



Urban Design and Conservation Consultation Response

Address:	200-204 Deansgate, Manchester, M3 3NN
Application Ref.:	136698/LO/2023 and 136701/LO/2023
Proposal:	Building Consent Installation of roof-top plant equipment and associated ducting. Listed Building Consent for elevational alterations including new shop front, replacement louvres and installation of awnings and erection of 2 x internally illuminated projecting signs and 1 x externally illuminated fascia sign
Case officer:	Max Gibson
Consultee:	Paula Burbicka
Site Visit:	10 th July 2023
Date:	19 th July 2023

1. Introduction

The building is a Grade II listed asset, known as Royal London House, located in located within Deansgate Conservation Area and in the setting of a number of Grade II and Grade II* listed building, including the landmark Sunlight House and the Deansgate Goods Station.

It was constructed c.1904 as insurance offices by Charles Heathcote in Free Baroque style and retains a strong presence in the streetscene – located at the junction of two busy historic routes in the city centre. The GF of the building has been altered, with modern shopfronts and fascias (not part of the original design), but retains the original structural frame (pillars, cornice and architrave).

2. Policy Context

2.1. National Planning Policy Framework (NPPF) (2021)

Para 136 - The quality and character of places can suffer when advertisements are poorly sited and designed.

Para 189 - Heritage assets should be conserved in a manner appropriate to their significance.

Para 194 - Local planning authorities should require an applicant to describe the significance of any heritage assets affected. The level of detail should be sufficient to understand the potential impact of the proposal on their significance.

Para 195 - LPAs should ensure that any conflict between the heritage asset's conservation and any aspect of the proposal is avoided or minimised.

Para 197 - In determining applications, LPA's should take account of, the desirability of sustaining and enhancing the significance of heritage assets.

Para 199 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

Para 200 - Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

Para 202 - Proposals of less than substantial harm to the significance of a designated heritage asset should be assessed against the wider public benefits of the proposal.

Para 206 - Local planning authorities should look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance.

2.2. Manchester City Core Strategy

Policy CC9 – Design and Heritage

Policy EN3 – Heritage

3. Discussion

3.1. M&E services

3.1.1. Kitchen Extract

The information submitted to date does not present sufficient detail to understand the exact impact of the installation of the M&E services on the building's appearance and significance. The options and development proposals as presented on the proposed plans, elevations and supporting documents have not been considered in the heritage statement, which is considered inadequate for the purposes of this application.

The heritage statement refers to new equipment (i.e. condensing units) that has otherwise not been illustrated on the proposed plans/elevations. The document does not recognise the harm that would inevitably be caused to the Grade II listed building through interventions to and loss of original fabric, as identified in the kitchen extract appraisal report.

Drawing no. 22329/002 does not correspond with other documents, and it is unclear whether it represent the proposed works. Please update/revise as required.

The works associated with Option 3 include works to install additional louvres and reuse/replace existing louvres to the west (Little Quay Street) elevation, which do not appear to benefit from LBC/PP that would be required for these works. No other improvements are proposed to the external envelope of the listed building in this location. As such, the works would be harmful and would not deliver public benefits to the heritage significance and appearance of the listed building and the local streetscene. In consequence, the proposed works are not considered acceptable on heritage and urban design grounds, exacerbating the adverse impact of the M&E services and associated installation to Little Quay Street.

The proposed louvre and flue to the roof proposed as part of Option 2 and as

presented on drawing no. J304-GLD-00-DR-M-5700-02, are not acceptable. As the new min.1m2 louvre would be located on the prominent side of the existing tower and the new flue would tower over the existing roofscape, these interventions would be prominent additions to the listed building and the local streetscene. These incongruous new interventions would also cause harm to the listed building through the removal of original fabric internally and externally. In consequence, the perceived harm to the listed building associated with the delivery of Option 2 would be considerable, with no evidence to show that the harm has been avoided or minimised, failing to show that great weight has been given to the conservation of the Grade II listed building and thus failing to comply with paragraph 199 of the NPPF.

The proposed M&E provisions for Options 2 and 3 appear excessive, with no clear and convincing justification for the installations (location, size and amount) proposed, and are not supported on heritage and urban design grounds.

In principle, the location of the new ductwork and cowl within the allocated tenant plant as presented on drawing no. CEG/ROOF/001A would be supported. However, more information is required to understand the exact impact of the required internal penetrations, as presented on drawing no 22329/002 and 03(07) – i.e. detailed internal elevations/cross-sections and photographs of the kitchen and plantroom. Please also confirm whether all penetrations have been considered/included on the relevant drawings – see drawing no. 03(09) and 22329/002 showing additional pipework routing through assumed original/historic wall.

