Built Heritage Statement

York House, Manchester

On behalf of Perry Williams Ltd for EE

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1. Introduction

1.1. Pegasus Group have been commissioned by Perry Williams Ltd on behalf of EE to prepare a Built Heritage Statement to consider the proposed upgrading of telecommunications equipment at York House, West Mosley Street, Manchester, M2 3BB as shown on the Site Location Plan provided at Plate 1.

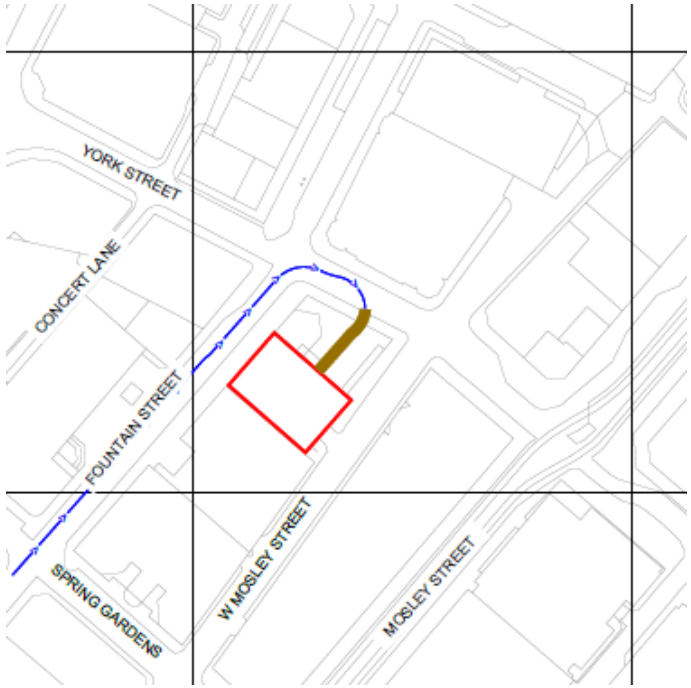


Plate 1: Site Location Plan.

1.2. The application Site comprises the rooftop and upper extent of York House, a 1970s office block (hereafter called 'the Site'). York House is not statutorily Listed, nor has it previously been identified by the Local Authority as a non-designated heritage asset; however, it is located within the Upper King Street Conservation Area.

1.3. Full Planning Permission is sought for the upgrading of telecommunications equipment, comprising 6no. replacement antenna, and associated works.

1.4. This Assessment provides information with regards to the significance of the built historic environment to fulfil the requirement given in paragraph 207 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".[1]

1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the built historic environment, following paragraphs 212 to 216 of the *NPPF*, any harm to the built historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

[1] Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, December 2024), para. 207.

1.6. As required by paragraph 207 of the *NPPF*, the detail and assessment in this Report is considered to be "*proportionate to the assets' importance*".[2]

[2] MHCLG, *NPPF*, para. 207.

2. Proposed Development

2.1. Full Planning Permission is sought for the upgrading and replacement of the existing telecommunications equipment, comprising 6no. replacement antenna, on the Site.

2.2. The full schedule of works is as follows:

- Removal and replacement of 3no antenna (mounted on existing wall mounted support poles);
- Installation of 3no new antenna (mounted on existing wall mounted support poles);
- Replacement GPS node fixed to side of existing equipment cabin on rooftop;
- 4no ERS fixed to existing support poles/ railing; and
- Internal upgrade to existing equipment cabin.

2.3. The proposals are detailed on the following plans which form part of the application package and which this assessment considers:

- Existing Site Plan - DWG No. 100 Issue A1
- Proposed Site Plan - DWG No. 150 Issue A1
- Existing Site Elevation A - DWG No. 200 Issue A1
- Existing Site Elevation B - DWG No. 201 Issue A1
- Existing Site Elevation C - DWG No. 202 Issue A1
- Existing Site Elevation D - DWG No. 203 Issue A1
- Proposed Site Elevation A - DWG No. 250 Issue A1
- Proposed Site Elevation B - DWG No. 251 Issue A1
- Proposed Site Elevation C - DWG No. 252 Issue A1
- Proposed Site Elevation D - DWG No. 253 Issue A1

2.4. ***Section 7*** of this Report presents an analysis of the impact of the proposed development on identified heritage assets discussed in ***Section 6***.

3. Methodology

3.1. The aims of this Report are to assess the significance of the heritage resource within the Site/study area, to assess any contribution that the Site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

3.2. This assessment considers built heritage only.

Sources

3.3. The following key sources have been consulted as part of this assessment:

- The National Heritage List for England for information on designated heritage assets;
- Information published online regarding Upper King Street Conservation Area by Manchester City Council;
- Historic maps available online;
- Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;
- Old photographs accessible via the Historic England Architectural Red Box Collection;
- Google Earth satellite imagery; and
- Planning records accessed via Manchester City Council's planning portal

Site Visit

3.4. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 26th August 2025, during which the Site and its surrounds were assessed.

Photographs

3.5. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development proposals, nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

Assessment Methodology

3.6. Full details of the assessment methodology used in the preparation of this Report are provided within ***Appendix 1***. However, for clarity, this methodology has been informed by the following:

- *Historic Environment Good Practice Advice in Planning: 2 - Managing Significance in Decision-*

Taking in the Historic Environment (hereafter *GPA:2*);[3]

- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) - The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter *GPA:3*);[4]
- *Historic England Advice Note 1 (Second Edition) - Conservation Area Appraisal, Designation and Management* (hereafter *HEAN:1*).[5]
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter *HEAN:12*);[6] and
- *Conservation Principles: Polices and Guidance for the Sustainable Management of the Historic Environment*.[7]

[3] Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment (GPA:2)* (2nd edition, Swindon, July 2015).
[4] Historic England, *Historic Environment Good Practice Advice in Planning Note 3 - The Setting of Heritage Assets (GPA:3)* (2nd edition, Swindon, December 2017).
[5] Historic England, *Historic England Advice Note 1 - Conservation Area Appraisal, Designation and Management (HEAN:1)* (2nd edition, Swindon, February 2019).
[6] Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN:12)* (Swindon, October 2019).
[7] English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

4. Site Description and Planning History

Site Description

4.1. The Site comprises the rooftop and upper extent of York House, an 11-storey tower block on York Street, situated at the junction of West Mosley, Fountain Street and York Street. The building was constructed in the 1970s to designs by Leach Rhodes & Walker and exemplifies the firm's characteristic use of alternating dark brick and slim white strips enveloping a concrete frame, with vertically proportioned inset glazing. There is an area of landscaping with tree planting at street level in front of its north elevation.

4.2. As shown on the Existing Site Plan and Elevation Plans, and discussed further below, there is currently a proliferation of approved telecommunication equipment, plant and equipment cabins installed on the upper elements and rooftop of York House, including pole mounted antenna and wall mounted antenna on the side of building. The equipment mounted to the side of the building is visible at ground level from the surrounding townscape (see Plate 2).

4.3. The Site is bound by York Street to the north-east, Mosley Street to the south-east, Charlotte Street to the south-west and Fountain Street to the north-west. The streets surrounding the Site include built form up to eight storeys in height.

4.4. The Site is located within the Upper King Street Conservation Area and is within the vicinity of several Listed Buildings including the Grade II* Listed Royal Bank of Scotland, Grade II Colwyn Chambers, Grade II Harvest House & Mosley Street, Grade II* Estate Exchange and the Grade II Listed 49 Spring Gardens.



Plate 2: York House as seen from York Street.

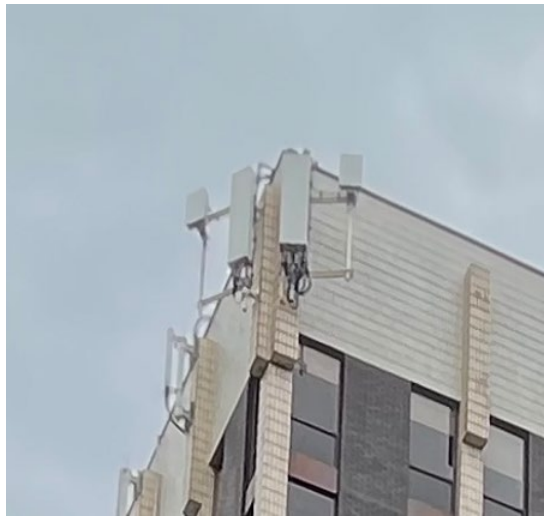


Plate 3: Zoomed in view of existing wall mounted antenna to rooftop of York House (provided for illustrative purposes only).



Plate 4: Google Earth aerial view of York House (circled) and surrounding area.

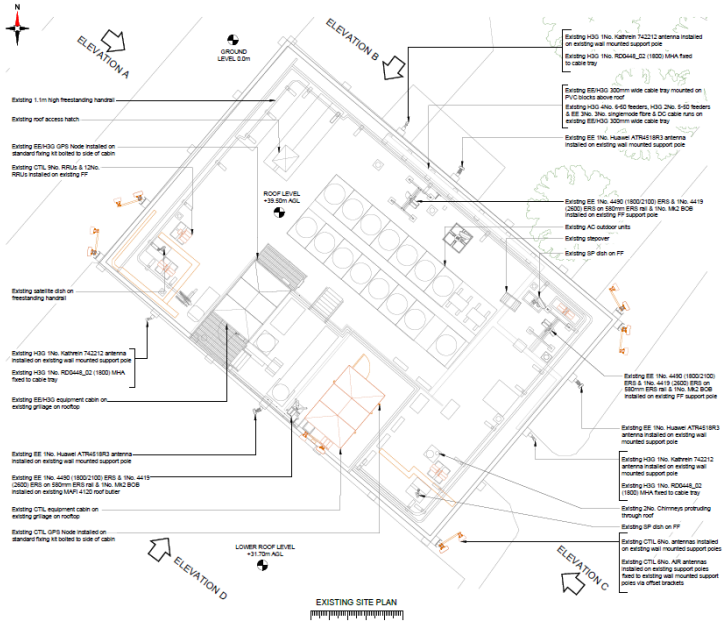


Plate 5: Existing Site Plan (DWG No. 100) detailing the extent of existing telecommunications equipment.

