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University of Manchester (Estates Design Services Group)

Waterloo Place: Proposed installation of Wi-fi as part of the University of Manchester Network Transformation Project

Heritage, Design and Access Statement

September 2023

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1. Introduction

- 1.1 This Heritage Statement has been prepared by Paul Butler Associates on behalf of the University of Manchester (Estates Design Services Group) to accompany a listed building consent application for buildings at Waterloo Place, 176-188 Oxford Road, Manchester, M13 9GP. The application proposal is for listed building consent for the installation of Wi-fi to Waterloo Place as part of the University of Manchester Network Transformation Project.
- 1.2 The application building comprises of a row of seven late Georgian/early Victorian former town houses which were listed Grade II on 3rd October 1974. The statutory listing address of the group is Waterloo Place, 176-188, Oxford Road.
- 1.3 This Heritage Statement has been prepared to accompany the listed building consent application for the proposal. The statement assesses the heritage significance of the listing and the potential impact of the proposed Wi-fi installation upon the buildings. The proposed works have been designed with a clear understanding of the heritage significance of the buildings and through a conservation-led approach. Appropriate heritage mitigation is identified where appropriate.
- 1.4 The proposals will allow the staff, students and visitors internet access ensuring the buildings continue to meet with user expectations and thereby helps secure the educational use of the complex and the long-term future of the buildings.
- 1.5 This statement has been prepared in accordance with the policies and procedures of the National Planning Policy Framework (NPPF) following a site visit (undertaken September 2023), in addition to an examination, analysis and assessment of available historic records.
- 1.6 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;
 - Consideration of design and access matters;

- A summary of pre-application building visits;
- A description and an assessment of the heritage significance of each building; and,
- An assessment of the impact of the proposed works upon the significance of each building.

1.7 This statement is not intended to be a full or complete record of the site rather it is proportionate to the works proposed.

2. Site Location

2.1 Waterloo Place, the building grouping to which this application relates, is located to the west side of Oxford Road, lying between the Alliance Manchester Business School located on Booth St West to the north and Bridgeford Street to the south. The buildings which are the subject of this application include a row of seven former terraced houses. The postal address of the application site is Waterloo Place, 176-188 Oxford Road, Manchester, M13 9GP. All the buildings which are included within this application are Grade II listed (LEN 1271457). They do not lie within a Conservation Area.



Figure 2.1 Waterloo Place, Source Google Earth.

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. The application building is Grade II listed. A description of the subject buildings are provided at Section 7 below.
- 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. The application buildings do not lie within a Conservation Area.

- 3.5 In determining this listed building consent application it is necessary to consider the impact of the proposal on the significance of Waterloo Place. This includes direct physical change on its built fabric. As the works are internal, no indirect impacts on the setting of the building have been noted. Section 9 of this report provides an assessment of these anticipated heritage impacts.

National Planning Policy Framework (NPPF)

- 3.6 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.
- 3.7 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'. Having regard to these factors, the proposal will provide economic benefits through investment and job creation and deliver economic/social and cultural benefits through the provision of comprehensive high quality Wi-fi coverage that will provide staff, students and visitors with full internet access thereby helping to ensure the buildings continue to meet with user expectations. This approach will help secure the continued educational use of the listed buildings and thereby ensure their long-term future as part of the University.
- 3.8 In relation to determining 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).
- 3.9 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.

- 3.10 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'.*
- 3.11 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.'*
- 3.12 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'.*
- 3.13 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'.*
- 3.14 Paragraph 199 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’.

3.15 Paragraph 200 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’.*

3.16 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.*

3.17 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’.

- 3.18 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'*.
- 3.19 Annex 2: Glossary 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'*.
- 3.20 '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)

- 3.21 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.
- 3.22 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.'* (Paragraph: 002 Reference ID: 18a-002-20190723).

Historic England Guidance

- 3.23 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 Environment Good Practice Advice 2: 'Managing Significance in Decision-Taking in the Historic Environment'

- 3.24 This document was published in March 2015 and provides advice to local authorities, planning and other consultants, owners, applicants and other interested parties. It sets out practical guidance to assist interested parties in making an assessment of the impact of proposals on the significance of heritage assets.

