



Manchester City Council
Development Management
Floor 6, Town Hall Extension
Albert Square
PO Box 532
M60 2LA

Our Ref: let.70109937

12 June 2023

Dear Sir/Madam,

Royal London House - Application for Listed Building Consent

On behalf of ASE REA LLP c/o CEG, we have submitted an application for Listed Building Consent relating to internal works on the fourth floor common areas of Royal London House, 196 Deansgate, Manchester, M3 3NE.

In addition to this cover letter, the application submission package comprises the following documents:

- Application form and certificates duly signed and completed;
- Location plan (ref: CEF001A);
- Existing / proposed floor plan (ref: SS 1386.002);
- Wall / Ceiling finishes (ref: SS 1386.003);
- RCP/Lighting 4th floor common parts (ref: SS 1386.005);
- Lighting Specification Sheet (ref: 196-JS-CA-ZZ-SP-I_Lighting);
- Finishes Specification Sheet (ref: 196-JS-CA-ZZ-SP-I_Finishes);
- Design and Access Statement;
- Schedule of Works; and
- Heritage Partnership Agreement.

The application has been submitted via the Planning Portal and has been given the following reference: PP-12173803.

SITE AND SURROUNDINGS

The application site relates to the fourth floor common areas of Royal London House. Royal London House, 188-202 Deansgate is a Grade II Listed building and is located within Deansgate / Peter Street Conservation Area. The listed structure was originally built as an insurance office in 1904 and comprises ground floor units, five storeys and an additional basement level.

The building is situated between Deansgate to the east, Quay Street to the south, Atkinson Street to the north and Little Quay Street to the west. The surrounding area is characterised

predominantly by commercial buildings which typically comprise office accommodation on the upper levels with retail/leisure/food and drink uses at ground floor and basement level.

PLANNING HISTORY

Royal London House is subject to an extensive planning history, with applications having been submitted for various changes of use relating to ground floor units, refurbishment of the upper floors, external alterations and advertisement consent. Some of the more relevant applications to the office and common areas include:

- 127726/LO/2020 - Listed Building Consent for internal works within the common areas at ground to third floor. Approved 12 August 2020.
- 115629/LO/2017 – Listed Building Consent for the sub-division of 1st Floor office floor plate and creation of circulation corridor. Approved 4 May 2017.
- 111013/LO/2016/C1 - Listed Building Consent for the refurbishment of office spaces at 4th floor level. Approved 9 March 2016.
- 107515/LO/2014 – Listed Building Consent for the refurbishment of the office space at 1st and 2nd floors and repair work to the exterior elevations. Approved 12 Feb 2015.

A Heritage Partnership Agreement (HPA) is in place between ASE REA LLP and Manchester City Council. The HPA was signed on Monday 17 December 2018 and given the reference: HPA/2018/002. The HPA is intended to streamline the planning process, enabling permitted works to be carried out in a timely and cost-effective manner. Under provision of the HPA, the applicant is permitted to carry out works to the building in accordance with a traffic light system, denoting the level of consent required, namely:

- Green category works are permitted works;
- Amber category works require written notification to the council prior to commencement; and
- Red category works require statutory consent.

We wrote to Urban Design and Conservation Officer, Paul Mason, in 2020 to provide a proposed schedule of works and seek agreement on the elements where statutory consent would be required. These pre-application discussions in turn informed the Listed Building Consent application (127726/LO/2020). The majority of works were agreed to fall within the Green permitted works set out within the HPA. This application was for works that have been agreed to fall within the Red category and therefore Listed Building Consent is required. We wrote again to Paul Mason on 5 May 2023 to discuss the elements of work proposed on the fourth and fifth floors and the scope of this application has been discussed and agreed in advance with MCC.

For completeness, the relevant CGI submitted with the earlier application have been provided to show the internal scheme inclusive of green category works which are permitted, where Listed Building Consent is not required. It should be noted that the burnt orange columns shown in the CGIs are not present on the upper floors and are excluded from the scope of works. The metal staircase shown is also not proposed. This application extends only to installation of the pendant lights and painting of cornicing.

