

Comments on application ref no 134954/FO/2022 39-41 Richmond Street

1.0 Introduction

The building and site under consideration area located in the Whitworth Conservation Area and in the setting of a number of listed buildings, including the Grade II listed former warehouse at 27 Sackville Gardens, the warehouse at 51-53 Richmond Street and the former school on Whitworth Street.

Dated to c.1800 it is noted that the premises are a rare survivor of Georgian domestic development in the area, constructed as a pair of terraced residences prior to the area's urbanisation and industrialisation in the 19th and early 20th centuries. Its form, construction, appearance and footprint are reflective of its date and origin, contributing to its appreciation as c.1800 dwelling. These elements contribute to the building's own heritage interest and the special significance and distinctive character of the conservation area.

On account of its high historic interest and rarity, the building is considered a non-designated heritage asset and an important contributor to the sense of place, sense of history and overall special significance of the Whitworth Conservation Area.

1.1 Policy Context

National Planning Policy Framework (NPPF) (2023)

Para 130 - Planning decisions should ensure that developments will function well and add to the overall quality of the area, are sympathetic to local character and history, and establish or maintain a strong sense of place.

Para 134 - Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

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

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

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

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

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

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

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

Para 203 - The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.

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

Manchester City Core Strategy

DM 1 – Development Management

SP1 – Spatial Principles

Policy CC9 – Design and Heritage

Policy EN3 – Heritage

Saved UDP Policies

DC18.1 Conservation Areas

DC19.1 Listed Buildings

Places for Everyone

Policy JP-P 1 - Sustainable Places

Policy JP-P 2 - Heritage

Manchester Residential Quality Guidance (2017)

National Model Design Code (2021)

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990

2.0 Formal comments on merits of application.

2.1 Principle of Demolition

It is considered that the proposed demolition of 39-41 Richmond Street would cause a high level of less than substantial, harm to the Whitworth Conservation Area. It would remove a rare example of an early domestic development in the area, eroding appreciation of, sense of history and the historic significance of the Conservation Area.

The demolition has not been substantiated with clear and convincing justification, as required by paragraph 200 of the NPPF (in terms of the harm to the conservation area). It has not been demonstrated that the building is incapable of viable reuse. No alternative options other than demolition have been presented within the application as having been considered and assessed. Without evidence to the contrary, it is assumed that the building is capable of re-use.

For reasons set out in more detail below the proposed demolition and subsequent development as proposed would not result in public benefits which would outweigh the harm to the conservation area as required by paragraph 202 of the NPPF (as a designated heritage asset) from the demolition.

Proposals which would retain, re-use and improve the premises would take the opportunity to preserve or enhance the conservation area and thus meet the objectives of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Core Strategy Policy EN3 and saved UDP Policy DC18.1.

The proposed demolition would also be contrary to the recommendation of paragraph 152 of the NPPF, which requires the planning system to support the transition to a low carbon future through the reuse of existing resources, including the conversion of existing buildings.

In addition, National Model Design Code (2017) sets out that new development *“should respect the historic assets of the site and its surroundings, making use of existing structures where possible”*. Manchester Residential Quality Guidance (2017) states that when delivering new residential development across the city *“sensitive retrofitting and re-use of heritage assets will be required, unless an alternative approach is justified by evidence of other material considerations”*. The proposed demolition, not evidenced as the optimal solution for the site, fails to comply with the aforementioned guidance.

2.2 Appearance and Design

The proposed design and appearance of the development are not considered to be appropriate in terms of the site's context and location. The proportions of the elevations do not match or reflect those of the adjacent buildings, with no evident measures, apart from the use of brickwork, to integrate the proposal onto existing streetscene and its historic context, i.e. through the use and redistribution of architectural features, depth modulation and other visual cues. The proposed elevations are of a poor-quality design, with no distinctive features and elements that would add visual interest and quality to the proposed new development.

There is minimal tripartite distinction between the bottom, middle and top of the proposed premises. The ground floor does not present an attractive and active frontage to Richmond Street, failing to meet the objectives of the Manchester Residential Quality Guidance (2017) and to contribute positively to a more vibrant and safer city centre. Instead, the ground floor presents a standard glazed door and a framed window, with a small recess that lacks enhanced detailing and aesthetic interest, which would be expected of a new development in a context of a conservation area.

The blank northeast elevation, which would be the most prominent aspect of the development in the local streetscene. No visual interest has been provided through a considered use of architectural features, depth modulation, feature brickwork, stepped parapet or else. Consequently, the proposed northeast elevation would be an adverse and incongruous feature in the local townscape, failing to deliver visual improvement.

The proposed louvres to the 'rear' elevation would be a poor quality prominent and central addition to this elevation and would further undermine the design failures of the proposals as set out above.

The building would stand in stark contrast to the expression of architectural ambition and quality of the Grade II 27 Sackville Street.

There is limited information on the proposed external materials and finishes of the development. Based on the information submitted to date, the proposed uPVC frames would fail to meet the standard of joinery expected in the context of a conservation area and to echo the quality and proportions of the traditional joinery in the area, as set out in the heritage statement.

In summary, the development is not considered to be an attractive, high-quality and well-designed, and instead would fail to function well in its context, be visually attractive and sympathetic to the local character and history.

2.3 Height and Mass

The building would be higher than the existing non-designated assets and the neighbouring domestic scale properties to the north-west, south-east and south-west of the site and no justification for this height based on an appropriate contextual analysis has been provided.

