Paul Butler Associates
Planning, Development & Heritage Consultants

Alterations to undercroft service area and associated works to provide protected fire escape route

St James Building, Oxford Street, M1 6FQ

Heritage Statement (including Planning Statement)

December 2023

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1. Introduction

1.1 This Heritage Statement has been prepared by Paul Butler Associates on behalf of Bruntwood to accompany an application for planning permission and listed building consent at St James Building, Oxford Street, M1 6FQ.

1.2 The proposal is for 'Alterations to undercroft service area and associated works to provide protected fire escape route'.

1.3 St James Building was constructed in 1912 as a commercial warehouse and office building. The building is Grade II listed and located within the Whitworth Street Conservation Area. The main purpose of this statement is to consider the heritage significance of the St James Building and to appraise the impact of the proposed scheme on this significance.

1.4 This statement has been prepared in accordance with the policies and procedures of the National Planning Policy Framework (NPPF) following a visual and photographic survey of the site (undertaken May 2022 and September 2023), in addition to an examination, analysis and assessment of available historic records and cartographic sources.

1.5 This statement includes:

- A description of the application site's location;
- A summary of the heritage planning policy guidance context;
- An overview of the proposed scheme;
- A summary of the application site's archaeological and historical background;
- An assessment of the relative archaeological, historical and architectural significance of the application site; and
- An assessment of the impact of the proposed scheme upon the significance of the site.
- A Planning Statement to consider planning matters associated with the proposals.

This statement is not intended to be a full or complete record of the site.

2. Site Location and Setting

2.1 The application site comprises the St James Buildings, 61-95 Oxford Street, Manchester City Centre. St James' is bounded to the north by the Oxford Place offices (61 Oxford Street); to the east by Linley House (offices); to the west by Oxford Street; and, to the south by the Rochdale Canal. The service yard is accessed from Portland Street and has an undercroft arrangement.

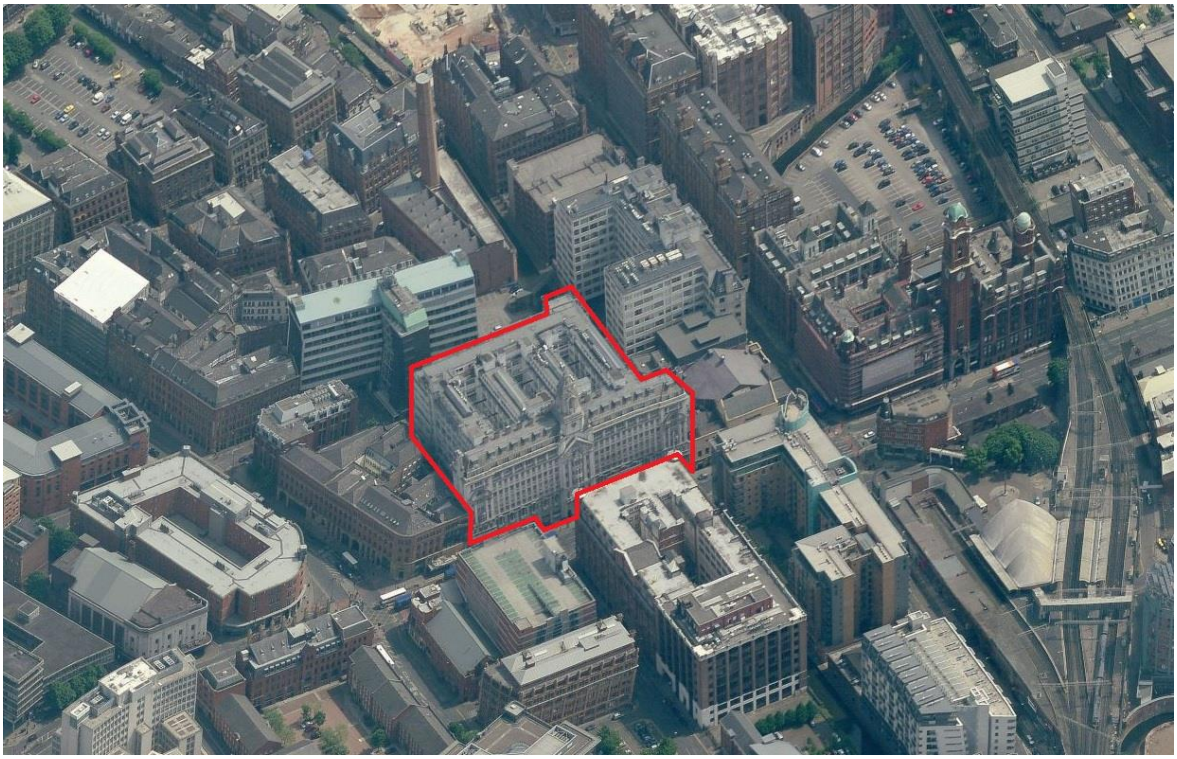


Figure 1.1: Aerial view of St James Buildings which the application site is located within.

2.2 The St James Buildings is Grade II listed. It was constructed by The Calico Printers Association in 1912, and was designed by Clegg, Fryer, and Penman. The building was designed to accommodate offices, a drafting department, and textile warehouse, and comprises eight storeys above basement. The building façade is of Portland stone, with a green slated mansard roof. The Listing notes its value as part of a group of buildings which include other former warehouses on Oxford, Portland, and Whitworth Streets.

Figure 2.2: View of St James Building from Oxford Street.

2.3 The majority of the St James' Buildings are occupied by a mixture of office, training, and educational uses, along with retail and leisure uses at ground floor level fronting Oxford Street. The proposed development relates to the undercroft service space located at the rear of the building. This can be accessed internally though the building, as well as via a vehicular access from Portland Street. The undercroft area accommodates car parking, service access to the building, mechanical plant and cycle storage.

2.4 The main entrance to the building is positioned centrally on the Oxford Street elevation. The reception area is accessible by steps from Oxford Street which then provides access via further staircases and lifts to the upper floors of the building.

2.5 As noted the site is located within the Whitworth Street Conservation Area (refer to figure 1.3 below).

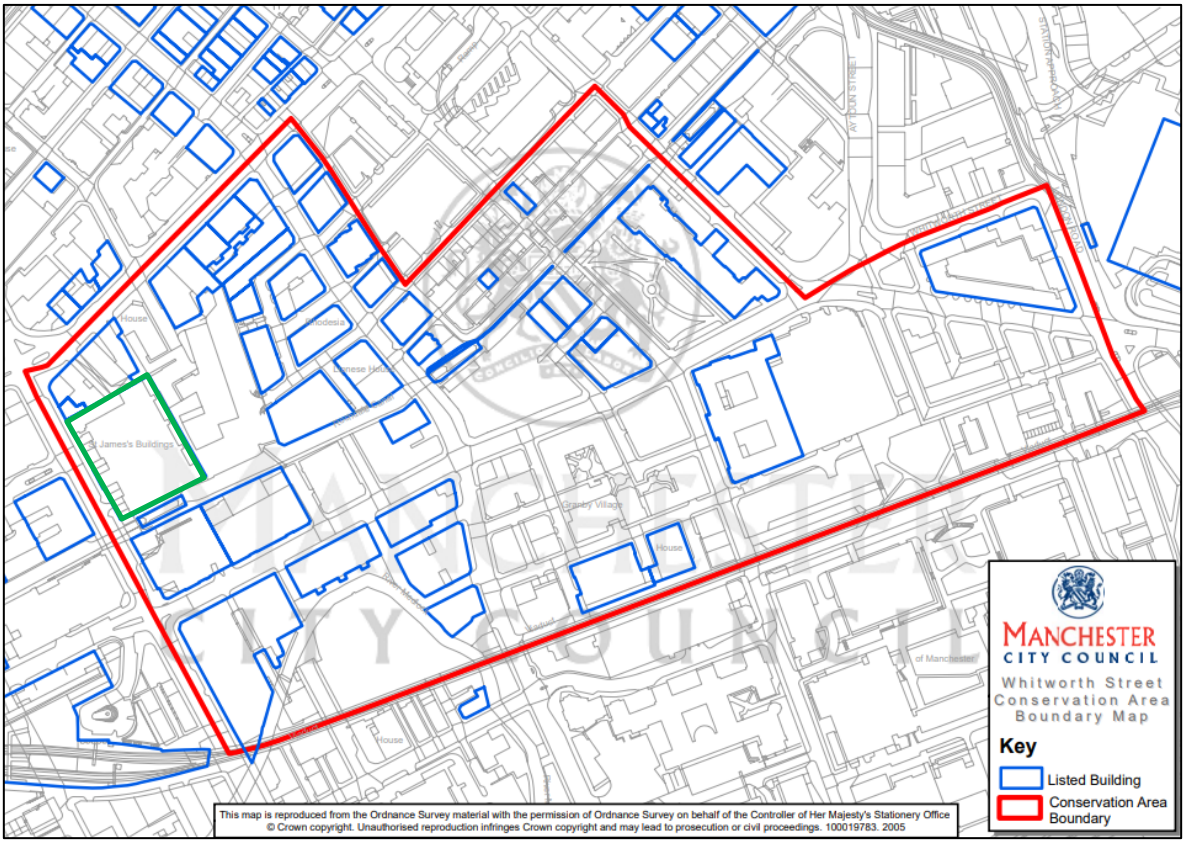


Figure 1.3: Plan showing the boundary of the Whitworth Street Conservation Area and listed buildings. The application site is outlined green.

Surrounding Area

2.6 The site lies within the western boundary of the Whitworth Street Conservation Area. It is within close proximity to several listed buildings and structures including the Tootal, Broadhurst, and Lee Building (Grade II*) which it faces, 61 Oxford Street (Grade II) which borders its northern perimeter, Rochdale Canal Lock 88 (Grade II) which is to the immediate south of the site, and beyond this, the Palace Theatre (Grade II). By the middle of the 19th century, Manchester had become the largest textile centre in the world. As a result, the need for warehousing grew and it is the above mentioned former industrial buildings, built larger than before and with considerable architectural characteristics, that form the conservation area (GMAAS 2014).

2.7 The Whitworth Street Conservation Area was designated in 1974 and is described as *'uniquely Mancunian in its character, its physical form being established by the wealth of fine Victorian and Edwardian buildings erected between 1850 and 1920'*. The character of the conservation area derives from the number of large warehouse buildings which were built to meet the increasing demand for this type of building form, associated with the growth of the textile industry in Manchester. The appearance of these warehouses was often used as an expression of the owner's wealth, with deeply modelled front facades in brick and/or terracotta a distinctive feature.

2.8 Following the cotton slump in the 1920's, many of the buildings became vacant. In more recent years there has been significant investment, with many of the warehouses being given a new lease of life and converted into offices and apartments.

2.9 The site has a highly accessible location within the City Centre. Within a few minutes' walk is a wide range of local shops, amenities and services, and leisure facilities. In terms of access by public transport, the site is located within close proximity to a high number of bus stops, tram stops located at St Peter's Square and Piccadilly gardens, and within walking distance of Oxford Road and Manchester Piccadilly Railway Stations.

3. The Heritage Planning Policy Context

3.1 The heritage planning policy of relevance to the proposed scheme, and which provides the context for its assessment, is set out within national and local planning policy guidance.

National Planning Policy Guidance

Town and Country Planning Act 1990

3.2 Section 38(6) of the Planning Act states that the determination of planning applications must be made in accordance with the Development Plan, unless other material considerations indicate otherwise. This establishes the Development Plan as the primary decision making document when considering planning applications. In this instance the development plan currently comprises the Manchester Core Strategy (2012); saved policies of the Unitary Development Plan for Manchester (1995); and, the Guide to Development in Manchester SPD (April 2007). The relevant provisions of these documents are discussed below.

Planning (Listed Buildings and Conservation Areas) Act 1990

3.3 Section 66 of the Planning [Listed Buildings and Conservation Areas] Act 1990) advises that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority 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.