THE PROPOSAL

The proposal replicates application (ref: 127726/LO/2020) where the approach and overall design proposed below was approved for the ground floor to floor three. As noted below, this scheme relates only to the cornicing and lighting. Therefore, this application seeks:

“Listed Building Consent for the refurbishment of the fourth floor common areas of Royal London House, to include painting cornicing and installation of pendant lights”.

Further to discussions with Paul Mason, and agreement on the elements of work where Listed Building Consent is not required, this application seeks Listed Building Consent for the following works:

- Painting cornicing;
- Lighting – pendant fittings.

The following elements are also included in the proposal but do not require listed building consent as they are classed as ‘Green’ works:

- WC cubicles demolished and modern finishes removed (no original finishes are disturbed);
- WCs new superloos;
- Door’s vinyl wrapping;
- Lift surrounds vinyl wrapping;
- Floor finishes replacing modern flooring;
- Painting of non-original ceilings;
- Skirting and door frames;
- Redecorating painted walls;
- Painting existing painted bricks to the same colour (white) where there are no instances where exposed (unpainted) glazed tiles would be affected by the works;
- Lighting – spotlights on metal frame which will attach to non-original ceilings, replacing modern lighting.

PLANNING POLICY AND LEGISLATION

LEGISLATION

The Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings, structures, and areas of specific historic architectural or historic interest.

Sections 16(2) and 66(1) of the Act set out the duty placed upon the local planning authority when considering whether to grant planning permission for development which affects a listed building as the decision maker, stating that the authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest. Section 72 of the 1990 Act requires that special attention be given to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

NATIONAL PLANNING POLICY FRAMEWORK (2021)

Chapter 16 of the NPPF explains 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, proportionate to the importance of the asset. Any harm to, or loss of, significance of the asset should require clear and convincing justification.

Significance is defined within the NPPF Glossary (Annex 2) as deriving from both the physical presence and setting of an asset.

Paragraph 202 states that when a development will lead to less than substantial harm to the significance of a designated heritage asset, the harm should be weighed against the public benefits of the proposal.

MANCHESTER CORE STRATEGY (2012)

Policy CC 9 (Design and Heritage) states that development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings.

Policy EN 3 (Heritage) requires developments to 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.

SAVED UDP POLICIES

Various UDP planning policies have been saved, including citywide development control policies and area-specific policies.

Saved Policy DC19.1 outlines that the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of buildings of Special Architectural or Historic Interest in the determination of planning application for listed building consent.

HERITAGE ASSESSMENT

The works relate only to internal parts of the building and only have potential to impact upon Royal London House itself. As such, the wider conservation area and nearby Listed Buildings have not formed part of our assessment.

ASSESSMENT OF SIGNIFICANCE

Royal London House is Grade II listed under the Planning (Listed Buildings and Areas) Act 1990 as amended for its special architectural or historic interest. The building was listed on 3 October 1974. Royal London House makes a significant positive contribution to the Deansgate Conservation Area using high quality materials and decorative details. The building is an important example of the phase of 'rebuilding' that was undertaken in the later nineteenth century as slum areas were cleared and is a typical example of the emerging office typology in the Victorian era. The significance of Royal London House lies within its fabric and design, predominantly in its historic external architectural detailing and internal features. Numerous phases of refurbishment have taken place over the 20th and early 21st century which has altered the internal spaces and in doing so has removed some of the historic features. Within the space relevant to this application, the special historic features which remain are highlighted in Table 1 below.