Site Development / Map Regression

4.5. York House is bound to all sides by an eclectic mix of large multi-storey commercial buildings dating from the 19th century onwards, some of which, including the Site, where constructed in the late 20th century. The Site is thus experienced as part of an evolved city-centre townscape with historic and modern elements sitting alongside each other.

4.6. The varying townscape character of the locality can be attributed in part to the redevelopment of swathes of the city following the destruction of World War II, though the site of York House was unaffected by bombing.

4.7. As illustrated in the historic mapping below, during the mid-19th century the Site was historically occupied of several smaller buildings with narrow footprints arranged around a central yard in its end-of-block location, including The Garricks Hotel Public House to the south-west as recorded on the 1st edition Ordnance Survey map of 1849 (Plate 6).

4.8. The 1891 Ordnance Survey map shows that by the end of the 19th century the Site had been redeveloped, with the footprint of the new building taking up the entire end of block site (Plate 7). The Ordnance Survey map of 1949 identifies this building as York House.

4.9. The 19th century York House was demolished between 1965 and the early 1970s and replaced with the extant York House (Plate 12).



Plate 6: Extract from 1849 Ordnance Survey map.



Plate 7: Extract from 1891 Ordnance Survey map.



Plate 8: Extract from 1922 Ordnance Survey map.



Plate 9: Extract from 1949 Ordnance Survey map.

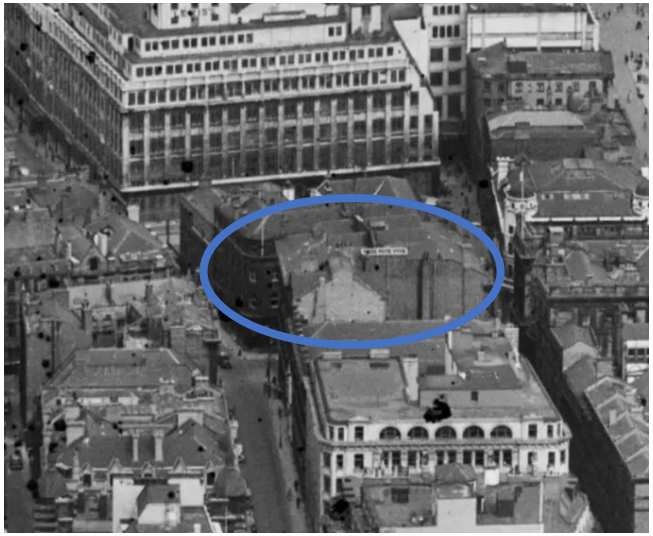


Plate 10: Extract from 1951 aerial photograph detailing the built form of the 19th century York House (Source: Historic England).

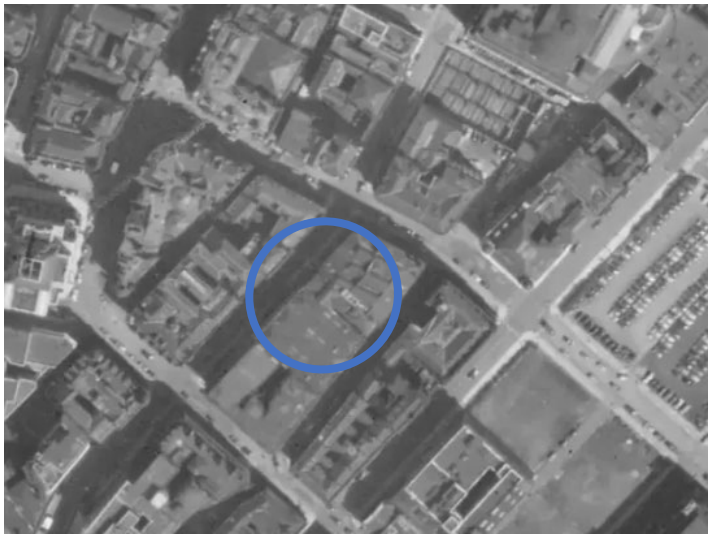


Plate 11: Extract from 1953 aerial photograph detailing the built form of the 19th century York House (Source: Historic England).



Plate 12: Extract from 1965 Ordnance Survey map.



Plate 13: 2025 satellite image (Source: Google Earth).

Planning History

4.10. A review of recent planning history records held online by Manchester City Council has revealed several telecommunication related applications for the Site:

062266/FO/CITY1/01 - *Installation of 3 No. face mounted antennas and 3 No. face mounted dummy antennas; and ancillary equipment at roof level to include: equipment cabin; 2 No. air-conditioning units and associated access and safety equipment.* Application approved 16th Feb 2002.

4.11. It is understood that the works approved under application reference 062266/FO/CITY1/01 have been implemented.

061435/FO/CITY1/01 - *Installation of rooftop mounted telecommunications equipment with cabin.* Application refused 11th April 2001.

4.12. The plans and details of the proposed development are not available to view online, and thus the extent and height of equipment considered under this application is not known. The resulting decision notice states that the application was refused for the following reasons:

"1) The proposed telecommunications development by way of its size, position and appearance on this building will impact unacceptably on the buildings overall appearance and would therefore be detrimental to the visual amenity of the Upper King Street Conservation Area that it is within.

2) The proposed telecommunications development by way of its size, position and appearance on this building will impact unacceptably on the surrounding street scenes in particular in association with long views of Piccadilly Gardens, an area undergoing major investment in the form of environmental improvements, will be detrimental to the appearance of the Upper King Street Conservation Area which contains several listed buildings and will therefore be detrimental to visual amenity. The proposal therefore is contrary to policies contained within the Unitary Developemnt [sic] Plan for the City of Manchester (UDP) including DC17 Telecommunications, DC18 Conservation Areas, DC19 Listed Buildings and RC4 Environment, and guidance contained within Planning Policy Guidance notes, PPG8 Telecommunications and PPG 15 Planning and the Historic Environment."

129430/FO/2021 - *Removal and replacement of 1No. Existing antenna with 2No. Upgraded antennas, installation of 1No. Valmont tripod frame, installation of 1No. GPS unit and ancillary development*. Approved 5th March 2021.

4.13. The Officer Report for this approved application is not available to view online; however, it has been possible review the approved plans. The approved works include the installation of a *c.*4.7metre high tripod pole mounted antenna on the rooftop of York House. The tripod pole does not appear to have been installed.

134235/FO/2022 | *Removal and replacement of 6no antennas and additional 6no. antennas mounted on new support poles, the installation of 2no. transmission dishes, 2no cabinets together with ancillary development thereto*. Approved 5th October 2022.

4.14. The above proposals comprised the addition of 6no antenna onto existing wall mounted support poles on the upper sides of York House. The Delegated Report set out the following assessment with regard to visual impacts and heritage matters:

"It is considered that utilising an existing established radio base station installation is preferable to pursuing a second base station within the immediate vicinity, as it would reduce the visual impact therefore preserving the character and appearance of the surrounding area. The proposed installation would involve the removal of 6 no. antennas and therefore the total amount of antennas would not increase."

4.15. Taking into account the existing baseline and the presence of telecommunications equipment since at least 2001, a key consideration in the assessment of the proposed development is thus whether the proposed upgrades to the existing equipment result in any greater visual change, and thus impact, on the relevant built heritage assets.

5. Policy Framework

Legislation

5.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.[8]

5.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[9]

5.3. Full details of the relevant legislation are provided in ***Appendix 2***.

National Planning Policy Guidance

5.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework* (*NPPF*), an updated version of which was published in December 2024. The *NPPF* is also supplemented by the national *Planning Policy Guidance* (*PPG*) which comprises a full and consolidated review of planning practice guidance documents to be read alongside the *NPPF* and which contains a section related to the Historic Environment.[10] The PPG also contains the *National Design Guide*.[11]

5.5. Full details of the relevant national policy guidance are provided within ***Appendix 3***.

The Development Plan

5.6. Applications for Planning Permission within Manchester are currently considered against the policy and guidance set out within the Manchester Local Plan, which consists of the:

- Places for Everyone Joint Development Plan for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 to 2039 (adopted 21st March 2024);
- Core Strategy (adopted on 11th July 2012);
- saved Unitary Development Plan policies;
- Greater Manchester Joint Waste DPD: (came into force on 1st April 2012); and

[8] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
[9] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).
[10] Ministry of Housing, Communities and Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 14th February 2024), https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment.
[11] Ministry of Housing, Communities and Local Government (MHCLG), *National Design Guide* (London, January 2021).

- Greater Manchester Joint Minerals DPD (came into force on 26th April 2013).

5.7. Details of the policy specific relevant to the application proposals are provided within ***Appendix 4***.

6. The Built Historic Environment

6.1. The following Section provides an assessment of elements of the historic environment that have the potential to be impacted upon by the proposed development.

6.2. As set out in ***Section 1***, the Site comprises the rooftop of York House, an 11-storey tower block on York Street, in Manchester city centre. The building is not Listed, but it is located within the Upper King Street Conservation Area and is within the vicinity of several Listed Buildings including the Grade II* Listed Royal Bank of Scotland, Grade II Colwyn Chambers, Grade II Harvest House & Mosley Street, Grade II* Estate Exchange and the Grade II Listed 49 Spring Gardens.

6.3. With regards to other heritage assets within the surrounds of the Site, Step 1 of the methodology recommended by *GPA3* (see methodology), is to identify which heritage assets might be affected by a proposed development. [12]

6.4. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.

6.5. It is however widely accepted (paragraph 220 of the *NPPF*) that not all parts of a heritage asset will necessarily be of equal significance.[13] In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.

6.6. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.

6.7. Consideration, based upon professional judgement and on-site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the Site as part of their setting, whether the Site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.