3.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that with respect to any buildings or other land in a conservation area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

3.5 The application site comprises St James Building which is Grade II listed, whilst as noted in the previous section there are numerous other listed buildings nearby. The building is also within the Whitworth Street Conservation Area.

3.6 In determining the planning and listed building consent applications it is necessary to consider the impact of the proposal on the significance of St James Building. This includes direct impact on its built fabric and any indirect impact on the setting of the building. It is also necessary to consider the potential impact of the works on the setting of nearby listed buildings and upon the character and appearance of the Whitworth Street Conservation Area. Section 9 of this report provides an assessment of these heritage impacts.

National Planning Policy Framework (NPPF)

3.7 Detailed guidance about the legislation is given in the National Planning Policy Framework (NPPF). The NPPF was first published on 27th March 2012 with the latest version published in September 2023. The NPPF sets out the Government's planning policies regarding the conservation of the historic environment. The NPPF is a key part of reforms to make the planning system less complex and more accessible; to protect the environment; and to promote sustainable growth. It replaces previous national planning policy guidance and is a material consideration in planning decisions.

3.8 NPPF places great emphasis on the role of decision makers to promote sustainable development. Paragraph 8 advises that sustainable development has three dimensions: 'economic, social and environmental'.

3.9 In relation to determining planning applications, the NPPF sets out a presumption in favour of sustainable development. For decision taking this means approving development that accords with an up-to-date development plan without delay (Paragraph 11).

3.10 Section 16 of the NPPF deals with conserving and enhancing the historic environment. Paragraph 189 states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

3.11 Paragraph 194 advises 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'.*

3.12 Paragraph 195 states that *'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.'*

3.13 Paragraph 196 states that *'Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision'.*

3.14 Paragraph 197 states *'In 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'.

3.15 Paragraph 193 states *'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'.

3.16 Paragraph 199 states *'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'.*

3.17 Paragraph 200 states *'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'.*

3.18 Paragraph 201 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.*

3.19 Paragraph 202 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'.*

3.20 Paragraph 205 states *'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted'.*

3.21 Paragraph 206 states *'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole'.*

3.22 Annex 2 of the NPPF provides a glossary of key terms which are relevant to this application. 'Significance' is defined as: *'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.*

3.23 'Setting of a heritage asset' is defined within Annex 2 as *'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the*

significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

National Planning Practice Guidance (NPPG)

3.24 The National Planning Practice Guidance (NPPG) is a web-based resource which was launched in March 2014 and coincided with the cancelling of the majority of Government Circulars. It provides guidance on many aspects of planning including plan-making and decision taking.

3.25 NPPG advises that *'In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary.'* (Paragraph: 002 Reference ID: 18a-002-20190723)

3.26 It goes on to state *'Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals'.*

3.27 In relation to setting of a heritage asset NPPG states *'A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.*

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors

such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation' (Paragraph 013 Reference ID: 18a-013-20190723).

3.28 NPPG states that *'Disrepair and damage and their impact on viability can be a material consideration in deciding an application. However, where there is evidence of deliberate damage to or neglect of a heritage asset in the hope of making consent or permission easier to gain the local planning authority should disregard the deteriorated state of the asset'* (Paragraph: 014 Reference ID: 18a-014-20190723).

Historic England Guidance

3.29 Historic England has published guidance to assist with the management of the historic environment. This assessment has been prepared having regard to the following Historic England Guidance.

Historic England Historic Environment Good Practice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment.

3.30 Published in March 2015, this document provides guidance on assessing the significance of heritage assets, using appropriate expertise and heritage recording.

Historic England Historic Environment Good Practice in Planning Note 3: The Setting of Heritage Assets (2nd edition)

3.31 First published in March 2015 and updated in December 2017, this document provides guidance for managing change within the setting of heritage assets, including historic buildings, sites, areas and landscapes. The guidance of this document has been considered within the appraisal at section 9 of this statement.

Historic England Technical Advice Note 2: Making Changes to Heritage Assets

3.32 Published in February 2016, this advice note illustrates the application of the policies set out in the NPPF in determining applications for planning permission and listed building consent.

Historic England Advice Note 12 'Statements of Heritage Significance: Analysing Significance in Heritage Assets'

3.33 Published in October 2019, this document provides information on the analysis and assessment of heritage significance in line with the National Planning Policy Framework (NPPF) to assist owners, applicants, local planning authorities (LPAs), planning and other consultants, and other interested parties in implementing historic environment legislation, the policy in the NPPF and the related guidance given in the Planning Practice Guidance (PPG).

Local Planning Policy Guidance: The Development Plan for Manchester

Manchester Core Strategy Development Plan Document (July 2012)

3.34 Manchester's Local Development Framework Core Strategy Development Plan Document was adopted on 11th July 2012. The plan contains various core strategic objectives which seek to encourage development on sustainably located brownfield sites. The proposed development is therefore supported in principle by these strategic development plan policies.

3.35 Specific heritage policies of the core strategy of relevance to the proposed scheme include:

- Policy CC 9 'Design and Heritage' which states that development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings.

- Policy EN 1 'Design Principles and Strategic Character Areas' which states that developers will be expected to consider the City's heritage and continue the rich pattern of activity in the core area.

- Policy EN 3 'Heritage' which states that proposals which enable the re-use of heritage assets will be encouraged where they are considered consistent with the significance of the heritage asset.

Saved Policies of the Unitary Development Plan (UDP) for the City of Manchester (adopted 1995)

3.36 Heritage saved policies of the UDP of relevance to the proposed scheme include:

- DC18 'Conservation Areas' states the Council will give particularly careful consideration to development proposals within Conservation Areas. The Council will seek to preserve and enhance the character of its designated conservation areas by carefully considering the following issues: i) the relationship of new structures to neighbouring buildings and spaces; ii) the effect of major changes to the appearance of existing buildings; iii) the desirability of retaining existing features, such as boundary walls, gardens, trees, (including street trees).

- DC19 'Listed Buildings' states that the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of such buildings. In giving effect to this policy, the Council will 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.

Guide to Development in Manchester Supplementary Planning Document (April 2007)

3.37 The guidance identifies the City's heritage as an asset. Paragraph 2.6 states that buildings and areas of architectural and historic importance together with their setting will be preserved and enhanced; and, paragraph 12.7 states that developers are encouraged to look positively at the role that older buildings can play in delivering a sense of place, and that the need for old buildings to have an economic use is recognised.

4. The Proposed Scheme

4.1 The proposal is for 'Alterations to undercroft service area and associated works to provide protected fire escape route'.

4.2 The proposal involves creating a protected fire route from four rear staircases out of the building via the undercroft area ultimately leading onto Dickinson Street in front of the Langley Building to the east of St James Building. This will improve the fire strategy of the building and allow for increased occupancy within the building, helping to future proof it and sustain its long-term occupation.

4.3 The proposal involves the partial removal of an existing platform deck and the installation of a new deck with enclosed corridor constructed of fire rated walls. Three sets of steps will lead from the fire rated corridor into the car park / service area, which then leads out of the building onto Dickinson Street.

4.4 To facilitate the proposals a series of other works are involved including provision of fire doors, fire rated partitions and fire curtains and other related adjustments and alterations. Some existing mechanical plant units will also be removed or relocated elsewhere within the service area. Bollards and barriers will be provided within the space to ensure the fire protected route is safe and kept free of obstruction. A fire rated enclosure for the bin store will also be provided.

4.5 As part of the proposals three car parking spaces will be retained compared to the existing provision of c.10 spaces within this part of the service area. Bruntwood have confirmed that following this change there will continue to be ample car parking within the building, including disabled provision. A loading bay will be incorporated ensuring servicing to the building and commercial uses is unaffected.

4.6 The proposals have been carefully developed by Bruntwood alongside the project fire engineers, structural engineer and architects. The proposals have been developed following an involved and iterative conservation-led process which have sought to minimise impact on the heritage significance of the building. The proposals have been further

modified following a pre-application site meeting with Manchester City Council planning and conservation officers in October 2023. The approach will comply with building regulations and ensures all works are confined to within the undercroft space, avoiding impact on parts of the building of higher heritage value.

4.7 Full details of the proposed works are identified by the application drawings prepared by AXI and are appraised at Section 9 of this Statement.

5. Archaeological and Historical Background

5.1 This section is to be read alongside the historical plans of the application site and surrounding area contained in Appendix 2.

5.2 The current understanding of any activity in Manchester during the prehistoric period is very poor, with evidence for Greater Manchester being sparse and based on chance finds. This perhaps reflects the unfavourable geological conditions, as boulder clay predominates in the area, whereas evidence suggests that prehistoric communities preferred well drained sands. It is reasonable to suggest that the Castlefield area may have been beneficial for late prehistoric settlement on account of the natural topography and its riverside location. However, physical evidence is fragmentary and the best evidence was yielded from an archaeological excavation that was targeted on a plot of land at 73 - 83 Liverpool Road (OAN 2005). An assemblage consisting of 2 Mesolithic flints, 1 Neolithic/Bronze Age waste flake and 1 fragment of Late Bronze Age/Iron Age pottery was found (UMAU 2002; Gifford 2005). Also, dugout canoes of the Bronze Age period were discovered during the excavation of the Manchester ship canal. In addition to these artefacts, the Greater Manchester HER includes four sites of prehistoric date in the area between Castle Street and Tomlin Street (OAN 2005). All of the prehistoric artefacts from the Castlefield area are residual, having come from secondary deposits. This indicates a background level of prehistoric activity for the area which has yet to have any defined foci (Gifford 2005). No prehistoric finds have been found on the site itself.

5.3 A Roman fort was established in the Castlefield area in 79AD (Fletcher 1989, 3). The original fort comprised a turf rampart with timber gates, and covered an area of cl.2ha. A fort of this size could hold a 480 man infantry unit. The fort was rebuilt in stone around AD 200 (Bryant et al 1986) and was supported by a substantial settlement, or vicus. This settlement originated largely during the early 2nd century and incorporated numerous buildings and a concentration of iron-working hearths or furnaces. Much of the current understanding of the Roman vicus in Manchester is derived from the analysed results obtained from three major excavations, which have all focused on the area to the north of the fort (OAN 2005). These excavations revealed extensive evidence for several successive phases of occupation

commencing during the late 1" century and continuing into the 3rd century. Less is known of the settlement to the south of the fort. However, it is believed to have incorporated a bath house on the north bank of the river Medlock, which was discovered during the 1770s and a temple of Mithras (OAN 2005).

5.4 Funerary remains have been discovered near the eastern boundary of Castlefield which represent part of the little understood cemetery of the settlement, which likely flanked the roads to the fort. Graves and artefacts were discovered in 1849 when Pioneer Quay was excavated in 1832 around the area of Great Jackson Street (OAN 2005). No Roman artefacts have been found on the site, although it lies c. 0.6km from the site of the fort.

5.5 There is very little archaeological evidence in the region as a whole that denotes the period between the end of the Roman occupation and the Norman Conquest. However, the supposed remains of four sunken-floored buildings of Anglo-Saxon type were discovered beyond the north gate of the Roman fort, although their date and interpretation was not conclusive (OAN 2005). The Anglo-Saxons did however build a settlement to the north of the fort, founding the beginning of the medieval town of Manchester, around the manor house and parish church of St Mary. In 1223, the right to hold an annual fair was obtained, and the town was important enough to be granted a charter in 1301 (Kidd 1993, 14). The Castlefield area became known as Aldport or The Old Town and a house and park in the area, which would later become known as Aldport Lodge, became the home of the Mosley family in 1601. The Lodge was used by Lord Strange in 1642 as the Royalist headquarters during the Siege of Manchester but was burned down by the victorious Parliamentarians (GMAAS 2014).