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

- 3.25 This Guidance was published in October 2019 and covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for changes to heritage assets.

Historic England: Conservation Principles Policies and Guidance

- 3.26 This Guidance was published by Historic England (then English Heritage) in April 2008. The Document is designed to provide a logical approach to making decisions and offering guidance on all aspects of England's historic environment. Guidance is provided on understanding heritage values (evidential, historical, aesthetic, and communal), and assessing heritage significance.

Local Planning Policy Guidance: The Development Plan for Manchester

Manchester Core Strategy Development Plan Document (July 2012)

3.27 Manchester's Local Development Framework Core Strategy Development Plan Document was adopted on 11th July 2012. A specific heritage policy of the core strategy of relevance to the proposed scheme is:

- Policy EN3 'Heritage' this states that '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 listed buildings. 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)

3.28 Saved heritage policies of the UDP of relevance to the proposed scheme include:

- DC19 'Listed Buildings' which 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)

3.29 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 University of Manchester Network Transformation Project is an initiative which seeks to install a contemporary wireless local area network (WLAN) across the entire University of Manchester estate including all buildings and rooms thereby ensuring complete wireless connectivity for staff, students, visitors and technical plant. At the application buildings the installation will upgrade existing provision whilst also filling major gaps in the existing WLAN coverage.
- 4.2 The proposed installation will comprise a series of access points (APs) which combine to provide a comprehensive WLAN for the building. The proposed APs are a small wall or ceiling mounted device that creates a WLAN once connected via an ethernet cable to a wired switch or communications hub. Each AP will project a Wi-Fi signal to a given area with each AP location being carefully selected by the technical network designer to provide a seamless WLAN throughout the subject buildings.
- 4.3 The Wi-fi installation works for which listed building consent is sought relate to those parts of University of Manchester known as Waterloo Place which include a variety of uses including Jubilee Church Office, Manchester University Press and the Sustainable Consumption Institute. The proposals will allow staff, students and visitors full internet access thereby ensuring the accommodation continues to meet with user expectations and thereby helps secure the long-term future of the listed buildings.
- 4.4 The scheme has been developed by a Team with substantial knowledge and experience of Wi-fi installation and is led by RECOM on behalf of the applicant. Other team members include TB&A Consultants, ROC Technologies and Paul Butler Associates.

5. Design and Access Matters

Design Considerations

- 5.1 The proposed scheme seeks to provide Wi-fi in a manner which is sensitive to the history of the buildings. Pre-application consultation has been undertaken with Manchester City Council Planning and Conservation Officers and the proposals have been developed through a heritage-led approach with a clear understanding and appreciation of the significance and heritage of the subject buildings.
- 5.2 The changes proposed are entirely internal to the subject buildings. Where possible existing cable trays and data cable voids will be used. Where new cabling is unavoidable the designer has located provision where existing plant is already present in order to reduce impact to a minimum. AP locations have also been carefully selected to minimise the number of APs required and wherever possible locate APs in the least sensitive parts of the building whilst still providing full Wi-fi coverage.
- 5.3 Details of the proposals are provided by the submitted application drawings and are noted and assessed within Section 9 of this statement.

Access Considerations

- 5.4 No matters regarding access have been identified as a result of the works and none therefore need be discussed within this Statement.

6. Pre-application Site Visits

- 6.1 The subject buildings were visited by Paul Butler Associates in September 2023 and we have made a proportionate assessment of the heritage significance of the group (Section 8).
- 6.2 Preliminary proposals were issued to Paula Burbicka (Heritage & Urban Design Officer, MCC) for comment.
- 6.3 Wi-fi is proposed to be installed to provide coverage to all seven former terraced houses. Please refer to the photographs included within the ROC installer reports submitted in support of the application.

