Paul Butler Associates
Planning, Development & Heritage Consultants

9 St John Street

Freetrade Exchange

Heritage Addendum

06 August 2024

Paul Butler Associates, 31 Blackfriars Road, Salford, Manchester M3 7AQ
t. 0161 835 3530 I e. pba@paulbutlerassociates.co.uk I w. www.paulbutlerassociates.co.uk

Professional Planning, Development & Heritage Advisors since 1992.
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	Name and Qualifications	Position	Date
Prepared by:	Don Murphy MPLAN MRTPI IHBC	Director	02.08.2024
Checked by:	Mark Clifford Bsc. (Hons) MA IHBC	Principal Heritage Consultant	06.08.2024
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1. Introduction

1.1 This Heritage Addendum has been prepared by Paul Butler Associates on behalf of 9 St John Street. 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 ground and first floor office suites, 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 20 May 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 ground and first floor office suites 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.

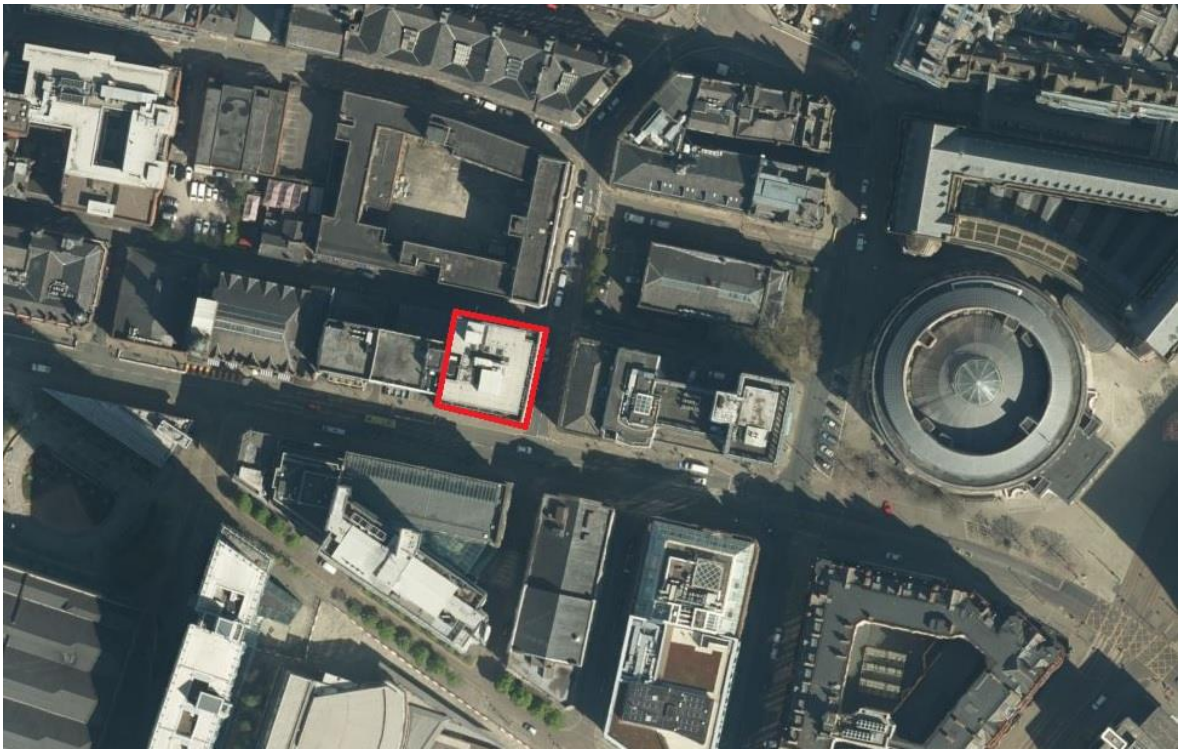


Image 2.1: Aerial Plan (Approximate site boundary in red edge).

2.2 The ground and four upper floors of the building are in office use, with the subject application relating to the ground and first floor office suites. The main reception and access point to these suites 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 currently undergoing refurbishment and will be 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 ground and first floor levels.

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 ground and upper floor office spaces, 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 ground and first floor office suites. This space has already undergone 'CAT A' refurbishment further to securing the 2022 consents mentioned above. The proposed operator of the suites, 9 St John Street (a Barristers' Chambers) 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 9 St John Street'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.

