



Heritage Impact Assessment

Deansgate Interchange, Manchester

Ocean Outdoor UK Ltd

Prepared by:

SLR Consulting Limited

(OPEN) Floor 3, 86 Princess Street, Manchester, M1 6NG

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Basis of Report

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Executive Summary

SLR Consulting was commissioned by Ocean Outdoor UK Ltd to produce a heritage impact assessment to inform the development of a digital advertising scheme at Deansgate Interchange (also known as Chester Road Roundabout), in central Manchester, centred on NGR SJ 83006 97287.

The proposed development comprises the erection of four individual digital advertising screens, one on each quadrant of the roundabout, orientated to address the main approach roads.

This report considers the development and significance of the Site, its contributions, if any, to the significance of any nearby heritage assets, and explores the possible impacts of the proposed redevelopment of the Site upon that significance.

This assessment concludes that the proposed development is not anticipated to materially impact upon the significance of any designated heritage asset.

As a result, it should prove to be compliant with the relevant heritage considerations as set out under the NPPF, and those set out within the Planning (Listed Buildings and Conservation Areas) Act 1990 (hereafter the 'Planning Act'). The council should be minded that, where proposals will preserve and enhance the character and appearance of a Conservation Area, the proposed development should be treated favourably, as per Paragraph 206 of the NPPF, and as per the duty imposed under Schedule 72(1) of the Planning Act: *'with respect to any building or other land in a conservation area...special attention shall be paid.... to the desirability... of enhancing the character or appearance of that area'*.

The development also complies with relevant policies within Manchester's Local Development Framework Core Strategy Development Plan Document and Extant Unitary Development Policies.

The methodology employed during this assessment was based upon relevant professional guidance, including the Chartered Institute for Archaeologists' *Standards and Guidance for Historic Environment Desk-based Assessment* (ClfA 2020), and relevant technical guidance issued by Historic England, including *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (2019).



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1.0 Introduction

In September 2023, SLR Consulting was commissioned by Ocean Outdoor UK Ltd ('the Client') to prepare a Heritage Impact Assessment (HIA) in relation to a proposed development at Deansgate Interchange, at the junction of Chester Road with Mancunian Way (A57M), Manchester (NGR SJ 83006 97287) (hereafter referred to as 'the Site'; Fig. 1).

The proposed development comprises a digital advertising scheme to replace the previous scheme (removed from the Site in 2019). It is proposed that four individual digital advertising screens are erected, one on each quadrant of the roundabout, orientated to address the main approach roads to the roundabout.

A previous planning application for the proposals, which was submitted in March 2023, was withdrawn in April 2023 due to concerns raised by Manchester City Council (planning reference: 136401/AOH/2023). This assessment has been prepared to address those concerns regarding potential heritage impacts on the adjacent Castlefield Conservation Area and the setting of the Grade II* listed St George's Church (NHLE 1208640).

1.1 The Site

The Site comprises Chester Road roundabout which lies at the junction of Chester Road, Chorlton Road, Egerton Street, the Mancunian Way and Trinity Way. The roundabout was constructed in 1994, when the area was reconfigured to remove the Chester Road flyover and provide for the A57 (M) as an underpass beneath the roundabout. The roundabout contains four quadrants of differing size, comprising grass.

1.2 Standards

The assessment has been undertaken in accordance with all relevant statute, policy and guidance, including the NPPF (2023), the Chartered Institute for Archaeology (CIfA) Standard and Guidance for Historic Environment Desk-based Assessment (2017), Historic England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017), and Historic England's Statements of Heritage Significance (2019).