6.8. It has been observed that the following heritage assets within the surrounds of the Site, have the potential to be sensitive to the development proposals and thus these have been taken forward for further assessment below:

- Upper King St Conservation Area;
- Grade II* Listed Royal Bank of Scotland;
- Grade II Listed Colwyn Chambers; and

[12] Historic England, *GPA:3*, p. 4.

[13] MHCLG, *NPPF*, para. 220.

- Grade II* Estate Exchange.

6.9. With regard to other heritage assets in the vicinity of the Site, assessment has concluded that the Site does not form any part of setting that positively contributes to overall heritage significance due the nature of the asset and a lack of visual connections, spatial relationships or historic connections. Accordingly, the proposed development is not anticipated to result in a change that would impact upon the overall heritage significance of these assets.

6.10. A map of all designated heritage assets in the vicinity of the site is included at ***Appendix 5***.

Upper King Street Conservation Area

6.11. The Upper King Street Conservation Area was first designated on 4th November 1970, and extended on the 26th June 1985.

6.12. The designated area comprises the central financial district around the eastern portion of King Street in Manchester city centre, and, following boundary amendments in 1985, now includes properties up to Market Street and Mosley Street.

6.13. A formal Character Appraisal document for the Upper King Street Conservation Area has not been prepared; however, an overview of the history, townscape character and buildings are provided on the Council's website, alongside recommendations for the improvement and enhancement of the asset.[14]

6.14. During the medieval period, the designated area comprised open fields to the south of Manchester. Development commenced in the late 17th century, and by the early 18th century, fashionable residences were being built in this location.

6.15. As Manchester grew, and the middle classes moved out to the suburbs, these older houses were cleared to make way for buildings of commerce, including banks and offices. To maximise returns on the investment in the city centre plots, building heights increased to maximise lettable floorspace.

6.16. This phase of development included the oldest building on King Street, the Trustee Savings Bank at no. 82, formerly a branch of the Bank of England, which led to the concentration of financial institutions in this part of the city, which is a defining part of the Conservation Area's character and appearance.

6.17. This character and appearance also relate to the diversity of architectural forms, materials and styles within its bounds, contributing to the architectural richness of its streets, as described on the Council's website:

"Many different building materials have been used in the Upper King Street conservation area. These include variously-coloured brick, stone (predominantly yellow sandstone), exposed aggregate

[14] Introduction | Upper King Street Conservation Area | Manchester City Council (Accessed 28th August 2025)

pre-cast concrete, bronze-coloured glass in metal frames, clear glass in concrete frames, and various modern high-tech materials. These have all been used with varying degrees of success. Granite tends to be used only at ground floor level, either for the construction of a plinth if the ground is sloping, or as a durable cladding for the entire ground floor. The effect of this is that the ground floor levels of buildings have a distinctive appearance.

Very often the top floor is differently treated also - perhaps with a mansard roof or a projecting cornice, or the roof-line may be elaborately decorated with pediments, cupolas, dormer windows and chimneys. Entrances are always clearly emphasised, being surrounded by architraves and set in a door-case with carved mouldings, often surmounted by a projecting balcony. They are also often located on the corner of buildings, which are frequently chamfered for this purpose, sometimes further emphasised by a cupola or other roof decoration. Windows are mostly vertically proportioned, of the vertical sliding-sash type, and nearly always grouped in twos or threes. Unless the fenestration is composed of projecting bay or oriel windows, it is always set well back from the facade of the building, creating an interesting three-dimensional modelling."



Plate 14: North-eastern edge of the Conservation Area along Mosley Street.



Plate 15: Views into Conservation Area from Mosley Street- existing telecommunication equipment visible on upper extent of York House.



Plate 16: Views along Fountain Street.



Plate 17: View along West Mosley Street.



Plate 18: 49 Spring Gardens.



Plate 19: Corner building on Spring Gardens.



Plate 20: 19th, 20th and 21st-century built form along York Street.

6.18. Older buildings from the 19th century occupy back-of-pavement positions, and many 20th-century rebuilds follow this grid like street pattern, though there are instances of newer buildings breaking away from this pattern of development with the creation of landscaped and pedestrianised areas, including that in front of York House. This has disrupted the linearity / historic building line of the streets within the designated area; however, is reflective of the ongoing evolution of this commercial area.

6.19. The character and appearance of the asset is best appreciated in channelled views within the designated area, particularly along principal streets, as well as views into the designated area from the surrounding streets. Due to the density of the townscape, views are often short-range and terminated by buildings. Broadly speaking, these views are obtained looking straight ahead at eye-level rather than up towards the roofline of the surrounding buildings.

6.20. As such, views of buildings within the designated area are often of the street level floors, rather than upper storeys of the buildings, though the upper extents of buildings are visible in longer views along streets.

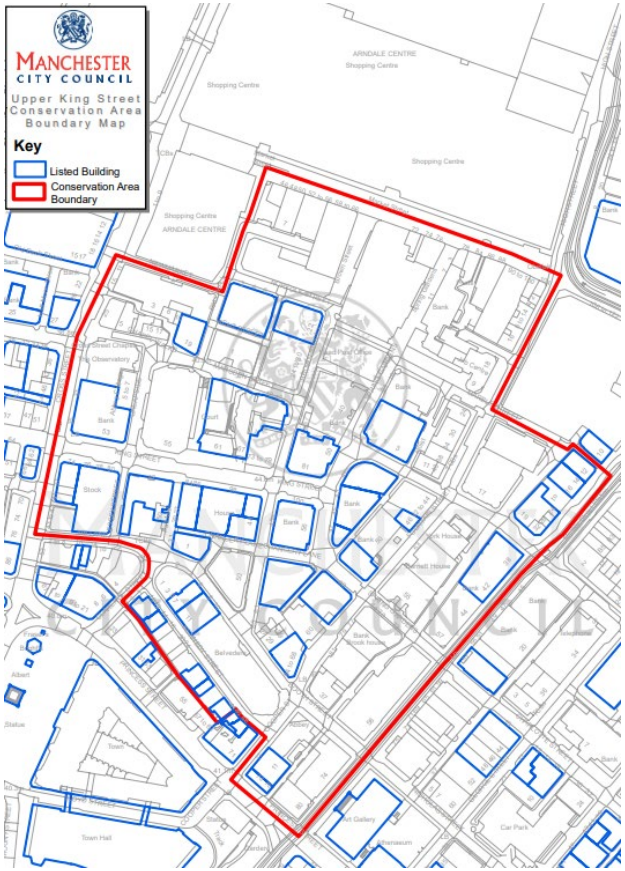


Plate 21: Upper King Street Conservation Area boundary (Source: Manchester City Council).

Statement of Significance

6.21. The significance of the Upper King Street Conservation Area is principally derived from those elements of its intrinsic character and appearance as detailed above. These comprise aspects of its historic layout and street patterns and historic built form which contribute to the combined historic, architectural, and artistic interest of the designated area.

6.22. The Conservation Area 's significance stems from its history as the commercial heart of Manchester from the 19th century, with a concentration of grand commercial and financial buildings, each competing architecturally with its neighbours creating a high-quality townscape.

6.23. The 20th-century redevelopment of isolated plots within the Conservation Area is also considered to be of historic interest with regard to the development of the area and trends of the time. Whilst noting the interest associated with such buildings, it is considered that the character and appearance of these areas within the designated area make a lesser contribution to the overall special interest of the asset than surviving 19th and early 20th-century buildings.

6.24. The significance of the Conservation Area is best understood in views primarily obtained within its bounds, which are channelled along streets.

The Contribution of the Site

6.25. The Site comprises the rooftop and upper extent of York House, a modern office block dating to the 1970s. The building thus forms part of the 20th-century development of the area noted above. At 11 storeys, it is of a different scale to the historic buildings in the locality and does not reflect the prevailing grid layout of the area, in that it is set back from York Street behind an area of landscaping, which in generally characterised by the Council as "*modern and atypical of the area*." [15]

6.26. York House is a clear departure from the traditional built form in the locality, exemplified in the use of modern building materials, the uniformity of its detailing and its flat-roofed form. It is however reflective of the architectural fashions of the time.

6.27. Overall, York House is considered to comprise a built form experienced at street-level that makes a neutral contribution to the character and appearance of the Conservation Area. It is noted that its flat rooftop, being situated on the 11th-storey of the building, is largely unseen in typical views from within the Conservation Area.

[15] Townscape | Upper King Street Conservation Area | Manchester City Council

Royal Bank of Scotland

6.28. The Royal Bank of Scotland building was added to the National List at Grade II* on 25th Feb 1952 (NHLE 1220165). The List Entry describes the building as follows:

" Bank. 1862, by Edward Walters for Manchester and Salford Bank, with extension c.1880 by Barker and Ellis. Ashlar, slate roofs. Rectangular plan on end-of-block site, with portal to left and extension beyond this. Italian palazzo style. The original block is 3 storeys and 7 bays, with massive vermiculated plinth, tall ground floor with banded piers and modillioned cornice carrying balustraded balconies to the 1st-floor windows, pilastered upper floors with Ionic corner pilasters, and massive bracketed cornice with balustraded parapet surmounted by urns. The ground floor has plate glass windows with geometrical tracery, the 1st floor has sashed windows with pedimented architraves (that in the centre segmental and on columns), and the 2nd floor has shorter sashes with moulded architraves. Right-hand return to York Street is 6 bays in matching style. Single-storey portal to left has Tuscan columns, massive consoles to prominent cornice, and balustraded parapet with urns. Extension to left of this is 3 storeys and 4 bays in style matching that of the original building. Interior: very fine banking hall with columns and coffered ceiling. History: last great work of Edward Walters."

6.29. A full copy of the List Entry is included at ***Appendix 6***.

6.30. The asset occupies a prominent end-of-block position at the corner of York Street, Mosley Street and West Mosley Street. The building was designed to be seen, to convey a sense of solidity and financial stability to existing and prospective customers. Its architectural interest is thus best appreciated in views of its principal elevation from Mosley Street and its side elevation from York Street.

6.31. As discussed above, the asset is experienced in an evolved townscape of 19th, 20th and 21st–century building, including York House, the subject of the proposed development.