9 St John Street

3.2 9 St John Street (9SJS) are a long-established yet forward-thinking barristers' chambers with an 80-year heritage in Manchester. 9SJS aim to create a space within the historic Freetrade Exchange building that honours the building's legacy while serving the modern needs of their legal community and clients. 9SJS's vision encompasses:

- A dynamic professional hub that fosters collaboration and innovation among barristers, encouraging in-person interactions crucial for maintaining a vibrant legal ecosystem in the heart of Manchester.
- A high-quality, sustainable working environment for their dedicated administrative and clerking staff, supporting local employment, and contributing to the city's economy.
- Most importantly, a secure and welcoming space for its clients - predominantly from Manchester and the North. This will provide a dignified setting where people can discuss sensitive personal and professional matters with the utmost confidentiality and comfort, reinforcing Manchester's status as a key centre for legal services.

3.3 As is evident from the submitted proposed layout plans, the proposed subdivision of spaces is more extensive than a standard office fit out. This is due to 9 SJS's specific requirement for multiple client meeting rooms which is at the heart of its operation. Whilst most partitions are required to be solid for acoustic reasons, these are predominantly glazed where facing

circulation spaces with blinds installed to provide privacy when required. This too is due to the highly sensitive nature of the meetings regularly taking place, often with distressed and vulnerable individuals; or highly sensitive matters involving family, commercial, employment, or property disputes (including matters confidential to Manchester City Council).

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 9 SJS as discussed above. Whilst these operational requirements present restrictions in terms of the use of glazed partitions, those partitions facing circulation spaces 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. Feature lighting is also proposed to replace the standard 'CAT A' fittings.

3.5 The proposed additional elements include:

- Demountable stud partitions with solid doors.
- Demountable glazed partitions.
- Carpet and vinyl floor finishes.
- Alterations to the installed M&E equipment.
- Replacement of recently installed internal lighting units with internal feature lighting.
- Paint finishes / wall paints.
- Bespoke joinery.

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.

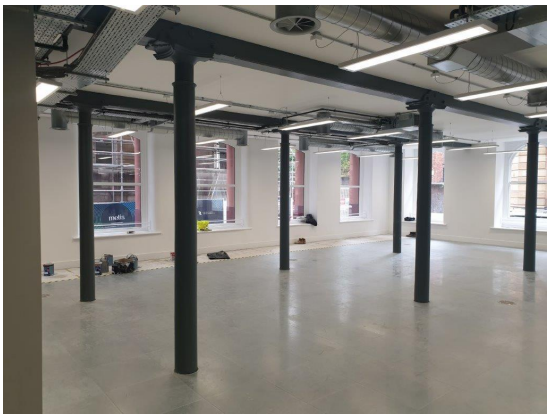


Image 3.1: Ground floor interior



Image 3.2: 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, the smaller meeting rooms and work pods have been located around the central core, rather than to the external elevations as is more common. This means that despite the extent of 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.

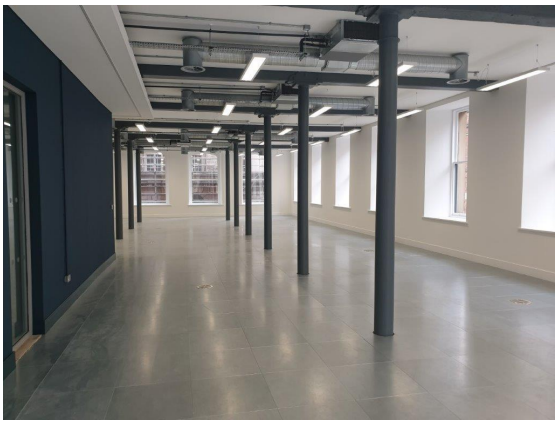


Image 3.3: First Floor interior



Image 3.4: First Floor interior and staircore

3.9 Only minor alterations are proposed to the CAT A ceiling arrangement. This includes the installation of alternative light fittings, and minor changes to the M&E ventilation equipment where this is necessary due to the meeting room 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 9SJS.

