

Heritage Statement

Ducie Street Warehouse, Manchester

November 2023

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Client
Native Places Ltd

Our reference
GONM3000

Nov 2023

1. Introduction

- 1.1 This Heritage Statement has been prepared by Turley Heritage on behalf of Native Places Ltd ('the Client') in relation to a S73 planning application, an application for a Non-Material Amendment and an application for listed building consent for minor internal alterations to reconfigure 28no. of the existing apartments to increase the number of apartments from 166no. to 194no. (the 'Proposed Works') at 'Ducie Street Warehouse', Ducie Street, Manchester (the 'Site').

- 1.2 The detailed descriptions of development are as follows:

Planning variation of condition application:

"Variation of condition no. 2 attached to planning permission ref. 115366/FO/2017 in order to substitute the schedule of approved drawings and facilitate a re-configuration of 28 no. units."

Planning non-material amendment application:

"Non-material amendment to planning permission ref. 115366/FO/2017 in order to change terminology within the description of development from 'units' to 'bedrooms'"

Listed Building Consent application:

"Reconfiguration of 28 no. units including installation of partitions, doors, bathroom and kitchenette facilities"

- 1.3 Ducie Street Warehouse, formerly known as London Warehouse, was constructed in 1867 by the Manchester Sheffield and Lincolnshire Railway. It was primarily intended for bonded goods and was converted to an apart-hotel in 1998. It is located on Ducie Street in Manchester City Centre, close to Piccadilly station.

- 1.4 The National Planning Policy Framework (NPPF) provides the Government's national planning policy on the conservation of the historic environment. In respect of information requirements for applications, it sets out 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"¹.

- 1.5 To fulfil this requirement, Section 2 of this Statement provides an assessment of significance of Ducie Street Warehouse; proportionate to both the importance of the asset and the likely impacts. This assessment is undertaken on the basis of published information, archival research and an on-site visual survey (undertaken 3 October 2023).

- 1.6 Section 3 provides an assessment of the impact of the Proposed Works on the significance of Ducie Street Warehouse, in light of the statutory duties of the Planning

¹ DLHC (2023) National Planning Policy Framework (NPPF), Paragraph 194

(Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF, and local planning policy for the historic environment.

2. Assessment of Significance

Introduction

- 2.1 The NPPF defines the significance of a heritage asset as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”²

Figure 2.1: Ducie Street Warehouse from Ducie Street, south-west elevation



- 2.2 Ducie Street Warehouse (**Figure 2.1**) was listed at Grade II on 3rd October 1974. Listed buildings are defined as buildings or structures of special architectural and historic interest. The list description for Ducie Street Warehouse states:

“Railway warehouse. 1867, for Manchester, Sheffield and Lincolnshire Railway. Brown brick with stone dressings, roof concealed. Large square plan. Seven storeys and 9 bays, the bays slightly recessed between pilasters, with long-and-short quoins to the corners, stone cornice, and parapet with 4 gables; coupled segmental waggon arches in the 2nd and 3rd, and 6th and 7th bays; small segmental-headed windows with raised sills and small-pane glazing; fire-escape in front of windows of 8th bay. Ten-bay side walls, the south side with 3 pairs of former waggon arches (formerly covered by single-storey sheds and all now blocked); 3 pairs of similar arches in rear wall; fenestration in all these walls matching that of the front. Interior: massive cast-iron columns supporting

² DLHC (2023) National Planning Policy Framework (NPPF), Annex 2: Glossary

large rivetted wrought-iron girders and cast-iron floor joists. Very prominent feature of Rochdale Canal basin site”.³

Site History and Development

- 2.3 Piccadilly Station was built in 1865 by the Manchester Sheffield and Lincolnshire Railway (MSLR) and the Manchester and Birmingham Railway Company (MBRC) and replaced the former London Road Station. The MSLR erected a new goods station complex to the west of the station, comprising four warehouses. The London Warehouse is the only surviving of these. Historic maps and sources⁴ suggest that part of the Ashton Canal terminus was filled in for the construction of the yard, and that the route of Ducie Street was altered (**Figure 2.2**).

Figure 2.2: 1850 Joseph Adshead Map of Manchester. Site is circled in red



- 2.4 The Goad map at **Figure 2.3** dates to 1889 and shows the four warehouses which make up the goods yard. The Site, identified as ‘Ducie Street Warehouse’, and its glazed linear rooflights are legible. Railway access was from the northeast side⁵ where railway sidings are visible extending along the eastern face of the building and connecting to

³ Historic England List Entry, London Warehouse: <https://www.historicengland.org.uk/listing/the-list/list-entry/1217858>

⁴ McNeil, R (2000) A Guide to the Industrial Archaeology of Greater Manchester

⁵ Hartwell, C (2002) Pevsner Architectural Guides, Manchester

Piccadilly Station, to the south east. A contiguous 'Goods Shed' extends from the south-east elevation of the 'Ducie Street Warehouse and in **Figures 2.4** and **2.5** this building is visible as a single storey structure with a saw-tooth roof. It is therefore clear that the ground floor of the south-east facing elevation was not originally exposed.

- 2.5 Excavations by Matrix Archaeology on the south side of the building in 2008-9 revealed foundations for a wagon turntable (circa 1860) near the former railway sidings and above a vault over the warehouse's basement. Road access was from the south west side, where a linear courtyard was formed by the other warehouses within the goods yard. **Figure 2.4** shows this yard, and the Goods Shed attached to the south east face of Ducie Street Warehouse.
- 2.6 The goods yard remained in use through the early 20th century. The map at **Figure 2.5** shows the layout of the site during the 1920's, little change is evident when compared with the late 19th century. The aerial image at **Figure 2.5** dates to 1937 and shows the goods shed at the south-east of Ducie Street Warehouse is still in place.
- 2.7 The Store Street Warehouse was demolished during the 1960's. The image at **Figure 2.6** shows the Store Street Warehouse under demolition, and the east elevation of Ducie Street Warehouse beyond it.
- 2.8 The contiguous 'goods shed' was also demolished at this time, leaving the ground floor eastern elevation of Ducie Street Warehouse exposed. The map at **Figure 2.7** is dated 1978-85 and shows the site after demolition of all the warehouses except the London Warehouse (then identified as 'Goods Shed'). It is unknown when the use of Ducie Street Warehouse as a warehouse ceased however it was abandoned and disused for much of the latter part of the 20th century. Images at **Figures 2.9-2.10** show the building whilst disused; the iron columns and roof trusses are visible in the vast internal spaces.