Plate 22: Southeast elevation with later extension to left.



Plate 23: North-east elevation onto York Street.



Plate 24: 1942 photograph (Source: Historic England).

Statement of Significance

6.32. The Grade II* Listing of the building highlights it is a heritage asset of the highest significance as defined by the *NPPF*.[16] This significance is consolidated by its inclusion within the boundaries of the Upper King Street Conservation Area.

6.33. The heritage significance of the asset is principally embodied in the historic and architectural interests of its physical fabric, as a purpose-built bank dating to the mid-19th century, designed in the Classical Italianate style to give an appearance of dependable dignity to the business. The asset's historical association with Edward Walters, a prominent English architect known for his significant contributions to the architectural landscape of Manchester.

6.34. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "*setting*") which are considered to contribute to its heritage significance comprise:

- Its visual and spatial relationship with the streets onto which the building faces, and from where its architectural interest can be best appreciated; and

[16] MHCLG, NPPF, para. 213.

- Its spatial and visual relationship with other historic buildings of commerce in the locality which reinforces the financial history of the asset.

The Contribution of the Site

6.35. The Site comprises the rooftop and upper extent of York House which is located c12m west of the Listed Building. The intervening area comprises West Mosley Street.

6.36. There is no identified functional or historic association between the Site and the asset.

6.37. Constructed in the 1970s, York House does not form part of the contemporary 19th-century townscape of the asset but instead forms part of its evolved townscape surroundings in which the asset is experienced.

6.38. There is intervisibility and co-visibility between York House and the asset in views from the surrounding streets. Where intervisibility exists, this is not considered to contribute or detract from the asset's significance, as views from the building do not form part of the design intent of the asset, for it is considered that views of the asset are of more importance, than views from its windows.

6.39. In views of the asset, it is considered that despite York House's 11-storey modern built form, which exceeds the tall three-storeys of the asset, it is not completely overbearing due to the office block being set back from York Street behind an area of landscaping.



Plate 25: Co-visibility with York House in views form York Street.



Plate 26: Co-visibility in views from West Mosley Street.



Plate 27: Short-range views from Mosley Street – York House not visible.



Plate 28: Co-visibility in slightly longer-range views from Mosley Street.

6.40. Moreover, it is noted that visibility of the rooftop and upper extent of York House in views of the asset is dependent on the eye level of the viewer from street level. On site assessment found that for there to be clear co-visibility between the asset and the upper elements of York House, the viewer had to be looking upwards. In views from standard eye level, the rooftop of York House does not feature in views of the asset.

6.41. Taking the above into account, York House is considered to comprise a modern built form within the setting of the Grade II* Listed Building which makes a neutral contribution to its overall heritage significance, neither contributing to nor detracting from the overall understanding and experience of the asset.

Colwyn Chambers

6.42. Colwyn Chambers was added to the National List at Grade II on 25th April 1985 (NHLE 1197929). The List Entry describes the building as follows:

"Formerly headquarters of Lancashire Mercantile Bank, now variously occupied by shops, restaurant and offices. 1898, by J.Gibbon Sankey; altered. Portland stone with polished granite to ground floor, slate roof. Rectangular plan on end-of-block site, with chamfered corners. Neo-Baroque style. Four storeys and 3 principal bays to both facades, plus the corners; with high ground floor of channelled rustication, 3-bay giant Ionic colonnades in antis to 1st and 2nd floors, very prominent enriched cornice to 3rd floor, 3-sided corners carried up to domed octagonal turrets, the angles pilastered and finished with volutes to the set-back lanterns. The corner entrances are round-headed, and have elaborate architraves including pairs of Ionic columns with crouching atlantes on top supporting open segmental pediments, and outer security gates with decorative Art Nouveau ironwork. The windows at ground are mostly altered; those to the upper floors of the 3 main bays have 3 lights at 1st and 2nd floors, 4 lights at 3rd floor, those at the corners are 1-light; and at the right-hand end of the Mosley Street facade is one bay which has a square-headed doorway at ground floor, 2-light windows to the upper floors in a segmental-arched recess, and a segmental cornice. Interior not inspected."

6.43. A full copy of the List Entry is included at ***Appendix 7***.

6.44. Colwyn Chambers was the home of the Mercantile Bank until the mid-20th century. The building was subsequently occupied by shops and offices and was partially converted to restaurant and bars in the 1970s. An extensive façade retention scheme in the late 1980-90s resulted in the total loss of all interiors to the building, and alterations to its external elevations. The List Entry has not been updated to reflect these works undertaken.

6.45. The asset occupies an end-of-block location at the junction of York Street, Mosley Street and West Mosley Street, and is now surrounded by primarily 20th and 21st-century built form, in its city centre location.



Plate 29: West corner of Colwyn Chambers from York Street.

Statement of Significance

6.46. The Grade II Listing of the building highlights it is a heritage asset of the less than the highest significance as defined by the *NPPF*.[17] This significance is consolidated by its inclusion within the boundaries of the Upper King Street Conservation Area.

6.47. The heritage significance of the Colwyn Chambers building is principally embodied in its physical fabric, from which it derives architectural and historic interest as an example of the purpose-built late 19th-century office premises for a bank. Architectural interest also stems from its distinctive Neo-Baroque design.

6.48. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "*setting*") which are considered to contribute to its heritage significance comprise:

- Its visual and spatial relationship with the streets onto which the building faces, and from where its architectural interest can be best appreciated; and
- Its spatial and visual relationship with other historic buildings of commerce in the locality which reinforces the financial history of the asset.

6.49. The asset is experienced within an evolved townscape context, comprising a mix of 19th-buildings, alongside 20th and 21st-century built form. The majority of these later buildings, through scale, massing, materials and detailing, have a harmonious relationship with the asset. However, the towering bulk of City Tower to the east is considered to be a negative element in the wider surrounds of the asset which detracts from its significance.

The Contribution of the Site

6.50. York House is located c35m south-west of the Listed Building. The intervening area comprises York Street, and the landscaped area in front of York House.

6.51. There is no identified functional or historic association between the Site and the asset.

6.52. York House does not form part of the contemporary late 19th-century townscape of the asset but instead forms part of its evolved townscape surroundings in which the asset is now experienced.

6.53. There is however very little co-visibility between York House and the asset, due to the street pattern, the setback position of York House on its block.

6.54. Where co-visibility was identified during on-site assessment, it was limited to restricted views of parts of the buildings elevations from street level and are not considered to contribute to the asset's significance. In this incidental and dynamic views from street level, there was even less co-visibility between the asset and the Site

[17] MHCLG, NPPF, para. 213.

itself (the rooftop), and, as already noted, this requires the viewer to raise their eye-line to see the roofline of the buildings.

6.55. Where intervisibility exists, this is not considered to form part of the design intent of the office building, for it is considered that views of the asset are of more importance, than views from its windows.

6.56. Taking the above into account, York House is considered to comprise a modern built form within the setting of the Grade II Listed Building which makes a neutral contribution to its overall heritage significance, neither contributing to nor detracting from the overall understanding and experience of the asset.



Plate 30: Co-visibility of York House and the side elevation of Colwyn Chambers from West Mosley Street.



Plate 31: Co-visibility of Colwyn Chambers and York House.

Estate Exchange

6.57. Estate Exchange was added to the National List at Grade II* on 3rd October 1974 (NHLE 1200835). The List Entry describes the building as follows:

" Overseers' and Churchwardens' office, now commercial offices. 1852, raised 1858, both by Thomas Worthington; altered. Red brick with sandstone dressings, slate roof. Rectangular plan. Italian palazzo style. Three-storey 4-window facade with basement and attic (top 2 floors added 1858), with channelled corner pilasters, stone basement, sill-bands to all floors, stone attic storey, very prominent modillioned cornice, and pierced parapet with corner chimneys of brick; round-headed doorway to the right, with panelled architrave and cornice, recessed porch with

internal steps; 3 cross-windows at ground floor with panelled jambs and cornices; 4 cross-windows at 1st floor with moulded architraves and pediments on consoles (4th window displaced slightly to the right, aligned over the door); 7-bay arcade of round-headed arched windows at 2nd floor including a central coved niche with shell canopy; 7 oeil-de-boeuf attic windows. Interior not inspected. "

6.58. A full copy of the List Entry is included at ***Appendix 8***.

6.59. The Listed Building is situated on Fountain Street, with a narrow four bays, which stretches back the full depth of the city block. At the time of its construction the asset formed part of a row of narrow-fronted buildings occupying back-of-pavement positions onto Fountain Street (Plate 34).



Plate 32: Principal elevation onto Fountain Street.



Plate 33: Principal elevation and south-west gable onto Fountain Street.

6.60. Today, the asset sits between a 20th-century office block to its north-east, and a landscaped area with trees to the south-west, behind which sits a modern office block leaving its plain rendered south-west gable end of the asset uncharacteristically exposed.

6.61. The asset's architectural character is therefore best appreciated in direct views of its principal elevation onto Fountain Street, and in oblique views looking south-west from York Street.



Plate 34: Extract from 1888 Ordnance Survey map.

Statement of Significance

6.62. The Grade II* Listing of the building highlights it is a heritage asset of the highest significance as defined by the *NPPF*.[18] This significance is consolidated by its inclusion within the boundaries of the Upper King Street Conservation Area.

6.63. The heritage significance of Estate Exchange is principally embodied in its physical fabric, from which it derives primarily architectural, and historic interest as a late 19th-century purpose-built office block. It exhibits the Italian palazzo style of architecture which contributes to its architectural interest.

6.64. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "*setting*") which are considered to contribute to its heritage significance comprise:

- Its visual and spatial relationship with the street onto which the building faces, and from where its architectural interest can be best appreciated; and
- Its associated curtilage to the rear (north-west) stretching back to Concert Lane which historically formed its service area, and from where architectural detailing on its rear elevation can also be appreciated, albeit such views are of lesser importance than those of its Fountain Street façade.

The Contribution of the Site

6.65. The Site is located on the rooftop of York House which is located c10m south-east of the asset. The Intervening area comprises Fountain Street.