The Gazetteer of Historic Finishes (Table 1) of the HPA records the historic features within the building. A full copy of the HPA is included within this submission, and entries relevant to this application are included below:

Table 1: The Gazetteer of Historic Finishes

Ref.	Location	Description
4.11	4 th Floor Common Areas	Exposed painted brickwork
4.12	4 th Floor Office Areas	Plaster Cornices

Royal London House in its entirety, is of considerable evidential, historical and aesthetic value. The special interest of Royal London House is associated with its physical fabric and its aesthetic contribution to the wider streetscape and character of this part of the Deansgate / Peter Street Conservation Area. It holds considerable aesthetic value, being an example of the style adopted by Charles Heathcote for a number of his buildings and in its use of high-quality materials and decorative details externally and internally to the entrance way. Royal London House (188-202 Deansgate) retains some important elements of the original configuration and detailing such as decorative tiles and unique features associated with historic uses. It also holds a number of historical associations including the design by the architect Charles Heathcote and the occupation by numerous diverse businesses in Manchester.

Further detail on the internal features which are of historical interest are included within the accompanying design and access statement.

IMPACT ON SIGNIFICANCE

The impact of the proposal on its individual components and the overall integrity and significance of the listed building may be measured as: adverse; neutral; or beneficial. The key objective is to minimise adverse impacts, and to ensure that any adverse impact is outweighed by the beneficial impact of the development in terms of the delivery of 'public benefits'. Greater weight has therefore been placed on the retention of elements of historic fabric, and sensitive re-decoration of these historic finishes.

Painting Cornicing

Plaster cornicing throughout the common areas of the fourth floor will be repainted in "Ravens Flight" matt emulsion. The cornicing will not be altered or covered up, simply the paint colour will differ. The significance of this historic finish relates to the detail, and as this will remain visible this element of work is thought to have a neutral impact on heritage significance.

This element has been approved on the lower floors through Listed Building Consent 127726/LO/2020.

Lighting

On the fourth floor, two bloom pendants will be installed above the new seating area, adjacent to the staircase. The lighting will attach to the underside of a bulkhead which sits adjacent to the ceiling cornicing above. The point of attachment is on a flat and undecorated part of the bulkhead,

as such, no decorative parts would be impacted by the proposal. The bloom pendant lights will be suspended by a thin, understated cord which will blend in with the decorative scheme.

This element has been approved on the lower floors through Listed Building Consent 127726/LO/2020

SUMMARY

The Heritage Assessment has identified the special characteristics and significance of the asset, and reference is made to the Heritage Partnership Agreement which relates to the fourth floor common areas of Royal London House. The proposal has been reviewed against relevant planning policy and guidance. In accordance with statutory requirements, special regard has been given to preserving the special architectural and historic interest of the heritage asset.

A cohesive scheme is proposed which seeks to retain and enhance the special character and features of the building.

No original fabric will be concealed, removed or harmed as a result of the works. The proposed works will not result in harm to the special architectural interest of the interior space, instead the redecoration will help to refresh the fourth floor common areas within Royal London House, improving the appearance and contribute to the longevity of those features in accordance with Policy CC 9 (Design and Heritage) and Policy EN 3 (Heritage).

Overall, the proposals intend to preserve and enhance the heritage asset, through redecoration and maintenance, in accordance with local policies.

Furthermore, the assessment concludes that the works will have minimal or negligible impact on the significance of the designated heritage asset. In accordance with the NPPF, the test of whether the proposals will lead to substantial harm or less than substantial harm has been applied. The proposals will not cause harm to the significance of the designated heritage assets as the features of special architectural and historic interest and character will be preserved.

CONCLUSIONS

This statement has been prepared in the context of national and local planning policy. In accordance with national policy and guidance, a heritage assessment of the site has been undertaken. The significance of the heritage asset has been identified and described, and the potential impact of the proposed development has been evaluated.

The redecoration and refurbishment works proposed within this application have given special regard to preserving and enhancing the special interest of the asset. The proposal aims to keep the heritage asset in good decorative repair.

The works will not harm the significance of the designated heritage asset and will protect and enhance the identified architectural and historic features. In these terms, the proposal meets the relevant statutory tests within the Planning (Listed Buildings Conservation Areas) Act 1990 by preserving the key features of special architectural or historic interest. In accordance with local and national policy, the proposal should be approved without delay.

We trust you have everything required to validate the application; however, please do contact us should you require anything further.

Yours faithfully



Victoria Welch
Senior Planner