Figure 2.3: 1896 Goad map of Manchester, Site is circled in red

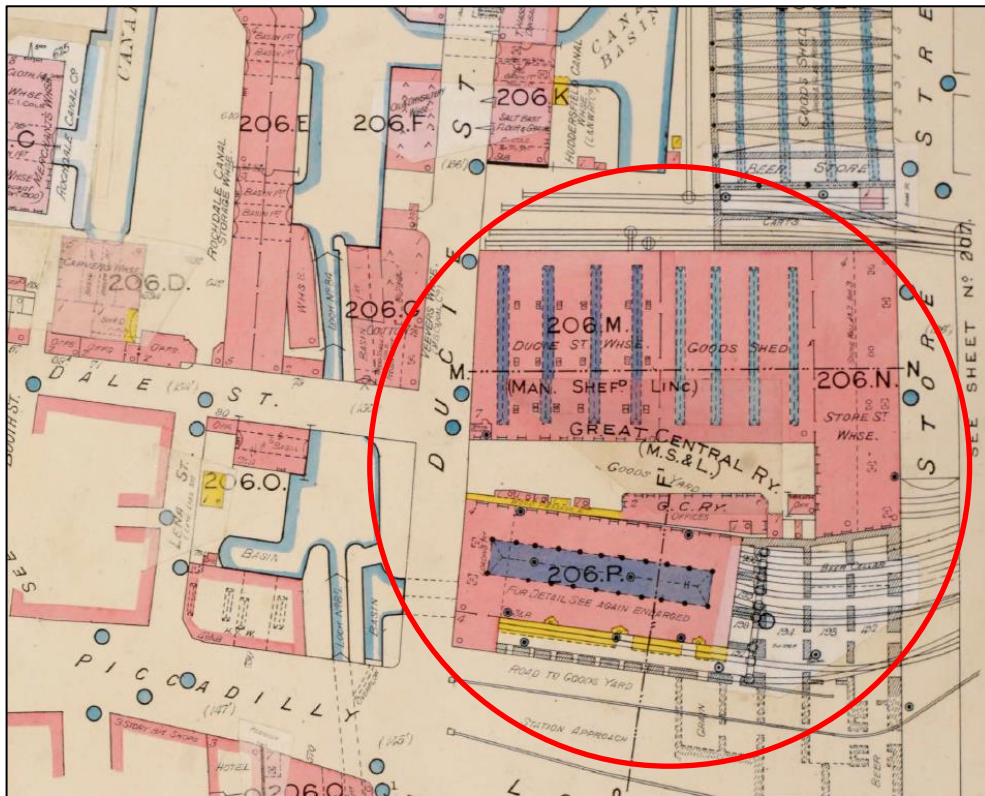


Figure 2.4: London Road Warehouse and contiguous good shed, 1900 (south east face of London Warehouse visible)

