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Our Ref: 04C400725
Your Ref: PP-13575717

29 November 2024

Planning and Building Control
Manchester City Council
P O Box 532
Manchester
M60 2LA

Dear Sir/Madam,

LISTED BUILDING CONSENT FOR THE INSTALLATION OF DRY RISERS AT ROYAL EXCHANGE MANCHESTER, OLD BANK STREET, MANCHESTER, M2 7PE

On behalf of our client, BVK Retail High Street Royal Exchange Manchester Ltd ("the applicant"), I am pleased to submit a listed building consent application proposing the Installation of a number of internal Dry Risers at the Royal Exchange Building, Old Bank Street, Manchester, M2 7PE.

The description of development on the planning application forms is as follows:

> *"Listed building consent for the installation of Dry Risers at Royal Exchange Manchester, Old Bank Street, Manchester, M2 7PE."*

The listed building consent application is accompanied by a comprehensive suite of supporting documents and plan. The enclosed documents are:

- Completed application forms and appropriate notices;
- Supporting cover letter;
- Heritage Statement;
- Plans:
    - Site Location Plan;
    - Existing Plans:
        - Dry Riser – Ground Floor
        - Dry Riser – First Floor
        - Dry Riser – Exchange Floor
        - Dry Riser – Second Floor
        - Dry Riser – Third Floor
        - Dry Riser – Fourth Floor
        - Dry Riser – Fifth Floor
        - Dry Riser – Sixth Floor
        - Dry Riser – Seventh Floor

    - Proposed Plans
        - North West section of building – P03
        - North East section of building –P02
        - South West section of Building – P02
        - South East section of Building – P02

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Site & Background

Manchester Royal Exchange is a Grade II listed building (listing entry: 1200826), originally built for the purposes of the export trade and is located within St. Ann's Conservation Area, within Manchester City Centre. The building played an important role in the textile trade of the northwest from the 1700s. The building holds a significance presence within Manchester City centre and defines its immediate area of its surroundings of St. Ann's square. It is one of the most iconic buildings located within the commercial and retail core of the city centre.

The ground floor of the building is predominately in use for retail (Use Class E(a)), the upper floors as office accommodation (Use Class E(g)) and part of the building as a theatre (sui generis). The surrounding area comprises a mix of commercial uses. The Arndale Shopping Centre is located to the north-east of the site and Deansgate to the west. St Mary's Gate is located immediately to the north of the site, Cross Street to the immediate east, Old Bank Street to the south, and Exchange Street to the west. The area contains high quality retailing and several restaurants. The site is located within St Ann's Square Conservation Area.

Proposed Development & Rationale

Due to the nature of the building of this kind, it is essential that the necessary upkeep works to maintain the integrity of the building is carried out. Additionally, it is vital to ensure that the character of the building is maintained and any opportunity to further solidify this is considered. Ensuring the appearance and character of the building is maintained is an ongoing task for the applicant.

As per the protocol for the ongoing maintenance of the building and following a routine test of the wet riser, it was identified the water pressure to the wet riser on the upper floors was below the required pressure required to allow the fire service to draw water in the event of a fire.

Subsequent investigations conducted by Firetec and United Utilities verified the previously identified issue of low water pressure. It was confirmed that the mains supplying the building lacked sufficient pressure to adequately support the wet riser system on the upper two floors. Following discussions with United Utilities regarding the possibility of increasing the mains pressure to the building, it was determined that such an adjustment was not feasible. Avison Young and Hines have therefore reviewed possible solutions.

It was considered replacing the wet riser on a like-for-like basis to comply with modern Building Regulations. However, this option required the installation of a water storage tank exceeding 15,000 litres, either in the building's basement or roof. This approach was ultimately deemed impractical due to the challenges of accommodating such a large tank and the potential structural load it could impose on the building.

The installation of a dry riser was identified as the most practical and contemporary solution, aligning with the technology commonly adopted in modern buildings. Manchester Fire Services have also confirmed this as their preferred system. A contractor has been appointed, and the design work has been subcontracted to a specialist fire protection contractor. Proposed drawings are included as part of this submission.

The design carefully accounts for the building's listed status, avoiding the installation of dry riser inlets on the external elevations to preserve the historic exterior. Instead, the inlets are proposed to be located internally within the reception areas, away from the building's historic external fabric. Additionally, the new dry riser design utilises the route and openings of the previous wet riser, reusing existing openings wherever feasible. The proposed route is detailed in the accompanying drawings.

Overall, the proposed project will improve the property protection provision and the dry riser will comply with BS 9990: 2015 in relation to fire safety ultimately bringing modern fire safety standards to an historic building.

Materials & Appearance

This section outlines the proposed appearance of the dry risers, the materials used and colour. For Risers 1 and 2 as outlined in the accompanying plans, the proposed outlets on each floor, intended for fire service hose connections, will be exposed on the staircase landings of Risers 1 and 2, without the use of cabinets. The associated pipework will also remain exposed. Currently, the existing wet risers for Risers 1 and 2 extend only up to the exchange floors. In the existing setup, Riser 1 is concealed within a cabinet, while Riser 2 features an exposed outlet with the pipework embedded within the wall. The existing pipework, made of galvanized steel, will be replaced with galvanized steel for the new dry riser system.