5.6 During the 18th century the surrounding area was predominantly agricultural consisting of isolated settlements and market towns with Manchester at the centre. By the middle of the century, Manchester was expanding at a considerable rate, and it was during this period that Deansgate, Market Street and Shude Hill developed commercially (Farrer and Brownbill 1911, 180). Casson and Berrys map of Manchester from 1741 shows this development and although the site lies off the scope of the map, it shows that the surrounding area was agricultural land.

5.7 The River Irwell was made navigable in the 1720s, allowing access to Liverpool via the River Mersey. In 1734 Edward Byrom financed the first quay on the Irwell for loading and unloading goods, which led to the construction of Quay Street. The first canal in Britain was constructed from 1758 to 1761 by James Brindley, to transport coal from Worsley to Manchester (GMAAS 2014). 25 Landowners perceived two potential uses for canalside land: as factory sites and as coal, stone, and timber wharfs (Maw et.al 2011, 5). Rochdale canal was originally conceived in 1776, and opened officially in 1804, although construction work continued for another few years. The width of the canal made it more successful than the Huddersfield Narrow Canal and it became the main highway of commerce between Lancashire and Yorkshire (Hadfield and Biddle 1970). As early as 1808, 10 of the town's eventual 23 private canal branches had been constructed, the remaining 13 branches being added in the trading booms of 1815–16, the mid-1820s, the early 1830s, and the mid-1840s.

5.8 Greens map of the late 18th century shows the site to still be agricultural land at this time, although with the Rochdale Canal lying directly to the south of it. The land on which the subject plot lies was owned by 'Salford Poor', possibly left to them by Humphrey Booth (Farrer and Brownbill 1911). Philips, Tate and Co. owned the neighbouring land to the northeast and they built a private canal branch through their land between Oxford Street and David Street in 1817. One of the partners in this venture stated that 'the full value would never be obtained for the land unless the canal was cut' and that 'the remaining land would be so abundantly increased in value thereby as to do far more than compensate the sacrifice of land it would require' (Maw et.al 2011, 6). This certainly would have also helped the land owned by the Salford Poor. Swire's map of 1824 shows that the land surrounding the site had begun to be built upon, although the subject site was, for the most part, empty. The exception being a small rectangular building fronting Oxford Street, with a large building complex to the north.

5.9 The 1850 OS town plan shows the effect that the private canal branch had on the development of the site. At the corner of Oxford Street and the Rochdale Canal were the Esdaile's Buildings, with a coach manufactory behind, backing onto Britannia Wharf. North of this was a timber yard and Atlas Saw Mills (both backing onto the canal branch) with a Coal Wharf to the north and Oxford Street Saw Mills beyond. Further mills lay around the site,

surrounding the canal, including a cotton mill to the south. By this time Manchester was the largest textile centre in the world and the need for warehouses grew. The Whitworth Street area saw a great number of warehouses built at this time and the distinctive architecture was both functional and expressive of the wealth of the owners (GMAAS 2014).

5.10 Portland Street appears to have been extended a little after this time and the area had already begun to see the construction of several shipping merchants' warehouses, including 109 Princess Street (Taylor 2000a).

5.11 The area quickly grew into a warehouse district, with 36 Princess Street being built in 1880-2 (Taylor 2000b), around the same time as 38 Whitworth Street (Taylor 2001). In 1881 St James's Hall was erected on the site, designed by W.H.M Ward and built for James Reilly as a Public Hall and Concert Hall and could accommodate 10,000 people. St James's Theatre was soon added to the northern end, although was put up for sale in 1886 (Lloyd n.d.). The Palace Theatre (HER No. 8525.1.0) was also erected soon after in 1891, to the southern side of the Rochdale Canal, built as the Manchester Palace of Variety by Derbyshire and Bennett Smith (GMAAS 2014).

Figure 5.1: St James's Hall c.1904 with its prominent clock tower (Stewart 2004)

5.12 The OS mapping for 1896 shows St James's Hall along with the theatre attached to the north and the 'Palace of Varieties' to the south. At the turn of the century the Thomas Edison Photo Company began renting out the hall to show their early films. The theatre and hall were put up for sale in 1906 but did not sell, although they were later bought by the Calico Printers Association (Lloyd n.d.). The OS mapping for 1908 show the situation had changed very little, although the 'Palace of Varieties' was noted as the Palace Theatre.

5.13 The Calico Printers Association demolished St James's Hall and Theatre, and erected St. James's Buildings in its place in 1912. The Calico Printers Association were a grouping of more than 50 finishing firms. The building was designed by Clegg, Fryer and Penman as the companies' offices, drafting department and main warehouse, explaining why the building was so large, with eight stories and 1000 rooms. At the time of its erection it was the pinnacle of the Lancashire textile industry and the building was at the heart of the commercial district of the city (Nevell 2008). The trade directories for 1914 note that the building contained St. James's Building Ltd, with Henry Elton as the secretary, along with the Calico Printers Association; Castleton Printworks Ltd.; Hoyles Prints Ltd.; Etablissements Grafton Ltd. (Francais); Gemmell & Harter Ltd, Calico Printers; Grafton T.W. and Co. Calico Printers; and Potter Edmund and Co., Calico printers (Slater 1914). The situation remained the same in 1920, although by this time Duncan & Foster Ltd., bakers and flour dealers had joined them along with the Prints Agency Ltd., although Gemmell & Harter Ltd,, Grafton T.W. and Co., and Potter Edmund and Co. had left. The OS mapping for 1922 shows St. James's Building for the first time as a large, roughly square, building. The situation is similar on the 1932 OS mapping, although several units are shown along the main frontage, likely let out. The trade directory for 1936 lists only the St James' Buildings Ltd. and the Calico Printers Association as being in the building (Kelly 1936).

Figure 5.2: St James's Buildings c.1932 with the Palace Theatre in the background (Stewart 2004)

6. Site visit and Pre-application Consultation

6.1 The property has been visited on several occasions as the proposals have been developed to understand the heritage significance of the building and its fabric, and design proposals that are sensitive to this.

6.2 Pre-application consultation with the Manchester City Council has also been undertaken with a site meeting taking place with Jack Naven (Assistant Planning Officer) and Paula Burbicka (Heritage and Urban Design Officer) on 11 October 2023. During the meeting the proposals were explained and there was discussion on the key planning and heritage matters requiring consideration. Following the meeting feedback comments were provided by the Council Officers. These comments have been addressed within the 'Response to Pre-application Comments' prepared by AXI Architects with the proposed scheme amended where appropriate. Email correspondence also took place with Jack Naven to agree information requirements for the validation and processing of the planning and listed building consent applications.

7. Description of St James Building

[To be read with plates provided at Appendix 1]

7.1 The Listed building description describes it as follows:

> *Commercial building. 1912, by Clegg, Fryer and Penman. Steel frame with facade of Portland stone; green slated mansard roof. Very large rectangular plan. Neo-Baroque style. Eight storeys plus dormers, 3:6:3:6:3 bays, symmetrical, the centre and the ends breaking forwards slightly; ground to 2nd floors treated as rustic, with channelled masonry, ground and 1st floors set in arcaded round-headed openings with massive polished granite plinths to the piers, shops at ground floor and lunettes at 1st floor, triple keystones to the arches. The centre and ends have balustraded balconies to recessed 2nd-floor windows, and above this level are treated as giant pedimented aedicules (to the 7th and 6th floors respectively), with paired Ionic pilasters framing the windows (projected canted bay windows in the centre at the 1st level), and open pediments (triangular in the centre and segmental at the ends); and the centre has a square tower with stepped Baroque spire. Main entrance in centre bay, with massive round-headed archway. Otherwise, the 2nd-floor windows of the main ranges have aedicules with small balconies, engaged columns and alternating triangular and segmental pediments, and the other floors have 2 smaller windows per bay, all with architraves. Dormer windows to 7th floor. Moulded chimney stacks. Rear and interior not inspected.*

7.2 In addition to the Building's listing above, the Pevsner Architectural Guide also describes the building:

> *High and broad and all Portland Stone: Baroque. A tower, rising from a broken pediment, crown the central entrance block. The entrance hall is the most opulent of surviving Manchester warehouses. Apart from the elaborate plaster ceiling with its deep dome, it is all of marble: grey – and white – clad walls, green columns and a sumptuous stair with black handrail and cream and brown*

balustrade. All internal areas were lined with patent fire-proofing cement and beneath the marble cladding the stair is of reinforced concrete.

(Hartwell 2001)

7.3 In order to gain a greater understanding of the significance of the building a number of site visits have been undertaken. These have focussed on the service area to the rear of the building to which the proposed application works relate.

7.4 The rear service area can be accessed through the building at ground floor level and via a vehicular access from the north off Portland Street via a barrier and roller shutter. The service area is a double height space which accommodates car parking, vehicle loading area, bin storage, mechanical plant and other services. The space is functional in its purpose and appearance with concrete ceiling and flooring, and concrete structure and walls.

7.5 The three escape rear staircases which rise through the building exit into the undercroft service area. These lead directly out onto a raised platform which is formed of concrete beams with brick infills. This is covered with steel flooring with railing with metal and concrete steps leading down to ground level. The rear (west) elevation which faces the raised platform is painted brick and there are various personnel / service doors, two goods lifts with concertina doors, and mechanical plant / services fixed to the building. At high level there is a RSJ beam which runs much of the length of the space, supported by steel brackets. The steelwork bears the engraving 'Frodingham Iron and Steel company Ltd.' and appears original to the building, and most likely formed part of a system for loading / unloading goods. To the north end of this space is a modern metal gantry platform accessed by a metal ladder which accommodates mechanical plant. The space around this accommodates open storage of bins and trolleys.

7.6 The south elevation facing into the service area is again of brick and concrete construction and accommodates personnel / service doors and a good lift. Various services are affixed to the elevation. A fire escape door leads onto a raised brick platform with steel floor covering and concrete steps which lead to ground level. Much of the platform is taken up by air handing equipment. The service area continues to the east of this space where further

mechanical plant is located. Beyond this is a modern partition wall which appears to have been installed when the loading bay was infilled to create a commercial unit (currently 'Bundobust' restaurant) which fronts Oxford Street.

7.7 The south elevation is of brick construction. There is a double-height vehicle access which is secured with a barrier. To the side of this is a double-height metal gate supported at the top by an RSJ fixed back to the building. To the east of this is a further opening which has a rollershutter door. The roof to this area is dual-pitched with glazing above the opening.

8. Heritage Significance of St James Building

[To be read in conjunction with Figures at Appendix 2]

8.1 The Historic England Publication 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' (HE 2019) suggests three areas of interest for assessing a heritage asset's significance. These are to be described, following which the level of the general significance of the heritage asset should be assessed, with the particular contribution of any described features. The three areas of interest are:

- Archaeological interest if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

- Architectural and artistic interest which 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 which is 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.

Archaeological interest

8.2 The building provides evidence of past human activity in terms of the construction and use of warehouses in the area during the early 20th Century. The service area, although much altered, does make some contribution to the historic interest in terms of helping to understand the function of this type of building.

Architectural and Artistic interest

8.3 The architectural and artistic interest is medium-high, in particular the Oxford Street elevation and the decorative marble entrance area. The service area to which the application relates however possess negligible architectural / artistic interest.

Historic Interest

8.4 The historical value is medium-high as the building was constructed for the Calico Printers Association in the early 20th century and the building provides evidence of past human activity in terms of the construction and use of warehouses in the area during the early 20th Century. The service area, although much altered, does make some contribution to the historic interest in terms of helping to understand the function of this type of building.

Summary

8.5 As a whole the building holds a great deal of heritage interest, particularly architectural and artistic, and historic interest, forming a part of a group of warehouses built at the same style and in the same location. However, the service area does not reflect this, as the majority of the value comes from the external appearance and ground floor lobby.

8.6 The service area can be considered to have both archaeological and historic interest, relating to the use and construction of warehouse/office units at the turn of the century. The space has however been much altered and modernised although continues to meet the service / functional needs of the building which have changed significantly since the time of the building's construction. Several features of value survive including original brick and concrete structure, the 'Fordingham' RSJ, and metal gates.