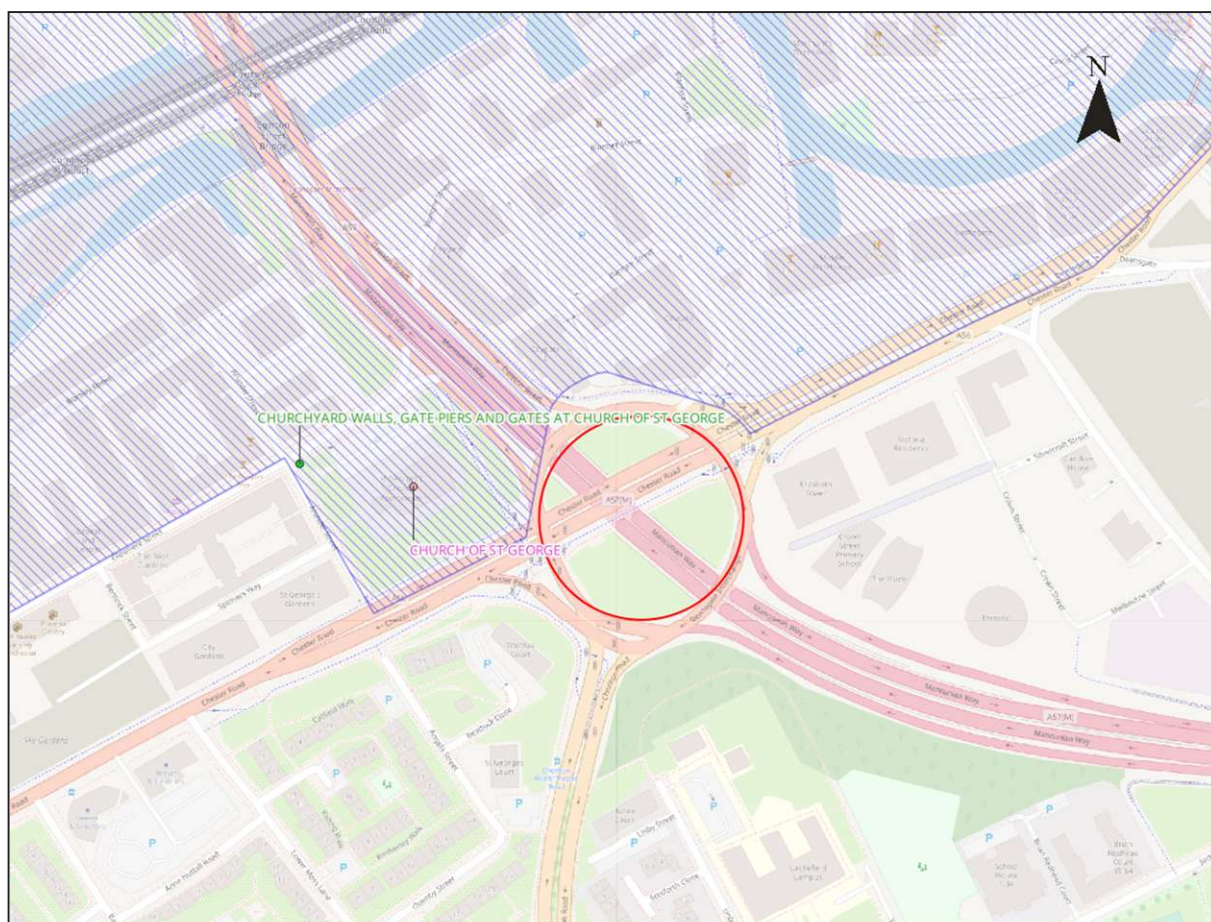


Figure 1: Site location (shown in red) with Castlefield Conservation Area (shown in hatched blue) and relevant listed buildings



2.0 Historical Background and Cartographic Analysis

Settlement within Manchester dates back to the construction of the Roman fort at Castlefield, known as Mamucium, located to the north-east of the Site. It was constructed on a rocky outcrop, partly protected by the rivers Irwell and Medlock. A civilian settlement, the vicus, developed as a linear settlement along the road from the fort's North Gate extending 100m to the west of the road and eastwards to straddle Deansgate. The southern boundary was the Medlock, whilst Quay Street marks the furthest extent northwards. During the post-Roman and Saxon periods, Greater Manchester was probably a sparsely populated frontier region.¹

By the medieval period, Manchester had become a town of regional importance, receiving its market charter in 1282. A castle at Manchester is mentioned in 1184, later replaced by a manor house. The settlement developed in the Hanging Ditch, Fennel Street, Deansgate and Market Street area and its growth took the form of linear expansion via Long Millgate northwards, Shudehill eastwards and Deansgate southwards. By the end of the medieval period, Manchester had established itself as a regional centre of flax and woollen manufacture and trade, which continued into the early post medieval period.

Historically, the Site is located within the township of Hulme, which derives its name from the Danish word meaning a small island or land surrounded by marsh - the area is surrounded by water on three sides (the River Irwell, the Medlock and the Cornbrook). Hulme lay to the south of the medieval Manchester. A medieval hall is recorded in the area, known as Hulme Hall. It is known to have existed in the 13th century, and was later demolished in 1845 to allow for the coming of the railways. Hulme remained predominantly agricultural farmland into the 18th century.

The textile industry was at the heart of Manchester's industrial growth from the 17th century onwards. Manchester became a hub for cotton spinning and weaving factories, and with the invention of the steam engines, a boom in mill construction followed, focused along the waterways of the river Irk, the river Medlock and Shooters Brook.

The earliest map reviewed which shows detail of the Site is Green's map of 1794 (see plate 5). This depicts Chester Road bisecting the Site east-west. To the north of the road, the land remains as undeveloped farmland, held by the Duke of Bridgewater. To the south, the streets have been initially laid out, but have yet to be developed in most parts. The Site is located across three rectangular plots. Silver Street lies to the south, Lloyd Street to the west and Bradshaw Street to the east. York Street incepts the Site. The central and east rectangular plots remain undeveloped. The western plot contains a square building and L-shaped building, likely residential, in the north with gardens to the south.

The opening of the Liverpool and Manchester Railway in 1830 revolutionised transportation even further, making Manchester an important railway hub, and allowing Manchester's industries to further expand, with the introduction of large-powered textile mills in the 19th century.

With this, came a massive influx of workers, both rural migrants and displaced agricultural workers, into Manchester. The population of the city exploded and the demand for housing, food and other basic necessities skyrocketed. The earliest worker's housing comprised blind-back and back-to-back court developments which were focused within the city centre and surrounding areas including Hulme. Bancks & Co.'s plan of Manchester and Salford (1832) shows that to the south of Chester Road, the majority of the Site had been developed by this time (plate 6). New streets within the Site comprise James Street and Back Bradshaw Street, both of which are dead-ends. The plot to the east of York Street was completely developed and contained a mix of terraced and back-to-back housing separated by alleyways. The plot to the west of York Street comprises terraced housing in the north and south, with the centre of the plot remaining undeveloped. The western plot has been completely developed by terraced housing and contains James Street. Within the wider area, the surrounding plots to the south, east and west have also been developed with housing. To the north-west of the

¹ The Greater Manchester Archaeological Unit. (2009) Greater Manchester Urban Historic Landscape Characterisation Manchester District Report



Site on the junction of Chester Street and Dawson Street (later Egerton Street), St George's Church has been constructed.