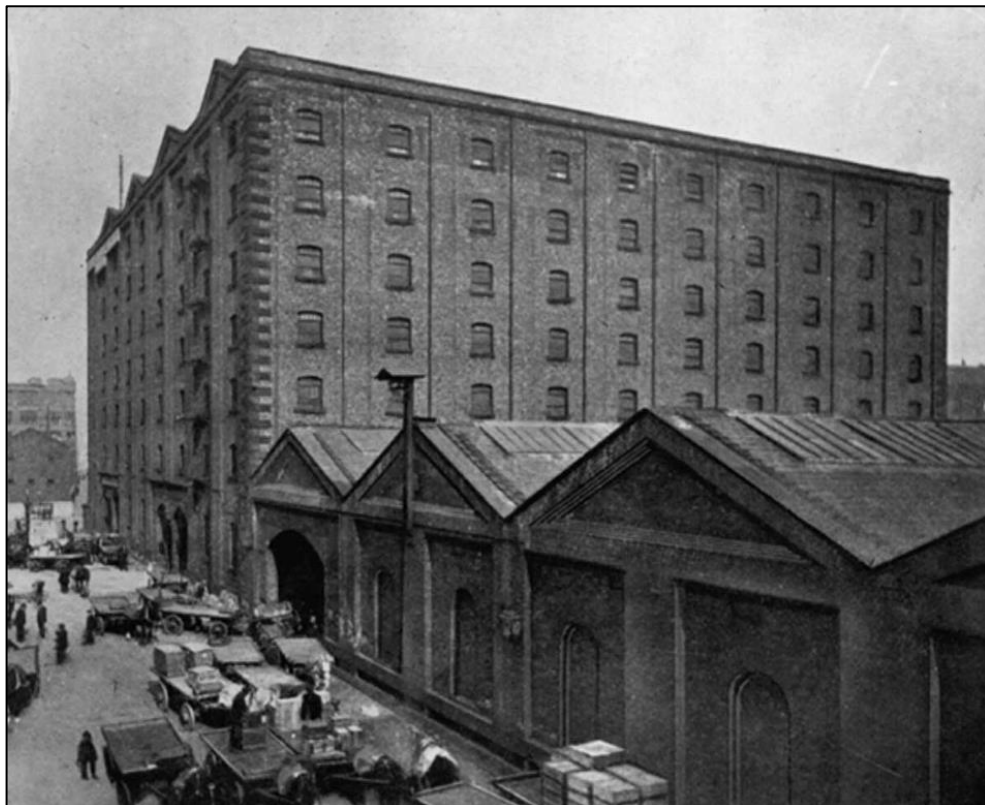


Figure 2.5: 1937 Aerial Image, the Site is shown outlined in red

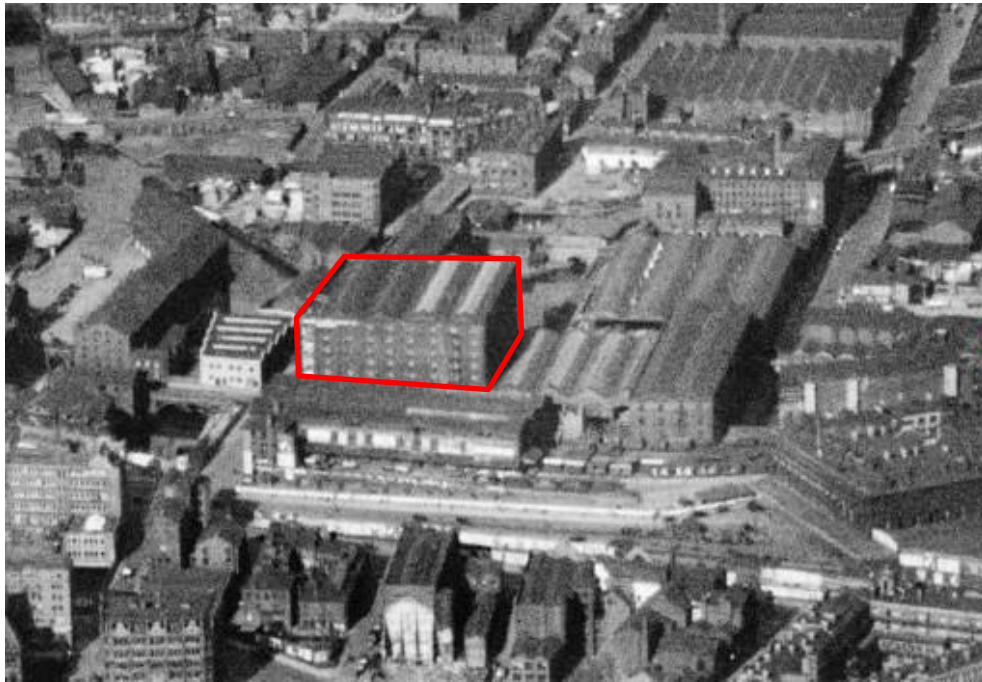


Figure 2.6: 1922 Ordnance Survey Map, the Site is shown circled in red

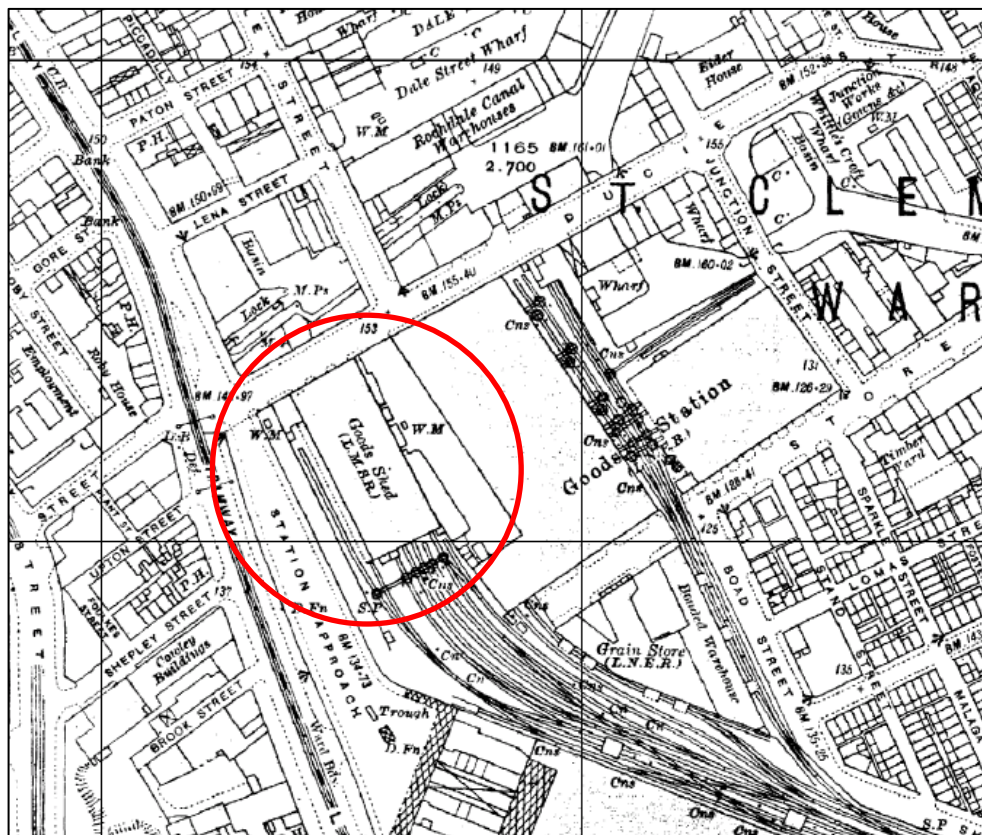


Figure 2.7: 1960's image of demolition of Store Street Warehouse (west face of London Road Warehouse visible to the right)



Figure 2.8: 1978-1985 Ordnance Survey map: shows the site following demolition of adjacent warehouses, the Site is shown circled

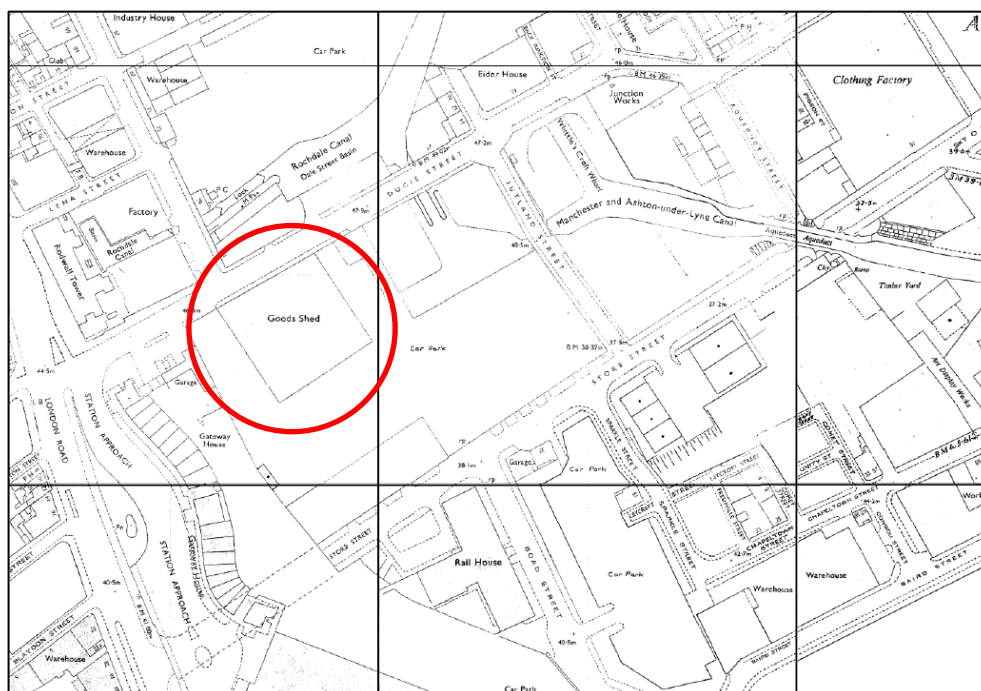
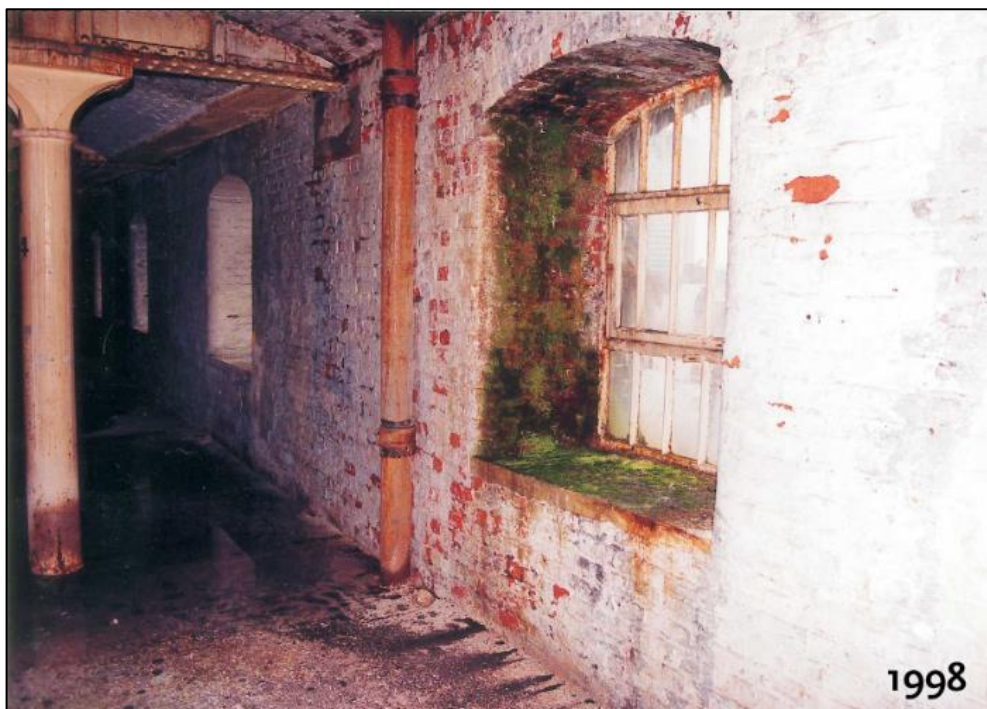


Figure 2.9: 1998 image of warehouse interior before conversion



Figure 2.10: 1998 Image of warehouse interior prior to conversion (mid-level floor)



- 2.9 The warehouse was converted into an apartment hotel at the end of the 20th century, by the architect Mueller Kneer. This conversion involved the removal of solid floors and the central section of ironwork to facilitate a full height atrium. New floorplates were inserted, and the space was partitioned to form apartments. Arched brickwork ceilings

were retained, as were the ironwork, columns and roof trusses in the apartment spaces. A penthouse floor was added to the roof, involving the removal of the central section of the pitched sawtooth roof structure and its replacement with a lightweight glazed structure over the atrium. The ground floor was converted and partitioned for use as hotel reception and function spaces, with mezzanine levels inserted.

Exterior

- 2.10 The warehouse is monumental in scale, and austere and functional in style. It is on a square plan, with 9 bays to the front and 10 to the sides, and rises to seven storeys. The historic form of the roof has been interrupted by inserted space for penthouse apartments, but this is not visible from ground level and four prominent gables remain visible to the south-west and north-east elevations, behind a parapet roof. Windows are small and segmental headed with small pane glazing; they are located in rhythmic bays between slightly projecting pilasters. The warehouse is in brown brick with stone dressings; prominent quoins are located to the corners and a stone parapet at roof level
- 2.11 The north-west (Ducie Street) elevation has a modern glazed entrance door set in a solid metal frame with slightly projecting porch roof, which extends across two bays (**Figure 2.11**). Ground floor windows are taller than those above. Grilles across the window sills are decorated with a flower motif.