Buildings on this part of Richmond Street are typically 2 or 3 storeys. At four storeys the proposed development would be out of scale with that context and relatively prominent. This impact would be exacerbated by its location. It is considered that development of this height in this location would fail to make a positive addition to the local streetscene and the character of the conservation area in contrast to the restrained domesticity of the existing non-designated heritage asset on site and adjacent buildings, with a negative impact on the sites contribution to the conservation area's appearance and special interest.

The proposed appearance and design of the development do not justify its relative prominence in its context.

2.4 Impacts from Height, Mass and Overall Design

It is considered that the proposed development, by virtue of the siting, scale, massing, appearance and architectural detailing, would result in an overly large development which would not meet required design standards for a building both within the city centre of Manchester, a conservation area and within the setting of listed buildings.

The proposal would therefore fail to respond positively to the character of the area, streetscene and resulting in an unduly harmful impact on visual amenity.

Overall the proposed design quality would not align with the expectations set out within paragraphs 130 and 134 of the NPPF or the objectives of the National Model Design Code (2021) and the Manchester Residential Quality Guidance (2017).

The proposed development due to the demolition proposed, its scale, massing and design would result in less than substantial harm to the character of the Whitworth

Street Conservation Area and the setting of the listed buildings detailed above. It is considered that the public benefits from the development would not on balance outweigh the harm to designated heritage assets as required by paragraph 201 of the NPPF or that having regard to the scale of any harm or loss and the significance of the heritage asset as part of a balanced judgement that the total loss of the existing building is justified in the context of the harm that would result from the development in respect of paragraph 203.

In terms of Chapter 16 of the NPPF the proposed development would also be contrary to paragraphs 189, 195, 197, 199 and 206.

Furthermore the form of development proposed would be contrary to Core Strategy policies DM1, SP1, EN3 and CC9 and Saved UDP Policies 18.1 and 19.1.

3 Conclusion

The proposed new development cannot be supported due to its overall height and poor design quality and its impacts on heritage assets (not least the loss of the building itself as a non designated heritage asset).

Although the harm to Whitworth Conservation Area and the setting of the listed buildings caused by the demolition of the non-designated heritage asset and the construction of the proposed new development would be less than substantial, it would nonetheless be material, and is considered to be cumulatively high.

If any development of the scale and height proposed could be fully justified it would have to manifest excellence in design and appearance and make an evidently positive contribution to the conservation area's character and streetscene and the setting of the adjacent listed building at 27 Sackville Street, the warehouse at 51-53 Richmond Street and the former school on Whitworth Street. In addition, there would have to be demonstrable public benefits which exceed those currently resulting from the development proposed to outweigh the harm from the loss of the building in terms of its contribution to the character and setting of the conservation area and the setting of listed buildings.

It is not agreed that the proposed development would have a positive impact on the local amenity, the conservation area and the setting of the listed buildings. The principle of the development would result in a high degree of harm due to the loss of an important non-designated asset of considerable historic interest.

The proposed replacement building would not contribute to the heritage significance, sense of history and special character of the local area, would fail to make a positive contribution to the local character and streetscene on account of its design, form and appearance. Consequently, the proposal would fail to secure material improvements to the local amenity, and thus maximise the public benefits of the new development.

The delivery of the new residential units per se is not considered to outweigh the perceived harm to the city's historic environment, where great weight should be given to the designated asset's conservation, and the local amenity. The proposal would not secure the positive redevelopment of this site.

The proposal is not considered to accord with saved UDP policies DC18.1 and DC19.1, Core Strategy Policies DM1, SP1, CC9 and EN3, Places for Everything Policies **Policy JP-P** and **Policy JP-P 2**, the guidance within Chapters 12, 14 and 16 of the NPPF (2023) and the objectives of the National Model Design Code (2021) and the Manchester Residential Quality Guidance (2017).

Additional points in response to e-mail 09 11 23 not covered by above.

Notwithstanding the degree of a significance, is agreed by both parties that the building under consideration has sufficient heritage interest to be classified as a non-designated asset. Identification as a non-designated heritage asset implies a positive contribution to the local area. As such, the building's loss would cause at least a degree of harm to the sense of place, sense of history and the distinctive character of the conservation area, and thus ultimately cause harm to the special significance to the designated heritage asset. The harm, due to the interest and the contribution the building makes to the area, is not negligible or de minimis, as in the above response.

On this point, I refer you to paragraph 207 of the NPPF and paragraph 19 of the PPG on the Historic Environment, which are clear that loss of an unlisted building that makes a positive contribution to a conservation area amounts to either substantial harm under paragraph 201 or less than substantial harm under paragraph 202.

Based on the above, it is considered that the council assessment that the degree of harm would be less than substantial is a reasonable and a justifiable one, and thus paragraphs 200 and 202 apply in addition to paragraphs 189, 197, 199, 203 and 206 of the NPPF.

Having regard to paragraph 200 in particular, it is not agreed that the proposed development, which would provide a total of four new apartment, will bring significant benefits to the area and the city. It is also not agreed that the public benefits would be sufficient to outweigh the perceived harm.

In light of the above, it is not considered that amended design would resolve the outstanding planning issues with the proposed development, the primary point of concern being the demolition of the non-designated heritage asset and the harm to the conservation area.