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 18 June 2024, and a meeting with MCC planning and conservation officers took place on 11 July 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 queried the corridor area in the NW part of the ground floor plan, asking if its enclosing wall was necessary or could be glazed. It was confirmed that although not as sensitive as some areas, some level of screening was required to this space. It was agreed that AXI would look to see if the section could be dropped from being full height so as to remove the intervention to the ceiling, and open up views of the ceilings, whilst also maintain the level of privacy required.	As requested, and as illustrated on submitted sectional plan AXI – 120, the height of the partition has been lowered to 1.8m, enabling views through to the ceiling beyond.
MCC asked if it was possible for the southernmost meeting room to be removed due to the intrusion of this into the space. If it needed to be retained, MCC requested the southern elevation be glazed, with privacy achieved via etched glass.	The requirement for a minimum of 6 (2 x 3) meeting rooms across both the ground and first floors was explained due to 9SJS operational requirements: a minimum number of meeting rooms was essential. It was also explained that the solid walls were also required due to the need for acoustic privacy. This was already partly compromised due to the glazing to the east elevation of this room, and further glazing would mean that the space would not

Query	Response
	achieve the high DB attenuation level required by 9SJS.
MCC suggested whether the meeting room partition heights could be reduced from full height, dropped down with a lidded arrangement, enabling the proportions of the space to be understood and column heads visible to the circulatory spaces.	Due to the need for soundproofing of the meeting rooms, a lidded arrangement would require further noise attenuation resulting in additional build up, resulting in the meeting rooms being quite tall. This approach would also complicate the proposed M&E arrangements, which would need to effectively drop down into the spaces.

3.12 Whilst the design team have not been able to meet all of MCC's design requests, it is noted that officers were generally very supportive of the proposals at the site visit meeting, and confirmed that they were happy for the scheme to proceed to formal submission, subject to consideration of the issues raised.

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 Ground and 1st floors 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 these spaces.

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**
	Ground Floor		
1.	Installation of new internal partition walls, which are necessary in order to meet the operational requirements of 9SJS.	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 in the two instances at ground floor, and three instances at first floor where partitions are required to abut / connect to original external walls, beams, and soffits. A positive element of the design is that the meeting rooms are based around the central stair / lift core, meaning that less intervention /	Samples of materials and method statement for installation to be submitted.

	Proposed Works	Impact on significance	Mitigation required to be undertaken
		abutment with original fabric will be necessary, and also ensuring that the original proportions of the space can continue to be understood. The adverse impact of the installation of partitions / meeting rooms has been mitigated-by-design in certain areas, through the use of glazed partitions where possible, the lowering of one partition away from the ceiling, the incorporation of a shadow gap where they meet historic walls or beams, and the sensitive fixing to original fabric. A minimum of 50mm spacing between the column capitals and partitions has been included to enable those features to continue to be fully appreciated. The extent of subdivision has been limited as far as possible, whilst also ensuring the space will meet 9SJS's highly sensitive operational requirements. The heritage impact is **low adverse**.	
2.	Laying of new floor finishes throughout including a combination of carpet to meeting rooms, offices and some circulatory spaces and luxury vinyl tiles to other circulatory spaces.	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.	Redecoration will not affect any historic fabric. The heritage impact is **neutral**.	No mitigation required.
4.	Adapting / altering recently installed feature lighting throughout.	The works will see the recently installed lighting altered as per the operational and brand requirements of 9SJS. The change in lighting is therefore regarded to have a **neutral** impact.	No mitigation required.

	Proposed Works	Impact on significance	Mitigation required to be undertaken
5.	Minor alterations to recently installed mechanical and electrical system, in accordance with meeting room layout to first floor.	The works will adapt an existing system, and will not result in a significantly 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, 9SJS, 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 Ground and 1st floors 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 9SJS 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 9SJS – one of the UK's leading barristers' chambers. A higher level of intervention through the creation of meeting rooms and use of solid partitions is evident as compared to standard office use, but 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