Figure 2.11: Main entrance, North-west elevation to Ducie Street

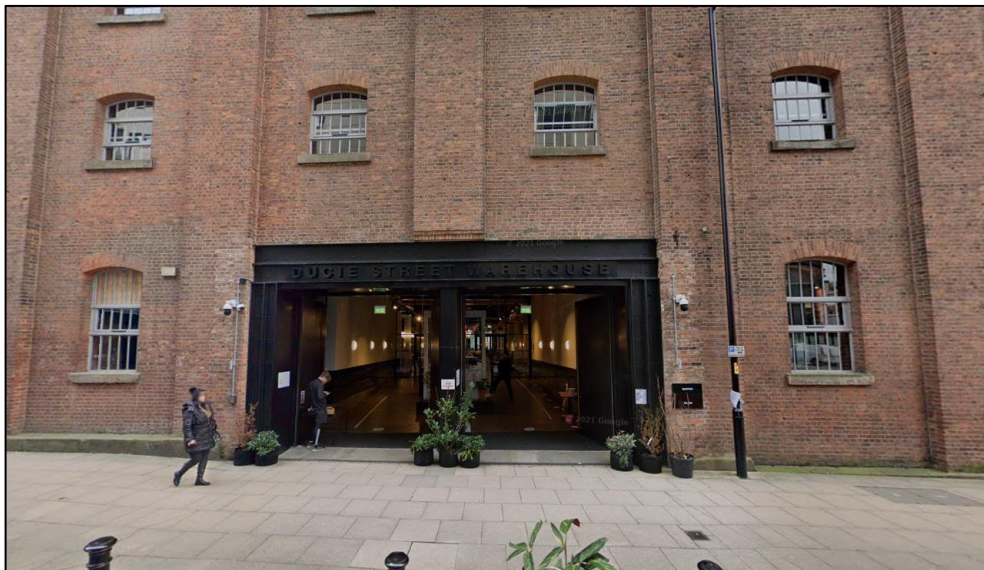


Figure 2.12: South-east elevation



- 2.12 Coupled segmental wagon arches are located to the ground floor; three pairs to the north-east where railway lines formerly provided access. These arches are divided by heavy cast iron columns with square capitals decorated with a flower motif. The wagon arches are now infilled with glazed panels and doors which are slightly recessed, and the southernmost pair is infilled with brick at the bottom section. On the south-west elevation (**Figure 2.13**), three pairs of wagon arches are separated by brick piers, and are also infilled, some by metal gates. Guard stones in front of arches indicate historic wagon access to the south-west elevation. A prominent feature of this elevation is the glazed lift tower which provides access to the penthouse apartments. The tower is set apart from the elevation, having two connections at roughly 2.5 and 5.5 storeys.
- 2.13 As previously stated, the ground floor of the south-east elevation (**Figure 2.12**) was formerly enclosed by the contiguous attached goods shed. There is scarring from the removal of this building, particularly visible in damage to the quoins (**Figure 2.12**, right). This elevation has a series of paired wagon arches which are separated by brick piers and these openings would formerly have allowed a level connection directly into the goods shed. Some have been in-filled with glazing, whilst the central one is open with inserted metal gates.

Figure 2.13: Ducie Street Warehouse from Ducie Street, south-west elevation



Interior

- 2.14 The mill was designed as a fireproof construction, originally having no interior dividing walls, and being constructed with cast iron columns and riveted wrought iron girders with jack arches which enabled large spaces to be spanned. Cast iron columns have base diameters of up over 2ft (65cm) and diminish in circumference on each floor. Eighteen regularly spaced internal hoists formerly raised and lowered goods from and to road and rail vehicles⁶. The ground floor ceiling height is comparatively higher than other floors and the floor level has been partially raised.
- 2.15 The reception area (**Figure 2.14**) is largely open, with inserted glazed partitions defining a large lobby area, as well as an interior 'garden' and other uses. Modern fittings have been inserted to create a reception area, and partition walling separates office and storage space. The original arched fireproof roof structure remains; aside from a central glazed section which defines the bottom of the atrium. A glazed roof at first floor level separates the ground floor from the atrium. Original cast iron columns rise through the space. Also at the ground floor are two large function rooms and office space formerly let separately but now used by the hotel. As in the rest of the ground floor, the function rooms retain historic ceilings, and the base of columns is visible, some set on large stone plinths (**Figure 2.16**). A fragmentary remnant of a historic concrete stair is located within a function room. A mezzanine floor has been inserted providing office spaces (**Figure 2.17**). Modern light fixtures and fittings have been inserted throughout.

⁶ Historic England, Manchester: The Warehouse Legacy (2002)

- 2.16 The atrium (**Figures 2.18 and 2.19**) is open from the first to seventh floors with a walkway to all sides. With the exception of the retained ironwork, the structure is modern and entirely relates to the late 20th century conversion of the building. Metal interior windows provide light into the apartments.

Figure 2.14: Reception



- 2.17 Lifts and two modern inserted staircases provide access through the building. A fragmentary remnant of a pulley system is visible in this area (**Figure 2.21**). Evidence of the 18 original hoists remain; blocked rectangular concrete frames are visible in the ceilings of various spaces in the building (**Figure 2.22**). Areas where the ceilings have been patched are also visible in some locations.

Figure 2.15: General view of function room

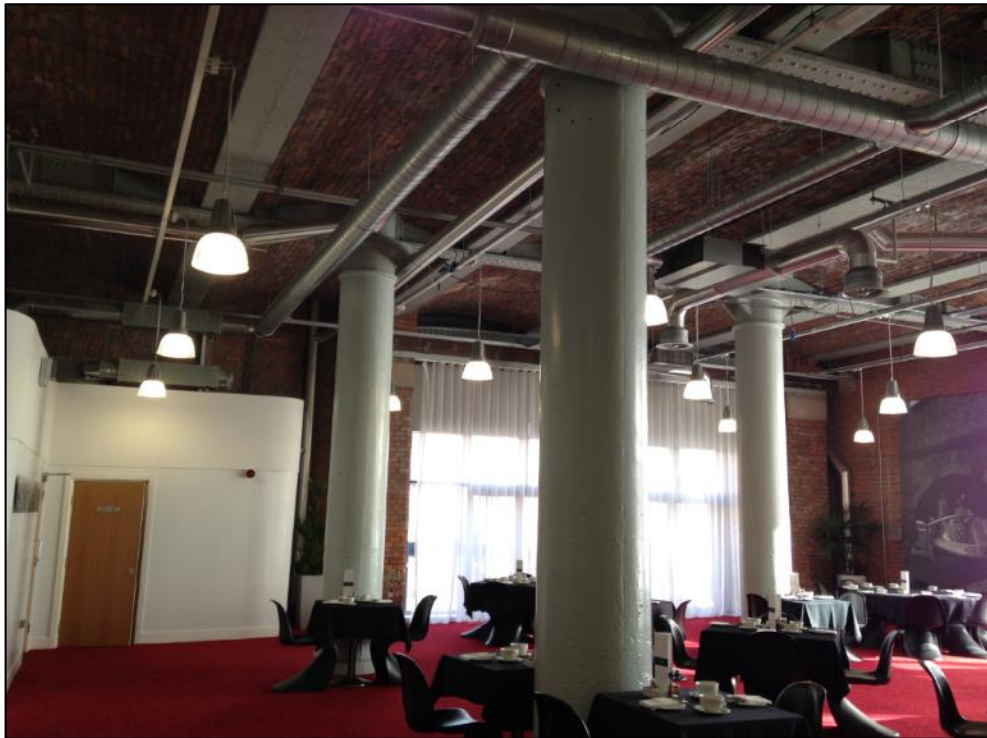


Figure 2.16: Column bases and stone plinths in function room bar area



Figure 2.17: Inserted mezzanine office space



Figure 2.18: General view of atrium



Figure 2.19: General view of atrium space



Figure 2.20: Historic hoist wheel, in modern staircase



Figure 2.21: Blocked hoist bay



- 2.18 Floors two to six are laid out in an identical manner. As previously mentioned, the space has been subdivided to create apartments through the insertion of partition walling. The fireproof ceiling is retained and exposed in the apartments and servicing and circulation areas, as are the iron columns and riveted girders (**Figures 2.22-2.25**). The apartment fixtures and fittings are modern. The penthouse level is located on the roof level of the building and is entirely modern. Roof terraces are located behind the original parapet wall (**Figure 2.26**). From this level, close up views of the roof structure, including original gables are available (**Figure 2.27 and 2.28**). The majority of windows are original.

