the internal fit out of the fourth floor office suite, with works primarily comprising the installation of solid and glazed partitions.
- 1.2 The building is Grade II listed and located within the Deansgate Conservation Area. The main purpose of this statement is to consider the heritage significance of the building and to appraise the impact of the proposed scheme on this significance.
- 1.3 This statement has been prepared in accordance with the policies and procedures of the National Planning Policy Framework (NPPF) December 2023, following a visual and photographic survey of the affected part of the building (undertaken on 24 October 2024). In recent years, the building has undergone a comprehensive 'CAT A' refurbishment with some parts now occupied. Where appropriate, this Statement will refer to previous reporting undertaken at the site rather than repeating this.
- 1.4 This Statement should be read alongside the Heritage Statement prepared by Stephen Levrant Heritage Architecture in relation to the broader refurbishment of the building (Dated June 2022); and the submitted Design and Access Statement and plans which have been prepared by AXI Studio Architects. A photographic survey of the fourth floor office suite is set out at Appendix A.

2. The Application Site and Surrounding Area

- 2.1 The Freetrade Exchange building is located within a prominent position at the junction of Peter Street and Southmill Street within Manchester City Centre. The building has recently undergone a comprehensive refurbishment to increase its attractiveness to high quality office occupiers, and to accommodate a restaurant operator at lower ground floor level. At the time of the subject application, the building is mostly vacant, but office and restaurant occupiers have been secured and are due to occupy the building within the coming months.

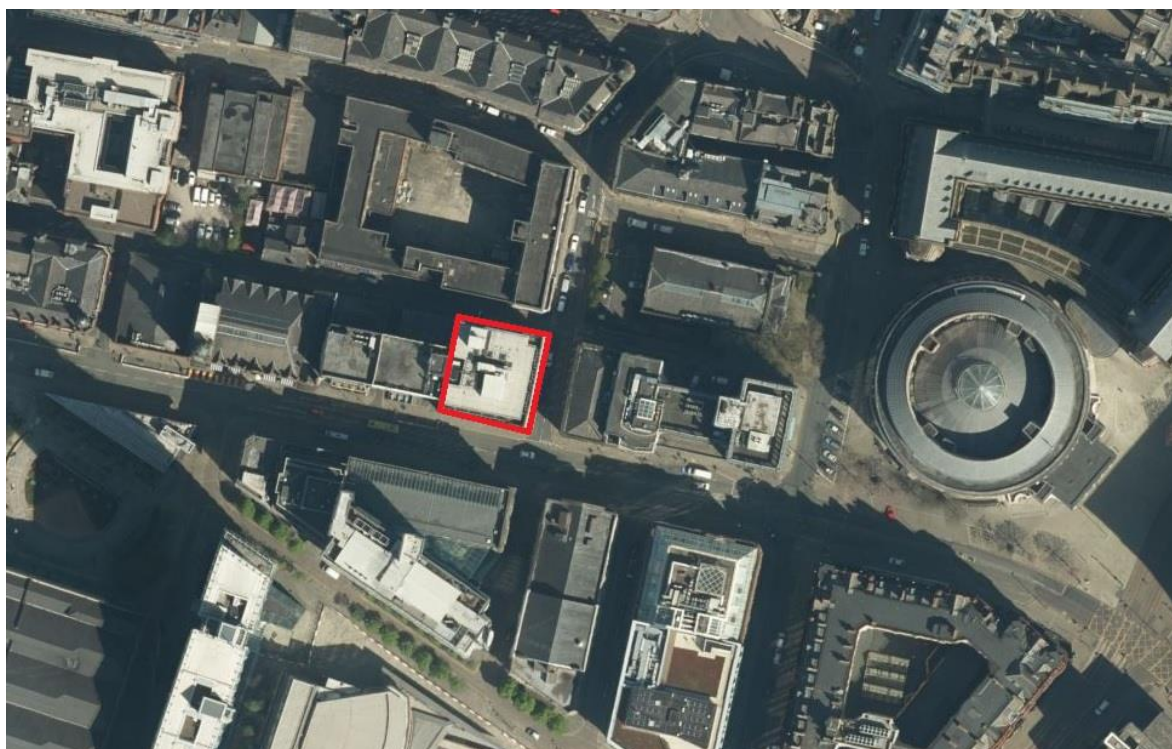


Image 2.1: Aerial Plan (Approximate site boundary in red edge).