Otherwise, further information on the impact, appearance and interventions proposed to original/historic fabric to accommodate the M&E services as presented on drawings no. 22329/001- 22329/004 would be required as part of the LBC, particularly kitchen extraction & ventilation. The number of louvres proposed/retained must be the minimum required to secure the reuse. Further information is required to evidenced that being the case. New louvres in new locations would not be supported.

More information on the additional roof plant equipment and installations not illustrated on drawing no. J304-GLD-00-DR-EM-6100-01 but mentioned in the heritage statement would need to be submitted as part of the LBC or as a condition.

Limited information has been submitted to confirm the scope of works required to accommodate new drainage (see drawings no. 22329/001 & 22329/002), with no information on routing, internal appearance/manifestation and impact on original/historic fabric. Further information would be required.

The proposed 120mm dia core drill holes in existing slab for service penetrations are of concern on heritage grounds (see drawing no. 03(07)). The impact of these works would need to be better understood, with presumption against new penetrations into original ornate fabric, especially where original ceilings and/or floor finishes survive. Please submit further information and revise as required.

3.2. External Works

The proposal should reinstate the glazing to the top of the existing shopfront (fanlights), to match other units within the Grade II listed premises (i.e. 198 Deansgate), and to take opportunities to improve the appearance and architectural interest of the listed building and the conservation area. As such, the proposal to overboard the existing 'fascias' and install new external fascia signage is not supported. New signage should be accommodated internally, i.e. in the form of hanging signage, hand painted signage to glazing or discrete internal vinyls. Please revise as required.

The proposed projecting signage as presented on drawing no. 03(15) is not acceptable on heritage and urban design grounds. The depth of the projecting signage is excessive (150mm). New projecting signage should be limited to max.30mm. New signage should be non-illuminated or externally illuminated (i.e. discrete LED through light). The location should be revised to match existing, to enable the existing fixings/fixtures to be reused and to avoid additional damage to original fabric. A hanging style signage would be recommended, most appropriate in the context of listed building and conservation areas.

No new additional signage (i.e. menu box – as proposed) should be installed to the original stone, to avoid damage to the original fabric.

The proposed awnings, neither traditional or sympathetic in design to the architectural style and appearance of the listed building, and considered incongruous in the wider townscape context of the premises, are not acceptable on heritage and urban design grounds. Please omit/revise as required.

I would seek further information on the proposed new shopfront to Deansgate (i.e. materials, RAL finish and detail). I advise timber or slim-line aluminium with a single pane shopfront window to match is installed.

The elevations alterations proposed for the Little Quay Street (see drawing no. 03(22) do not match the proposals submitted as part of 136698/LO/2023. The works as presented on drawing no. 03(22) are not supported. The existing louvres should be removed, with new M&E extracts/inlets routed onto the plant space to roof. Any retention should be minimal required to secure reuse of the premises, and evidenced as such. Where redundant louvres are to be removed to windows, the openings should be reglazed to match. The replacement of existing glazing and louvered panels to windows with solid timber panels or similar, as proposed and which would fail to preserve or enhance the Grade II listed building and the conservation area, is not supported. The use of vinyls to block out existing windows, as proposed, would also not be acceptable. Please amend as required.

Please confirm whether other external installations (i.e. intruder alarm, CCTV, lighting) will be proposed to the exterior of the Grade II listed building. Further information on location and method of affixing would be required.

3.3. Internal Works



The information submitted to date is insufficient to understand the *exact* impact of the proposal on the special significance of the interior of the Grade II listed building.

The starting point of an application for the internal works to the Grade II listed building should be a comprehensive assessment of its interior and the survival and condition of any historic/original fabric, features and finishes. Any new scheme for the listed building must be conservation-led and informed by its special architectural and historic interest, as derived from the original/historic fabric.

In consequence, the detailed new fit-out and finishes (i.e. floor finishes as per drawing no.03(12)) cannot be agreed prior to that information being made available to the LPA (i.e. through a strip-out).

Albeit the intention to preserve and retain original and historic fabric is commended, based on the limited information submitted to date there are concerns about the proposed works to the interior of the Grade II listed building.

The proposed bar would conflict with the existing cast iron column. No detail to show how this would be resolved has been submitted to date (see drawing no. 03(17)). In consequence, the bar should be relocated or redesigned, to avoid building onto the original column.

I have concerns regarding the location and layout of the proposed toilets. In the first instance, I would query whether the existing toilet on the ground floor could not be reused, with the new toilets to basement accommodated to the north-west of the premises, where drainage and associated M&E services could be stacked and minimised. The current layout would clash with one of the columns; this is not acceptable. Please amend as required.

The proposed new service area in the basement would also clash with original column. Please revise layout as required. Works to the assumed box-out column/riser located next to the proposed service area to the basement should also be confirmed as part of the LBC.