Figure 2.22: General view of apartment interiors with interior window (left)

Figure 2.23: General view of apartment with exterior window (right)



Figure 2.24: General view of apartment interior showing riveted girder (left)

Figure 2.25: General view of apartment interior showing iron column (right)



Figure 2.26: Penthouse roof terrace, with original parapet wall



Figure 2.27: Retained historic roof structure: gables, viewed from glazed lift access

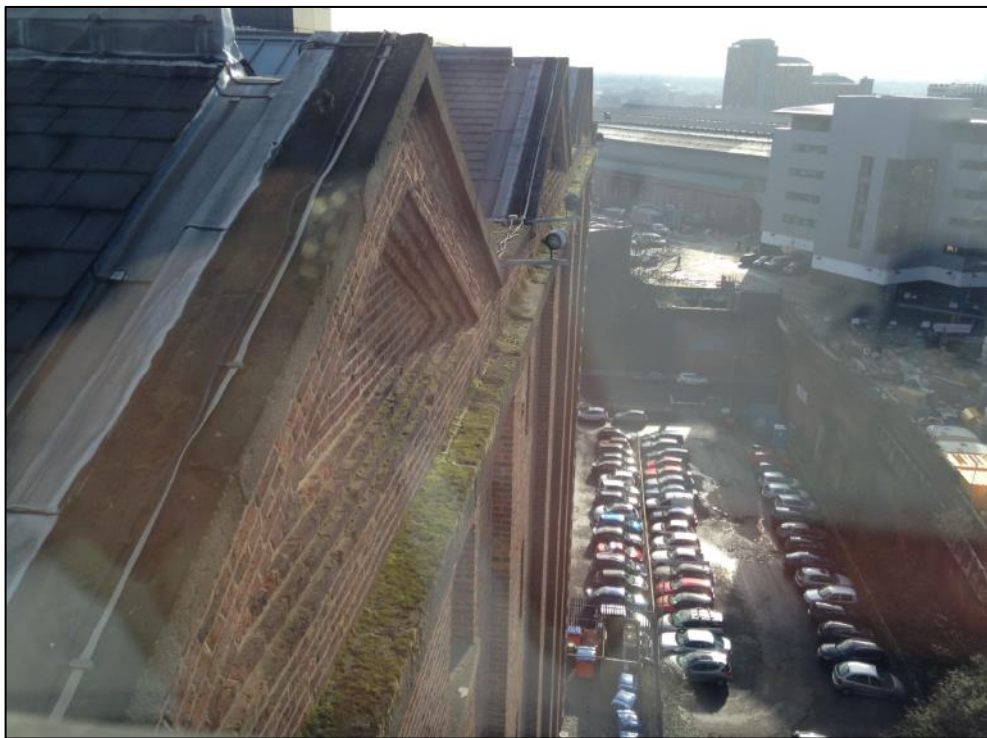


Figure 2.28: Gabled roof profile, with glazing ridge lights



Summary of Significance

- The industrial architecture of Ducie Street Warehouse, in particular the vast scale, bold functionality and rhythmic fenestration of the elevations are of special interest and make a strong contribution towards the overall significance of the building.
- The addition of a glazed structure to the roof in 2002 resulted in the loss of much of the original roof structure; however the gables and lights are retained and remain visible from ground level. The modern fabric of the roof and penthouse apartments is not of interest.
- Much of the historic interior structure of the warehouse has been removed as part of the conversion of the building for apartment uses. However, key elements, are retained and visible internally including cast iron columns, riveted wrought iron girders and brick fireproof ceilings. Similarly, original windows were retained as part of the conversion. These elements are of special interest as the only remaining historic elements of the interior, and contribute to the historic industrial character of the building.
- Limited fragmentary elements of the historic structure or workings of the warehouse survive such as the hoist wheel (**Figure 2.21**) and hoist bays (**Figure 2.22**). These features contribute towards an understanding of the former function of the building. The inserted structure and mezzanine floors date from the 20th century and are not of interest.
- In addition to the above the building is of historic interest as a former bonded warehouse and for its association with the Manchester Sheffield and

Lincolnshire Railway (MSLR). It is the only remaining of four original buildings built as a goods yard shortly after the opening of Manchester Piccadilly Station in 1865. The building was formerly connected to a single storey goods shed at the south-east, but this was demolished during the 20th century leaving this elevation exposed.

3. Assessment of Impact

Summary of Legislation and National Planning Policy

- 3.1 Under The Planning (Listed Buildings and Conservation Areas) Act 1990, Manchester City Council, in determining the submitted S73 planning application, and application for listed building consent have statutory duties to have special regard to the desirability of preserving the special interest of the listed building (s16(2) and s66(1)). The key heritage issue to be taken into consideration is therefore the effect of the proposed minor internal works on the architectural and historic special interest of the listed building.
- 3.2 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, as well as the desirability of new development making a positive contribution to local character and distinctiveness.
- 3.3 Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to asset's conservation. 'Conservation' is defined by the NPPF as 'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance'.
- 3.4 A full review of the heritage legislation, national and local planning policy and guidance relevant to the determination of the planning application and application for listed building consent is set out at Appendix 1.

Proposed Works

- 3.5 The Proposed Works will retain the existing use of the building as a serviced apartment hotel which will be operated by Go Native. The alterations are intended to better align the accommodation with market demand and thus contribute to the on-going and long-term use and occupation of the building.
- 3.6 The Proposed Works include:
- Limited works to the internal layout of 28no. apartments out of a total of 166 apartments. This comprises 7no. apartments (nos. 03, 04, 05, 06, 16, 17 & 18) on each of the first, second, third and fourth floors. Each apartment will be altered so that it can be flexibly let as two separate one bed apartments or as a single two bed apartment;
 - The careful removal of limited areas of modern fabric. The demolition plan (**Figure 3.1**) shows the extent of this element of the works and show that there will be no removal of any historic fabric;