- 2.2 The ground and five upper floors of the building are in office use, with the subject application relating to the fourth floor office suite. The main reception and access point to the fourth floor is via the main entrance at the west side of the building on Peter Street, whilst there is a secondary access to the rear of the building on Bootle Street. There is also an access on Peter Street at the eastern side of the building which is the main entrance to the restaurant unit at lower ground floor level.
- 2.3 The building is located on the fringe of Manchester City Centre's Central Business District. The building is attached to Scottish Mutual House (35 Peter Street) to its west which is a 1960s office building, which also accommodates a bar and restaurant at ground floor level.
- 2.4 The application site covers an area of 0.07 Hectares. The building was previously known as 'Harvester House' and was constructed as a merchant's warehouse in 1868. It underwent a comprehensive refurbishment in 2007 whereupon it was relaunched as Freetrade Exchange, in reference to the Grade II* Free Trade Hall (now the Radisson Edwardian Hotel), located directly opposite the site. The more recent refurbishment of the building has enhanced it both on a heritage basis and in terms of it being able to meet the space and facilities' expectations of modern occupiers.



Image 2.2: Freetrade Exchange from Peter Street



Image 2.3: View from west

- 2.5 The building is square within the plot, with its primary south and east elevations in sandstone ashlar. The other two visible elevations (north and west) are in red brick and are of a more utilitarian design.

Surrounding Area

- 2.6 The building is located within the Deansgate Conservation Area and within close proximity to a number of Grade II and Grade II* listed buildings. Designated in June 1985, the conservation area includes much of the area surrounding Peter Street and the junctions of Deansgate with both Quay Street and Bridge Street. The boundary of the St Peter's Square Conservation Area runs down Southmill Street thereby aligning with the boundary of the Deansgate Conservation Area.
- 2.7 The application proposals relate solely to the office suites at fourth floor level.

Relevant Planning History

- 2.8 Planning Permission (133119/FO/2022) and Listed Building Consent (133282/LO/2022) was secured on 26 July 2022 for external works and the internal refurbishment of the Listed Building, as well as the change of use of the lower ground floor. Subsequent to that, a number of applications were submitted to discharge conditions attached to those consents. With regards to the fourth floor office space, these were stripped back to reveal original and historic features, and refurbished to a 'CAT A' standard.

3. The Proposed Scheme

- 3.1 The proposed scheme involves the fit out of the building's vacant fourth floor office suite. This space has already undergone 'CAT A' refurbishment further to securing the 2022 consents mentioned above. The proposed operator of the suites, Zurich Insurance is now ready to occupy the suites, but must make physical alterations to the spaces to enable them to be suitable for their operation. This application submission reflects Zurich's specific requirements for this floor. This section explains the occupier's specific requirements, and sets out the physical works necessary to adapt the space for its use.

Zurich Insurance

- 3.2 Zurich Insurance was originally founded in Switzerland in 1872 (4 years after the construction of the Listed Building), and is now a global insurance company, employing 55,000 people. Zurich Insurance Group's UK operations offer a comprehensive range of insurance services, including property, liability, motor, and life insurance.
- 3.3 The sensitive nature of Zurich's work results in specific requirements for their Manchester office which are reflected in the proposed layout. There needs to be clear separation between spaces which will be accessed by visitors and spaces restricted to staff. Visitors need to be able to access meeting rooms and the boardroom, hence these being located in the southern part of the plan. Whilst much of the layout, particularly in the east and north of the plan can remain open (a heritage benefit of the proposal), there is a requirement for breakout / kitchen spaces, and recreational / break space in the form of a games room to the less sensitive west part of the plan. There is also a wellness room which will also be located adjacent to the games room. Where partitions are necessary, these have been glazed as far as possible to retain the sense of openness across the floorplan, reflecting the original character of the warehouse.

