



Heritage Impact Assessment

easyHotel
Manchester, 33 Dale
Street, Manchester

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1. Introduction

- 1.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of easyHotel Ltd. It relates to an application for the introduction of photovoltaic (PV) cells to the southern roof slope of easyHotel Manchester, 33 Dale Street, Manchester. Manchester City Council (MCC hereafter) are the determining authority.



Figure 1: 33 Dale Street (grade II)

- 1.2** 33 Dale Street, also known as Bradley House, is a grade II listed building (UID: 1197772) which was first designated in June 1994. The building is a late 19th

century shipping warehouse and is located within the Stevenson Square Conservation Area.

1.3

In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (2023) this statement describes the significance of the identified heritage assets.



Figure 2: Site location plan

The Proposals and Relevant Background

1.4

Proposals seek to introduce a series of PV cells (two rows) on to the southern roof slope of the grade II listed building. The cells are proposed to be installed over the existing roof (so sit above the retained slates) and would be fixed via anchor points to the roof structure below. The extent of PV cells proposed in conjunction with their siting and the form of the building means only wholly limited visibility of the cells will be possible from street level.

- 1.5** Following officer comments received during the course of the live application, amendments to the scheme have been made to reduce the number of PV cells proposed to avoid visibility of the cells from the north west along Dale Street.
- 1.6** As identified above, 33 Dale Street is a grade II listed building located within the Stevenson Square Conservation Area. A large number of other grade II listed buildings are present in the streets and spaces surrounding the application site. However, due to the minor nature of the proposals, these assets are not found to be capable of being affected individually. Instead, they have been considered as part of the conservation area's rich and varied high quality townscape.
- 1.7** The proposals have been based on a thorough understanding of the significance of the identified heritage assets and seek to provide environmental benefits while preserving their unique heritage values.

Purpose of this Assessment

- 1.8** The purpose of this Heritage Impact Assessment is to assist with the determination of the application by informing the decision takers on the effects of the proposed development on the historic built environment, i.e. the grade II listed building and conservation area. Value judgements on the significance of the identified heritage assets is presented and the effects of the proposals upon that significance are appraised. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the National Planning Policy Framework (NPPF) 2023 and local planning policy.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The NPPF requires the impact on the significance of a designated heritage asset⁴ to be considered in terms of either "substantial harm" or "less than substantial harm" as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at **Appendix 1**.

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

⁴ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

2.6 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.7 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.8 The Manchester Local Plan consists of the Core Strategy (adopted 2012) and remaining saved policies of the Extant Unitary Development Plan.

2.9 **Policy CC9 Design and Heritage:** This policy notes that design of new buildings will need to be of the highest standard of design in terms of appearance and function and that development in the city should preserve or enhance heritage assets.

2.10 **Policy EN3 Heritage:** This policy notes 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. It goes on to note that new development 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.

2.11 **Saved Policy DC18 Conservation Areas:** This policy notes that the Council will give particularly careful consideration to development proposals within conservation

⁶ The balancing exercise was the subject of discussion in *City and Country Bramshill v CCSLG and others* [2021] EWCA, Civ 320.

area and will seek to preserve and enhance their character by carefully considering the following issues:

- i) the relationship of new structures to neighbouring buildings and spaces;*
- ii) the effect of major changes to the appearance of existing buildings;*
- iii) the desirability of retaining existing features, such as boundary walls, gardens, trees, (including street trees);*
- iv) the effect of signs and advertisements;*
- v) any further guidance on specific areas which has been approved by the Council.*

2.12 Saved Policy DC19 Listed Buildings: This policy notes that in determining applications for listed building consent or planning applications for development involving or having an impact on listed buildings, 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. The policy notes that the Council will not permit any external or internal alteration or addition to a listed building where there would be an adverse effect on its architectural or historic character. The policy also notes that the Council will 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.

3. Statement of Significance

Assessment of Significance

- 3.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF. In accordance with paragraph 194 of the NPPF, the descriptions are proportionate to the asset's significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.
- 3.2** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected is therefore fundamental to understanding the scope for and acceptability of change.