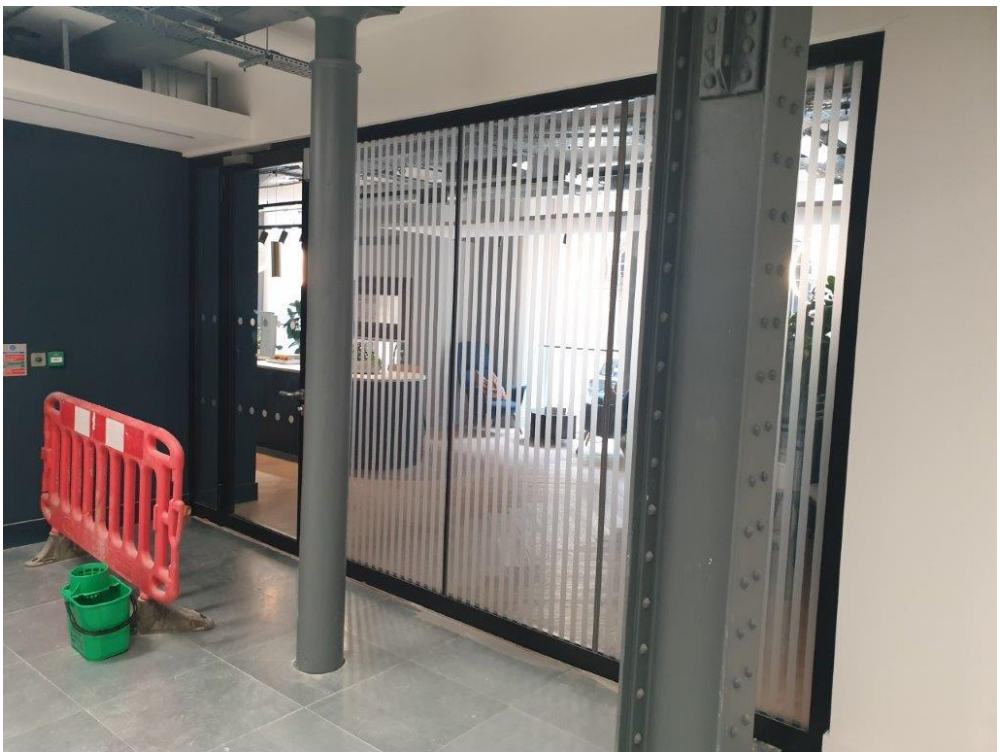


Image 1: Ground floor

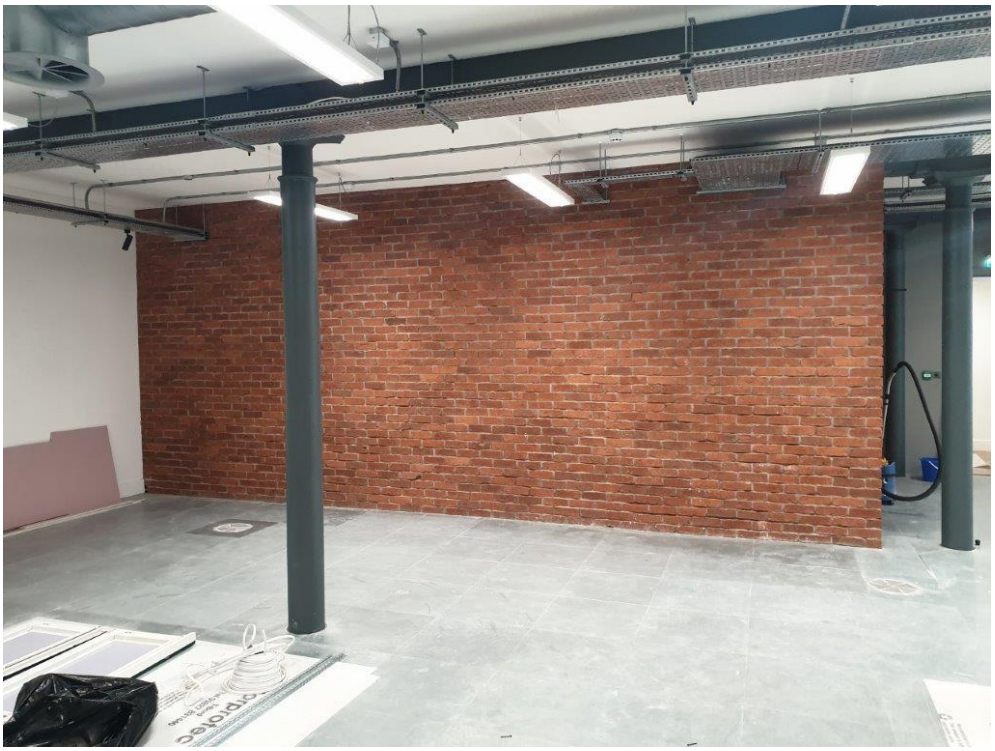


Image 2: Ground floor

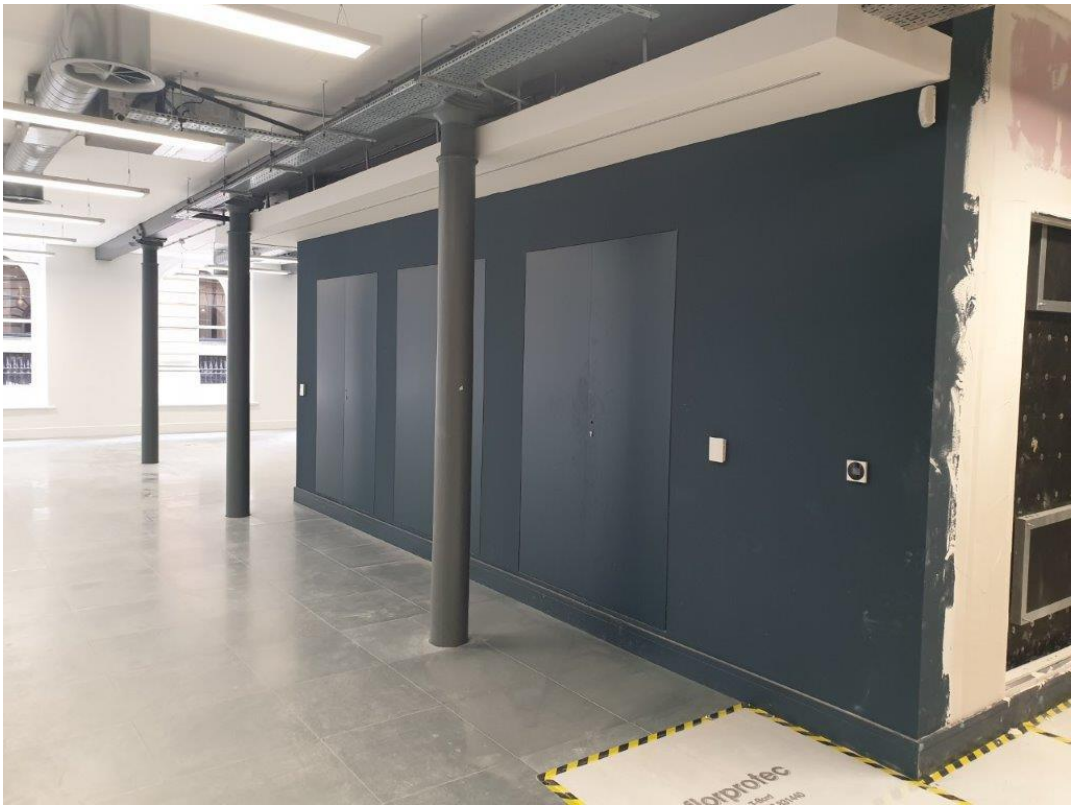