6.66. There is no identified functional or historic association between the Site and the asset.

6.67. York House does not form part of the contemporary late 19th-century townscape of the asset, which is much

[18] MHCLG, NPPF, para. 213.

altered, but instead forms part of the evolved townscape surroundings in which the asset is now experienced.

6.68. There is intervisibility between the asset and York House, with views of York House's lower levels visible from the pavement in front of the asset and from its windows. The Site itself (the rooftop) does not feature in these views from typical eye-level, only if looking upwards towards the roofline. Generally, however, views from the asset are not considered to form part of its design intent, being constructed in a part of the city with a concentration of large commercial premises, where outwards views are incidental and determined by the location and orientation of the city-centre plot.



Plate 35: Oblique views of Estate Exchange co-visible with the lower levels of York House.



Plate 36: Ibid.



Plate 37: Wide lens view of Estate Exchange co-visible with York House.

6.69. On-site assessment found there to be very limited co-visibility between York House and the asset in dynamic views from the junction of York Street and Fountain Street.

6.70. Oblique views of the asset's principal elevation are considered to contribute to the experience and understanding of the asset's significance, but only the lower levels of York House are viewed alongside the asset, rather than the Site itself (the rooftop) at typical eye-level.

6.71. Taking the above into account, York House, the rooftop of which is the Site, is considered to comprise a modern built form within the setting of the Grade II* Listed Building which makes a neutral contribution to its overall heritage significance, neither contributing to nor detracting from the overall understanding and experience of the asset.

Summary

6.72. These assessment works have concluded that only the Upper King Street Conservation Area has the potential to be sensitive to the proposed development. This asset is thus taken forward for further assessment in ***Section 7.***

6.73. When taking into account the lack of contribution made by the Site to Site to overall heritage significance of the Grade II* Listed Royal Bank of Scotland building, the Grade II Listed Colwyn Chambers and the Grade II* Listed Estate Exchange, alongside a consideration of the existing baseline and nature of development proposed, these assets are not considered sensitive the proposed development on the Site and are not taken forward for further assessment in ***Section 7***.

7. Assessment of Impacts

7.1. This Section addresses the heritage planning issues that warrant consideration in the determination of the application for Planning Permission in line with the proposals set out within ***Section 2*** of this Report.

7.2. As detailed above, the *Planning and Compulsory Purchase Act (2004)* requires that applications for Planning Permission are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.

7.3. The statutory requirement set out in Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* confirms that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area.

7.4. In addition, the *NPPF* states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Listed Buildings and Conservation Areas, and this needs to be the primary consideration when determining the acceptability of the proposals.

7.5. It is also important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "*substantial harm*" or "*less than substantial harm*" to the identified designated heritage assets, in the context of paragraphs 214 and 215 of the *NPPF*.[19] With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 216 of the *NPPF*.[20]

7.6. The *PPG* clarifies that within each category of harm ("*less than substantial*" or "*substantial*"), the extent of the harm may vary and should be clearly articulated.[21]

7.7. The guidance set out within the *PPG* also clarifies that "*substantial harm*" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development, which is to be assessed.[22] In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:

"...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced." [23]

7.8. This Section will consider each of the heritage assets detailed above and assess the impact of the proposed

[19] MHCLG, *NPPF*, paras. 214 and 215.
[20] MHCLG, *NPPF*, para. 216.
[21] MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).
[22] MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).
[23] EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

development, whether that be harmful or beneficial to the significance identified above.

Upper King Street Conservation Area

7.9. When considering potential impacts on the Conservation Area, it is important to note that the Site forms only one small part of the asset.

7.10. Paragraph 220 of the *NPPF* states that it is necessary to consider the relevant significance of the element of the Conservation Area which has the potential to be affected and its contribution to the significance of the designation as a whole, i.e., would the application proposals undermine the significance of the Conservation Area as a whole?[24]

7.11. This approach, and its compliance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, is supported by Case Law, with a 2020 High Court Judgement confirming that:

"Section 72 requires an overall assessment of the likely impact of a proposed development on the conservation area, and not just that part of it where the development site is located".[25] (my emphasis)

7.12. The proposed development is detailed on the following existing and proposed plans which form part of the submission (Plate 38 - Plate 45). These drawings illustrate the minimal additional visual impacts of the proposed telecommunication equipment against the existing baseline.

7.13. The proposed development would be sited across a number of locations on the rooftop of York House, utilising existing mountings.

7.14. The top of the existing EE H3G antenna's is 39.52m above ground level (AGL), and the bottom section is 38.08m AGL. The replacement/new antenna will be marginally longer with the top at 39.85m AGL and the bottom between 38.75m and 39.14m AGL depending on the antenna specification. This increase will be barely perceptible from street level particularly in the context of the existing scale of the host building.

7.15. The proposed arrangement has been carefully considered to mitigate additional visual impacts from with the wider public realm. and the 6no. antenna will be painted to match the colour of the existing tiled façade of the upper storey of York House.

[24] MHCLG, *NPPF,* para. 220.

[25] Spitfire Bespoke Homes Ltd v Secretary of State for Housing Communities And Local Government [2020] EWHC 958 (Admin).

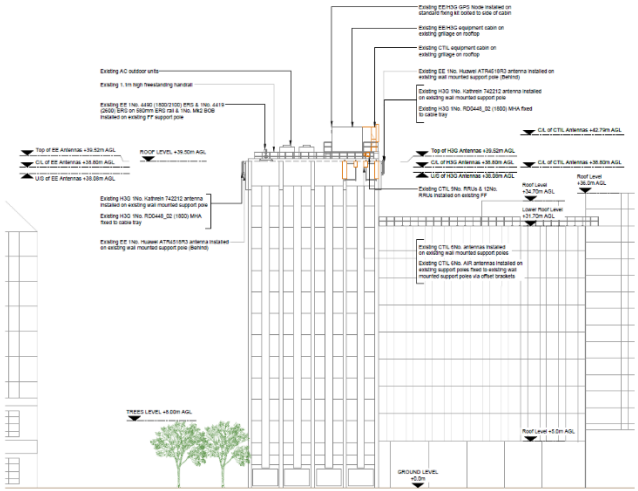


Plate 38: Existing north-west elevation of York House.

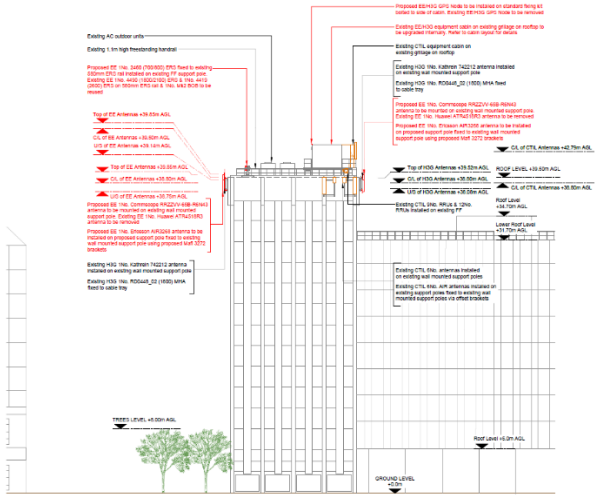


Plate 39: Proposed north-west elevation of York House.

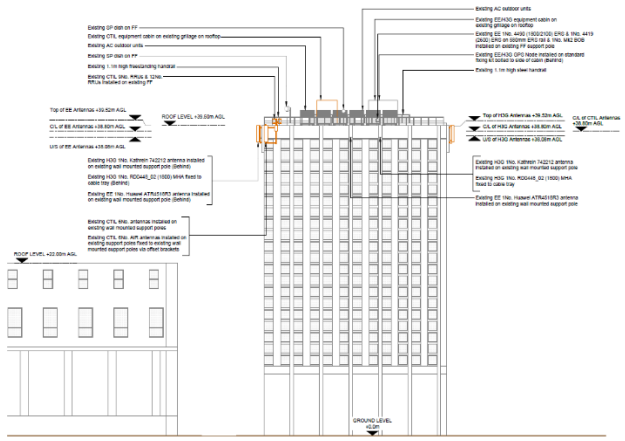


Plate 40: Existing North-east elevation of York House.

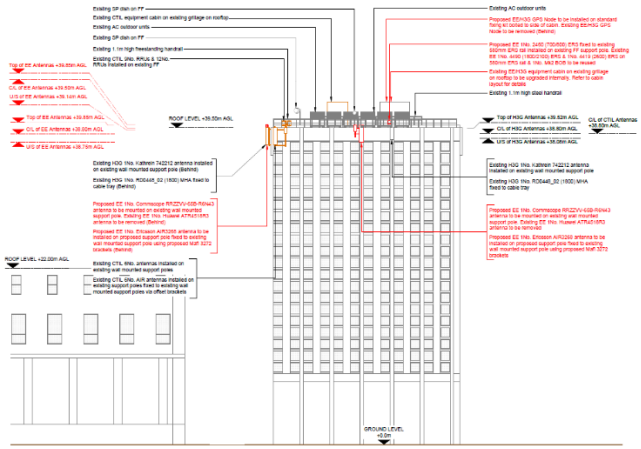


Plate 41: Proposed north-east elevation York House.

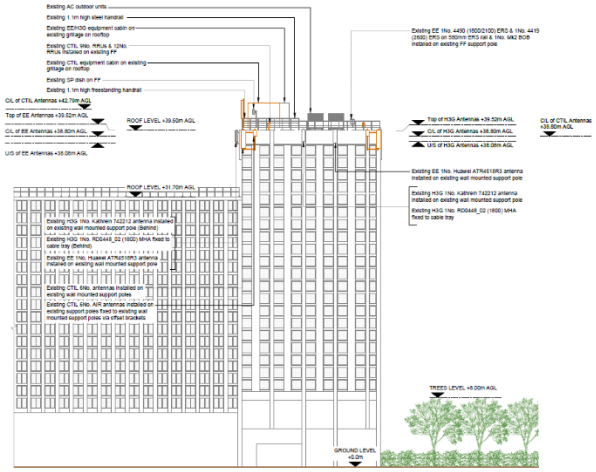


Plate 42: Existing south-east elevation.