The 1851 Town Plan notes a small amount of infill to the east of York Street and the creation of York Court (plate 7). To the west of York Street, the development of York Place has occurred (plate 1), and Back Bradshaw Street has been renamed Hulme Place on the west side of York Street and Little Street to the east. A private school is recorded at Hulme Place. In the north-west of the plot, the terraced houses have either been replaced or extended north on the same alignment as the other surrounding buildings fronting Chester Road.

During the 1860s, the Duke of Bridgewater's lands to the north of Chester Road were developed, including within the Site, as shown on Slater's map of 1871 (not reproduced). Within the Site, Lorn Street intersects the Site off Chester Road and terraced housing has been constructed.

By the time of the 1891 Town Plan, the private school on Hulme Place had become a Temperance Hall (plate 8). The change had occurred by 1880, when the hall achieved notoriety for hosting a 'drag ball' for which the members were arrested and put on trial. To the south of Chester Road, some further infill with an L-shaped building in the west of the Site had occurred.

During the early 20th century, industry entered a phase of decline due to a general economic depression and shrinking world markets.

During the 1950s and 60s, the view was prevalent that earlier industrial housing developments were obsolete and problematic slums. The result was widespread slum clearance and redevelopment which occurred across Manchester and its suburbs including within Hulme which suggests that the area of the Site previously comprised widespread slums. Road improvement schemes including the A57(M) Mancunian Way and Chester Road flyover led to particular disconnection within the area of the Site, including its total clearance and therefore removal of any of the former slum dwellings. A 1969 RAF aerial photograph shows the extent of clearance within the area of the Site and the Chester Road flyover (not reproduced).²

In 1994, the Site was redeveloped to its present configuration as Chester Road Roundabout/ Deansgate Interchange, the flyover was removed and the A57(M) was rediverted via an underpass beneath Chester Road.

Aerial photographs show that by 2003, the roundabout featured a traditional back-illuminated 96-sheet advertising displays (x 4) contained within a 20m high sculptural metal feature (plate 12) (planning reference 063296/AOH/SOUTH1/01). This was erected by Town and City Posters Ltd. This was removed in 2019 for roadworks. Prior to this, there were no boards on the roundabout, only one advertising board to the south-western side of the roundabout, which is present today.

² https://historicengland.org.uk/images-books/archive/collections/aerial-photos/record/RAF_543_4782_V2_0003





Plate 1: York Place, within the Site in 1922 (Source: Manchester Local Image Archive)



Plate 2: The Site and its environs in 1938 (approximate area of Site indicated by shaded red) (Source: Britain from Above)





Plate 3: Slum clearance and St George's Church looking north from Silver Street. Site is to the right, 1957
(Source: Manchester Local Image Archive)



Plate 4: View of St George's Church looking across the Site from Chester Road, westwards, 1973 (Source: Manchester Local Image Archive)





Plate 5: St George's Church with Chester Road Flyover in front, 1979 (Source: Manchester Local Image Archive)

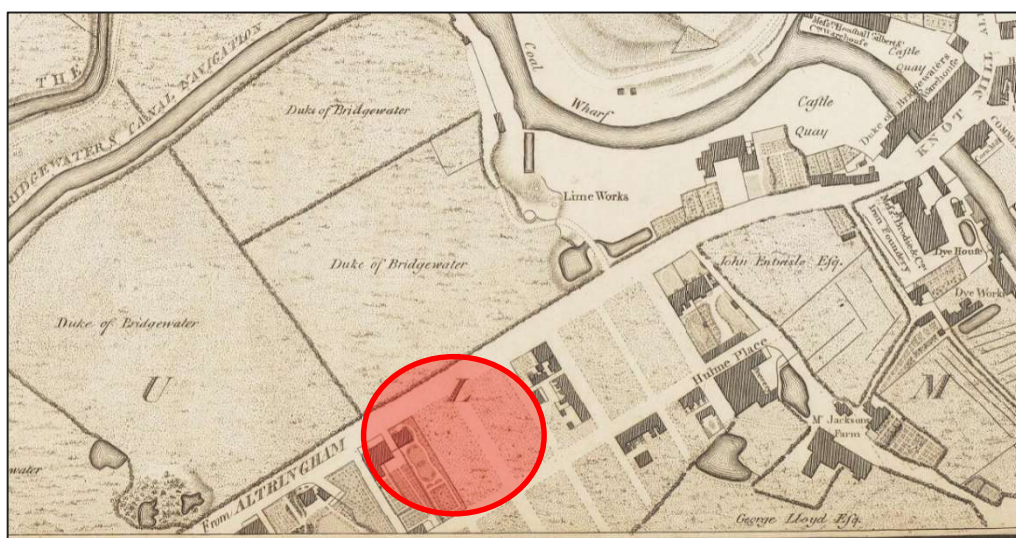


Plate 6: Extract from Green's map of Manchester 1795 (approximate area of Site indicated by shaded red)





Plate 7: Extract from Bancks & Co.'s plan of Manchester and Salford 1832 (Site indicated by red circle)



Plate 8: Extract from 1851 Town Plan





Plate 9: Extract from 1891 Town Plan



Plate 10: Extract from 1922 Ordnance Survey





Plate 11: Extract from 1934 Ordnance Survey



Plate 12: Google Maps photo of Site with previous advertising board, 2017 (Source: Google Maps)



3.0 Statement of Significance

This section considers which heritage assets have the potential to be affected by the proposed development, through either direct physical change or a change in setting.