Proposed Physical Works

- 3.4 The works which require LBC primarily comprise the installation of partitions. These have been minimised as far as possible whilst also ensuring that the space meets the operational requirements of Zurich as discussed above. All partitions facing circulation space or the main

office area will for the most part be glazed, and will be almost full height, with a solid section to help obscure services / M&E. Partitions have been located to avoid historic architectural features as far as possible, whilst fixed storage units are proposed to non-original walls. Some minor adjustments to the internal 'CAT A' lighting scheme are proposed.

3.5 The proposed additional elements include:

- Demountable stud partitions with solid doors.
- Demountable glazed partitions.
- Carpet and vinyl floor finishes.
- Minor alterations to the installed M&E equipment.
- Paint finishes / wall paints.
- Kitchen units and island.

3.6 The internal fit out has been designed to ensure that architectural features of heritage interest are maintained and remain exposed as far as possible. These features are limited to the columns, column heads, and external walls and windows, as well as the general open proportions of the historic spaces.



Image 3.1: Refurbished column head and beam detail

3.7 In order to allow these areas of interest to be appreciated whilst also enabling the floor area to be subdivided, all meeting / board rooms and the games room are located in the southern half of the plan. This has means that a fully open undivided office space can be provided to the northern half of the plan, enabling long views of the external walls / windows

and historic columns and beams. Despite the subdivision, the historic proportions of the space can continue to be understood.

- 3.8 All proposed solid partitions have been detailed to present a shadow gap at any abutments with heritage ceilings/soffits and walls. The scheme has been designed so that no partitions will abut historic columns.
- 3.9 Only minor alterations are proposed to the CAT A ceiling arrangement. This includes minor changes to the M&E ventilation equipment where this is necessary, to serve the proposed layout.
- 3.10 A light touch design approach has been taken to ensure that the impact of the proposed works on the fabric of the Listed Building is as limited as possible. This includes with regards to the other proposed works which are set out above, all of which have been designed to be sensitive to the character of the Listed Building whilst also providing an office accommodation suitable for Zurich.

Pre-Application Consultation

- 3.11 MCC officers have been involved in the application proposals as these have been developed. PBA initially consulted MCC by email on 16 October 2024, and a meeting with MCC planning and conservation officers took place on 24 October 2024. A number of issues were raised by officers which are set out within the table below, with responses provided where appropriate.

Query	Response
MCC's preference was that meeting rooms should be 'clustered' around the central stair core as much as possible, to reduce the impact on the north, east, and south external walls as much as possible. The approved scheme for the first floor was referred to.	The size of the required meeting rooms and board room dictated that this would not be possible in this instance. It would create a long corridor of unusable commercial space and whilst opening up longer views of the external east elevation, would close down the space in other ways. The meeting rooms also need to be client-facing off reception, and removed from the office space, thereby restricting their location.