Bradley House, 33 Dale Street (grade II)

- 3.3** Bradley House (UID: 1197772) was first designated as a grade II listed building in June 1994. It's list description, one of the older types for identification purposes only, reads:

Shipping warehouse, now various workshops and offices. Later C19, probably for Kessler & Co., merchants. Blackened sandstone ashlar and brown brick in Flemish bond, roof not visible. Wedge-shaped plan on island site between Newton Street on north side and Port Street on south side, with very narrow frontage to Dale Street. Very plain late-Georgian style. Basement and 3+2 storeys, with one-bay facade to Dale Street, 15- and 14-window left and right sides. The basement and ground floor have channelled piers on punched plinths, and a cornice band, a similar band divides the 2nd and 3rd floors, and the parapet has a simple moulded coping. The narrow front has an altered ground

floor with 2 doors, and tripartite sashed windows on each floor above, that at 1st floor with a stone frame and cornice but the others in plain brick (a large signboard between those at 3rd and 4th floors). The sides have similar plain tripartite sashes at the ends and plain 4-pane sashes between; a loading entrance to the rear; cast iron railings to the basement windows (except 6 nearest the front end, which are blocked); one chimney near the west end of the north side and another in the centre of the south side. Interior not inspected.

HISTORY: built on site occupied in 1850 by a machine manufactory.

3.4

Bradley House was constructed in the second half of the 19th century as a 'flat iron' type narrow warehouse and followed the demolition of a much larger, likely 18th century, cotton mill on the site. A firm date for the construction of Bradley House is not known but it was certainly in place by 1885 (the building can be glimpsed on a photograph of this date, not replicated here) and seen on historic mapping surveyed in 1888 (**Figures 3 and 4**).



Figures 3 and 4: Comparison between the 1848 OS Map, surveyed 1843 (left) and 1893 OS Map, surveyed 1888-91 (right) showing Bradley House in place by 1888

3.5

Bradley House remained in warehouse use well into the 21st century and had, by 2015, been empty and unused for a number of years. In 2015 consent was granted for the conversion of the building into easyHotel Manchester (LPA refs: 109696/FO/2015/C2 and 109697/LO/2015/C2). As part of this application considerably alterations were undertaken both internally and externally which can be summarised as including:

- Subdivision of internal floorplates to provide bedrooms and back of house areas etc.;
- Creation of a new hotel entrance and lobby;
- Installation of a new passenger lift;
- Installation of secondary glazing;
- The creation of a platform within the roof valley to accommodate externally mounted plant; and
- Removal of 1930s fabric including a lift and staircase.



Figure 5: 1960 photograph of Bradley House from Newton Street

3.6 The significance of Bradley House as a grade II listed building primarily relates to a combination of its special architectural and historic interest.

3.7 Architectural interest relates to the building being a good quality example of a mid 19th century shipping warehouse which survives predominantly intact externally. The building's simplistic and repetitive form and appearance is of interest and the quality of materials and detailing (for example the use of rusticated stone and stone

string course) also provide evidence as to the quality of the building and its importance in the heart of Manchester's shipping district. Architecturally, the building also marks a point between the simple earliest shipping warehouses and the later 19th and early 20th century more elaborately detailed warehouses also present in this part of Manchester.



Figures 6 and 7: Views of Bradley House from Newton Street (left) and Dale Street (right)

- 3.8** Historic illustrative interest relates to the way in which the building provides an understanding of the early phases of shipping interest in Manchester during the mid 19th century.
- 3.9** In addition to the building's architectural and historic interest, the structure also possesses a degree of group value with other Victorian and Edwardian warehouses in the area, many of which are also grade II listed. As an ensemble, these buildings provide further evidence as to the prominent shipping past of this part of Manchester.
- 3.10** The roof structure of Bradley House is original, featuring repetitive timber trusses, and is of clear architectural and historic interest. As a result of the hotel conversion, the roof is now primarily concealed from view but was previously visible from the fourth floor of the building. The hotel conversion scheme demonstrated that while

an important component of the building, some alteration to this feature could be undertaken (concealment of visibility internally and introduction of the external plant deck).