Consultation with Manchester City Council has confirmed that the significance of the following assets may be susceptible to harm as a result of change to their setting under the proposals:

- Grade II* listed St George's Church (NHLE 1208640) and associated walls and gate piers (NHLE 1197789); and
- Castlefield Conservation Area.

These assets are depicted on Figure 1.

No other heritage assets are likely to be affected by the proposed development owing to the nature of the proposed works and the existing character of the Site, which is such that it does not contribute to the significance of any heritage assets in the wider area, Castlefield. As such, heritage assets beyond the Site have been scoped out of this assessment.

The following assessment is proportionate, in line with the requirements of Paragraph 194 of the NPPF, with the significance of any identified heritage assets and the likely impact of the proposed development. In Statements of Heritage Significance, Historic England confirm that it is '*important that the level of detail given in a statement of heritage significance is proportionate to the impact of the proposal*' (Historic England 2019: 11), and that '*an analysis of the setting of the heritage asset is only needed where changes to the setting by the proposal would affect the significance of the heritage asset or how that significance is appreciated*' (Ibid., 15).

In line with the requirements of paragraph 194 of the NPPF, this section of the report will set out the significance of the identified heritage assets, their setting, and the contribution the Site makes to their significance, if any, as part of that setting.

Plates are presented in Appendix A.

3.1 St George's Church (NHLE Reference 1208640) and associated walls and gate piers (NHLE Reference 1197789)

St George's Church lies to the north-west of the Site, within Castlefield Conservation Area. The church was constructed between 1826 and 1828, designed by Francis Goodwin, who also designed the original Manchester Town Hall. It was a Commissioners' church, built to celebrate the victory at the Battle of Waterloo. In 1884, the church was restored by J. S. Crowther but was closed in 1984. In 2000, the building was converted into apartments.

The building primarily derives its significance from its little-altered exterior which provides architectural interest (Photos 1 & 2). The church epitomises 'Commissioners' Gothic' as a prime example of the Neo-Gothic Perpendicular Revival style by one of the most prolific ecclesiastical designers of this type, with attenuated proportions, fanciful Perpendicular detailing and bristling pinnacles.

The listed building is located at the southern edge of the Castlefield Conservation Area. The church would have once provided a place of worship for those who lived and worked nearby including the Manchester Regiment, based a short distance away, who frequently provided congregations of 1,200 soldiers. This contributes a degree of historical significance to this asset, illustrating its integration within and as part of the development of Hulme.

The church lies within its associated churchyard bounded by its separately listed Grade II churchyard walls and gate piers (NHLE 1197789). The walls and railings hold group value deriving from their association with the church. They provide the immediate historic setting as well as providing an external boundary wall to the church and churchyard site, albeit this perimeter has been subject to change and therefore the setting; a carpark for the apartments is now located within the grounds to the north of the church, which was formerly part of the graveyard. It is from within this churchyard that the church and associated perimeter features are best appreciated.



The church does not fall within any key views from Castlefield Conservation Area, nor is it mentioned as an aspect of its setting which contributes to its special architectural or historic interest, though it is sited at the southern gateway into the city centre (Photos 3 & 4). Views of the church tower are possible from the wider area, albeit in the context of modern street furniture (lighting and traffic lights) and modern multi-storey apartment buildings (a six-storey apartment building is adjacent to the west of the tower).

The wider historic setting of the church has been all but lost as a result of extensive slum clearance and demolition of warehouses throughout the 20th century, and the subsequent redevelopment of the area during the 20th and 21st centuries. Whilst to its north and east the historic grid pattern of streets partially remains, the majority of the buildings comprise 21st century apartment buildings. In the 1960s, the reconfiguration and extension of the surrounding road system including the A56 Chester Road flyover to the south of the building and the A57 (M) Mancunian Way to the east bifurcated through part of the surrounding residential streets, resulting in the church being physically isolated. As such, these aspects to its setting have no historic functional associations with the church, nor serve to emphasise any element of the church's significance.

The asset's immediate setting comprises its churchyard. The reconfiguration of Chester Road, first as a flyover, and now today with Chester Road roundabout and Mancunian Way as an underpass, has significantly altered the asset's historic setting, severing the church's physical and functional relationship with its wider surrounding residential and urban setting. Other changes over time included the growth of tall modern apartment blocks to its west and south. The wider setting, which includes views of the Site, no longer contributes to the significance of the asset. The Site is located adjacent to the asset, and while there will be visibility of parts of the Site from the rear of the church, the Site does not contribute to the significance of the asset as part of its setting. Thus, the extent to which setting contributes to the church's significance is tightly defined, being limited to its immediate vicinity, with its wider setting, making no contribution to its significance.³ It is not anticipated that the changes proposed within the Site will in any way affect the way in which its significance is experienced or understood.

3.2 Castlefield Conservation Area

Castlefield Conservation Area is located adjacent to the north of the Site. It is one of the largest conservation areas in Manchester and is focused on the Roman fort, located to the north-east of the Site, from which the area derives its name '*castle in the field*'.⁵

The Site forms part of the southern area of the Conservation Area, which is characterised by larger scale and more recent development than in other parts of the Conservation Area, albeit with a pocket of smaller-scale buildings to the south. Larger and taller buildings form part of the existing street scene and are present to the east, west and south of the existing Site.