Image 3: Ground floor



Image 4: Ground floor



Image 5: Ground floor

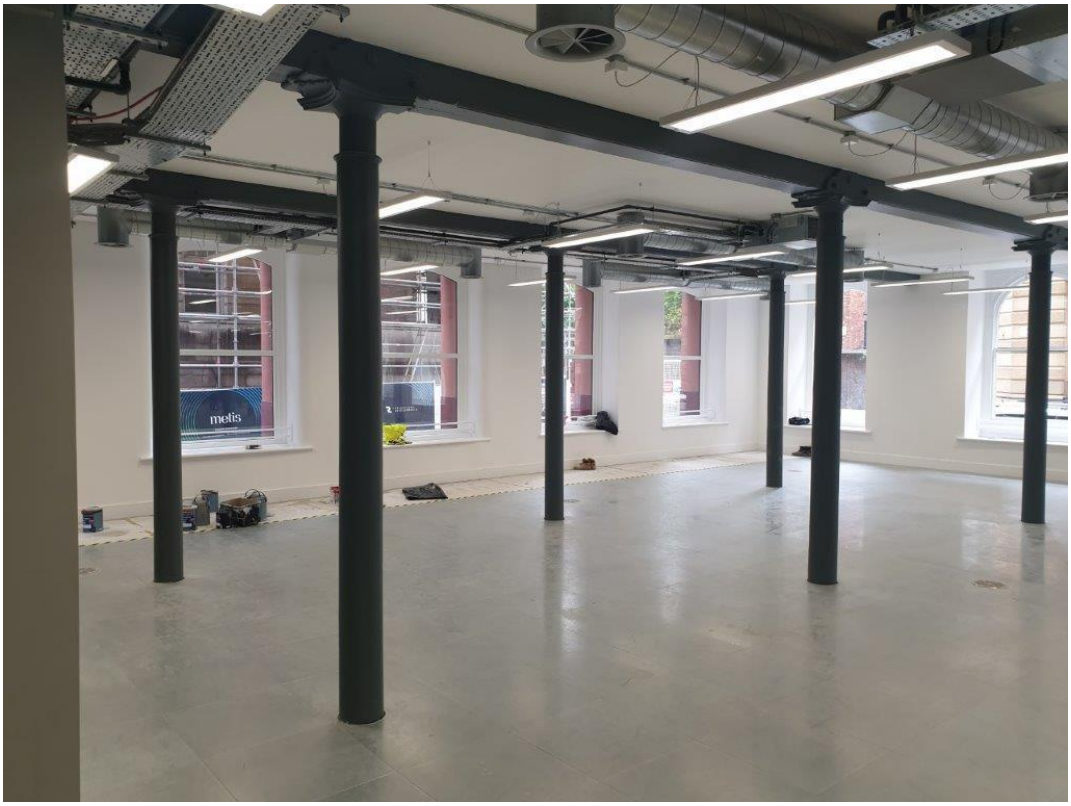


Image 6: Ground floor