Figures 8 and 9: Views of Bradley House from Port Street

Stevenson Square Conservation Area

3.11 The Stevenson Square Conservation Area was first designated in February 1987 with subsequent boundary changes in December of that year. There is no adopted conservation area appraisal, however, the MCC website does contain detailed information on the conservation area which has informed this assessment.

3.12 It is not intended to present a fully detailed appraisal of the history of the conservation area but instead the area's historic development (as detailed on MCC's website) can be summarised as:

- The area being the site of the so-called 'daub holes' where mud for wattle and daub was extracted;

- Land sold in the mid 18th century to William Stevenson, and subsequently local developers, for residential redevelopment;
- Gradually both residential development and local trades were introduced to the area; and
- During the later part of the 19th century the area became solely commercial.

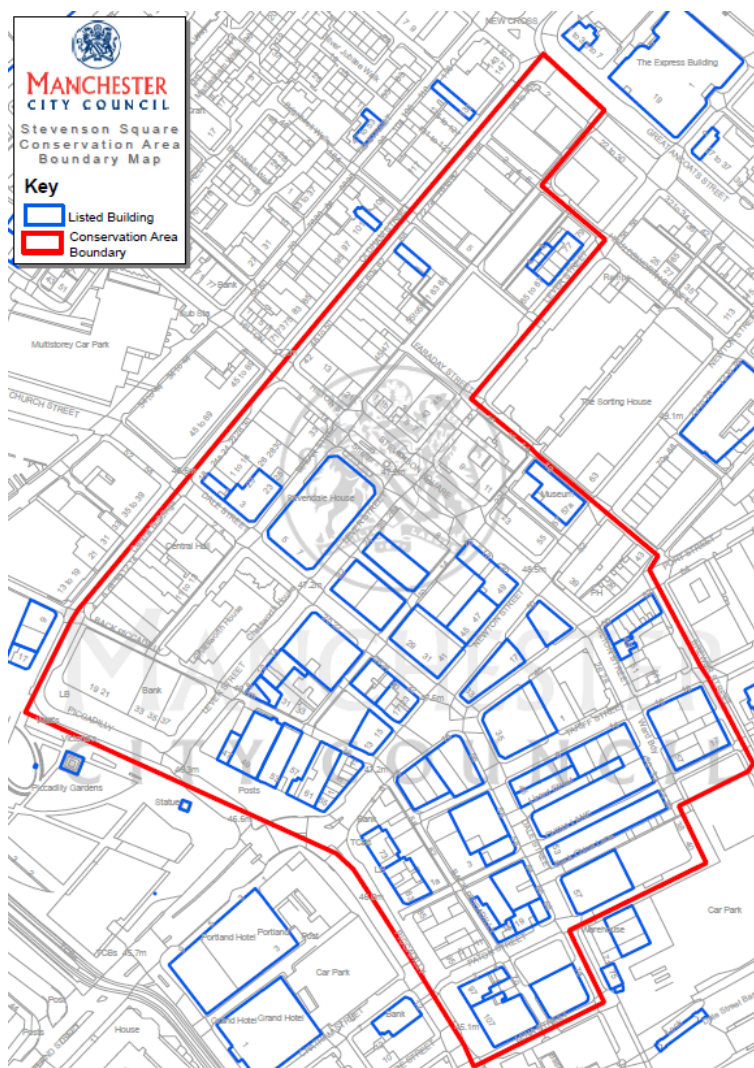


Figure 10: Stevenson Square Conservation Area boundary map

3.13 The area is of clear architectural and historic interest as a result of the quality and character of its built form which typically date to the Victorian and Edwardian eras and represent the commercial past of this part of Manchester.

3.14 MCC's website succinctly defines the special interest of the conservation area as:

The majority of buildings of architectural or historic interest in the conservation area are Victorian or early-20th century. Most are related to the cotton industry, often warehouses, showrooms or workshops. These buildings are taller than the earlier examples and create a varied matrix of building mass, divided by largely dark, narrow streets. Wealth produced by the cotton industry can be seen reflected in the buildings, either stone or brick with stone dressings, many of which are elaborately decorated. Towards the end of this period terracotta became popular and was extensively used either in conjunction with brick or on its own...