In relation to the Site, the southern part of the conservation area has seen extensive change during the 20th and 21st centuries. Firstly, with the clearance of the 18th and 19th century housing and warehouses, the reconfiguration of the A57(M) which intersects the conservation area to a dual carriage way in the 1960s, and then in the 1980s and 1990s, the redevelopment of the area for predominately residential uses, with new apartment buildings being constructed.

Building heights, scale and footprint vary considerably across the conservation area with historic warehouses as well as modern apartment blocks which adds to the eclecticism and height differentiation of the conservation area.

The Site, which is located directly adjacent to the south of the conservation area, is a modern reconfiguration of the road system which, whilst allowing a gateway into the conservation area, does not positively contribute to the character or appearance of the conservation area.

³ 'Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view'. (Historic England 2015: 7)



The Site makes a neutral contribution to the character and appearance of the Conservation Area, at best.



4.0 Impact Assessment

This section sets out the proposed scheme and its likely effects on the significance of the designated heritage assets discussed above.

4.1 Proposed Development

The proposed development comprises a digital advertising scheme of four individual digital advertising screens, one on each quadrant of the roundabout, orientated to address the main approach roads to the roundabout. The displays will be a mix of portrait (height 7020mm) and landscape (height 4820mm). The inspiration for the design of the screens was drawn from the distinctive wing mirrors of 1950's classic cars, which is felt to reflect the primary user of the screens – motorists using the highway.

The application also includes for improvements to the existing landscaping of the roundabout. Existing trees which need to be moved will be transplanted on site. Two new trees have also been included as replacements for recent additions which have not survived.

Enhancements to the wildflower meadow planting will be undertaken in consultation and agreement with Manchester City Council Highways Department.

The design concept, associated plans, and drawings are contained in the design statement prepared by Simpson Haugh.

4.2 Impact Assessment

4.2.1 St George's Church (NHLE Reference 1208640)

The asset's architectural interest is the primary contributor to its significance, as vested in its design, plan form, and fabric. As the proposed development will not harm the historic fabric of the building nor impair the way the building's architecture was designed to be experienced, its architectural interest will be preserved.

Whilst it is located within the wider setting of the asset, the Site does not contribute to any aspects of its setting nor its overall significance. The proposed development, whilst visible within views of the church tower on one's approach to Chester Road Roundabout from the south and east, would not dominate, with the church roofline and tower remaining prominent (Appendix B). The building would retain its prominent position at the gateway into Castlefield Conservation Area.

The location of the Listed building to the north-west of the Site has the following implications for any future development:

- The asset's significance is considered to derive largely from its architectural and historic interest. Given that development within the Site would not result in any loss of physical fabric or any other physical effects upon the asset, the significance of the asset would be preserved.
- Views towards the Site from the heritage asset do not make a key contribution to the significance of the asset and as such the aspects of the asset's setting considered to contribute to its heritage significance will not be impacted.
- In the above context, and on balance, St George's Church, a Grade II* Listed Building, ***should not preclude development within the Site in principle.***

4.2.2 Castlefield Conservation Area

The Site is not situated within the conservation area, and as such the proposed development will not directly affect its character and appearance.



Whilst it is located within the setting of the asset, the Site does not contribute to any aspects of its setting nor contributes to the significance of the Castlefield Conservation Area. As described above, the proposed development would not detract from key aspects of this area of the conservation area.

The wider setting of the asset has undergone extensive development (dominated as it is by modern apartment buildings and infrastructure) since its initial designation, changing its character. As such, views towards the Site do not make a key contribution to the significance of the asset and as such the aspects of the assets' setting considered to contribute to their heritage significance will not be impacted.

Overall, the proposed development will have a neutral impact upon the Castlefield Conservation Area, with no harm to the conservation area's significance.



5.0 Compliance with Statute and Policy

5.1.1 Statute

In reaching the conclusions presented in this report, the need for the application to comply with Section 66 (1) and 72 (1) the Planning Act has been considered. It is considered that the proposals would be in compliance with these statutory conditions.

5.1.2 National Policy

The assessment provided by this report has set out the significance of any heritage assets affected, including any contribution made by their setting, in full accordance with paragraph 194 of the NPPF.

As the proposed development will preserve the character and appearance of the conservation area, the local planning authority should treat the development favourably, as per paragraph 206 of the NPPF.

5.1.3 Local Policy

With regards to Manchester City planning policy, the proposed development complies with the relevant policies. The proposed development will preserve the identified heritage assets in accordance with policies CC 9, EN 3 and DC19.1. In relation to policy DC18.1, the proposed development will not harm the appearance or character of the conservation area and will preserve the key aspects to views into and out of the conservation area.



6.0 Conclusions

This assessment, undertaken with due regard to the guidance published by Historic England and in full accordance with the National Planning Policy Framework, has identified those heritage assets located within the Site and its vicinity and has described their significance. Potential development effects have also been discussed.

The proposed development is not anticipated to materially impact upon the significance of the identified designated heritage assets outside of the Site, namely St George's Church and Castlefield Conservation Area.

The Scheme therefore complies with the relevant heritage planning policies as set out within the NPPF (2023) and under relevant policies within Manchester's Local Development Framework Core Strategy Development Plan Document, 2012 and Extant Unitary Development Policies, n.d.