9. Impact Assessment

9.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England. The NPPF builds upon the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and requires applications affecting the significance of any heritage asset to be accompanied by an assessment of the asset's significance, including any contribution made by their setting, in addition to consideration of the potential impact of the application on the significance.

9.2 When assessing potential heritage impacts associated with the proposed scheme the key issues to consider are:

- Direct and indirect impact on St James Building;
- Impact on the setting of nearby listed buildings; and
- Impact on the character and appearance of the Whitworth Street Conservation Area.

Direct impact on St James Building

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

	Proposed Works	**Impact on significance**	**Mitigation required to be undertaken**
1.	Part of existing platform deck to be removed including all steps & railings ahead of Installation of new deck.	The raised platforms throughout the car park are formed of concrete beams with brick infills. These, visible to the sides, are likely original. The steel floor covering and railings however, are later 20th century and of no significance. The basic brick and concrete structure of the platform and stairs are of historic value, albeit	No mitigation on the basis of careful removal.

	Proposed Works	Impact on significance	Mitigation required to be undertaken
		this is only low. They possess no aesthetic value. The removal of part of the deck at the south end of the undercroft area will have a low negative heritage impact.	
2.	Form new partition system to form new escape corridor.	The corridor enclosure will visually read as an insertion within the space and will have limited physical impact where the walls adjoin the walls of the existing building. The corridor enclosure could be removed at a future point. The use of concrete blocks to the base is appropriate and reflects the utilitarian appearance of the service area. The impact on heritage significance is negligible-low.	No mitigation required.
3.	Form new composite floor to corridor, to incorporate fixing to existing floor to SE design.	The existing surface finish is contemporary and there is no heritage impact. The intervention is reversible.	No mitigation required.
4.	Form new roof to corridor, to include detail around existing steel brackets.	The corridor enclosure will visually read as an insertion within the space and will have limited physical impact where the ceiling adjoins the walls of the existing building attaching into mortar joints of brickwork (refer to detail). The detailing around steel brackets is provided on the application drawings. Whilst it is not possible for the ceiling to sit below these brackets (due to the necessary ceiling height) the detailing avoids any direct impact / harm, whilst the change will be reversible.	No mitigation required.

	Proposed Works	Impact on significance	Mitigation required to be undertaken
5.	Install checkerplate floor finish to corridor, to be carried up walls to 1500 height.	This relates to modern fabric (ie. the wall of the new protected corridor) and there is no heritage impact.	No mitigation required.
6.	Existing electrical distribution and services to be encased within fire rated lockable cupboards.	The encasing of services will have negligible / no heritage impact associated with minimal fixings into the building. The intervention will be reversible with no longterm harm.	No mitigation required.
7.	New steel stairs to be installed, allowing for access to corridor from car park level.	The existing stairs are not historic. Removal / replacement will therefore have no heritage impact.	No mitigation required.
8.	New steel stairs to be installed, with adjacent DDA refuge, to allow access to protected corridor.	This forms part of the corridor enclosure which will visually read as an insertion within the space and will have limited physical impact. The impact on heritage significance is negligible-low negative.	No mitigation required.
9.	New 1hr fire rated partition and door to be formed in front of timber cladded area to lightwell.	A partition is required to separate the corridor from the area indicated to provide protection for external fire spread and maintain the enclosed fire rated escape route. Existing exposed timber surfaces represent a risk of surface spread of flame and their structural integrity cannot be guaranteed in the event of an emergency requiring use of the proposed corridor as an escape route. The infill will visually read as an insertion within the space and will have limited physical impact where the walls adjoin the walls of the existing building. The partition and doors could be removed at a future point. The	No mitigation required

	Proposed Works	Impact on significance	Mitigation required to be undertaken
		impact on heritage significance is negligible-low negative.	
10.	Form new stair with AD K compliant handrails to end of corridor.	The existing stairs appear historic but are of low heritage value. Removal / replacement will therefore have a low heritage impact.	No mitigation required.
11.	New fire rated shutters to be installed to provide compartmentation where lifts adjoin new corridor.	The fire shutter installation will have limited physical impact associated with its connection to the building. The housing of the shutters will not be prominent and will be visually compatible with the character / function of the service area.	No mitigation required.
12.	Install new crash barriers in front of corridor, Armco or similar.	This does not affect historic fabric and will be a reversible intervention. The barriers and surface markings will be visually consistent with the overall function of the service area and already exist elsewhere within the space.	No mitigation required
13.	Form gated open platforms for loading bay access from corridor.	This relates to modern fabric and there is no heritage impact.	No mitigation required.
14.	Form new bin store and trolley store partitions.	The bin store enclosure will visually read as an insertion within the space and will be a largely freestanding structure with limited physical attachment. Importantly the installation will not remove or affect the existing historic metal gate which is unaffected. The bin store enclosure could be removed at a future point. The impact on heritage significance is negligible-low negative.	No mitigation required.
15.	Form new bin store roof – to be loadbearing to allow access to plant gantry.	This relates to modern fabric and there is no heritage impact.	No mitigation required.
16.	Install new ladder for gantry access	This relates to modern fabric and there is no heritage impact.	No mitigation required.

	Proposed Works	Impact on significance	Mitigation required to be undertaken
	to be housed within separate area within bin store.		
17.	Form new stair for gantry access via bin store roof.	This relates to modern fabric and there is no heritage impact.	No mitigation required.
18.	Form new safety balustrade around walkway for gantry access for plant maintenance.	This relates to modern fabric and there is no heritage impact.	No mitigation required.
19.	Escape areas from corridor to be demarcated with contrasting painted surface (e.g. yellow cross hatch).	This does not affect historic fabric and will be a reversible intervention. The surface markings will be visually consistent with the overall function of the service area.	No mitigation required
20.	Contrasting painted surface (e.g. yellow cross hatch) to be applied to demarcate "no stopping zone" around crossing point to corridor from main building.	This does not affect historic fabric and will be a reversible intervention. The surface markings will be visually consistent with the overall function of the service area.	No mitigation required
21.	Existing condenser units to be relocated to opposite side of escape stair egress.	This relates to modern fabric and there is no heritage impact.	No mitigation required.
22.	Existing (redundant) lift shaft to be blocked off and compartmented to separate from egress route.	This intervention will conceal the lift however the works will be reversible in the future if required. The heritage impact is low negative.	No mitigation required.

	Proposed Works	Impact on significance	Mitigation required to be undertaken
23.	Existing stairs to be removed and new platform constructed to house condenser units.	The existing stairs appear historic but are of low heritage value. Removal will therefore have a low heritage impact.	No mitigation required.
24.	New fire rated door to be installed from escape stair to be hung outwards on opposite side to existing opening.	This relates to modern fabric and there is no heritage impact.	No mitigation required.
25.	Redundant a/c unit to be stripped and removed from wall.	This relates to modern fabric and there is no heritage impact.	No mitigation on the basis of careful removal.
26.	All redundant electrical & A/c fittings to be stripped from corridor route.	This relates to modern fabric and there is no heritage impact.	No mitigation on the basis of careful removal.
27.	New portal frame to be installed housing fire shutters to form evacuation corridor allowing for sheltered safe egress across from main building.	The fire shutter installation will have limited physical impact associated with its connection to the building (refer to submitted detail). The housing of the shutters will not be prominent and will be visually compatible with the character / function of the service area. The impact on heritage significance is negligible-low negative.	No mitigation required.
28.	New fire shutters to be installed to existing external openings.	This relates to modern fabric and there is no heritage impact. The replacement shutters will be of a similar appearance finished in a stainless steel grey colour.	No mitigation required.
29.	Existing window to be retained and boarded to external face to achieve 60 minutes fire resistance.	This intervention will conceal an existing window however the works will be reversible in the future if required. The heritage impact is low negative.	No mitigation required.

Cumulative Impact

9.4 The table above has identified the impact of a range of works on the significance of the building. The majority of the works proposed will not affect historic fabric and are clearly acceptable. Whilst there are occasional negative impacts these are judged to be necessary in terms of facilitating the provision of a fire strategy which allows for increased occupation of the building. This in turn contributes to sustaining the building in active economic use thereby securing its long-term future. The negative impacts are limited (in terms of number and magnitude of impact) and are largely reversible. They can also be visually read as later interventions within the space which reflects best practice.

9.5 Other options for achieving the aims of the fire strategy were considered, this included undertaking a fire engineered solution which required multiple interventions to be completed throughout the building. The interventions to achieve an improved fire strategy and increased occupancy included:

- Lobby protection to all staircases which incorporates installation of partitioning and additional fire doors to create a lobby to each escape staircase on all floors.
- Alterations to the floor slab construction to achieve fire resistant compartment floors which provides fire separation between each floor.
- Sprinkler system and mechanical smoke extract ventilation system with the car park which would include external alterations to provide louvres to extract smoke.
- Alterations to fire alarm system to allow for phased evacuation (full replacement of fire detection system likely).

9.6 On the basis of the extent of interventions which was required for the alternative option to achieve the desired occupancy, it was decided that the protected fire escape route throughout the carpark was the best option to improve the building fire strategy and future proof the building. A conservation-led approach has therefore been followed with the small number of negative impacts associated with the scheme being minimised as far as possible. Mitigation is set out where necessary.

Indirect Impact on the Setting of St James Building

9.7 In terms of any indirect impacts on the setting of St James Building it is noted that all works are internal / within the undercroft space and are not associated with any impact on setting.

Impact on the setting of nearby listed buildings

9.8 As noted previously St James Building is located in part of the City Centre where there are numerous listed buildings as identified by the plan below.

Figure 9.1: Plan identifying listed buildings in the vicinity of the site (blue triangles).

9.9 With the proposed works being internal there is no impact on the setting on any nearby listed buildings. The only elements which could affect the setting of other listed buildings relate to the provision of fire shutters to the vehicular access to the service area from the north. Shutters already exist in these locations and where this element will have any intervisibility

with other listed buildings (such as 61 Oxford Street), the impact will be neutral with no harm to setting.

Impact on the character and appearance the Whitworth Street Conservation Area

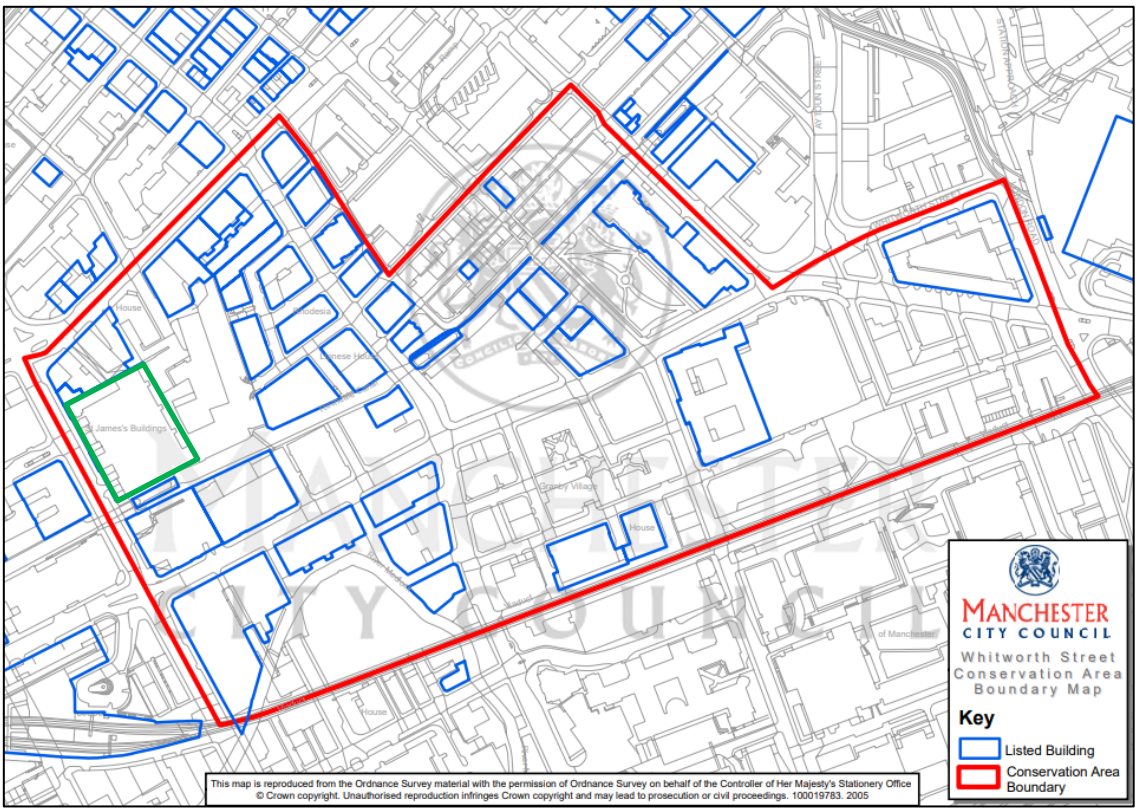


Figure 9.2: Plan identifying the site (outlined green) in relation to the boundary of the Whitworth Street Conservation Area.