The main characteristic of the Stevenson Square conservation area is one of a closely woven network of narrow streets intersecting at right angles. An exception to this occurs in the Port Street area and in Stevenson Square itself, where there is a change in spatial quality. Moderately tall buildings, creating a varied and interesting tapestry of built form are located hard up to the back of pavement...

In the numerous buildings of special interest in and around Stevenson Square, there is not only an enormous variety of styles but also a common unity which designers of new and refurbished buildings must acknowledge...

3.15 Specifically of Dale Street, the Council note that this was the most significant street redeveloped for textile uses during the Victorian and Edwardian periods. The website goes on to note that the change of direction at the junction of Newton Street and Port Street is important and increases the presence of buildings at this point, including Bradley House.

3.16 Bradley House is a prominent building in the area's streetscape, both due to its siting at the angled junction but also due to its 'flat iron' form and historic warehouse use. The building makes a clearly positive contribution to the area's character, appearance and significance.

4. Heritage Impact Assessment

4.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter. This chapter should be read in conjunction with the preceding chapter, and the drawn submission of the application.

Impact Assessment

4.2 As identified in the Introduction, proposals seek to introduce a series of PV cells (two rows) on the building's southern roof slope. The cells are proposed to be installed over the existing roof (so sit above the retained slates) and have be arranged to maximise energy output.



Figure 11: Proposed south elevation of Bradley House showing the location of PV cells

4.3 The PV cells would possess a clear lack of visibility in the area from street level as a result of a number of factors including, their location on the southern side of the building only, as a result of the building's height, the obscuring nature of surrounding townscape, and the relatively shallow pitch of the roof.

4.4 The Design and Access Statement provides a photo study of views from surrounding streets and spaces. This demonstrates that there would be no visibility

from directly north of the building on Newton Street and from directly south of the building on Port Street.

- 4.5** Amendments made to the scheme during the application submission (essentially pushing back the PV cells from the southern edge of the building) have ensured that the PV cells would not be visible in longer views to the west on Newton Street and from Dale Street (**Figures 12 and 13**).



Figures 12 and 13: Views of the building from Dale Street where some limited visibility of the PV cells will be possible

- 4.6** Visibility is also likely to be possible from the upper floor windows of a number of surrounding buildings to the south. Unlike views from street level, these are not deemed to be key views of the listed building or designed views.

- 4.7** Where visibility is possible (from the upper floors of surrounding buildings only), it is important to note that the cells (and their supporting rails and frames) will be dark in colour to avoid them being visually intrusive. Should it be required, the Council could place a condition on any consent relating to providing details of the PV cells to ensure that factors such as the reflectivity of the cells was carefully managed.

- 4.8** It is also important to note that the PV cells would not affect the form or profile of the roof of the listed building in any way and will have no effect or impact on the building's skyline or silhouette.
- 4.9** On this basis, the proposals would not dominate or detract from the clear architectural and historic value of the building or the role it plays within the wider conservation area.
- 4.10** Due to the building's statutory listed nature, the way in which the PV cells connect to the roof structure also needs consideration. The cells are proposed to be fixed to the building through a number of new anchor points. To create these anchor points, a small number of slates would be removed (to be retained and stored for future use) with new anchor points attaching in an entirely reversible way to the historic roof structure below. New slates would be cut to fit around the anchor points, re-finishing the roof.
- 4.11** This method of fitting will ensure that no historic fabric is removed as a result of the proposals and ensure that, if required in the future, the proposals are fully reversible. While connected to the building's roof structure, structural calculations will be undertaken to ensure that the additional weight does not compromise the performance of the roof.
- 4.12** Overall, while the PV cells would be entirely concealed from views in context of the grade II listed Bradley House and Stevenson Conservation Area apart from a small number of views from upper floors of surrounding buildings. As such, the extent of visibility is wholly limited and would not affect views along the conservation area's streets or key views towards the building. The introduction of PV cells would not erode or affect the ability to appreciate the significance and unique heritage values of either the host building or conservation area and the introduction of the PV cells is not found to be harmful to the heritage assets especially given the current emphasis on the need for renewable energy sources.
- 4.13** The significance of the listed building, which is derived from its architectural form, fabric and character as a mid 19th century shipping warehouse and associated historic illustrative and group values, would be entirely preserved even if some PV cells were visible. Similarly, the significance of the conservation area as a high quality Victorian and Edwardian commercial area would be entirely preserved.