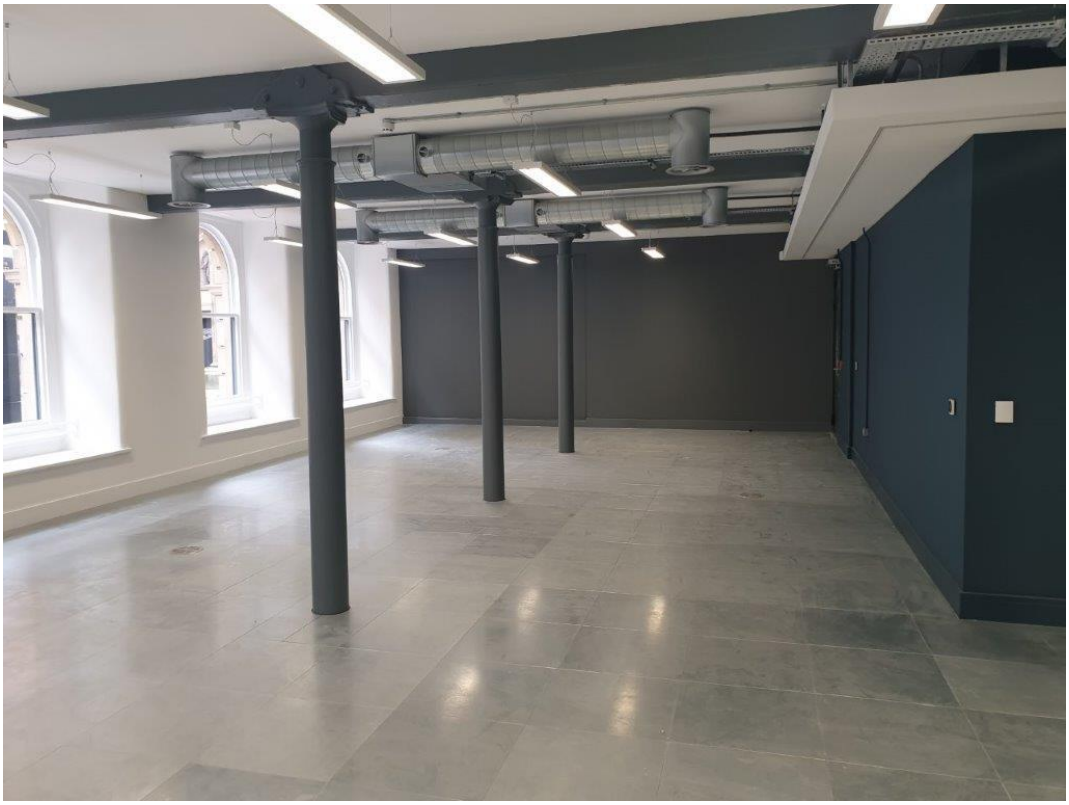


Image 7: Ground floor



Image 8: Ground floor



Image 9: Ground floor

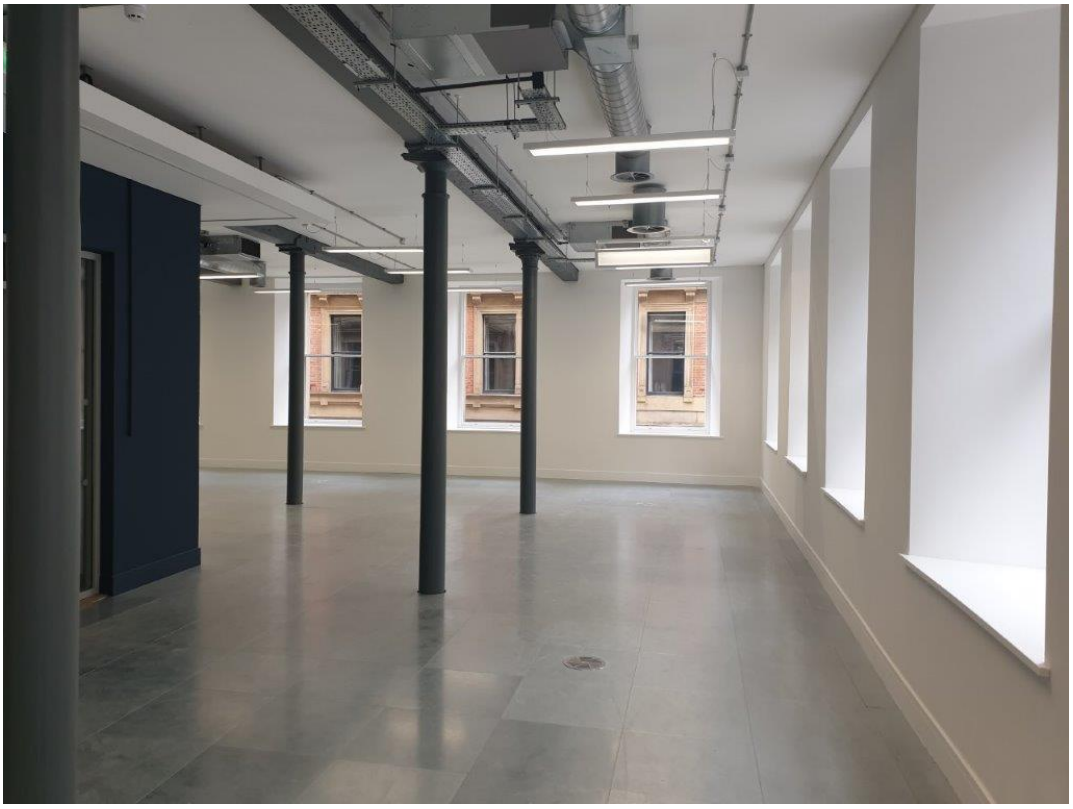