9.10 For reasons previously discussed as the proposed works are internal there is no direct impact on the setting of the Whitworth Street Conservation Area. Crucially the scheme also improves the fire strategy for the building which will allow for an increased level of occupation within the building and thereby help to retain the building in active economic and viable use. On the basis of the above, the proposed development will indirectly have a positive impact on the character and appearance of the Whitworth Street Conservation Area.

Overview of Heritage Impact and Assessment against Planning Legislation and Policy

9.11 This Heritage Statement has concluded that the majority of the works will have no heritage impact and are appropriate within the context of the service area. A small number of the works relate to historic fabric although this is generally of low significance. Whilst the loss/impact is regrettable, through a conservation-led approach, such loss / impact has been minimised as far as possible, and achieves the improved fire strategy in the most sensitive heritage manner. Accordingly identified impacts have been minimised and as such it is demonstrated that the proposal is consistent with paragraph 195 of the NPPF which requires that harm to a heritage asset's conservation is minimised or avoided.

9.12 Paragraph 202 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'*. The impact on the heritage significance of the building has been minimised as far as possible and overall is judged to be of negligible-low impact. When weighed against the economic benefits that are associated with increased levels of occupation of the building (through an improved fire strategy) compliance with Paragraph 202 of the NPPF is demonstrated. Given the above it is therefore confirmed that the policy tests provided by Paragraph 195 and 202 are satisfied, whilst other relevant legislation, policy and guidance set out within Section 3 is also complied with.

10. Planning Statement

10.1 This section considers the relevant planning specific matters associated with the scheme, having regard to the relevant national and local planning context. The relevant specific planning policy context is set out, followed by a planning appraisal:

Planning Policy Context

10.2 Section 3 of this Statement has set out the relevant heritage planning policy context of relevance to the determination of the planning application. More general planning policy guidance of relevance to the proposed scheme is set out below:

National Planning Policy Framework (NPPF)

10.3 The NPPF sets out the Government's planning policies for England and is a material consideration in the determination of planning applications. A revised NPPF was published July 2018 and last updated September 2023. The document states that the purpose of the planning system is to contribute to the achievement of sustainable development. It seeks to achieve this objective by:

- Setting out that there is a need for the planning system to perform a number of roles, including an economic role, social role and environmental role. The economic objective relates to building a strong, responsive and competitive economy and ensuring that sufficient land of the right types is available in the right places. The social objective seeks to support strong, vibrant and healthy communities. The environmental objective seeks to protect and enhance the natural, built and historic environment and make effective use of land, and minimise waste and pollution (Paragraph 8).

- Requiring that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible (paragraph 47).

- Ensuring that planning decisions help create conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity (Paragraph 81).

- Ensuring that planning policies support the role that town centres play and taking a positive approach to their growth, management and adaption (Paragraph 86).

- Requiring that planning decisions promote effective use of land including giving substantial weight to the value of using suitable brownfield land within settlements for identified needs, and promoting and supporting the development of under-utilised land and buildings (Paragraph 120).

- Requiring that planning decisions should ensure that developments: will function well and add to the overall quality of the area, not just for the short-term but over the lifetime of the development; are visually attractive as a result of good architecture; are sympathetic to local character and history including the surrounding built environment; maintain a strong sense of place; and, create places that are safe, inclusive and accessible (Paragraph 130).

- Advising that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to the impacts that could arise from the development. In doing so amongst other things, they should mitigate and reduce to a minimum potential adverse impacts resulting from the noise from new development and avoid noise giving rise to significant adverse impact on health and quality of life (Paragraph 185)

The Development Plan for Manchester

10.4 The Development Plan for Manchester comprises the following documents:

- The Core Strategy Development Plan Document (July 2012);

- Saved policies of the Unitary Development Plan for Manchester (July 1995);
- Interactive Proposals Map;

The Core Strategy Development Plan Document (July 2012)

10.5 The Core Strategy, adopted in July 2012, is the key Development Plan Document against which proposals should be judged. Planning specific Core Strategy objectives and policies of particular relevance to the proposed scheme include:

- Policy SP 1 'Spatial Principles' which states that the Regional Centre will be the focus for economic and leisure activity; and, that development should enhance/protect the built/natural environment, reuse previously developed land wherever possible and improve access to jobs.

- Policy EC 1 'Employment and Economic Growth in Manchester' aims to improve access to jobs and continue the social, economic and environmental regeneration of the City, whilst seeking efficient use of buildings and minimising detrimental impacts on adjacent uses.

- Policy CC 1 'Primary Economic Development Focus' states that a range of uses, including leisure, will be encouraged in the City Centre, to support the development of a vibrant employment location attractive to businesses, employees and visitors to the City Centre.

- Policy C 1 'Centre Hierarchy' states that development of town centre uses will be prioritised in centres, taking account of the different roles of the City Centre.

- Policy T 2 'Accessible area of opportunity and need' seeks to ensure that new development is accessible by walking/cycling/public transport.

- Policy EN 1 'Design Principles and Strategic Character Areas' states that development in Manchester must follow the seven principles of urban design and should have regard to the strategic character area in which the development is located. With regards to

development in the City Centre developers will be expected to consider the City's heritage and continue the rich pattern of activity in the core area.

- Policy EN 19 'Waste' states that developers will be required to submit a waste management plan to demonstrate how the waste management needs of the end user will be met.

- Policy DM 1 'Development Management' sets out various issues that development should have regard to, including: appropriate siting, layout, scale, form, massing, materials and detail; impact on the surrounding areas; effects on amenity; accessibility; community safety and crime prevention; and refuse storage and collection.

Saved Policies of the Unitary Development Plan for Manchester (July 1995)

10.6 The Unitary Development Plan (UDP) was superseded by the Core Strategy. However, a number of UDP polices have been 'saved'. Extant polices contained within the UDP which are relevant to the proposed scheme include:

- Policy DC26 'Development and Noise' aims to minimise the adverse impact of noise on noise-sensitive developments.

Planning Appraisal

10.7 The application works are primarily within the internal undercroft of the building and therefore do not require planning permission. The only exception to this is the replacement / installation of 3 x roller shutter doors located at the rear of the building and partially visible from Dickson Street. The main planning matter associated with these shutter doors relates to the visual appearance / design. In this regard it is noted that roller shutters already exist in this location, which is not visually prominent and located at the rear of the building which has a service function. The new roller shutters will have shutter housing located internally, ensuring this is not a bulky or unattractive element on the elevations of the building. On this basis the proposed roller shutters are acceptable in design terms, aligning with relevant national and local planning policy.

10.8 Whilst the proposed scheme does not raise any direct planning implications it is highlighted that it will enable increased occupancy of the building. This will provide significant economic benefits in terms of increased employment within the building. By allowing for improved efficiency of the application floorspace it will enable expansion of existing businesses within the building, as well as providing opportunities for new businesses to locate to St James Building and within Manchester City Centre. This is an important planning benefit which should be given significant weight in the determination of the planning application.

10.9 As part of the proposed scheme there is some adjustment to car parking and servicing arrangements within the undercroft area. At present there are approximately 10 car parking spaces plus a loading bay. This will be reduced to 3 car parking spaces with a loading bay. Bruntwood have however confirmed that the building has extensive car parking capacity including at lower ground floor / basement levels to more than meet present and future demand. It is also noted that the site is in a highly sustainable and accessible location with excellent public transport connectivity. As confirmed the proposal will maintain a service bay within with the undercroft area ensuring no change in the service functions / operations of the building and therefore no impacts on the surrounding highway network.

10.10 The proposal will not affect existing cycle storage at St James Building. Whilst a bin store will be provided within the undercroft area (in order to comply fire regulations) there is no change to bin storage capacity which can readily be accommodated within the undercroft to St James Building with no implications for the wider highway network. In light of these characteristics it is not considered that this reduction in car parking would raise any highway safety concerns, and will therefore align with national and local planning policy.

10.11 The proposed scheme does not require the provision of any additional mechanical plant / ventilation equipment. Any changes to plant will simply relocate existing units to elsewhere within the enclosed undercroft area and will not have any acoustic implications.

10.12 In conclusion, this Planning Statement has demonstrated that the proposals are acceptable in terms of national and local planning policy. Significant economic benefits will be provided by facilitating increased occupation of the building and boosting employment in a highly

sustainable and accessible location in Manchester City Centre. The proposal is acceptable in terms of design and does not raise any implications for the highway network.

11. Conclusion

11.1 This Heritage Statement (including Planning Statement) has been prepared to consider the impact of a development proposal on the heritage significance of St James Building, a Grade II listed building, constructed as offices, a drafting department, and textile warehouse. It has also considered the potential impact on the setting of nearby listed buildings and impact on the Whitworth Street Conservation Area.

11.2 The report has established that the proposed development has been designed to be sensitive to the heritage significance of the building with a conservation-led approach adopted to minimise impact. The scheme seeks to improve the fire strategy of the building in a sensitive manner which will allow for increased occupation of the building helping to safeguard its long-term future. The proposal involves limited loss of historic fabric with most of the works being reversible. Visually the works are also considered appropriate within the context of the service area and can be seen as contemporary interventions.

11.3 On the basis of the above it has been demonstrated that the proposal accords with relevant legislation, provisions of the NPPF, the Development Plan for Manchester and other relevant guidance in terms of heritage impacts.

Appendix 1: Plates

Plate 1: View of west elevation of undercoft wall.

Plate 2: View of infilled loading bay area.

Plate 3: View of south end of undercroft area.