Query	Response
MCC queried whether the games room area needed to be sealed off, and whether this could simply form an extended part of the open plan office.	As noted on site, there would be functional / noise issues with opening this space up, and it is also noted that the games room has been positioned to the floor plan's least sensitive area in conservation terms. Also, the impact can be partly mitigated (see next entry).
Could a vision panel be added adjacent to the door between the games room and kitchen / breakout area. Double glazed if necessary for noise spill.	This has been incorporated.
The necessity for the wellness room, which is fully solid partitioned, and projects out in to the plan was queried. If it is required, could it be relocated, glazed and / or a freestanding pod?	A wellness space is required in accordance with the working environment which Zurich needs to achieve for its staff at all locations. AXI have however re-sized this and relocated it along the west wall to reduce its protrusion and impact. The nature of the use of this small space dictates that the partitions must remain solid.
Small meeting room to the south east corner – Could the glazing go all the way to the perimeter wall?	This has been incorporated.
Small meeting rooms to south east corner – The size of these was queried. Could the partition be pushed eastwards to the next pier, making the rooms smaller and making the reception area larger. It was noted that the rooms appeared to be excessively large for 6 person tables.	A relocated partition, to the next pier, would then need to avoid the easternmost row of columns, ultimately restricting the size of the meeting rooms too much and making them inaccessible.
Could the FF17 storage be relocated to the nearby staircore wall, and this partition glazed?	This has been incorporated.
The necessity for the work pods and small meeting room adjacent to the northern elevation were queried. It was noted that the work pods were fully solid, and the solid partitions / storage to the small meeting room negatively impacted the space. Could freestanding work pods within the space could be considered to enable a better appreciation of the space?	This has been incorporated. The small meeting room has been removed, and as suggested by MCC, Zurich will now acquire two freestanding work pods to sit within the space. As these will not be fixed, LBC is not required for them.

- 3.12 An amended layout was provided to MCC on 31 October 2024 illustrating the amendments that had been made further to MCC's input.

4. The Policy Context

- 4.1 Section 3 of the Heritage Statement: Significance Appraisal & Impact Assessment prepared by Stephen Levrant Heritage Architecture (dated June 2022 – REV A) ('the SLHA statement') and submitted in support of the applications for the broader refurbishment of the building sets out the Policy Context. The following are referred to:

- The Planning (Listed Building and Conservation Areas) Act 1990
- National Planning Policy Framework (2023)
- Planning Practice Guidance (PPG) (2019 and as subsequently amended)
- Manchester City Council Local Planning Policy.
- Historic England Guidance including:
 - Advice Note 12 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' (2019)
 - Historic Environment Good Practice Advice in Planning: 2 'Managing Significance in Decision-Taking in the Historic Environment' (2015).

- 4.2 The above documents remain the key policy and guidance relevant to the application proposals. Since the SLHA statement was issued in June 2022, there has been a further update to the NPPF (December 2023), along with adoption of the 'Places for Everyone' development plan, but this has not resulted in any policy implications relating to the proposed scheme.

5. Statement of Significance

- 5.1 A Heritage Statement (dated June 2022) was prepared by Stephen Levrant Heritage Architecture (SLHA) and submitted in support of applications 133119/FO/2022 and Listed Building Consent 133282/LO/2022 which were approved on 26 July 2022. This included a review of the site's historical development (Section 4), a description of the building (Section

5), and significance appraisal (Chapter 6). With regards to the significance appraisal, this primarily focuses on the building's external elevations where its significance is highest, but which are unaffected by the subject application proposals. The elements of significance which are of relevance to the submitted proposals are set out at Section 6.3 and summarised below:

- The building's internal planform demonstrates its primary function as a packing warehouse. The internal plan form and structure have architectural interest in the use of decorative ironwork within industrial buildings and historic interest in evidencing the functional form of a packing warehouse.

5.2 Within the Statement of Significance, the surviving components of the building determined to be of high significance include the original timber sash and case windows, cast iron columns, beams and original floor structure

5.3 Whilst there have been some minor policy changes since the SLHA report was completed and some additional guidance published, none of this would impact upon the way the report was completed or its findings and the statement of significance is therefore regarded as being up to date. Further information on the significance of Freetrade Exchange is set out within the SLHA report.

6. Impact upon Significance

6.1 This section appraises the proposals against the heritage significance of the building. It should be highlighted that from the outset of developing the proposed scheme, the architect has sought to design a solution which has little or no impact upon the Listed Building's heritage significance. The scheme involves the works set out within Section 3.

6.2 The works have been designed in such a way as to have as limited an impact as possible on the fabric of the listed building, as well as seeking to ensure that the internal elements of significance and the historical operation of the spaces can continue to be read and understood as far as possible.