Image 10: First Floor



Image 11: First floor



Image 12: First floor

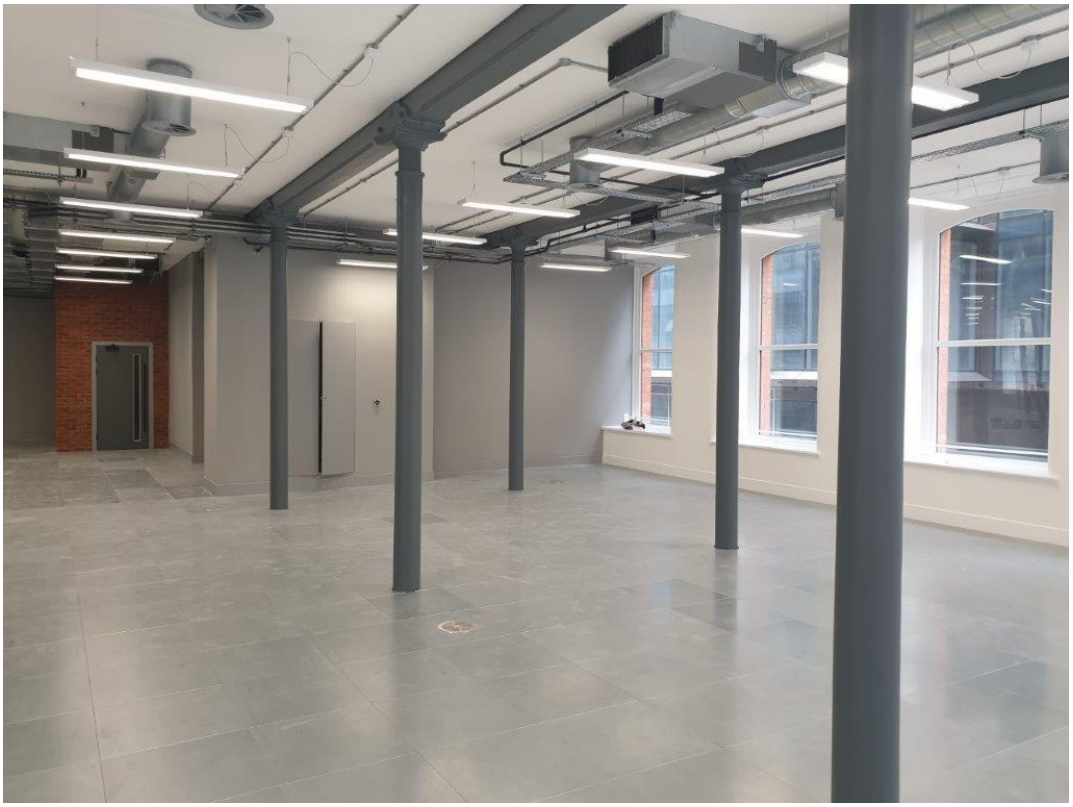


Image 13: First floor