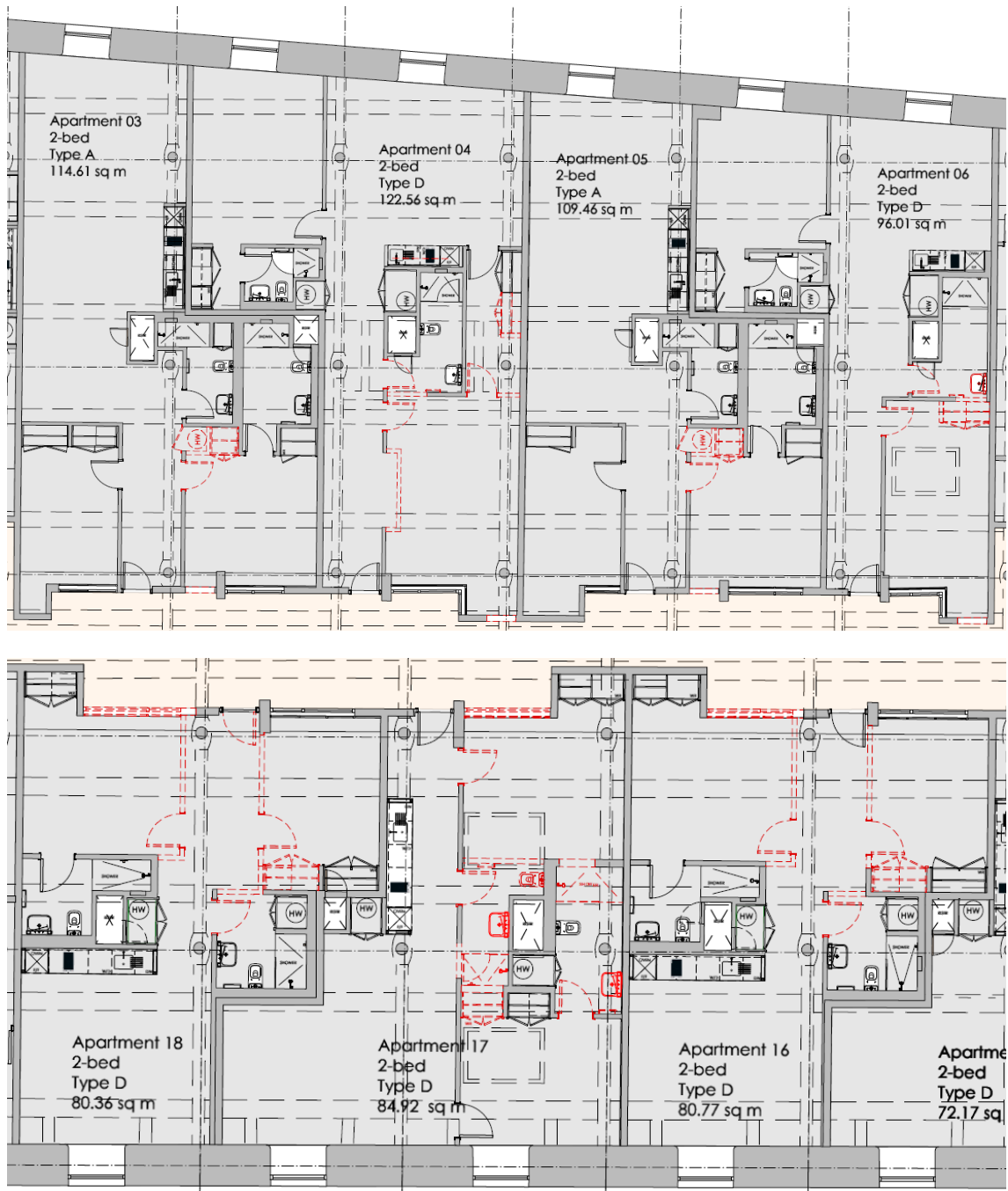


Figure 3.1: Floor plan showing the extent of the proposed removal of modern fabric (extract from drawing AHA/PLC/DM/105. – E by Archer Humphryes Architects)

- The installation of 7no. additional 'front doors' within the communal areas of the atrium on floors 1, 2, 3 and 4 (**Figure 3.2**). These will match the existing doors and will involve the addition of a total of 28no. new doors in addition to the existing doors to the 166 apartment, linen stores, maintenance stores, back of house and circulation cores;
- For 3no. apartments on each floor an existing modern internal window will be modified to allow the installation of these doors; and

- minor internal works to the 28no. apartments (**Figure 3.2**) to include the addition of new stud partition walls, relocation of sanitaryware, relocation of built in wardrobes and provision of kitchenettes.



Figure 3.2: Floor plans showing location and extent of proposed new fabric (extract from drawing AHA/PLC/DM/105.. – E by Archer Humphries Architects)

- 3.7 The existing wall finishes are a combination of exposed external brick walls (historic) and modern plasterboard. The reconfiguration of apartments at the upper floors will affect modern partition walls only, but as a result of the reconfigured plan, there will be some changes to areas where modern fabric is interfaced with the historic structure

(external walls, iron columns, girders etc). Typical interface details have been provided (drawings ref: AHA/PLC/DET/801 A). These are the same details that were approved on 13 April 2017 under application 115366/FO/2017) and the following principles apply:

- Where new partition walls meet existing historic beams (Detail 1 on drawing AHA/PLC/DET/801A) there will be a shadow gap to emphasise the distinction between historic and modern fabric. A core board and sealant will separate the new wall from the existing beam to allow the wall to be removed without affecting the historic fabric;
- Where new partition walls interface with exposed arched ceilings (Detail 2), core boards and sealant will also be used and a shadow gap introduced below the arch; again to emphasise the distinction between old and new;
- Currently, there are dropped suspended ceilings in the kitchens and bathrooms of the apartments and the brick fireproof ceilings of the original building exposed in bedroom and corridor areas (Detail 3). This principle will be continued; allowing for the reconfiguration of apartment units. Historic ceilings will be exposed in all communal corridors, living areas and bedrooms and they will be covered in kitchens, bathrooms and storage areas, consistent with the existing arrangement. Where suspended plasterboard ceilings meet the historic brick ceilings plasterboard will be attached by sealant. A soffit cleat and strap hanger will be used to secure the ceiling;
- The existing floors within the apartments are engineering timber flooring with tiles to the bathroom and will be replaced with new tiles to the bathrooms. Where new floors are required (Details 4 & 5) (for example where part of a communal area becomes a bathroom) they will be separated from the existing floor (presumed historic) using timber battens; ensuring no adhesive is used on the surface of the historic floor. New partition walls will be secured at the floor, between battens separating the new timber flooring from the historic floor; having no impact on historic fabric; and
- Where new partition walls and existing exterior walls meet (Detail 6), the new wall will be attached via a core board and sealant to allow its future removal without harming the historic fabric.

- 3.8 Lighting will be fixed to modern plasterboard walls, suspended ceilings and on the underside of the exposed, modern atrium deck.

Assessment of Impacts

- 3.9 The Proposed Works involve direct works to the grade II listed former London Warehouse and therefore have the potential to affect its heritage significance. These heritage impacts are described in this section before being assessed for the listed building as a whole in light of the relevant statutory duties of the Planning Act 1990, national planning policy within the NPPF 2023 and supporting NPPG, and the local policy and guidance for change within the historic environment.

Context for Change

- 3.10 The late 20th century conversion of the building (approved in August 1998 under applications 054085/FO/CITY3/98 and 054086/LO/CITY3/98) involved the insertion of a large atrium structure into the warehouse, the addition of a penthouse and mezzanine floors and the subdivision of the former open floor plates. There have been a number of applications approved since this point, for further works to the building. Relevant to the current proposal are works approved on 13 April 2017, under applications 115367/LO/2017 and 115366/FO/2017, which included the reconfiguration of apartments to provide 59no. additional serviced apartments, to make 166no. in total, alongside other internal and external works.
- 3.11 Much of the historic interior structure of the warehouse has been removed as part of the conversion of the building for apartment uses. Externally the addition of a glazed structure to the roof in 2002 resulted in the loss of much of the original roof structure; however the gables and lights are retained and remain visible from ground level.
- 3.12 Internally, key elements, are retained and visible internally including cast iron columns, riveted wrought iron girders and brick fireproof ceilings. Similarly, original windows were retained as part of the conversion. These elements are of special interest as the only remaining historic elements of the interior and contribute to the historic industrial character of the building.
- 3.13 At present there is a high level of vacancy of two bed apartments during the week, although these remain popular at weekends. The Proposed Works will facilitate the reconfiguration of 28no. rooms to allow greater flexibility in response to market demand.
- 3.14 The current proposals should be considered within this context of change and with an appreciation of which elements of the extant building fabric contribute to the significance of the building; as described in Section 2.

Summary of Impact

- 3.15 The significance of Ducie Street Warehouse lies primarily in its industrial architecture, in particular the vast scale, bold functionality and rhythmic fenestration of its largely unaltered elevations as well as the survival of key internal features.
- 3.16 Historically, the building's floor plates were open and were subdivided when the building was converted in the late 20th century. Historic fabric which remains in the building includes exposed brick fireproof ceilings, and structural frame including columns and riveted girders, and these features will remain exposed and visible in common areas and apartment living spaces. As the demolition floor plans show (**Figure 3.1**), fabric to be removed is limited to modern partitioning, bathrooms and kitchen units within apartments only. No historic fabric will be removed or permanently altered.
- 3.17 In relation to the proposed alterations to the interior of the 28no. apartments. There will be no impact at all on the ability to appreciate the relationships between the cast iron columns in apartments 03, 05, 06, 16, 17 and 18. There will be no partitions or door inserted between the columns within an apartment so there will be no change to the way these features are experienced.