6.3 Heritage impact is defined as the potential level of harm or benefit to the special architectural or historic interest caused by a proposed development. The NPPF stresses that

impacts on heritage assets should be avoided and if it cannot be avoided, it should be minimised or mitigated. The NPPF does not prescribe a format for analysis of heritage significance and/or impact.

- 6.4 Scale or severity of impacts or changes can be judged taking into account their direct and indirect effects and whether they are temporary or permanent, reversible or irreversible. The cumulative effect of separate impacts should also be considered. Change can be either harmful or beneficial to heritage significance.
- 6.5 The following methodology is based on the guidance set out by ICOMOS (2011) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties. Although intended for World Heritage Sites it provides a sliding scale of impacts that can be applied to assets on all significance levels.

Impact Grading	Criteria
High Beneficial	Comprehensive changes to an asset or its setting resulting in a major enhancement of significance.
Medium Beneficial	Significant changes to an asset or its setting resulting in a notable enhancement of significance.
Low Beneficial	Modest changes to an asset or its setting resulting in a slight enhancement of significance.
Neutral	No or negligible change to an asset or its setting resulting in no or negligible change to significance.
Low Adverse	Modest changes to an asset or its setting resulting in slight harm to significance.
Medium Adverse	Significant changes to an asset or its setting resulting in notable harm to significance.
High Adverse	Comprehensive changes to an asset or its setting resulting in major harm to significance.

- 6.6 The following section gives a breakdown of the proposals, providing a background justification for each element and an associated impact upon significance. Any mitigation which has been undertaken or could further reduce harm has also been identified.
- 6.7 As the proposed works relate to internal works on the fourth floor of the building only, when assessing potential heritage impacts associated with the proposed scheme the key heritage issue to consider relates to direct impact on this floor.

6.8 No external works are proposed therefore it is not necessary to consider direct impacts on the external appearance of the building, upon the setting of nearby listed buildings, and upon the setting of the Deansgate Conservation Area.

6.9 The impact of the proposed works on the application building are assessed in the table below, with appropriate mitigation identified where appropriate.

	Proposed Works	Impact on significance	Mitigation required to be undertaken
	Fourth Floor		
1.	Installation of new internal partition walls, which are necessary in order to meet the operational requirements of Zurich.	<p>The subdivision of the space does result in some adverse impact due to it resulting in the enclosure of spaces that historically would have been open (as a packing warehouse), and also some physical impact where partitions are required to abut / connect to original external walls, beams, and soffits.</p> <p>A positive element of the design is that the office space retains a large open plan area within the northern part of the floorplan ensuring that the original proportions of the space can continue to be understood.</p> <p>The adverse impact of the installation of partitions / meeting rooms has been mitigated-by-design, through the use of glazed partitions where possible, the incorporation of a shadow gap where partitions meet historic walls or beams, and the sensitive fixing to original fabric.</p> <p>A minimum of 50mm spacing between the column capitals and partitions has been included to enable those features to continue to be fully appreciated.</p> <p>The extent of subdivision has been limited as far as possible, whilst also ensuring the space will meet Zurich's sensitive operational requirements.</p> <p>The heritage impact is low adverse.</p>	Samples of materials and method statement for installation to be submitted.

	Proposed Works	Impact on significance	Mitigation required to be undertaken
2.	Laying of new floor finishes throughout including a combination of timber luxury vinyl tiles to circulatory spaces, carpet tiles to office / recreational spaces and woven vinyl tiles to meeting and board rooms.	Due to the presence throughout of a raised access deck, installation of floor finishes will not affect any historic fabric and its installation will be reversible. The heritage impact is neutral .	No mitigation required.
3.	New decoration finishes throughout to walls. This includes making good of white matt paint where necessary to external walls.	Redecoration will only affect historic fabric where making good of the white matt paint to external walls were necessary. A breathable paint will be used. The heritage impact is neutral .	No mitigation required.
4.	Redecoration of meeting rooms and board room ceilings with woods pine green paint.	The works will not directly affect historic fabric.	No mitigation required.
5.	Minor alterations to recently installed mechanical and electrical system.	The works will adapt an existing system, and will not result in a greater amount of equipment, nor will the alterations create any additional impact to historic fabric or features. The changes are considered to have a neutral impact.	No mitigation required.
6.	New doors will be laminate faced solid doors with glazed sections.	The installation of new doors does not affect historic fabric. The design of doors is considered appropriate and will allow them to be clearly distinguished as modern fabric. The heritage impact is neutral .	No mitigation required.