Albeit the supporting statement is clear in that suspended ceilings would be removed across the building, which is supported, the detail as presented on drawings no.03(19), no.03(20), no.03(21), 03(09), 03(10) and 03(13) shows new suspended ceilings across the Grade II listed building. Original ceilings should be exposed throughout the listed premises, with the exception of the toilets & kitchen. The scheme should be amended as required. Additional details (i.e. depth, method of affixing, junction detail) should be submitted as part of the LBC or conditioned.

Otherwise, there is a general concern about the impact of the proposed subdivisions on the original/historic walls and ceilings, in particular consideration of the glazed bricks to basement and the ornate ceilings to ground floor, with no fixing details or junction detail submitted to date. Further information to show how original/historic fabric would be protected would need to be submitted as part of the LBC or as a condition.



I would seek further information on the proposed lobby, as presented on drawing no.03(20), and why this is required. A suspended ceiling in this location would not be supported, with the new installations to ceilings causing harm to the architectural and historic interest of the Grade II listed building. It is also unclear how the new screen would relate to existing cornice and whether it would impact on other historic features (i.e. radiator). Please revise/submit further information as required.

The proposal includes demolition of original wall to the basement (drawing no.03(08) and the demolition of original/historic wall and removal of a door on the GF (drawing no. 03(07)). These works are not supported. Original fabric should be retained in-situ, with new layouts adapted accordingly.

The principle of the new staircase and the reinstatement of the floorplate is acceptable in principle, however more information would be required in regard to proposed construction, finishes and associated installations (i.e. balustrade), which can be conditioned.

I would also seek further information on the proposed works to plant roof – i.e. impact and scope of the proposed demolition, the installation of the M&E services, works to ceilings/floors and floors.

On the ground floor, the proposal to plasterboard/clad original brick walls and repaint the original/historic walls with plastic/acrylic paintwork (i.e. DULUX trade) as per drawing no. 03(11) and 03(13) would not be supported. Should hygienic cladding be required in toilets/kitchen, it should be the minimum required and not extend full-height. I would seek further information on the proposed works/finishes to the DDA toilet and the plant room.

In the basement, the proposal to plasterboard, re-paint, re-tile and re-clad the original glazed brick walls to the basement, as per drawing no. 03(12) (WF-11, WF-12 and WF-30), is not supported. The original walls should be exposed and repaired as required. I would also seek confirmation on the proposed wall finishes in the walk-in chiller, not submitted on drawing no.03(12).

The proposed floor finishes cannot be agreed prior to confirmation whether original/historic finishes remain in-situ. Where these survive (i.e. timber floorboards, clay tiles) the presumption would be for these to be retained and exposed.

More generally, the supporting documents on proposed works to original/historic fabric does not include sufficient provisions to retain, repair and reinstate original/historic fabric, with insufficient detail on the surviving original/historic fabric (i.e. radiators, tiles, timber floorboards, timber panelling, timber skirtings) and the proposed works to these items, as well as the materials and methods proposed. The information submitted to date does not evidence that the proposed works would give great weight to the conservation of the special significance of the Grade II listed building in all aspects of the scheme and take opportunities to preserve and enhance original/historic fabric and finishes.

The works to remove modern fabric and intrusive modern paintwork to reveal the

cast iron columns, cornices, glazed brickwork and original ceilings is supported in principle.

The proposal to remove original/historic plasterwork to reveal underlying brickwork on the GF (see drawing no. 03(13)) are not supported. Any areas of original/historic plaster must be retained, with damaged/missing areas repaired/reinstated on like-for-like basis.

Otherwise, where historic/original features and finishes (i.e. floors) are revealed behind modern fabric and not in good condition, the presumption will be for these to be retained and repaired/reinstated as required. For example, timber panelling that survives in-situ to the north external wall should be retained and exposed; it should not be replaced with new full-height panelling as per drawing no. 03(13) and 03(11) unless evidenced to be modern or beyond feasible repair.

I would seek further information on the proposed works to existing skylights in the abasement, which would require further consideration. Further information on the fitted booths and seating, and whether these will be affixed to original/historic walls/floor, and on the proposed curtains and rails to shop windows (i.e. method of affixing, permeability/visibility) would also be required.

4. Position

Amendments, further information and safeguards as outlined in this advice are required to consider the application acceptable on heritage grounds and meet the requirements of paragraphs 189, 199, 200 and 206 of the NPPF, Policies CC9 and EN3 of the Core Strategy and Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

In general, there should be more weight given to the original/historic fabric on the interior of the Grade II listed building, with a presumption of retention and repair/reinstatement as required. Opportunities to improve the external appearance and the architectural interest of the building and its contribution to the character and streetscene of the conservation area would also be required – i.e. removal of louvres and reinstatement of the glazed fanlights.

Paula Burbicka

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