



Urban Design and Conservation Consultation Response

Address: 19 Royal Exchange
Application Ref.: 138196/LO/2023
Proposal: Listed Building Consent for internal refurbishment works to basement and ground floor to facilitate creation of gym and juice bar.
Case officer: Michael Pearson
Consultee: Paula Burbicka
Site Visit: 9th January 2024
Date: 18th January 2024

1. Introduction

The commercial premises are located within the Royal Exchange, which is a Grade II listed building. It was constructed in 1914-21 to the designs of Bradshaw, Gass and Hope as a commercial exchange in sandstone. This impressive listed building, decorated with opulent classical detailing, occupies a prominent position in the St Ann's Square Conservation Area. It is located in the setting of a number of Grade I, Grade II* and Grade II listed assets, including the Grade I listed St Ann's Church positioned at the core of the Conservation Area.

The commercial unit under consideration fronts onto the internal arcade, and is the only original shopfront that remains in-situ, including the splayed entrance lobby complete with ornate tiled floor. Internally, despite modern interventions, elements of the original floorplan and original/historic architectural features survive throughout. Whilst not the most ornate portion of the Grade II listed building, this part of the premises nonetheless makes a positive and important contribution to its overall significance, appreciation and completeness.

2. Policy Context

2.1. National Planning Policy Framework (NPPF) (2023)

Para 195 - Heritage assets should be conserved in a manner appropriate to their significance.

Para 200 - 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 sufficient to understand the potential impact of the proposal on their significance.

Para 201 - LPAs should ensure that any conflict between the heritage asset's conservation and any aspect of the proposal is avoided or minimised.

Para 203 - In determining applications, LPA's should take account of, the desirability of sustaining and enhancing the significance of heritage assets.

Para 205 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

Para 206 - Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

Para 208 - Proposals of less than substantial harm to the significance of a designated heritage asset should be weighed against the wider public benefits of the proposal.

2.2. Manchester City Core Strategy

Policy CC9 – Design and Heritage

Policy EN3 – Heritage

2.3. Citywide Development Control Policies

DC18.1 – Conservation Areas

DC19.1 – Listed Buildings

3. Discussion

The proposal is for external and internal alterations to the Grade II listed building, including new signage, internal demolitions, new partitions and comprehensive fit-out to facilitate its change of use into a gym and juice bar.

The proposed use is considered acceptable in principle, considered compatible with the spatial qualities and character of the spaces under consideration.

On individual aspects of the proposal I offer the following advice.

3.1. External Works

The proposed external works are limited to the new external advertisement to the unit under consideration.

Albeit the size and position of the fascia signage is acceptable, it should be in the form of individual aluminium letters or similar and of a minimum projection required. To that end, please amend drawing no. APM-LUXMAN-7003 as required and submit additional cross-section showing the depth and projection of new signage.

For the avoidance of doubt, the proposed projecting signage is acceptable.

3.2. Internal works

To the ground floor, the main alterations include two proposed new openings to original wall and a new staircase to basement.

These works would remove original fabric and alter the floorplans and appreciation of this part of the Grade II listed building, causing a degree of harm to its significance.



The proposed new openings to original wall would however secure a level access for all at all times and secure an adequate degree of security into the premises, thus delivering public benefits and ensuring viability of the proposed new use. As such, it is considered that, on balance, these works are acceptable and justified. These works would avoid harm to more ornate and significance aspects of the listed building (i.e. shopfront).

In order to minimise and mitigate the harm, the proposed openings should be the minimum required – in height and width. The proposed cross-section A-A (see drawing no. APM-LUXMAN-7002) should be amended to that end, and clearly show the size and location of the proposed new openings.

Similarly, the proposed construction of the new staircase is supported by clear and convincing justification, and would replace a modern insert – albeit with additional loss of floorplate and an adverse impact on existing floorplan. In order to minimise the harm and to support these works on heritage grounds, the proposed lining and panelling to original walls should be omitted – to better preserve the appreciation, appearance and proportions of this space. Please amend as required.

Whilst acceptable, further information on the proposed new partitions to lobby is required, including full design specifications and affixing/junction detail with original/historic fabric. These details can be conditioned.

Otherwise, the removal of the existing MDF bulkhead to shopfront should be, as a minimum, explored, in order to take the opportunities to enhance the architectural and aesthetic interest of the asset.

However, neither the proposed permanent (albeit reversible) blocking off of the 'side' staircase to basement nor the demolition of its bottom section are supported on heritage grounds. The staircase is original and a core element of the floorplan of this part of the Royal Exchange.

Whilst an openable secured partition to GF and basement could be supported (contingent on location, design and appearance), the staircase must be retained as a core element of the floorplan, either preserved in its current form or restored to its original form – that is a straight flight of stairs. In any case, its partial removal and/or mothballing cannot be supported.

It is noted that whilst its retention would not provide the optimal space in the basement for the client's requirements, it would not prevent the viable reuse of this space following the demolition of existing partitions in this location (see drawing no. APM-LUXMAN-1006).

Similarly, the removal of the original load bearing walls (original fabric and historic elements of the floorplan) to basement in order to create a wider central corridor is not supported on heritage grounds. These works would cause a degree of harm for which no clear and convincing justification has been submitted, and which would not deliver obvious public benefits in their own right, thus failing to meet the guidance

within paragraphs 206 and 208 of the NPPF. The exception is the original wall off the staircase, demolition of which is understood to be required to secure level access across the premises.

Otherwise, the proposed floorplan is generally acceptable, with original/historic partitions retained and a considerable quantum of modern partitions removed – taking the opportunities to enhance the appreciation and significance of the asset. In particular, the location of the toilets is commended, in place of existing and thus limiting the need for new harmful interventions elsewhere.

Minor amendments recommended/required include the repositioning the proposed cleaning cupboard in the proposed male changing room flush with existing wall and setting back the proposed partition to form a double studio space off central area to align with existing.

The works to remove cladding from central columns and remove suspended ceilings to expose the original features/fabric, in particular consideration of the vaulted ceilings, are supported. Further works to exposed original fabric should be considered, including the removal of modern wall linings to expose original brick finishes and original beams and cornices in the main area (see attached).

Otherwise, whilst modern floor finishes are acceptable, as no original/historic fabric remains in-situ, these should be entirely reversible. The use of resin, concrete or similar wet-applied and permanent new interventions will not be supported. Please amend drawings no. APM-LUXMAN-2001 and APM-LUXMAN-200 and submit further information/safeguards as required.

Further information on proposed wall and ceiling finishes should also be submitted as part of the LBC or as a condition. Where original walls remain exposed, these should remain as such – with no proposed new cladding, dry-lining or similar. The paint finishes need to reflect original/historic character of the building and ensure breathability (i.e. water-based). Where exposed ceilings are retained for example, these should be painted off-white/cream or similar, not black as proposed.

Further information is required on the proposed M&E services and drainage as part of the LBC. For example, new penetration and incongruous new installations (in location and appearance) must be avoided. Where exposed original/historic ceilings are proposed/retained, exposed services limited to minimum required should be installed. Full and final details can be covered by a condition.

4. Position

As outlined in this advice, amendments, further information and safeguards as outlined in this advice are required in order to support the proposals on heritage grounds and comply with the guidance within section 12 of the NPPF, in particular consideration of paragraphs 195, 200, 205, 206 and 208, Policies CC9, EN1 and EN3 of the Core Strategy and saved UDP policy 19.1.

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