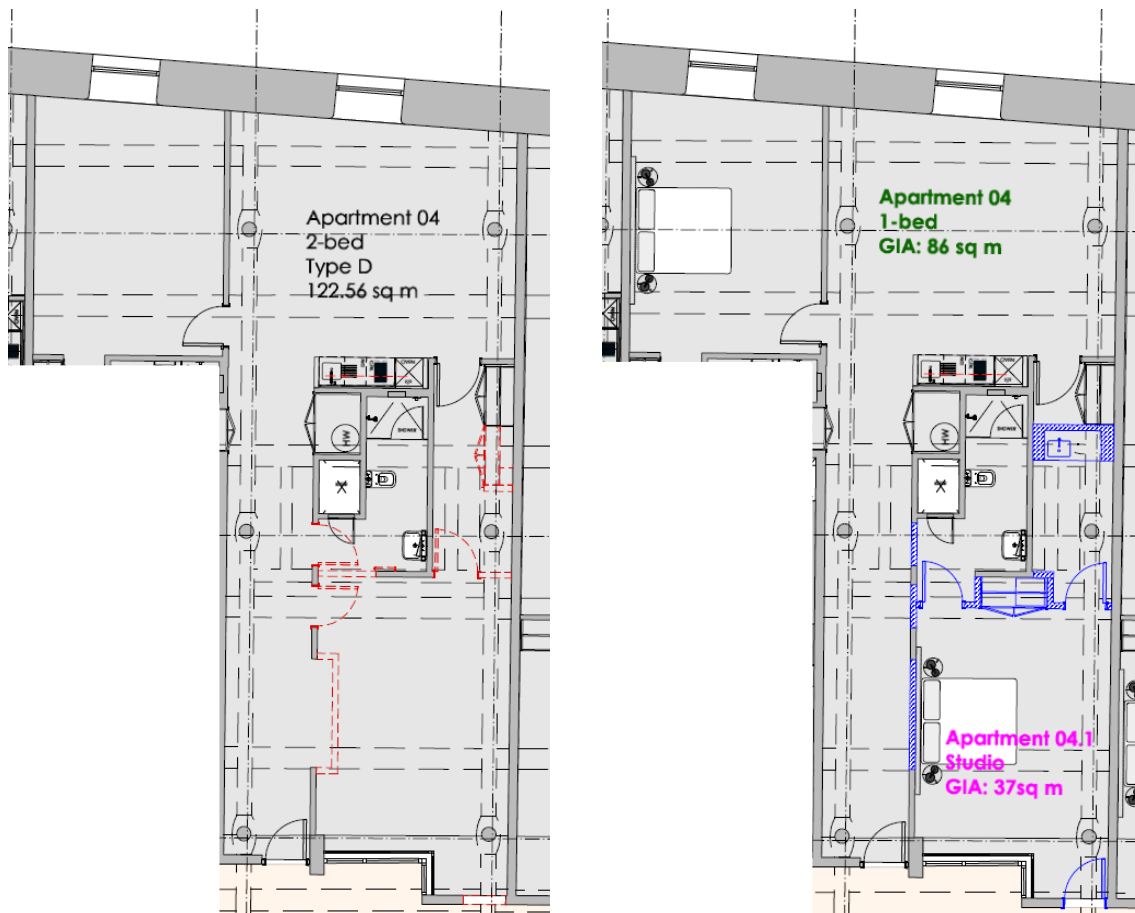


Figure 3.3: Existing plan (left) showing areas of demolition and proposed plan (right) showing areas of new fabric

- 3.18 In terms of apartment 04, this includes two rows of 3no. columns (**Figure 3.3**). The northerly of these two rows (on the left hand side of the plans) will not be impacted and will remain appreciable as a row of three columns, within the communal spaces within the apartment. The southerly of these two rows (on the right hand side of the plan) includes three columns that are at present in three separate rooms and which have existing doors between each of them. The Proposed Works would include the installation of a wall (as part of a kitchenette) between two of these columns, this would be in addition to the existing door. Given the presence of the existing partition and door, the ability to experience these two columns together is already limited. The inclusion of a wall here would mean that this limited ability would be impacted. Prior to arriving at this point in the building, an understanding of the building's historic function and character would have gained and the overall ability to appreciate the significance of the listed building will be sustained.
- 3.19 New internal partitions and doors will match the existing modern fabric. Where a new interface is proposed between modern and historic fabric this will be treated sensitively. The Proposed Works will therefore maintain the industrial character of the building.
- 3.20 In relation to the proposed alterations to the exterior of the 28no. apartments (as viewed from the central atrium); it is considered that the additional doors and the

alterations to the existing internal windows will result in a minor visual impact when viewed from the central atrium. This impact will be reduced through the design of new doors being consistent with the existing doors. Furthermore, this visual impact will be minor when considered in the context of the building as a whole, taking into account its vast scale and in the context of a further 28no. doors in addition to those leading to the existing 166no. apartments and ancillary rooms and spaces including laundry and storage rooms and circulation spaces. The changes will not hinder the ability to appreciate the building as a former warehouse which has been sensitively converted to a new use. For these reasons it is not considered that these works would result in any change to the ability to appreciate and experience the significance of the building.

- 3.21 When considered in the existing context of change to the building and the minor nature of the alterations it is considered that the Proposed Works will sustain the significance of the listed building.

Statutory Duties and NPPF

- 3.22 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

“In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- 3.23 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- 3.24 The concept of ‘preserve’ has been interpreted through case law to mean ‘to cause no harm’.

- 3.25 The Proposed Works intend to retain a grade II listed building in sustainable and viable use by upgrading it to meet current market expectations and demand. The proposals have been informed by an understanding of those elements of the listed building which contribute to its special architectural and historic interest and as established above, will sustain the significance of the listed building. The interior works relate to modern inserted fabric and limited works to historic fabric. Where a new interface is proposed between modern and historic fabric a sensitive methodology is proposed. The Proposed Works are inherently reversible and could be removed at a future point with no permanent impact on the asset.

- 3.26 Based on our assessment of the designated heritage asset it is concluded that there would be no harm to the significance of the grade II listed former London Warehouse.

- 3.27 The Proposed Works would therefore meet the objectives of Paragraphs 197,199 and 206 of the NPPF and the requirements of s.16(2) and s.66 (1) of The Planning (Listed Buildings and Conservation Areas) Act 1990 can be satisfied if the Council grants planning permission and listed building consent.

Local Planning Policy Considerations

- 3.28 Policy DC19.1 of the Manchester Unitary Development Plan states that *“the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of such buildings [listed buildings] and to protecting their general setting.”* The policy continues by stating that *“the Council will not permit any external or internal alteration or addition to a listed building where, in its opinion, there would be an adverse effect on its architectural or historic character.”*
- 3.29 Policy CC9 of the Manchester Local Development Framework (LDF) Core Strategy, states that development in Manchester City Centre should preserve or enhance heritage assets and new development must support the range of uses the Council expects in the City Centre. Policy EN3 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.”* The Proposed Works are consistent with Policies CCP and EN3 in enabling the continued viable use of Ducie Street Warehouse; whilst sustaining its significance.