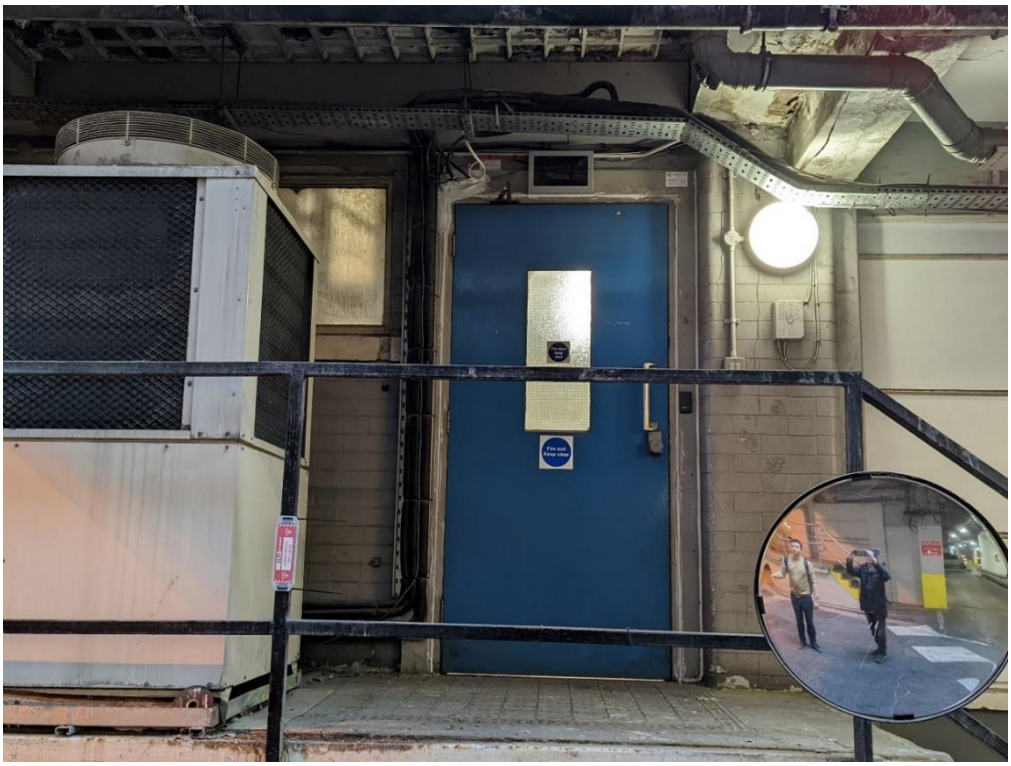


Plate 4: View of door on the south elevation of the undercroft area.

Plate 5: View of platform at the south end of the undercroft.

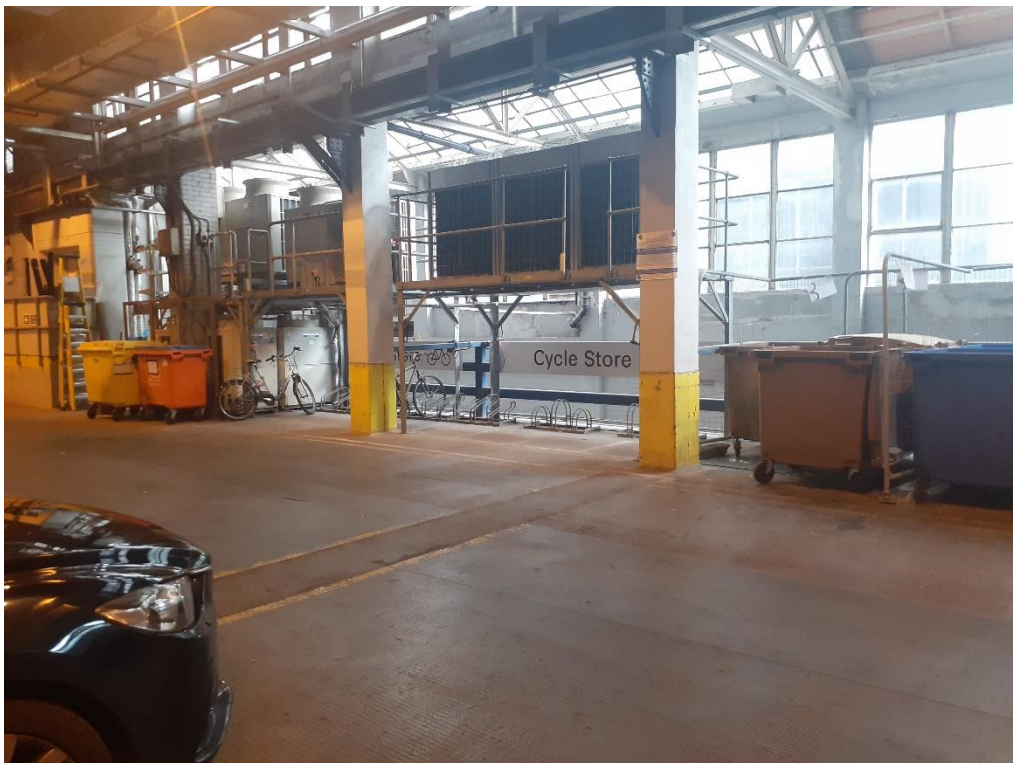


Plate 6: View of east side of undercroft area.

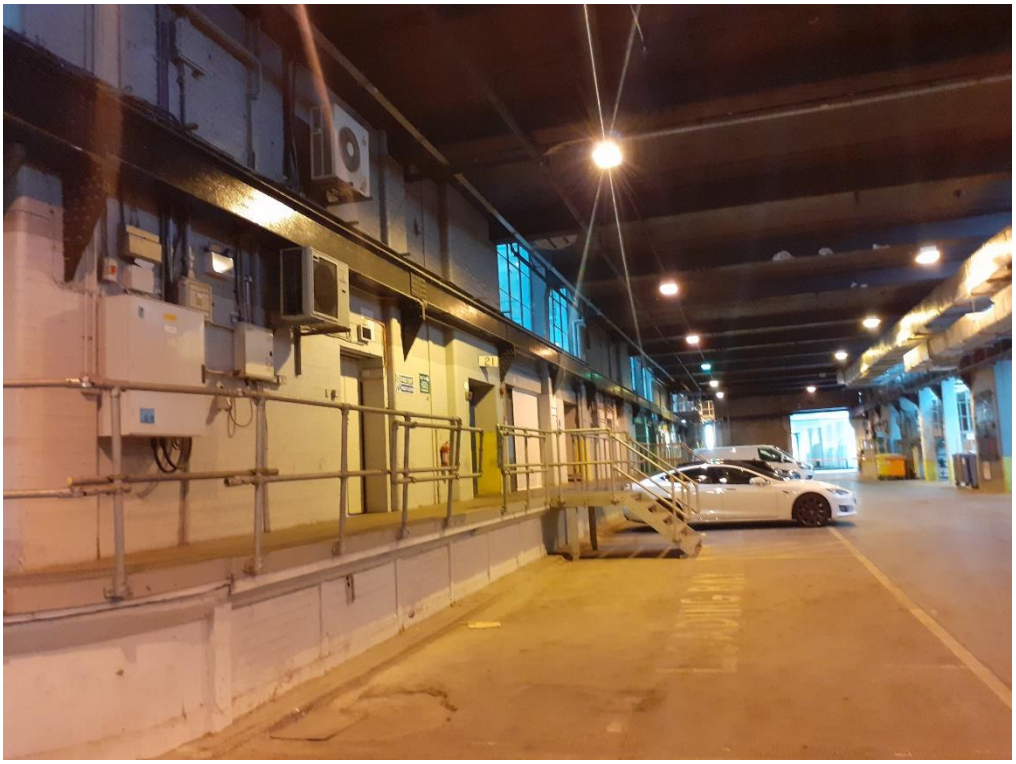


Plate 7: View looking north along the west elevation of the undercroft area.

Plate 8: Detail of platform at the south end of the undercroft area.

Plate 9: View of platform area looking north.

Plate 10: Detail of the area below the undercroft.

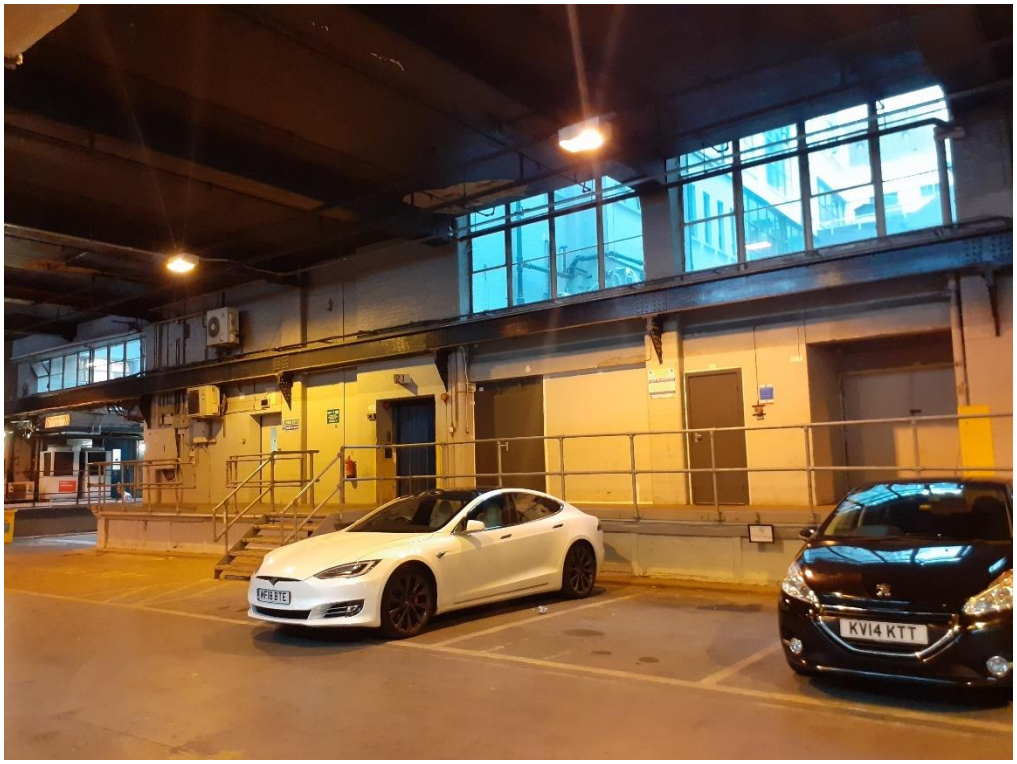


Plate 11: View of west elevation of undercroft wall.

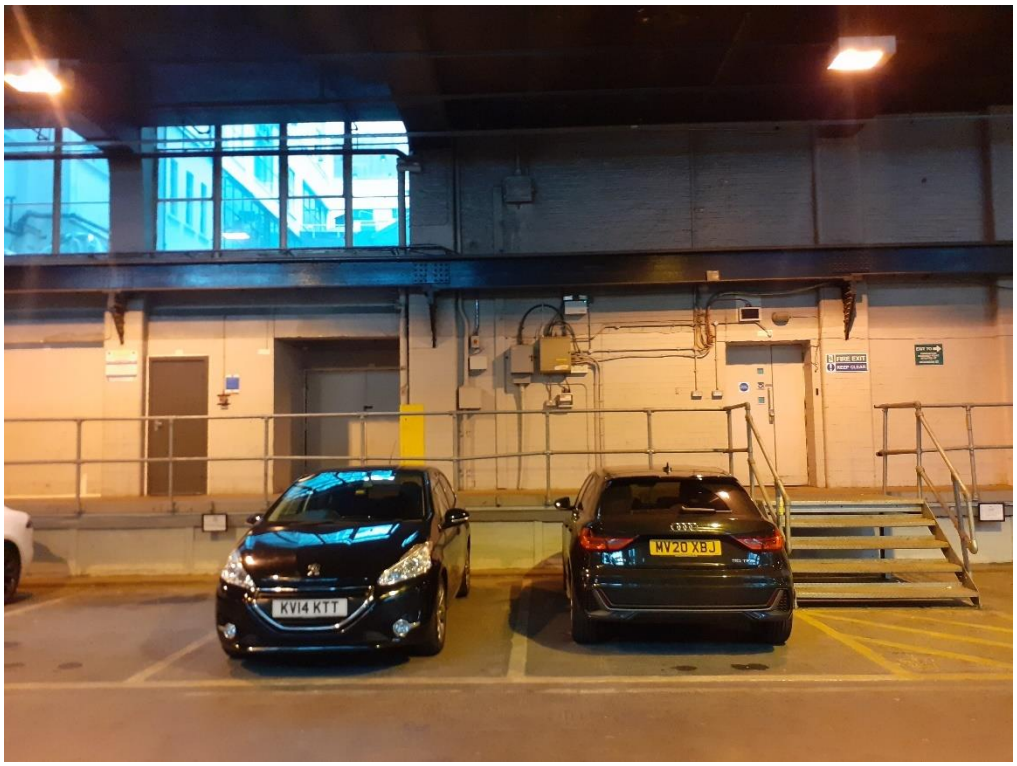


Plate 12: View of west elevation of undercroft wall.