7. Listed Description of Waterloo Place

- 7.1 The Listed Building entry describes the building thus: *'Terraced row of 7 town houses, now offices. 1832, altered. Red brick with some sandstone dressings, slate roofs. Double-depth plan, each house single-fronted, with individual back extensions. Two storeys over cellars, 21 bays (3 windows to each house); with stone plinth, 1st-floor band, moulded eaves cornice (except Nos 176 to 182 which have an added mansard attic). Each house has a wide round-headed doorway to the right, with set-in doorcase of slender Tuscan columns with entablature and mutuled cornice, panelled door and fanlight with elegant fan-like tracery (except No.186 which is plain); and 12-pane sashed windows with raised sills and flat-arched heads. Rear and interior not inspected.'*

8. Heritage Significance

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 This grouping of buildings retain a fairly high proportion of original fabric externally, particularly to the frontages but less so internally having been subject to alteration from residential to office use and also to a variety of subsequent office refurbishments. The grouping is considered likely to contain fabric of evidential interest associated with the construction and use of the buildings as a group of seven purpose built late Georgian/early Victorian town houses with potential interest lying within their physical construction. A variety of this type of similar dwelling survive within the City and have been noted and recorded. This grouping is considered to have **low-medium archaeological interest**.

Architectural and artistic interest

- 8.3 The townhouses were purpose built as a group. The architectural interest is considered to be **medium – high interest**, with the buildings having external features of merit within the elevations and fenestration, none of which is impacted by the subject application. The interiors have been subject to alteration and subsequent refurbishment and are of least interest.

Historic Interest

- 8.4 The **historic interest is high** as the buildings were constructed as townhouses in the early 19th century and follow a design which reflects the fashion of the time. They were later converted for use as offices and for other educational support uses by the University of Manchester.

Overall Level of Significance

- 8.5 This building grouping can be regarded to have high historic and architectural value. It was erected in the early 19th century as a purpose-built group of townhouses and retains external features including some of its original plan form, although the conversion to office uses and some modernisation has altered the interiors significantly with these regarded to have lesser interest. The lower quality interiors are in keeping with the grade II listing.

9. Heritage 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 only impact to consider is the direct impact of the proposed Wi-fi works on the physical fabric of the building:

Direct impacts

- 9.3 The impact of the proposed works assessed in the table below, with appropriate mitigation identified where appropriate. This table should be read alongside the ROC Installer Report and TB&A cabling/conduit drawings.

	Proposals as shown by ROC Report and TB&A plans	Impact on significance	Mitigation required to be undertaken
1.	Level -10 Basement Floor AP Install type: - 101-L-C(N) - 103-L-C(N) - 107-L-C(N) - 108-L-C(N) - 109-L-C(N) - 110-L-C(N)	- 101-L-C(N), - 103-L-C(N) are proposed to be installed and contained within an area characterised by modern ceiling mounted plant. - 107-L-C(N), - 108-L-C(N) and - 109-L-C(N) are mounted on existing contemporary cable trays.	No mitigation is required.

	Proposals as shown by ROC Report and TB&A plans	Impact on significance	Mitigation required to be undertaken
	- 111-L-C(N)	- 110-L-C(N) is proposed to be installed on a contemporary inserted ceiling alongside modern plant mounted at the junction of the wall and ceiling. - 111-L-C(N) is proposed to be installed on a contemporary inserted ceiling between modern ceiling mounted plant. The above works involve little or no disturbance to sensitive fabric. The works are also reversible when the plant is no longer required for operational purposes. The works proposed are regarded to have no impact on the identified significance of the building.	
2.	Level 00 Ground Floor AP Install type: -001-L-C(N) -005-L-C(N) -010-L-C(N) -011-L-C(N) -013-L-O(N) -015-L-C(N)	-001-L-C(N) is proposed to be ceiling mounted aside and between existing strip lights and near a smoke/fire sensor. -005-L-C(N) is proposed to be ceiling mounted aside existing strip lights and near a smoke/fire sensor in a room with altered ceiling. -010-L-C(N) is proposed to be ceiling mounted within a group of existing flush mount luminaires in a room with altered ceiling and plasterwork finishes.	No mitigation is required.