Cumulative Impact

- 6.10 The table above has identified the impact of a range of works on the significance of the building. The works proposed primarily affect later fabric and will not have a direct adverse impact on any original or historic fabric. The works will enable the spaces to be used by the confirmed operator, Zurich Insurance, thus helping to facilitate the ongoing use and reuse of the building. As such there may be indirect positive impacts linked to bringing the spaces back into use. Moreover, through helping to facilitate the active economic reuse of the building this will have a significant beneficial impact on this part of the City Centre. Historic features that have been exposed within the spaces (ie. steel columns, beams etc) which were revealed as part of the broader 'CAT A' refurbishment of the building will remain exposed.

Indirect Impact on FreeTrade Exchange, nearby listed buildings and the Deansgate Conservation Area

- 6.11 The proposed works relate to internal fabric on the fourth floor of the building with no external changes involved. On this basis there is no direct impact on the external appearance/significance of the building, whilst there will also be no direct impact on any nearby listed buildings or the Deansgate Conservation Area. Indirectly however, the scheme will help to improve the attractiveness of the subject spaces helping to facilitate their continued use / re-use. This in turn will have beneficial impacts for the Listed Building.

Overview of Heritage Impact and Assessment against Planning Legislation and Policy

- 6.12 This Heritage Statement has confirmed that the majority of the proposed works will have a 'neutral' impact on the building's significance, whilst the installation of partitions will have a 'low adverse' impact. This low level of harm is considered to be at the lowest end of the scale of 'less than substantial' as per paragraph 208. The works will however enable the internal floors to be re-used by Zurich Insurance whilst ensuring that the historic internal character of the spaces are preserved. This represents a public benefit to be weighed in support of the application proposal. As such it is demonstrated that the proposal is consistent with paragraph 208 of the NPPF which requires that harm to the significance of a heritage asset 'should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Similarly the proposal is consistent with relevant legislation, policy and guidance set out and referred to within Section 4.

- 6.13 As the proposed works are fully internal to the building, the character and appearance of the Deansgate Conservation Area will be unaffected. Approval and delivery of the proposed scheme will help to secure the future of the Listed Building which significantly contributes to the significance of the Deansgate Conservation Area.

7. Conclusion

- 7.1 This Heritage Addendum sets out analysis of the heritage significance of the Freetrade Exchange, Manchester with specific analysis to the affected part of the building which the subject application relates to.
- 7.2 The broader internal and external refurbishment of this building has preserved and enhanced its architectural significance whilst also making it fit for contemporary professional use. The proposed fit-out and adaptation of the space will make it suitable for use by Zurich – a global insurance company. The design and layout has sought to limit any adverse heritage impact as far as possible.
- 7.3 The identified heritage significance has helped inform the design of the proposed works. The proposed works have been designed in such a way as to ensure that the appreciation of the heritage significance of the building is unaffected and interventions to the Listed Building's original fabric will be extremely minor and reversible.
- 7.4 This Statement has been prepared in accordance with national and local planning policy guidance. The design team look forward to working further with the Council in progressing the proposals through to determination.

Appendix A: Photographic Record



Image 1: Fourth Floor



Image 2: Fourth Floor



Image 3: Fourth Floor



Image 4: Fourth Floor



Image 5: Fourth Floor



Image 6: Fourth Floor