Plate 13: View along west elevation of undercroft wall looking north.

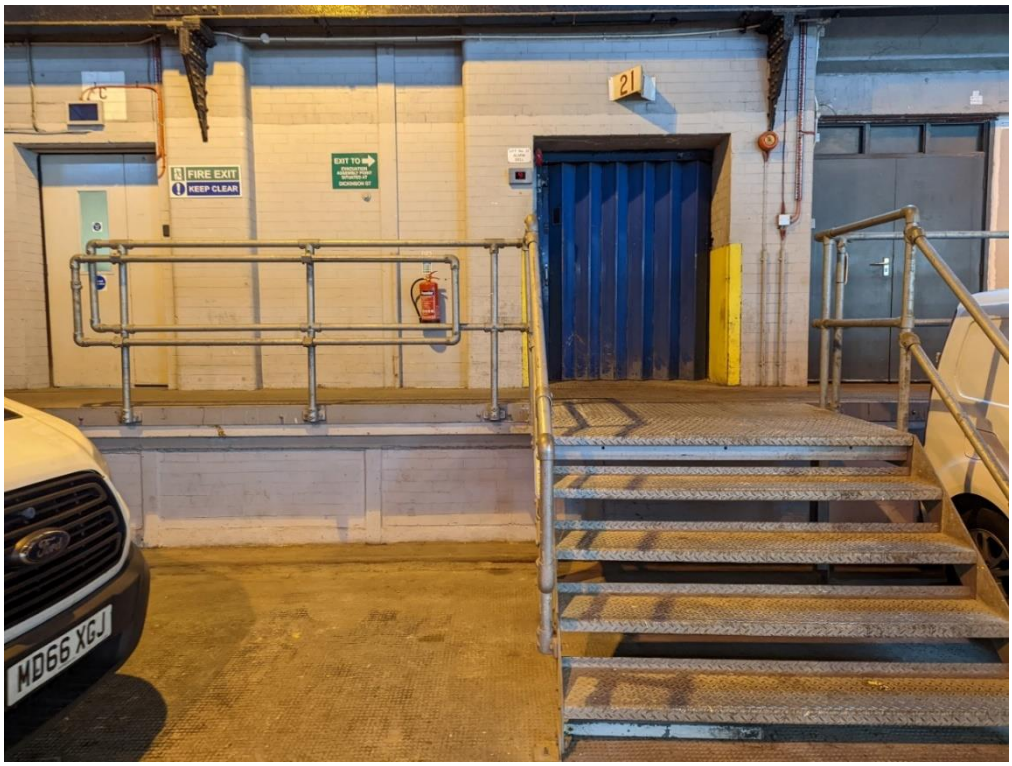


Plate 14: Detail of platform and stairs on the west side of the undercroft.

Plate 15: Details of stairs and platform on the south side of the undercroft.

Plate 16: Detail of RSJ on the west elevation of the undercroft.

Plate 17: Detail of the RSJ on the west elevation of the undercroft.

Plate 18: View of west elevation of undercroft wall.

Plate 19: View of bin storage and gantry at the north end of the undercroft area.

Plate 20: View towards toward the north elevation of the undercroft area showing the metal gates.

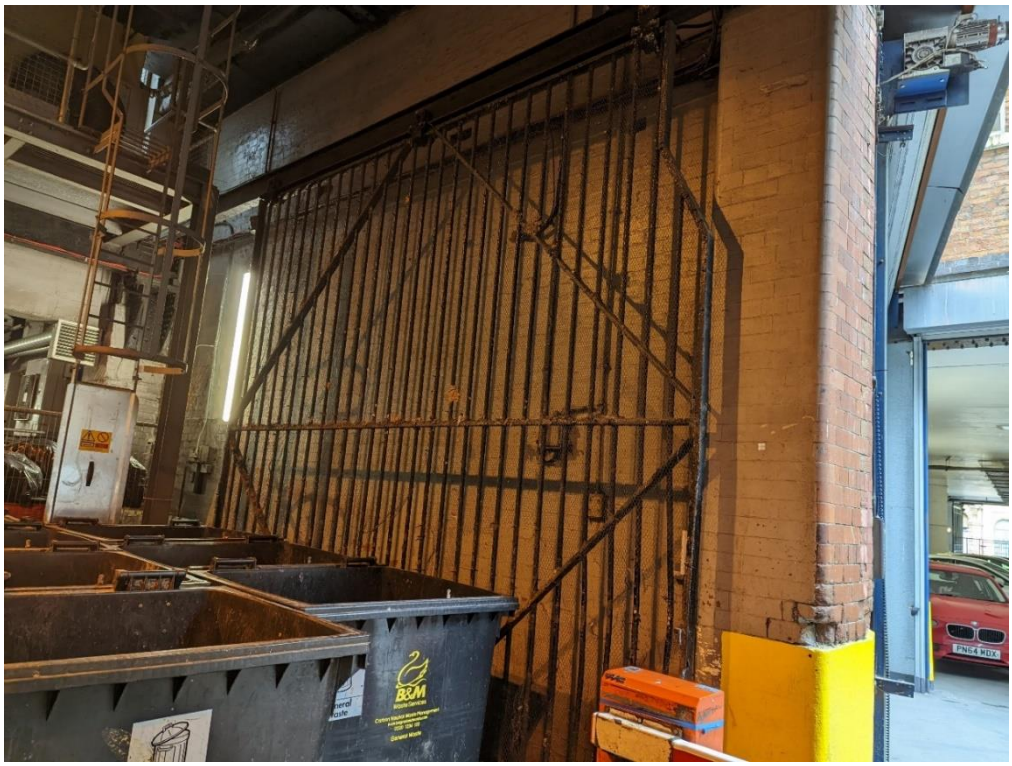


Plate 21: View of metal gates on the north elevation of the undercroft area.

Plate 21: View into the undercroft area looking south.

Appendix 2: Historical Plans

Figure 1: 1794 Green's map of Manchester and Salford

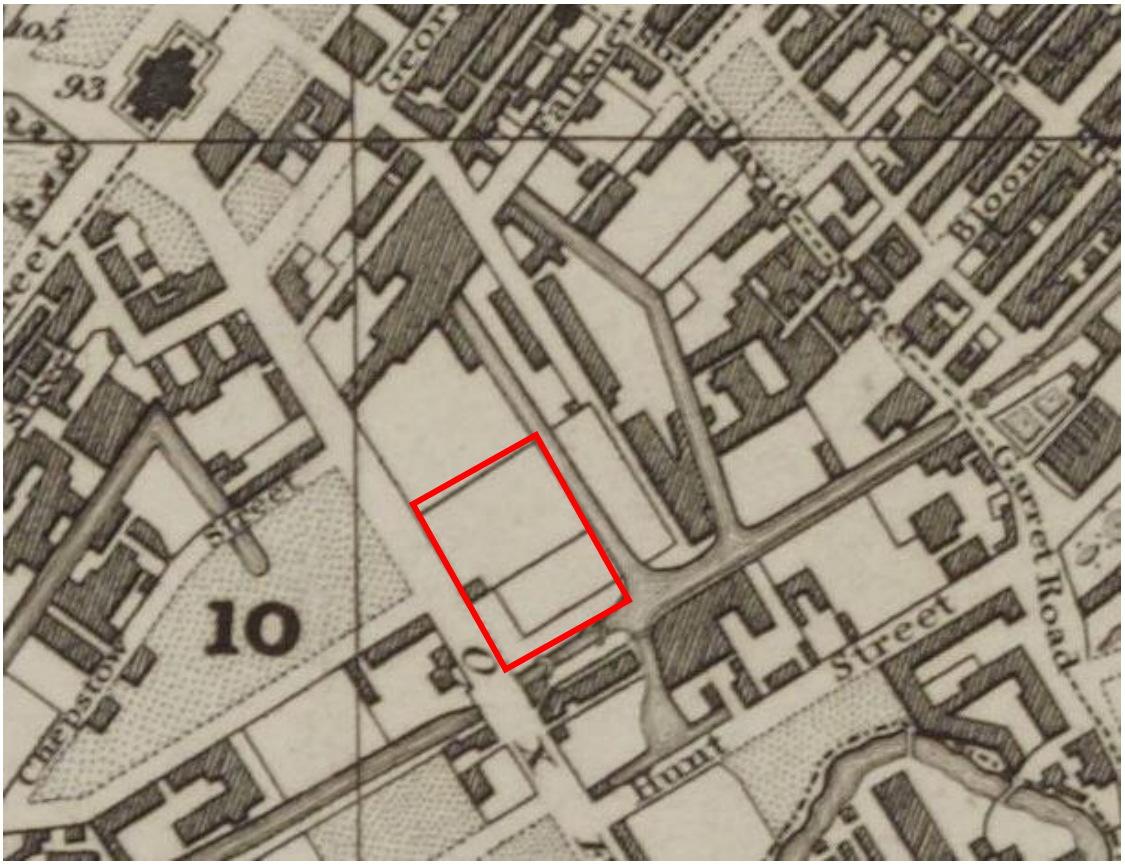


Figure 2: 1824 Swire's map of Manchester

Figure 3: 1850 OS 1:500 town plan

Figure 4: 1896 OS map Lancashire sheet CIV.10

Figure 5: 1908 OS map Lancashire sheet CIV.10

Figure 6: 1922 OS map Lancashire sheet CIV.10

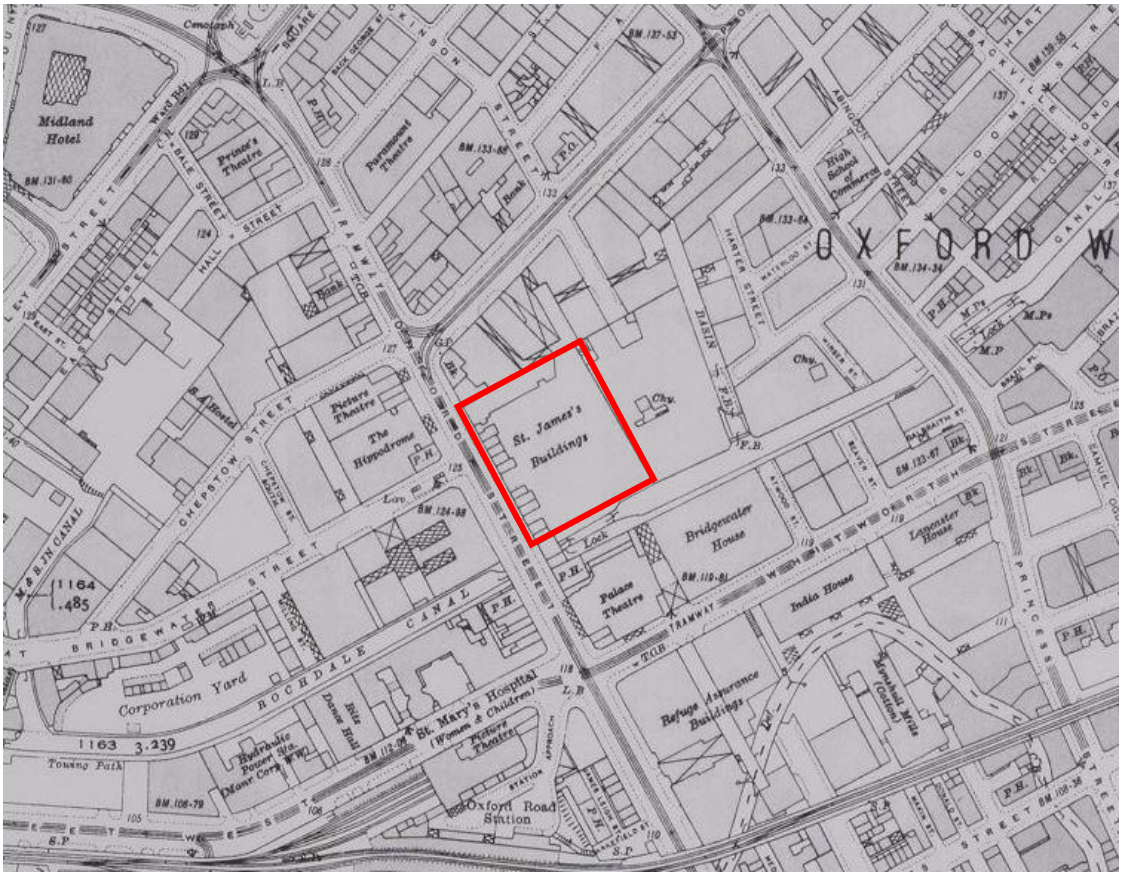


Figure 7: 1932 OS map Lancashire sheet CIV.10

Appendix 3: Response to Pre-application Comments

Project reference: 22-097: Bruntwood St James'

05/12/23

Response to Pre-application Comments

The following statement has been produced by AXI in conjunction with Bruntwood and DWLLP, in response to planning officer comments on the application for proposed "Alterations to undercroft service area and associated works to provide protected fire escape route" at St James Building, Oxford Street, Manchester, M1 6FQ.