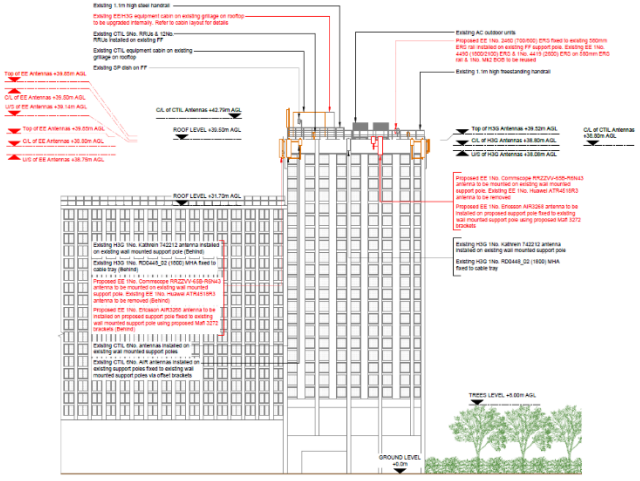


Plate 43: Proposed south-east elevation.

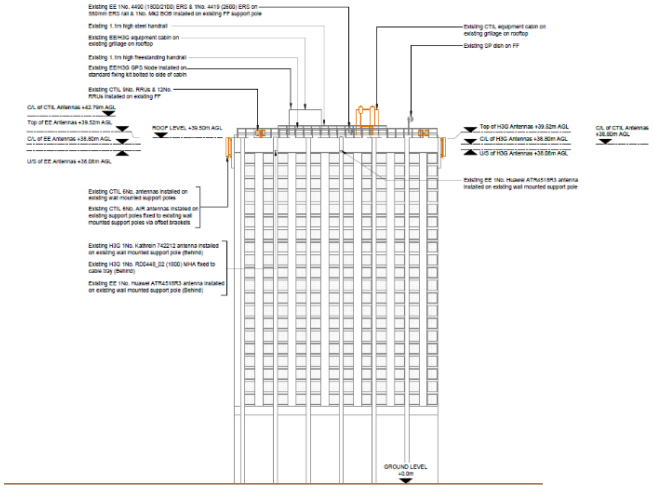


Plate 44: Existing south-west elevation.

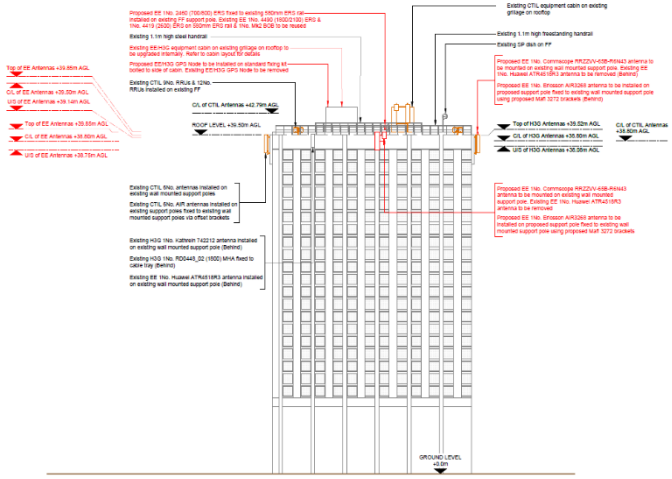


Plate 45: Proposed south-west elevation.

7.16. As discussed in ***Section 6***, York House is considered to make a neutral contribution to the character and appearance of the Conservation Area primarily forming part of the 20th-century development of building plots within the area Its rooftop and upper extent is not readily appreciable in typical views within the Conservation Area at 39.5m AGL. Similarly, the existing equipment, is not a prominent visual feature within the townscape at street-level.

7.17. As outlined in ***Section 4***, the Local Planning Authority has previously determined that utilising the rooftop of York House for new telecommunications equipment is preferable to locating such equipment on a different building in terms of visual impact, stating:

"It is considered that utilising an existing established radio base station installation is preferable to pursuing a second base station within the immediate vicinity, as it would reduce the visual impact therefore preserving the character and appearance of the surrounding area."

7.18. This is consistent with paragraph 120 of the NPPF which states that applicants should explore, among other criteria "*...the possibility of erecting antennas on an existing building, mast or other structure....*".

7.19. Where views of the proposed equipment would be obtainable, they would be above typical eye-level in dynamic views while travelling through the Conservation Area.

7.20. The rooftop of York House is already utilitarian in nature, with its flat profile and with the presence of plant and equipment. Therefore, given the minor scale of the proposals, and the existing visual baseline, it is considered that the proposed development would have no greater visual impact than the existing in views from street level.

7.21. The limited scope, scale and overall visibility of the proposed development, when considered against the existing baseline, is not anticipated to have a negative impact on the appearance of York House, and its roofline.

7.22. When considering the limited visual change set out above in the context of the significance of the Conservation Area as a whole, and that the change is not associated with those elements of the asset that contribute to its character and appearance it is considered that there would be no greater impact than the baseline situation which has already been deemed by the LPA as acceptable and preferable in the context of the proliferation of telecommunication equipment in the area.

7.23. Overall, it is considered that the proposed development will cause no harm to the heritage significance of the Upper King Street Conservation Area, therefore preserving the character and appearance and thus significance of the asset.

8. Conclusions

8.1. Pegasus Group have been commissioned by Perry Williams Ltd on behalf of EE to prepare a Built Heritage Statement to consider the proposed upgrading of telecommunications equipment at York House, West Mosley Street, Manchester.

8.2. The application Site comprises the rooftop and upper extents of York House, a 1970s office block. The building is not Listed, but it is located within the Upper King Street Conservation Area.

8.3. Full Planning Permission is sought for the upgrading of the existing telecommunications equipment, comprising 6no. replacement antenna, and associated works.

8.4. With regard to Upper King Street Conservation, assessment has concluded that the proposed development would not result in no greater impact to the character and appearance, and thus significance, of the Conservation Area than the existing baseline situation which has already been deemed by the LPA as acceptable

8.5. In respect of other designated assets in the vicinity, including The Grade II* Listed Royal Bank of Scotland building, the Grade II Listed Colwyn Chambers and the Grade II* Listed Estate Exchange, no harm was identified to the significance of these assets.

8.6. The proposed development is considered to be in accordance with the statutory requirements of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 16 of the NPPF, and the historic environment policies within the Manchester Local Plan.

Appendix 1: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

> ***"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[26]

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.[27]

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.[28] These essentially cover the heritage 'interests' given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.[29]

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

- ***Architectural and artistic interest:*** These 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*:** 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

[26] MHCLG, *NPPF*, Annex 2.
[27] Historic England, *GPA:2*.
[28] Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values are identified as being 'aesthetic', 'communal', 'historical' and 'evidential', see idem pp. 28–32.
[29] MHCLG, *NPPF*, *Annex 2*; MHCLG, *PPG, paragraph 006, reference ID: 18a-006-20190723*.

> experience of a place and can symbolise wider values such as faith and cultural identity.[30]

Significance results from a combination of any, some, or all of the interests described above.

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report. [31]

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the NPPF:

> ***"Significance derives not only from a heritage asset's physical presence, but also from its setting."***[32]

Setting is defined 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."***[33]

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of "*what matters and why*".[34]

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

[30] MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.
[31] Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).
[32] MHCLG, *NPPF*, Annex 2.
[33] MHCLG, *NPPF*, Annex 2.
[34] Historic England, *GPA:3*, pp. 8, 11.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

> ***Paragraph 25 – "But – again in the particular context of visual effects – I said that if "a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one's experience of the listed building in its surrounding landscape or townscape" (paragraph 56)".***
>
> ***Paragraph 26 – "This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building's setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, "the historic relationship between places". Historic England's advice in GPA3 was broadly to the same effect."*** [35]

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance,** as identified in paragraph 213 of the NPPF, comprising Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 75 of the NPPF;[36]

- **Designated heritage assets of less than the highest significance,** as identified in paragraph 213 of the NPPF, comprising Grade II Listed Buildings and

[35] Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

[36] MHCLG, *NPPF*, para. 213 and fn. 75.

Grade II Registered Parks and Gardens (and also some Conservation Areas);[37] and

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as "buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets".[38]

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

There is no definitive grading system for assessing or categorising significance outside of the categories of Designated Heritage Assets and Non-Designated Heritage Assets, specifically with regards to the relative significance of different parts of an asset.

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighing exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would "have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced";[39] and

- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the *PPG* states:

> ***"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."***[40]

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the *NPPF* requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm

[37] MHCLG, *NPPF,* para. 213.
[38] MHCLG, *PPG*, paragraph 039, reference ID: 18a-039-20190723.
[39] Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.
[40] MHCLG, *PPG*, paragraph 018, reference ID: 18a-018-20190723.

to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, "*preserving*" means doing "*no harm*".[41]

Preservation does not mean no change, it specifically means no harm. *GPA:2* states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*".[42] Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of "*what matters and why*".[43] Of particular relevance is the checklist given on page 13 of *GPA:3*.[44]

It should be noted that this key document also states:

> ***"Setting is not itself a heritage asset, nor a heritage designation…"***[45]

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

> ***"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".***[46]

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.[47]

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in ***Appendix 3***, the *NPPF* (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.[48]

[41] R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).
[42] Historic England, *GPA:2*, p. 9.
[43] Historic England, *GPA:3*, p. 8.
[44] Historic England, *GPA:3*, p. 13.
[45] Historic England, *GPA:3*, p. 4.
[46] Historic England, *GPA 3.*, p. 8.
[47] Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.
[48] MHCLG, *NPPF,* paras. 214 and 215.