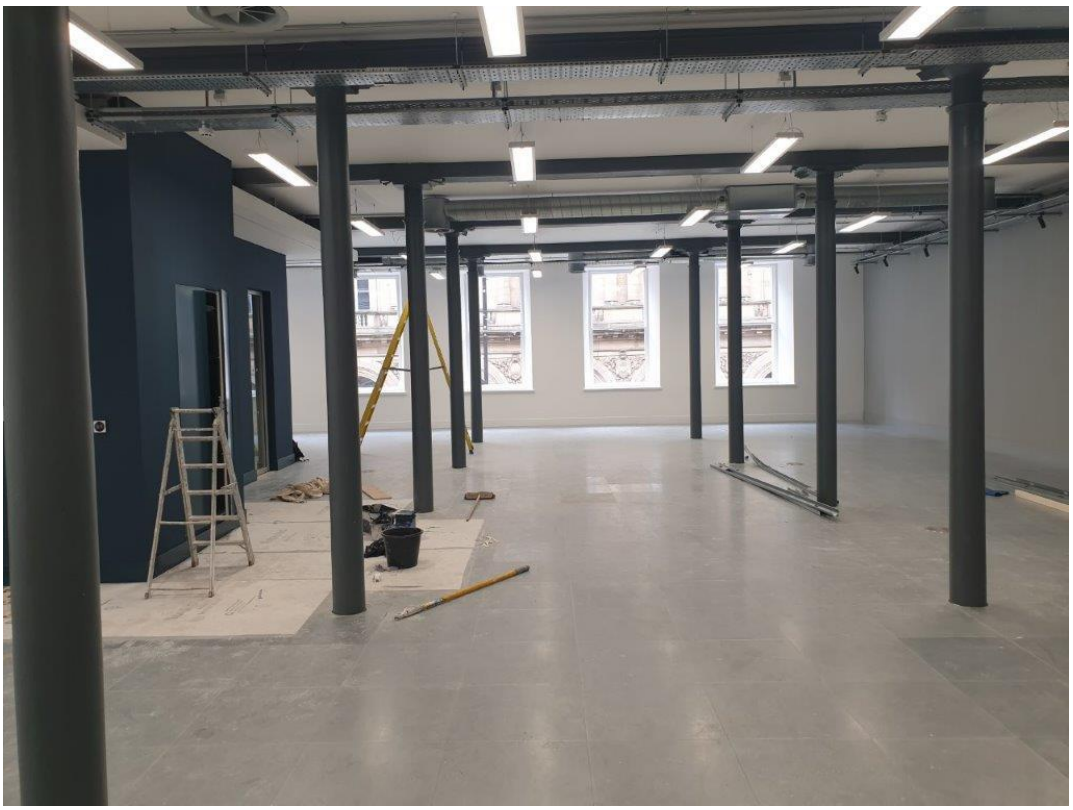


Image 14: First floor



Image 15: First floor



Image 16: First floor



Image 17: First floor



Image 18: First floor