	Proposals as shown by ROC Report and TB&A plans	Impact on significance	Mitigation required to be undertaken
		-011-L-C(N) is proposed to be ceiling mounted in a rear outshut room with altered ceiling. -013-L-O(N) will provide essential wi-fi coverage to the general office to allow effective use of the building to continue. A discrete location is proposed with an existing data port to be reused if possible. -015-L-C(N) is proposed to be ceiling mounted aside an existing flush mounted luminaire and smoke alarm in a rear altered room. The above works involve little or no disturbance to sensitive fabric. The works are also reversible when the plant is no longer required for operational purposes. The works proposed are regarded to have no impact on the identified significance of the building.	
3.	Level 10 – First Floor AP Install type: 101-L-C(N) 103-L-C(N) 111-L-O(N) 114-L-C(N)	101-L-C(N) is proposed to be installed within a rear outrigger in an area characterised by modern ceiling mounted installations. 103-L-C(N) is sited between four office strip lights and installation takes advantage of the false ceiling.	No mitigation is required.

	Proposals as shown by ROC Report and TB&A plans	Impact on significance	Mitigation required to be undertaken
		111-L-O(N) is wall mounted above existing conduit and sockets within a long established office. 114-L-C(N) is sited between four suspended modern office strip lights within an existing office. The above works involve little or no disturbance to sensitive fabric. The works are also reversible when the plant is no longer required for operational purposes. The works proposed are regarded to have no impact on the identified significance of the building.	
4.	Level 10 – Second Floor AP Install type: 201-L-C(M) 202-L-C(N) 206-L-O(N) 207-L-O(N)	201-L-C(M) is placed in a rear outrigger and ceiling mounted in a refurbished and altered room. 202-L-C(N) is placed in a rear outrigger on a ceiling beam. 206-L-O(N) is placed in a rear outrigger and ceiling mounted in a refurbished room. The AP is wall mounted in a discrete location and an existing data port is to be reused if possible. 207-L-O(N) is placed in a rear outrigger and wall mount in a refurbished room. The AP is	No mitigation is required.

	Proposals as shown by ROC Report and TB&A plans	Impact on significance	Mitigation required to be undertaken
		sited in a discrete location and above existing trunking. The above works involve little or no disturbance to sensitive fabric. The works are also reversible when the plant is no longer required for operational purposes. The works proposed are regarded to have no impact on the identified significance of the building.	

Cumulative Impact

- 9.4 The table above has identified the impact of the proposed works on the significance of the subject buildings. The works are reversible and involve minimal disturbance to sensitive fabric. They are regarded to have little or no impact on the described significance of the buildings. The changes for which approval is sought are necessary to secure the functionality of the buildings and are reversible should a future occupier wish to remove the installations.

Overview of Heritage Impact and Assessment against Planning Legislation and Policy

- 9.5 This Heritage Statement has confirmed that the Wi-fi installation will be reversible and involve minimal disturbance to sensitive fabric. The works are regarded to have little or no impact on the described significance of the subject buildings. 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.

- 9.6 Given the minimal heritage impact and having regard to the relevant planning policy tests, the proposed works would have less than substantial harm to the significance of the building.
- 9.7 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 positive heritage benefit identified is that the installation facilitates the continued use of the building for a use which is sympathetic to the existing form and layout of the building. It is our considered view that the public benefits of the proposed scheme outweigh the less than substantial harm caused, therefore the policy tests provided by Paragraphs 195 and 202 are satisfied, whilst other relevant legislation, policy and guidance set out within Section 3 is also complied with.

10. Conclusion

- 10.1 This Heritage, Design and Access Statement has been prepared to consider the impact of a development proposal on the heritage significance of Waterloo Place.
- 10.2 The report has established that the proposed Wi-Fi installation has been designed to be sensitive to the heritage significance of each building. Importantly the scheme allows the application buildings to continue to meet the needs of today's students, staff and visitors keeping the buildings in use and helping to preserve them into the future. On this basis 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.