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.[49]

The *PPG* provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

> ***"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.***
>
> ***Examples of heritage benefits may include:***
>
> - ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
> - ***reducing or removing risks to a heritage asset***
> - ***securing the optimum viable use of a heritage asset in support of its long term conservation."***[50]

Any "*heritage benefits*" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

.

[49] Including - Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin); MHCLG, *NPPF,* paras. 214 and 216.

[50] MHCLG, *PPG*, paragraph 020, reference ID: 18a-020-20190723.

Appendix 2: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.[51] It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act goes on to state that:

> ***"In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."***[52]

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

> ***"Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."***[53]

A judgement in the Court of Appeal ('Mordue') has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 215 of the current, revised NPPF, see ***Appendix 3)***, this is in keeping with the requirements of the 1990 Act.[54]

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

> ***"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."***[55]

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

[51] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
[52] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).
[53] Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.
[54] Jones v Mordue [2015] EWCA Civ 1243.
[55] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[56]

[56] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 3: National Policy Guidance

The National Planning Policy Framework (December 2024)

National policy and guidance is set out in the Government's *National Planning Policy Framework* (*NPPF*) published in December 2024. This replaced and updated the previous *NPPF* (December 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

> ***"Plans and decisions should apply a presumption in favour of sustainable development.***
>
> ***For plan-making this means that:***
>
> ***a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
>
> ***b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
>
> ***i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For decision-taking this means:

a. approving development proposals that accord with an up-to-date development plan without delay; or

b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."[57]

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

> ***"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change."***[58] (our emphasis)

The *NPPF* continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the *NPPF* as:

> ***"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage***

[57] MHCLG, *NPPF*, para. 11.

[58] MHCLG, *NPPF*, para. 11, fn. 7.

assets and assets identified by the local planning authority (including local listing)."[59]

The NPPF goes on to define a Designated Heritage Asset as a:

"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."[60]

As set out above, significance is also 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. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."[61]

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 208 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."[62]

Paragraph 210 goes on to state that:

"In determining planning 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."[63]

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 212 and 213 are relevant and read as follows:

"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

[59] MHCLG, *NPPF*, Annex 2.
[60] MHCLG, *NPPF*, Annex 2.
[61] MHCLG, *NPPF*, Annex 2.
[62] MHCLG, *NPPF*, para. 208.
[63] MHCLG, *NPPF*, para. 210.

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."[64]

"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."[65]

Section b) of paragraph 213, which describes assets of the highest significance, also includes footnote 75 of the NPPF, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 214 reads as follows:

"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."[66]

Paragraph 215 goes on to state:

"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."[67]

[64] MHCLG, *NPPF*, para. 212.
[65] MHCLG, *NPPF*, para. 213.
[66] MHCLG, *NPPF*, para. 214.
[67] MHCLG, *NPPF*, para. 215.

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 219 that:

> ***"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."***[68]

Paragraph 220 goes on to recognise that "*not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance*" and with regard to the potential harm from a proposed development states:

> ***"Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole."***[69] (our emphasis)

With regards to non-designated heritage assets, paragraph 216 of NPPF states that:

> ***"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."***[70]

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Ministry of Housing, Communities & Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

[68] MHCLG, *NPPF*, para 219.
[69] MHCLG, *NPPF*, para. 220.
[70] MHCLG, *NPPF*, para. 216.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of 'significance' in decision taking is important and states:

> ***"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."***[71]

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

> ***"In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.***
>
> ***While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."***[72] (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

> ***"When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape."***[73]
>
> ***"Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way."***[74]

[71] MHCLG, *PPG*, paragraph 007, reference ID: 18a-007-20190723.
[72] MHCLG, *PPG*, paragraph 018, reference ID: 18a-018-20190723.
[73] MHCLG, *NDG*, para. 46.
[74] MHCLG, *NDG*, para. 47.

It goes on to state that:

> ***"Well-designed places and buildings are influenced positively by:***
>
> - ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***
> - ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
> - ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details - see Identity.***
>
> ***Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."***[75]

[75] MHCLG, *NDG*, paras. 48-49.

Appendix 4: Relevant Development Plan Policies

Applications for Planning Permission within Manchester are currently considered against the policy and guidance set out within the **Manchester Local Plan**, which consists of:

- Places for Everyone Joint Development Plan for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 to 2039. (adopted 2024);
- Core Strategy;
- extant Unitary Development Plan policies;
- Greater Manchester Joint Waste DPD: (came into force on 1 April 2012); and
- Greater Manchester Joint Minerals DPD: (came into force on 26 April 2013).

Relevant development plan policies are listed below.

Policy JP-P2: Heritage

> ***We will proactively manage and work with partners to positively conserve, sustain and enhance our historic environment and heritage assets and their settings. Opportunities will be pursued to aid the promotion, enjoyment, understanding and interpretation of heritage assets, as a means of maximising wider public benefits and reinforcing Greater Manchester's distinct character, identity and sense of place.***
>
> ***Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness and which should be the priority for conserving and enhancing in the future and demonstrate a clear understanding of the historic environment and the heritage values of sites, buildings or areas and their relationship with their surroundings. This knowledge should be used to inform the positive management and integration of our heritage by:***
>
> ***1. Setting out a clear vision that recognises and embeds the role of heritage in place-making;***
>
> ***2. Ensuring that the heritage significance of a site or area is considered in accordance with national planning policy in the planning and design process and opportunities for interpretation and local engagement are optimised;***
>
> ***3. Integrating the conservation and enhancement of heritage assets and their settings, with creative contextual architectural responses that contribute to their significance and sense of place;***
>
> ***4. Delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing; and***
>
> ***5. Exploring opportunities to reduce greenhouse gas emissions that restoration of historic buildings offer.***

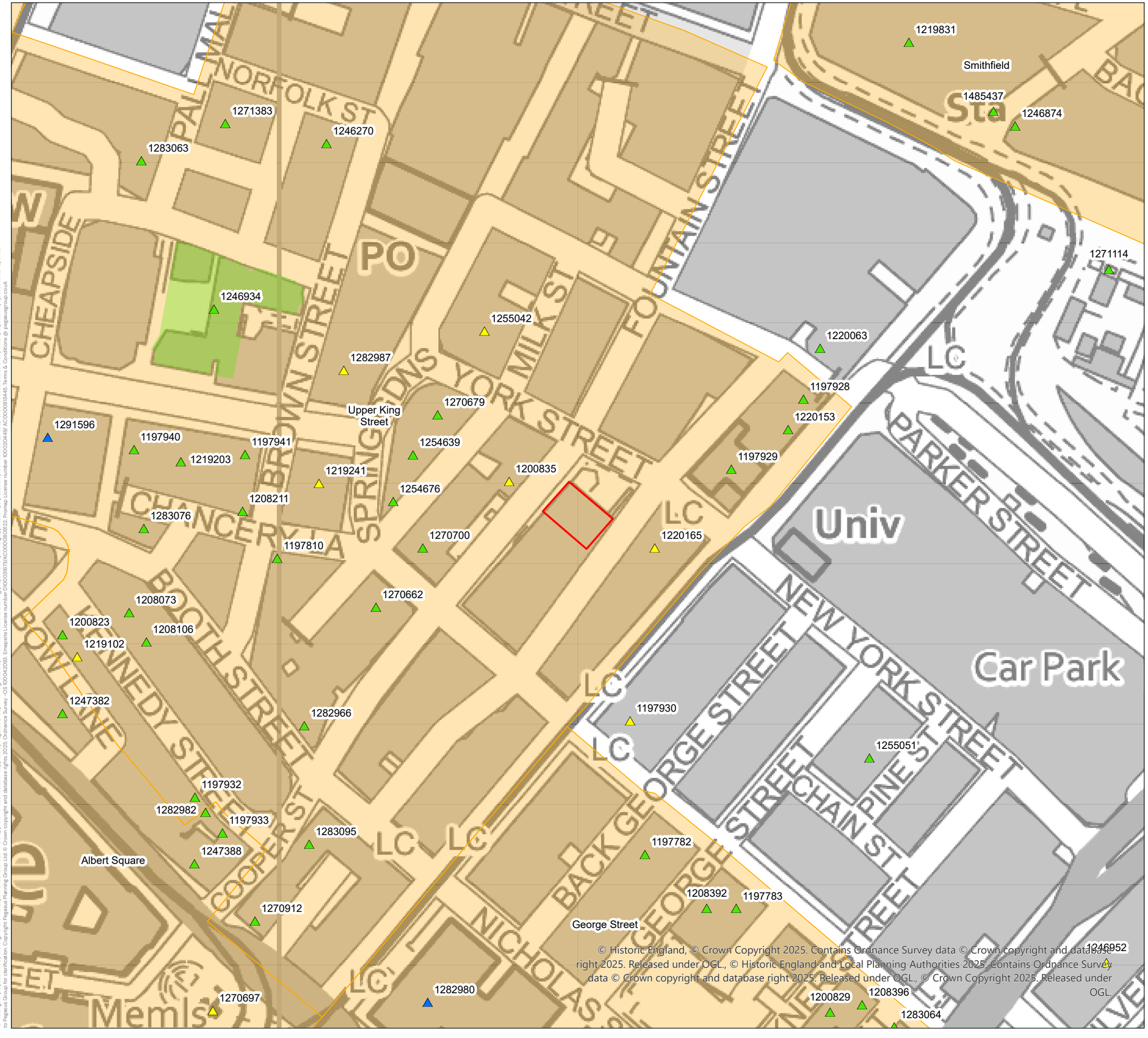
Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. These include historic town centres, places of worship, historic transport routes including the canal network, industrial buildings and structures including textile mills, farmsteads and other sites, buildings, and areas of identified archaeological, architectural, artistic and/or historic value.

Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.

Where heritage assets have been identified as being at risk, Local Plans should identify specific opportunities for them to contribute to regeneration and place making, and they should set out strategies for their repair and re-use. Development proposals which will help safeguard the significance of and secure a sustainable future for Greater Manchester's heritage at risk will be supported in principle, provided they are not contrary to national policy or other policies in the development plan.

Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process.