Comments made by Manchester City council are set out in **bold** as follows, with our response below each:

1. **The proposed new protected corridor should be set under the current steelwork, <u>including the brackets</u> (see Plate 16, Heritage Statement). Please amend the proposed cross-section (drawing no. DW2329) as required. Please can it be confirmed whether it is strictly necessary for the proposed partition to be affixed to brick wall? Affixing to floor slab and modern fabric instead would minimise harm to the heritage asset.**

   Due to height constraints, whilst the new protected corridor can be set beneath the main steel beam, it cannot be set underneath the existing steel brackets. This ceiling height is based on existing openings into the corridor which need to be accommodated within the structure. It is worth noting that the lowest angled existing steel brackets are at a height below several of these door openings.

   To bring the corridor roof beneath the brackets would compromise the available head height within the corridor.

   Proposed details to show how the corridor roof can be constructed around the brackets are now included with the typical section on drawing 22-097 AXI 120.

   The proposed partitions would need to be fixed to the existing brickwork as the alternative would be to construct an entirely freestanding structure which would be set forward of the existing brick wall. This would necessitate the removal of the existing platform floor, but the chief concern would be that the brickwork would be entirely concealed. The planning comment below indicates objection to the existing brick being lined, which would need to be the case if no fixings would be allowed.

2. **The existing brick wall should not be lined – as illustrated on the typical cross section through corridor (drawing no. DW2329). This should be amended.**

   The typical cross section on drawing 22-097 AXI 120 has been updated. It is not proposed to line the existing brick wall with plasterboard.

   The 'lining' of the wall originally shown was not a plasterboard lining, but a timber boxing in of existing services (largely electrical), which would be in specific locations where it would be impractical to relocate these services. Lockable cupboards would be formed to restrict access to maintenance personnel only. Locations of the boxing in and an isolated detail are now included on drawing 22-097 AXI 144

3. **Please can you confirm whether the proposed partition to the existing lift shaft is essential to comply with the current fire regulations?**

   This is indeed the case. The partition is required so that the lift shaft is separated and does not enable fire to spread through the building, between floors, and into the protected corridor.

4. **Please confirm the location and impact of the works to conceal the existing windows (cross-reference the impact assessment to plans and photographs) and please can you also confirm whether these proposed works are essential to meet the current fire regulations? Harm should be avoided/minimised and supported by clear and convincing justification to outline and explain why it is considered to be strictly necessary.**

   No works are intended to the existing windows which terminate above the proposed corridor, as shown in drawing 22-097 AXI 140.

   One window is proposed to be boarded over to ensure 60 minutes fire compartmentation to the corridor where existing A/C units are to be removed as shown below. The window itself is to be retained in situ.

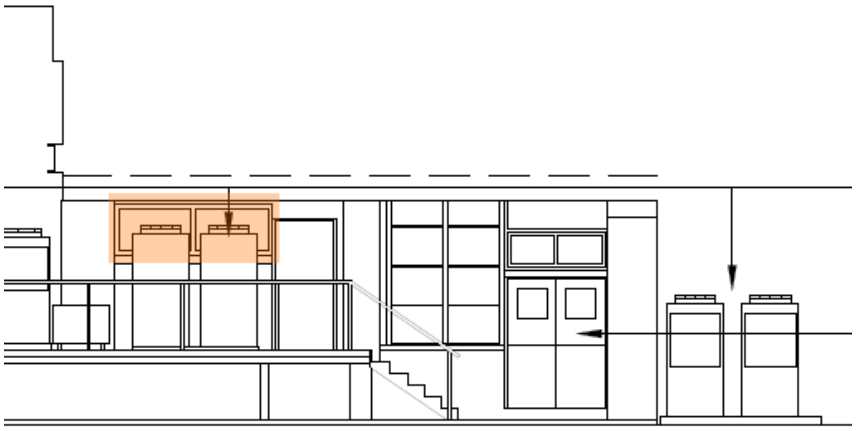


Figure 1: Location of existing window to be boarded over (existing elevation)

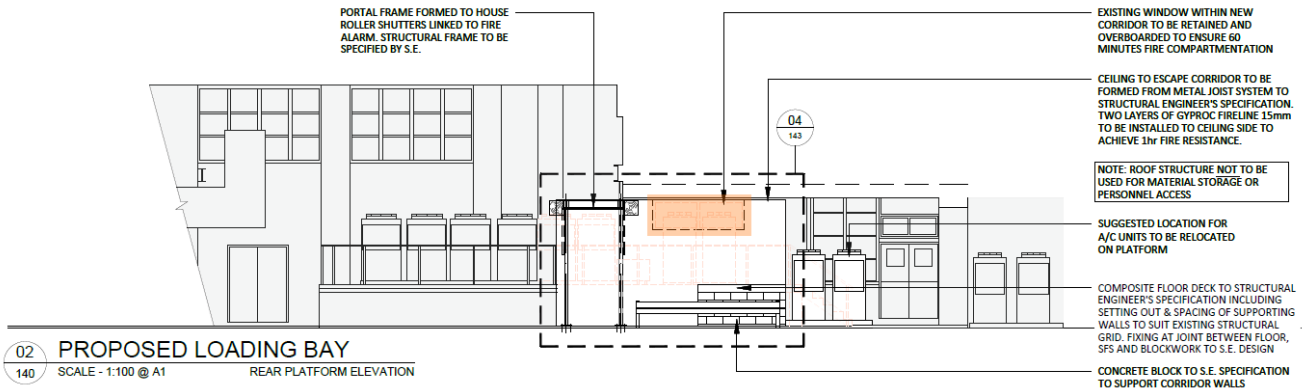


Figure 2: Location of existing window to be boarded over (proposed elevation)

Figure 3: Location of existing windows behind A/C units

5. **In the first instance, the new bin store should be separate from the cast iron gates to be retained – these should be located outside of the proposed bin store. As discussed by Paula on site, we recommend that the proposed bin store is free standing and limited in height – not full height and affixed to the external walls and columns as proposed.**

   The bin store has been redesigned in order to accommodate the existing cast iron gates and to be set at a lower height. A new partition wall is proposed in front of the gates and the structure is to be freestanding. Please refer to drawing 22-097 AXI 142 for details.

6. **The proposed external shutters should be internal (with the shutter mechanism concealed from the street scene) and set below the existing steelwork. Please submit a cross-section to confirm that this will be the case. It is also recommended that these are finished in matt black or other muted/neutral colour, in order to minimise adverse external impact and improve the current situation.**

   External shutters are proposed to be internal except where the existing shutter to Opening B is set within the existing opening. Finish is to be in a stainless steel grey colour as per the existing shutters.
   Please refer to drawing 22-097 AXI 141 for details

7. **Please submit evidence on whether the proposed internal shutter in the AC area is essential. It should be omitted if not required, to avoid/minimise harm. If supported by clear and convincing justification, please confirm the exact position and how this would work with the proposed partitions, existing walls and existing steelwork? The proposed cross-section through shuttered corridor (drawing no.DW2329), does not appear to show the exact position of the shutter in the context of existing and proposed structure/features. A complete cross-section and a more detailed elevation drawing should be provided as part of the forthcoming application.**

   The proposed shutter between the two stairwells, adjacent to the existing lightwell, is required to allow for a safe fire protected escape route to be formed across this area.

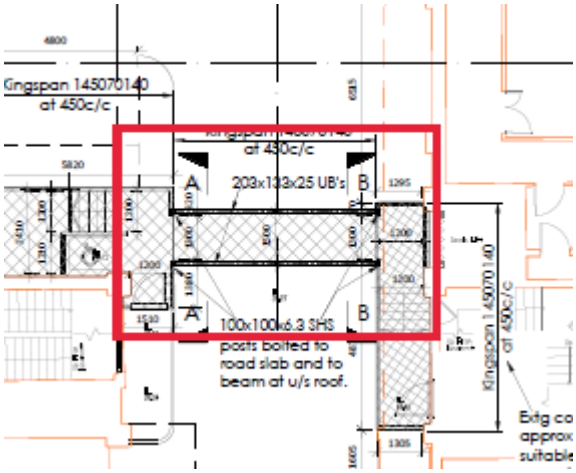
This safe egress route was identified by Hilson Moran in their role as fire consultants. If it is not employed the stair marked Stair 4 needs to be omitted from the building's fire strategy, which will severely reduce the permitted occupancy, functionality, and as a consequence, long term feasibility of the building.

Additional sectional details and elevations have been provided in drawing 22-097 AXI 143, as well as the updated drawings by DWLLP.

The proposed shuttered section of corridor will sit forward of the existing lightwell, which will not be affected by these works.

The structure is effectively to be formed as a goalpost frame with main steel columns concealed within the new corridor walls which will adjoin the shutter framework. For lateral stability this framework will need to be extended to connect to the existing beam via a clamped connection which would enable removal in the future if/when required.

8. Please confirm whether a raised platform is proposed in this area – see below (elevation vs. floorplan).



No, a raised platform is not proposed in the area indicated.

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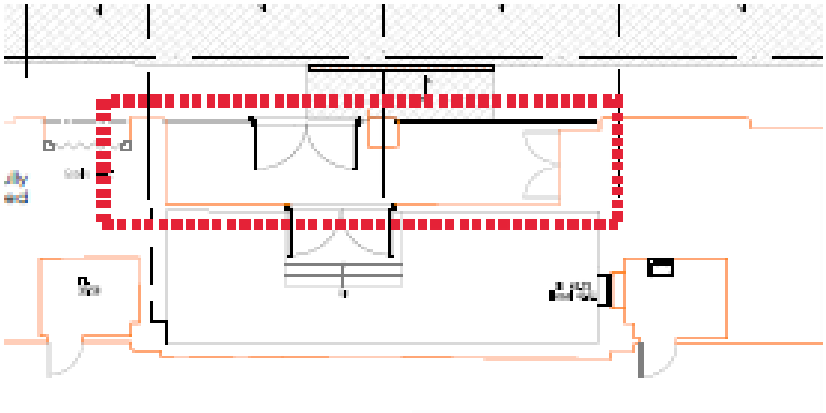
9. please submit further details on the partition as outlined below and confirm whether this is essential



A partition is required to separate the corridor from the area indicated to provide protection for external fire spread and maintain the enclosed fire rated escape route. Existing exposed timber surfaces represent a risk of surface spread of flame and their structural integrity cannot be guaranteed in the event of an emergency requiring use of the proposed corridor as an escape route.

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