7.0 Bibliography

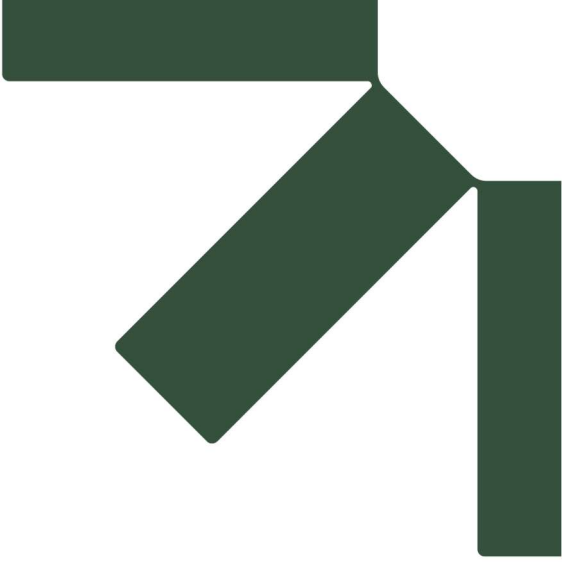
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- The Greater Manchester Archaeological Unit. (2009) *Greater Manchester Urban Historic Landscape Characterisation Manchester District Report*
- Historic England. (2023) *National Heritage List for England downloadable GIS data*
- Historic England. (2019) *Historic England Advice Note 12 (Statements of Heritage Significance: Analysing Significance in Heritage Assets)*
- Historic England. (2017) *Good Practice Advice Note 3 (The Setting of Heritage Assets)*
- Historic England. (2015) *Good Practice Advice Note 2 (Managing Significance in Decision-Taking in the Historic Environment)*
- Hulme History website available: <http://hulmehistory.info/> [accessed 02.10.23]
- Manchester City Council. (2012) *Manchester's Local Development Framework Core Strategy Development Plan Document*
- Manchester City Council. ND *Manchester's Extant Unitary Development Policies (UDP)*
- Ministry of Housing, Communities and Local Government. (2023) *National Planning Policy Framework*

Cartographic Sources

- Green's plan of Manchester and Salford, 1794
- Banks & Co.'s plan of Manchester and Salford, 1832
- 1851 Town Plan
- Slater's new plan of Manchester and Salford, 1871
- 1891 Town Plan
- 1922 and 1934 Ordnance Survey





Appendix A Site Photographs



Photo 1: St George's Church, view from Chester Road, southern elevation

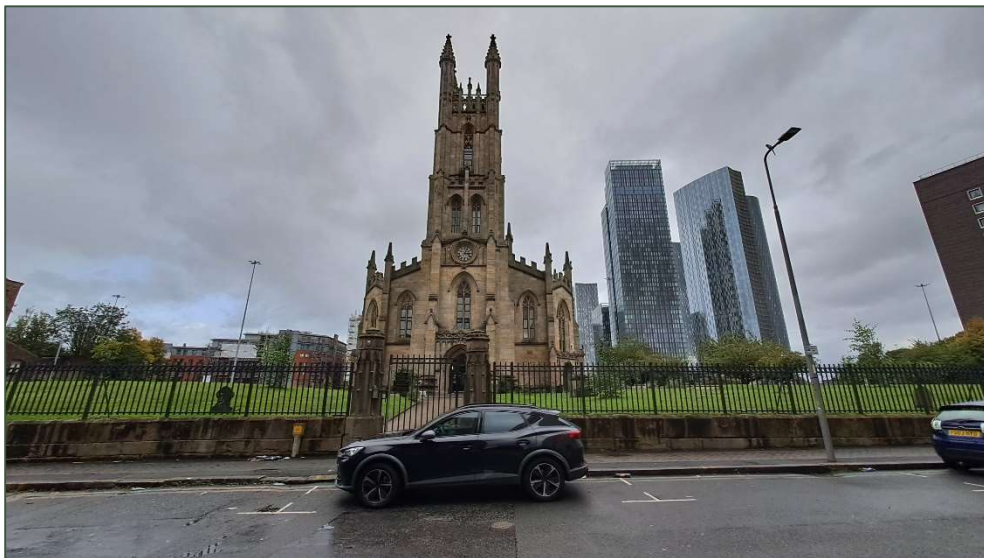


Photo 2: St George's Church, view from Arundel Street, eastern elevation



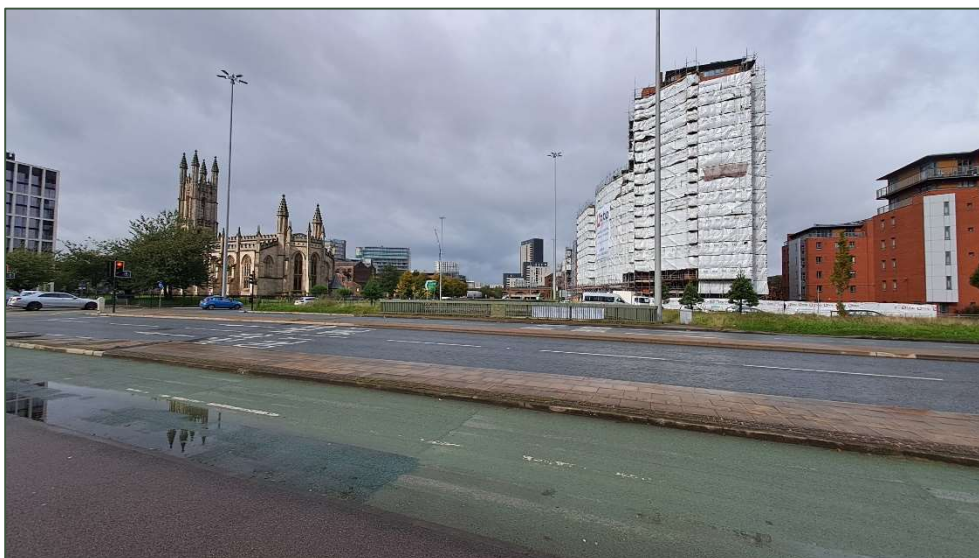


Photo 3: View towards Castlefield Conservation Area with St George's Church on the left, looking north from Chester Road Roundabout (the Site)