4. Conclusions

- 4.1 This Heritage Statement has been prepared by Turley Heritage on behalf of Native Places Ltd ('the Client') in relation to a S73 planning application, an application for a Non-Material Amendment and an application for listed building consent for minor internal alterations to reconfigure 28no. of the existing apartments to increase the number of apartments from 166no. to 194no. (the 'Proposed Works') at 'Ducie Street Warehouse', Ducie Street, Manchester (the 'Site').
- 4.2 The detailed descriptions of development are as follows:
- Planning variation of condition application:
"Variation of condition no. 2 attached to planning permission ref. 115366/FO/2017 in order to substitute the schedule of approved drawings and facilitate a re-configuration of 14 no. units."
- Planning non-material amendment application:
"Non-material amendment to planning permission ref. 115366/FO/2017 in order to change terminology within the description of development from 'units' to 'bedrooms'"
- Listed Building Consent application:
"Reconfiguration of 14 no. units including installation of partitions, doors, bathroom and kitchenette facilities"
- 4.3 Ducie Street Warehouse, formerly known as London Warehouse, was constructed in 1867 by the Manchester Sheffield and Lincolnshire Railway. It was converted to an apart-hotel in 1998. It is located on Ducie Street in Manchester City Centre, close to Piccadilly station and is a grade II listed building.
- 4.4 The significance of Ducie Street Warehouse lies primarily in its industrial character and the scale, and the functionality and rhythmic fenestration of its largely unaltered elevations, as well as the survival of key internal features. Internally the conversion of the building to an apart-hotel in 1998 involved the insertion of a large atrium structure into the warehouse, the addition of a penthouse and mezzanine floors and the subdivision of the former open floor plates and the removal of much historic fabric. The principal historic fabric which remains includes external windows, iron girders and columns and brick fireproofed ceilings.
- 4.5 By ensuring that the Proposed Works affect only modern inserted fabric, with limited and reversible effects on historic fabric and a sensitive approach to any new interfaces between historic and new fabric, the Proposed Works will sustain the special architectural and historic interest (significance) of Ducie Street Warehouse. The ability to appreciate the building's industrial architectural and historic character will be maintained.
- 4.6 For these reasons the Proposed Development fully addresses the statutory duties of s16(2) and s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, Policy DC19.1 of the Manchester Unitary Development Plan and Policy CC9 of the Manchester Local Development Framework (LDF) Core Strategy.

Appendix 1: Heritage Legislation and Planning Policy

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for:

‘(s.7) ... any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest ...’

In determining such applications the following duty is placed on the decision maker:

‘s.16 (2) In considering whether to grant listed building consent for any works the local planning authority, or as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.’

Similarly in determining planning applications affecting a listed building, the decision maker:

s66(1) 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.

National Planning Policy

National Planning Policy Framework (2023)

Chapter 16 contains policies regarding the conservation and enhancement of the historic environment.

The NPPF defines 'significance' in respect of heritage policy as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”⁷

Paragraph 128 outlines the information required to support planning applications affecting heritage assets. It states that applicants should provide a description of the significance of any heritage assets affected, including any contribution made by their setting. The level of detail

⁷ DLHC (2023) National Planning Policy Framework (NPPF) – Annex 2: Glossary

should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

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...They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.”

Paragraph 197 states that in determining planning applications, local planning authorities should take account of (amongst other things) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable use consistent with their conservation.

Paragraph 199 confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. It also confirms that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

Paragraphs 201 and 202 of the NPPF differentiate between 'substantial harm' and 'less than substantial harm'. Paragraph 134 states that where a 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 securing its optimum viable use.

Local Planning Policy

Manchester Unitary Development Plan 1995 (Extant Policies)

Policy DC19.1 states that in determining applications for listed building consent or planning applications for development involving or having an impact on buildings of Special Architectural or Historic Interest, the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of such buildings and to protecting their general setting. In giving effect to this policy, the Council will not permit any external or internal alteration or addition to a listed building where, in its opinion, there would be an adverse effect on its architectural or historic character. It will also not permit alterations to a listed building which would prevent the future use of any part of the building, in particular upper floors or basements, or where poor maintenance is likely to result.

Manchester Local Development Framework (LDF)

Core Strategy (2012)

Policy CC9 states that development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings, conservation areas and scheduled ancient monuments. New development must support the range of uses the Council expects in the City Centre and contribute to a coherent and integrated physical environment.

Policy EN1 states that within the City Centre Character Area (1), developers will be expected to consider the City's heritage and continue the rich pattern of activity in the core area.

Policy EN 3 states that throughout the City, the Council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods, including those of the City Centre. New developments must be designed so as to support the Council in preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance, including scheduled ancient monuments, listed buildings, registered parks and gardens, conservation areas and archaeological remains. Proposals which enable the re-use of heritage assets will be encouraged where they are considered consistent with the significance of the heritage asset.

Places for Everyone Plan – Modifications Version 2023

Nine planning authorities in Greater Manchester, including Manchester City Council, are in the process of preparing a joint development plan (to 2037) known as 'Places for Everyone'. The Plan was submitted to the Secretary of State in February 2022 and examined in public hearing sessions between November 2022 and July 2023. A series of main modifications are now being considered through public consultation, with a view to the Plan being adopted in 2024. The advanced stage of the draft Plan means that it can now be afforded weight in the planning process.

Draft Policy JP-P2 (Heritage) states *"we will proactively manage and work with partners to positively conserve, sustain and enhance our historic environment and heritage assets and their settings. Opportunities will be pursued to aid the promotion, enjoyment, understanding and interpretation of heritage assets, as a means of maximising wider public benefits and reinforcing Greater Manchester's distinct character, identity and sense of place."*

Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness and which should be the priority for conserving and enhancing in the future and demonstrate a clear understanding of the historic environment and the heritage values of sites, buildings or areas and their relationship with their surroundings. This knowledge should be used to inform the positive management and integration of our heritage by:

- 1. Setting out a clear vision that recognises and embeds the role of heritage in place-making;*
- 2. Ensuring that the heritage significance of a site or area is considered in accordance with national planning policy in the planning and design process and opportunities for interpretation and local engagement are optimised;*
- 3. Integrating the conservation and enhancement of heritage assets and their settings, with creative contextual architectural responses that contribute to their significance and sense of place;*
- 4. Delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic vitality, accessibility and environmental quality of a place, and to social wellbeing; and*
- 5. Exploring opportunities to reduce greenhouse gas emissions that restoration of historic buildings offer.*
- 6. Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity*

and sense of place are protected from harm. These include historic town centres, places of worship, historic transport routes including the canal network, industrial buildings and structures including textile mills, farmsteads and other sites, buildings and areas of identified archaeological, architectural, artistic and/or historic value.”

Guidance

Planning Practice Guidance (2019)

Paragraph 002 of the 'Conserving and enhancing the historic environment' section of the Planning Practice Guidance (PPG) describes conservation as:

“an active process of maintenance and managing change.”⁸

It also confirms the following:

“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. Where changes are proposed, it is confirmed that the NPPF sets out a clear framework for both plan-making and decision-taking to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development.”⁹

In advising on how proposals can avoid or minimise harm to the significance of a heritage asset, it is confirmed that the clear understanding of the significance of a heritage asset and its setting is necessary to develop proposals which avoid or minimise harm.

The PPG also advises on what constitutes a viable use for a heritage asset. It states the following:

“The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.....

It is important that any use is viable, not just for the owner, but also the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between

⁸ DLHC (2019) Planning Practice Guidance (PPG) - Paragraph 002 Reference ID: 18a-002-20190723

⁹ DLHC (2019) Planning Practice Guidance (PPG) - Paragraph 002 Reference ID: 18a-002-20190723

alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused provided the harm is minimised.”¹⁰

The PPG confirms that a clear understanding of the significance of a heritage asset is necessary to develop proposals which avoid or minimise harm. Early appraisals, a conservation plan or targeted specialist investigation can help to identify constraints and opportunities arising from the asset at an early stage. Such studies can reveal alternative development options, for example more sensitive designs or different orientations, that will deliver public benefits in a more sustainable and appropriate way.

It states that public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Public benefits may include heritage benefits, such as:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation.

Managing Significance in Decision-Taking in the Historic Environment

Historic England Good Practice Advice in Planning: 2 (2015)

The guidance stresses the importance of being able to properly assess the nature, extent and importance of the significance of a heritage asset early in the process. It also endorses understanding the nature of significance, the extent of that significance and the level of significance.

It confirms that change to heritage assets is inevitable but it is only harmful when significance is damaged. The nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording that may be needed if it is to go ahead.

¹⁰ DLHC (2019) Planning Practice Guidance (PPG) - Paragraph 015 Reference ID: 18a-015-20190723

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