Summary and Policy Compliance

- 4.14** The proposed development is based on an understanding of the character of Bradley House (grade II) and the Stevenson Square Conservation Area, their historic development and significance. The proposed development has been informed by this with the proposals being specifically designed to provide the building with a sustainable and green energy source in a way which is sensitive to the significance of the assets.
- 4.15** As identified above, the proposals are found to preserve the significance of the assets identified. As such, it is the findings of this report that the proposed works would fall outside of the remit of paragraphs 201-202 of the NPPF insofar as they will not result in any harm to, or loss of significance. There would be preservation for the purposes of Sections 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990.
- 4.16** The proposals are also found to accord with the requirements of local planning policies as follows:
- **Policy CC9 Design and Heritage:** In accordance with the requirements of this policy, the proposed development would entirely preserve the significance of the heritage assets.
 - **Policy EN3 Heritage:** The proposed development accords with the requirements of this policy insofar as the development would complement and preserve the area's heritage assets.
 - **Saved Policy DC18 Conservation Areas:** The proposed PV cells would meet the requirements of this policy as the development seeks to preserve the conservation area and have a positive relationship with the surrounding buildings and spaces. Historic features would be retained, and the overall character of the area maintained.
 - **Saved Policy DC19 Listed Buildings:** In accordance with the requirements of this policy, the proposals would entirely preserve the significance of this asset. While amounting to external alterations to the grade II Listed building, these would not result in any adverse effect upon its architectural or historic character and the entirely reversible works would have no effect on the future use of the building.

- 4.17** While unlikely given the nature of the development, should the Council consider any harm to be caused this should be weighed against the environmental benefits of the scheme in accordance with paragraph 202 of the NPPF.

5. Conclusions

- 5.1** This Heritage Impact Assessment presents an assessment of significance of Bradley House, 33 Dale Street, a grade II listed building now functioning as the easyHotel Manchester. This is followed by an appraisal of the effects of the proposals upon these heritage assets with consideration given to local and national policy and guidance.
- 5.2** easyHotel Manchester (Bradley House, 33 Dale Street) is a grade II listed 'flat iron' type mid 19th century shipping warehouse located within the Stevenson Square Conservation Area in the heart of Manchester's historic shipping district.
- 5.3** Proposals seek planning permission and listed building consent for the introduction of PV cells to the southern roof slope of the building in order to provide the building with a sustainable and green energy source.
- 5.4** Section 5 of this report presents an assessment of the impact of the proposed works on the significance of the identified heritage assets and concludes that, while the PV cells would hold some visibility from upper floor windows of surrounding buildings, visibility would not be possible from street level and the introduction of PV cells would not erode or affect the ability to appreciate the significance and unique heritage values of either designated heritage asset. The visibility itself of glimpses of PV cells is not found to be harmful to the heritage assets especially given the current emphasis on the need for renewable energy sources.
- 5.5** The significance of the listed building, which is derived from its architectural form, fabric and character as a mid 19th century shipping warehouse and associated historic illustrative and group values, would be entirely preserved even if some PV cells were visible. Similarly, the significance of the conservation area as a high quality Victorian and Edwardian commercial area would be entirely preserved.
- 5.6** In summary, the proposed works to the grade II listed building and within the conservation area are considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. There would be preservation for the purpose of the decision maker's duty under sections 16, 66 and 72 of the Planning (Listed Building and

Conservation Area) Act 1990. While unlikely given the nature of the development, should the Council consider any harm to be caused this should be weighed against the environmental benefits of the scheme in accordance with paragraph 202 of the NPPF.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁷

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁷ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)