For Risers 3 and 4 as outlined in the accompanying plans the existing outlet cabinets, built into the wall, will be retained and reused (please see pictures contained within the accompanying plans). The current pipework is concealed within a service riser and constructed of galvanized steel. This existing galvanized steel riser will be removed and, where feasible, replaced with a new riser made of galvanized steel in the same location.

With regards the inlets, which are used by the fire service to charge the riser (e.g., pump water from their fire appliance) will be exposed for Riser 1. For Risers 2, 3, and 4, the inlets will be housed in cabinets as shown in the drawings. These cabinets will be constructed from steel and painted in Carmine Red (RAL 3002) as per standard practice for such installations. Each cabinet will feature a Georgian wired glass window. The cabinet for Riser 2 will be recessed into plasterboard, while the cabinets for Risers 3 and 4 will remain exposed. The materials and appearance are generally governed by the standards applicable to dry risers e.g. to BS 5041.

The fixings are illustrated in the accompanying plans. Pipes will be faced fixed to the existing structure – either floor or walls using M10 rawl bolts/ concrete anchors. All fixings are internal with no risers showing externally or on the external fabric of the building. The risers are contained either within protected fire escape staircases or existing service risers as required by the relevant standards (Building Regulations Approved Document B/ BS 9990/ BS5041).

Planning Policy

This section sets out the national and local level planning policy that is relevant to the proposed development. The National Planning Policy Framework outlines the national policy whilst the development plan consisting of the core strategy and the saved policies of the unitary development plan compose the local level policy. the relevant sections of each are outlined below.

National Planning Policy Framework (NPPF)

The NPPF was recently updated in December 2023 and sets out the planning policies for England at a national level and is a material consideration in planning decisions. The following policies are considered relevant to this full planning permission and listed building consent application:

- Paragraph 85 of the NPPF states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the

need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

- Paragraph 200 of the NPPF states that when 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.
- Paragraph 203 of the NPPF outlines that when determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.
- Paragraph 208 of the NPPF 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 212 of the NPPF outlines that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Manchester Core Strategy

The key policies of the Core Strategy which apply to the proposed development are:

- **Policy CC9** – Design and Heritage – this states that the design of new buildings will need to be of the highest standard in terms of appearance and function. Furthermore, it outlines that development in Manchester City Centre should preserve or enhance the heritage assets which includes listed buildings and conservation areas.
- **Policy CC1** – Primary Economic Development Focus: City Centre and Fringe – this outlines that the city centre is a strategic economic location and focus of employment growth in the city and city region. In order to ensure that the buildings structural integrity is maintained and to allow for the continued use of the building as an employment and mixed-use location.
- **Policy EN1** – Design Principles and Strategic Character Areas - advises that Developer's will be expected to consider the City's heritage and continue the rich pattern of activity in the core area.
- **Policy EN3** – Heritage – this policy outlines that throughout the city, the council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods including those of the city centre. It adds also that new developments must be designed so as to support the Council in preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance, including scheduled ancient monuments, listed buildings, registered parks and gardens, conservation areas and archaeological remains.
- **Policy SP1** – Spatial Principles – outlines that development in all parts of the city should protect and enhance the built and natural environment.

- **Policy DM1** – Development Management – states that all development should have regard to the following specific issues; appropriate siting, layout, scale, form, massing and detail.

Saved policies of the UDP

- **Policy DC19** - states that the Council will not permit any internal alteration to a listed building where there would be an adverse effect on its architectural or historic character.
- **Policy DC18**- states that the Council will give particularly careful consideration to development proposals within Conservation Areas, such as the effect of major changes to the appearance of existing buildings.

Other material considerations

Impact on the Listed Building

The proposed development would not have a material change on how the building operates, nor alter the character of the building. The proposal is considered minor and has only come about for consideration to assist in ensuring the maintained heritage value and appearance of the Manchester Royal Exchange Building. The specific design details have been carefully considered and the use of the existing wet risers where possible minimises the impact of the proposed development on the heritage value of the building. One vital aspect to note is that there are no external changes to the building proposed. Additionally, there are negligible changes to the internal appearance of the building as part of this proposed development.

In light of this, the public benefits of the proposal significantly outweigh the any potential harm to the listed building, in accordance with paragraph 196 of the NPPF and Core Strategy policies CC9, EN9, CC1 and saved policy DC19 of the UDP.

Impact on the St Ann's Square Conservation Area

The site is located within the St Ann's square Conservation Area and is a prominent building on St Ann's square. The proposal does not include any external alterations to the building footprint, which should be a primary consideration of its impact on the St Ann's Square Conservation area. The proposal has been carefully designed to ensure no impact on the character or appearance of the conservation area. As the proposal does not involve any external alterations, the historic fabric and aesthetic of the building's exterior will be preserved. This approach ensures the building meets current Building Regulations for fire safety while respecting its heritage value and contributing to the ongoing preservation of the conservation area's overall character.

Summary & Conclusion

The application has been submitted via Planning Portal (ref: PP-13575717). The full suite of supporting application documents has been uploaded to the planning portal and is included in the application pack. I trust that the enclosed information will enable you to validate the submission as soon as possible. If you have any queries or require any further details, please do not hesitate to contact me.

Yours sincerely

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For and on behalf of Avison Young (UK) Limited