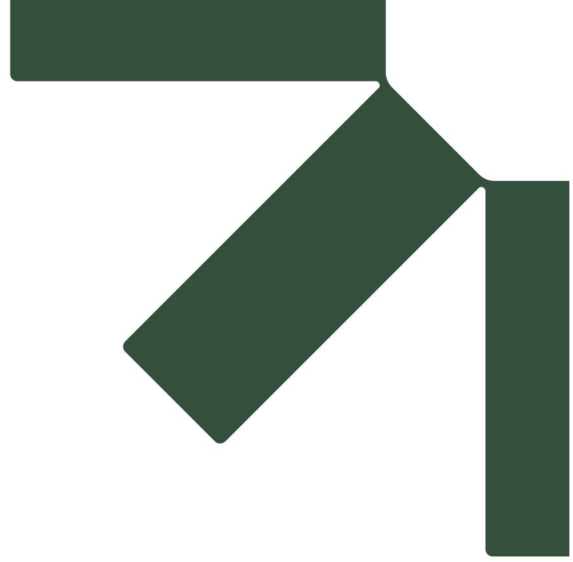
Photo 4: View towards Castlefield Conservation Area with St George's Church on the left, looking north from Chester Road Roundabout (the Site)





Photo 5: View westwards along Chester Road towards Chester Road Roundabout (the Site). Castlefield Conservation Area with St George's Church on the right





Appendix B Methodology

Data procurement

Archaeology

A 250m study area was utilised for the purposes of baseline data collection.

Heritage

Concerns have been raised by the Manchester City Council about the potential for impacts of the proposed development on the following heritage assets:

- Grade II listed St George's Church (NHLE 1208640); and
- Castlefield Conservation Area.

Therefore these assets will be the focus of this report.

Sources consulted

The following sources were consulted:

- the National Heritage List for England (NHLE), for all records relating to designated heritage assets;
- Greater Manchester Historic Environment Record (HER), for sites, events and Historic Landscape Characterisation (HLC) data;
- the Environment Agency's library of open access LiDAR data (DSM, DTM and point cloud);
- the Ordnance Survey open-source library, for topographic and cartographic data, including elevation point cloud, contour and hydrological data;
- historic cartographic sources, including large-scale county surveys, tithe mapping and early Ordnance Survey editions;
- Historic England's Aerial Archaeology Mapping Explorer, for mapped archaeological earthworks and other features identified by the aerial investigation unit;
- Historic England's Aerial Photo Explorer, for online access to the historic aerial photo archive;
- the Cambridge University Collection of Aerial Photography (CUCAP) online;
- other online resources, including: the British Geological Survey; the Cranfield University Soilscape viewer; and the National Library of Scotland's online mapping database.
- Manchester City Council's online planning application portal, for relevant documentation submitted in relation to proximate applications; and
- grey literature relating to excavations within, and within proximity to, the Site.

HER data

A proportionate level of HER data, sufficient to inform the assessment of archaeological potential, significance and potential impact presented in this report, was obtained. The HER data was reconciled and analysed within the context of the objectives of the present assessment.

While all of the HER data received has been reviewed and considered, not all HER records (sites and events) are discussed further within this report, only those that are of relevance to the determination of potential, significance and potential impact.



LiDAR data

Digital terrain model (DTM) and digital surface model (DSM) LiDAR data, at 1m resolution, was processed using ArcGIS software. Multiple hill-shade and shaded-relief models were created, principally via adjustment of the following variables: azimuth, height, and 'z-factor' or exaggeration. The models created were then colourised using pre-defined ramps and classified attribute data, to reveal the micro-topography and allow for analysis. Identified features are discussed in the relevant places within this report.

Site inspection

Field observations were undertaken in September 2023 in order to assess the Site within its wider landscape context, identify any evidence for previous disturbance, and examine any known or suspected archaeological features.

Assessment of Significance

The NPPF defines 'significance' as:

'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic'.

The NPPF glossary and the Planning Practice Guidance (PPG) define these interests as follows:

- Archaeological interest: "there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point."
- Architectural and artistic interest: "These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture."
- Historic interest: "An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity."

Historic England's recently published guidance: *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (2019),⁴ concurs with the use of this terminology and methodology, both of which are thus adopted for the purposes of this report.

This approach allows for a detailed and justifiable determination of heritage significance and the interests from which that significance derives. In accordance with the NPPF and the PPG, the level of significance attributed to heritage assets is then articulated as follows:

1. **Designated heritage assets of the highest significance.** These are identified in paragraph 200 of the NPPF as comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites, Registered Battlefields, and non-designated archaeological remains of demonstrably equivalent significance to that of Scheduled Monuments (as identified in footnote 63);

⁴ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).



2. **Designated heritage assets of less than the highest significance.** These are identified in paragraph 200 of the NPPF as comprising Grade II Listed buildings and Grade II Registered Parks and Gardens; and
3. **Non-designated heritage assets.** These are defined within the PPG as “*buildings, monuments, Sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets*”.⁵

Assessment of Effects

When discussing designated heritage assets, potential development effects are described in terms of harm to significance, in accordance with the NPPF (2023), which references the follows levels of harm:

- ‘Substantial harm or total loss’
*Being a level of harm that would “have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”;*⁶ and
- ‘Less than substantial harm’
Being any lesser level of harm than that defined above; recent case law has confirmed that this includes any level of harm (not considered substantial) regardless of its quantification, e.g. the finding of a ‘negligible’ level of harm must still be treated as less than substantial harm and be weighed in the balance under paragraph 202.

As clarified in the High Court, preservation of a heritage asset does not mean no change; it specifically means no harm.⁷ This is echoed by Historic England in ‘Managing Significance in Decision-Taking in the Historic Environment’ (GPA2), which states that “Change to heritage assets is inevitable but it is only harmful when significance is damaged”.⁸

With reference to the broad parameters referenced above, the PPG provides that the category of harm identified for any given asset be ‘explicitly identified’, and that the extent of that harm be ‘clearly articulated’.⁹ For purposes of this assessment, this has been done with reference to a ‘scale’, e.g. at the lower/upper end of the scale of less than substantial.

In discussing non-designated heritage assets, the NPPF does not provide that harm be categorised as either ‘substantial’ or ‘less than substantial’, only that the scale of any harm or loss is articulated. For purposes of this report, this has been expressed using professional judgment, with reference to the heritage interests defined within the NPPF, PPG and Historic England’s ‘Statements of Significance’ (2019).

The assessment of anticipated development effects can thus be seen to have been undertaken in accordance with a robust methodology, formulated within the context of current best practice, the relevant policy provisions, and key professional guidance.

⁵ MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

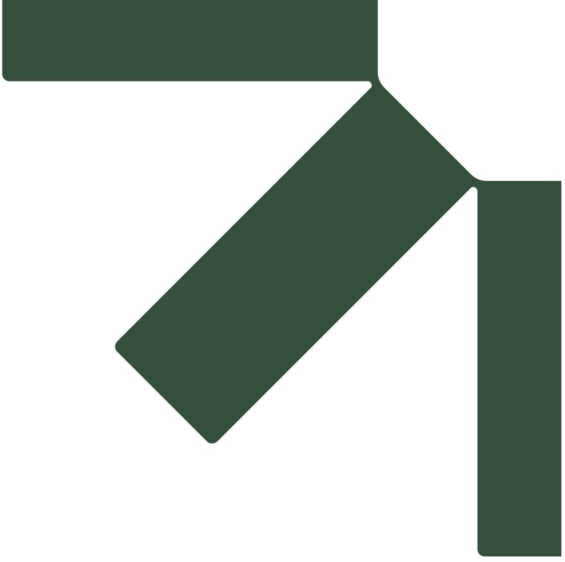
⁶ *Bedford Borough Council v Secretary of State for Communities and Local Government* [2013] EWHC 2847 (Admin), para. 25.

⁷ *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin).

⁸ Historic England, GPA 2, p. 9.

⁹ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.





Appendix C Statute, Policy and Guidance

Statute

Listed Buildings and Conservation Areas are protected under the Planning (Listed Building and Conservation Areas) Act (1990). In relation to development proposals, the legislation states that:

'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the secretary of state shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' (section 66).

With regards to Conservation Areas, it states that:

'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area' (section 72).

Planning Policy

National Planning Policy Framework (Revised 2023)

Applicable national policy comprises the National Planning Policy Framework (2023), and specifically the following paragraphs:

Paragraph 194, which 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a Site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

Paragraphs 199 and 200, which provide for designated heritage assets, and state respectively that:

'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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance,' and

'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. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck Sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'*

Paragraph 201, which relates to instances of 'substantial harm', and 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 202, which relates to instances of 'less than substantial harm', and 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.'

Local Planning Policy

Local planning policy is provided in:

- Manchester's Local Development Framework Core Strategy Development Plan Document (adopted 2012)
 - Policy CC9
 - Policy EN3
- Extant Unitary Development Policies (UDP)
 - Policy DC18.1
 - Policy DC19.1

These policies are quoted below:

Policy CC 9 Design and Heritage

Design of new buildings will need to be of the highest standard in terms of appearance and function. The standards and guidance explained in other LDF policies should be the basis for the approach to design, with particular attention to be given to the City Centre context and character.

Development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings, conservation areas and scheduled ancient monuments.

The Council will support high density and mixed use development in the City Centre, but developers must recognise the specific design challenges that must be overcome to ensure complementarity of function and form. New development must support the range of uses the Council expects in the City Centre and contribute to a coherent and integrated physical environment.



Policy EN 3 Heritage

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.

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.

Proposals which enable the re-use of heritage assets will be encouraged where they are considered consistent with the significance of the heritage asset.

Policy DC18.1 Conservation Areas

...

- e. Development proposals adjacent to Conservation Areas will be granted only where it can be shown that they will not harm the appearance or character of the area. This will include the protection of views into and out of Conservation Areas.

Policy DC19.1 Listed Buildings

In determining applications for listed building consent or planning applications for development involving or having an impact on buildings of Special Architectural or Historic Interest, the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of such buildings and to protecting their general setting. In giving effect to this policy, the Council will:

...

- d. seek to preserve and enhance the settings of listed buildings by appropriate control over the design of new development in their vicinity, control over the use of adjacent land, and where appropriate, by the preservation of trees and landscape features...





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