Appendix 5: Figures



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KEY

- Site
- Listed Building points
  - Grade
    - I
    - II
    - II*
- Listed Building polygons
  - Grade
    - I
    - II
    - II*
    - Conservation Areas

REV	DATE	DESCRIPTION
2	19/09/25	DHAS

FIGURE 1 – DESIGNATED HERITAGE ASSETS

DATE	SCALE	DRAWN	APPROVED
19/09/2025	1:1,500@A3	HB	ES

SHEET	REV	N	0	0 KM
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P25-2180_HT_01

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Appendix 6: Royal Bank of Scotland List Entry

Official list entry

Heritage Category: **Listed Building**

Grade**: II***

List Entry Number**: 1220165**

Date first listed: **25-Feb-1952**

Date of most recent amendment: **06-Jun-1994**

List Entry Name: **ROYAL BANK OF SCOTLAND**

Statutory Address 1**: ROYAL BANK OF SCOTLAND, 38 AND 42, MOSLEY STREET**

Location

Statutory Address: **ROYAL BANK OF SCOTLAND, 38 AND 42, MOSLEY STREET**

The building or site itself may lie within the boundary of more than one authority.

District: **Manchester (Metropolitan Authority)**

Parish: **Non Civil Parish**

National Grid Reference**: SJ 84153 98209**

Details

MANCHESTER

SJ8498SW MOSLEY STREET 698-1/28/239 (West side) 25/02/52 Nos.38 AND 42 Royal Bank of Scotland (Formerly Listed as: MOSLEY STREET (West side) Williams and Glyns Bank) (Formerly Listed as: MOSLEY STREET No.38)

GV II*

Bank. 1862, by Edward Walters for Manchester and Salford Bank, with extension c.1880 by Barker and Ellis. Ashlar, slate roofs. Rectangular plan on end-of-block site, with portal to left and extension beyond this. Italian palazzo style. The original block is 3 storeys and 7 bays, with massive vermiculated plinth, tall ground floor with banded piers and modillioned cornice carrying balustraded balconies to the 1st-floor windows, pilastered upper floors with Ionic corner pilasters, and massive bracketed cornice with balustraded parapet surmounted by urns. The ground floor has plate glass windows with geometrical tracery, the 1st floor has sashed windows with pedimented architraves (that in the centre segmental and on columns), and the 2nd floor has shorter sashes with moulded architraves. Right-hand return to York Street is 6 bays in matching style. Single-storey portal to left has Tuscan columns, massive consoles to prominent cornice, and balustraded parapet with urns. Extension to left of this is 3 storeys and 4 bays in style matching that of the original building. Interior: very fine banking hall with columns and coffered ceiling. History: last great work of Edward Walters.

Listing NGR: **SJ8415398209**

Legacy

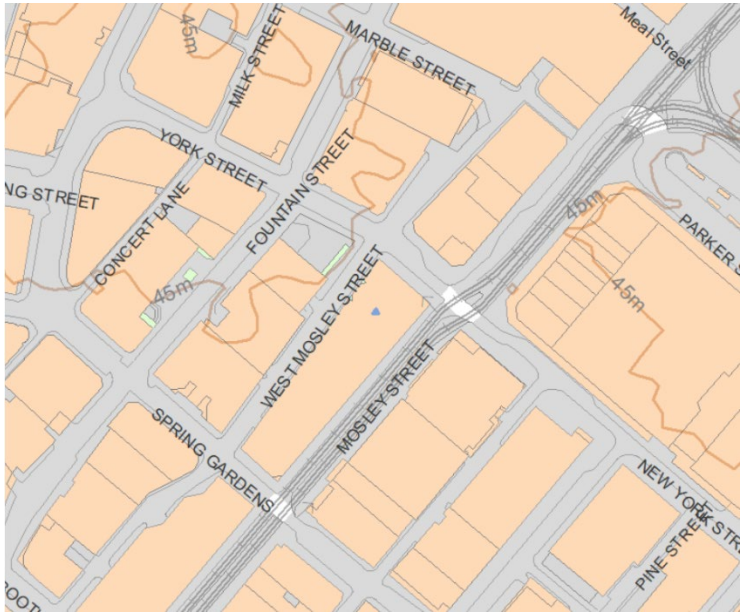
The contents of this record have been generated from a legacy data system.

Legacy System number: **388328**

Legacy System: **LBS**

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



End of official list entry

Appendix 7: Colwyn Chamber List Entry

Official list entry

Heritage Category: **Listed Building**

Grade: **II**

List Entry Number: **1197929**

Date first listed: **25-Apr-1985**

List Entry Name: **COLWYN CHAMBERS**

Statutory Address 1: **24-30, MOSLEY STREET**

Statutory Address 2: **COLWYN CHAMBERS, 17 AND 19, YORK STREET**

Location

Statutory Address: **24-30, MOSLEY STREET**

Statutory Address: **COLWYN CHAMBERS, 17 AND 19, YORK STREET**

The building or site itself may lie within the boundary of more than one authority.

District: **Manchester (Metropolitan Authority)**

Parish: **Non Civil Parish**

National Grid Reference: **SJ 84184 98241**

Details

MANCHESTER

SJ8498SW MOSLEY STREET 698-1/28/238 (West side) 25/04/85 Nos.24 TO 30 (Even) Colwyn Chambers (17 and 19 York Street)

GV II

Includes: Nos.17 AND 19 YORK STREET. Formerly headquarters of Lancashire Mercantile Bank, now variously occupied by shops, restaurant and offices. 1898, by J.Gibbon Sankey; altered. Portland stone with polished granite to ground floor, slate roof. Rectangular plan on end-of-block site, with chamfered corners. Neo-Baroque style. Four storeys and 3 principal bays to both facades, plus the corners; with high ground floor of channelled rustication, 3-bay giant Ionic colonnades in antis to 1st and 2nd floors, very prominent enriched cornice to 3rd floor, 3-sided corners carried up to domed octagonal turrets, the angles pilastered and finished with volutes to the set-back lanterns. The corner entrances are round-headed, and have elaborate architraves including pairs of Ionic columns with crouching atlantes on top supporting open segmental pediments, and outer security gates with decorative Art Nouveau ironwork. The windows at ground are mostly altered; those to the upper floors of the 3 main bays have 3 lights at 1st and 2nd floors, 4 lights at 3rd floor, those at the corners are 1-light; and at the right-hand end of the Mosley Street facade is one bay which has a square-headed doorway at ground floor, 2-light windows to the upper floors in a segmental-arched recess, and a segmental cornice. Interior not inspected.

Listing NGR: SJ8418498241

Legacy

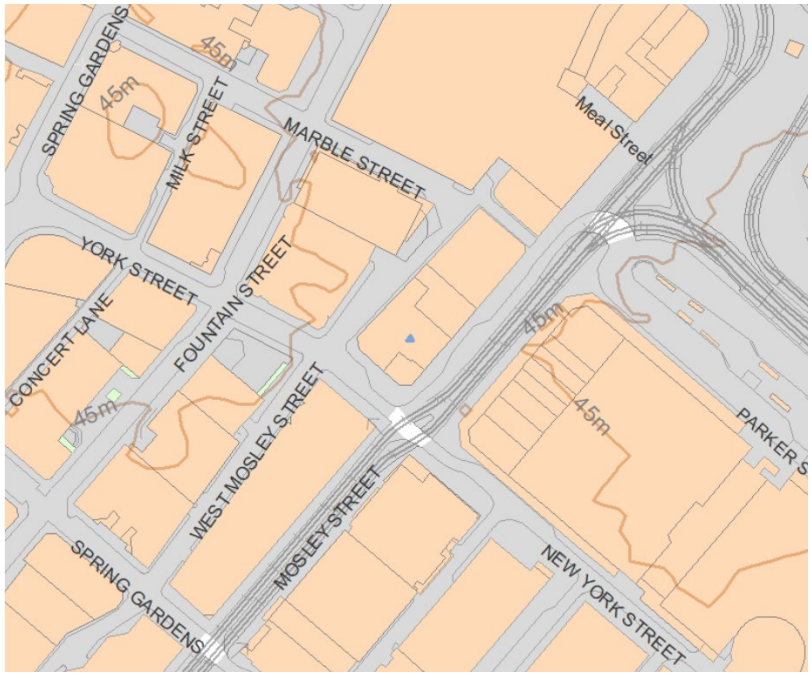
The contents of this record have been generated from a legacy data system.

Legacy System number: **388327**

Legacy System: **LBS**

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



End of official list entry

Appendix 8: Estate Exchange List Entry

Official list entry

Heritage Category: **Listed Building**

Grade: **II***

List Entry Number: **1200835**

Date first listed**: 03-Oct-1974**

List Entry Name: **ESTATE EXCHANGE**

Statutory Address 1: **ESTATE EXCHANGE, 46, FOUNTAIN STREET**

Location

Statutory Address: **ESTATE EXCHANGE, 46, FOUNTAIN STREET**

The building or site itself may lie within the boundary of more than one authority.

District: **Manchester (Metropolitan Authority)**

Parish: **Non Civil Parish**

National Grid Reference: SJ 84094 98236

Details

MANCHESTER

SJ8498SW FOUNTAIN STREET 698-1/28/137 (West side) 03/10/74 No.46 Estate Exchange

II*

Overseers' and Churchwardens' office, now commercial offices. 1852, raised 1858, both by Thomas Worthington; altered. Red brick with sandstone dressings, slate roof. Rectangular plan. Italian palazzo style. Three-storey 4-window facade with basement and attic (top 2 floors added 1858), with channelled corner pilasters, stone basement, sill-bands to all floors, stone attic storey, very prominent modillioned cornice, and pierced parapet with corner chimneys of brick; round-headed doorway to the right, with panelled architrave and cornice, recessed porch with internal steps; 3 cross-windows at ground floor with panelled jambs and cornices; 4 cross-windows at 1st floor with moulded architraves and pediments on consoles (4th window displaced slightly to the right, aligned over the door); 7-bay arcade of round-headed arched windows at 2nd floor including a central coved niche with shell canopy; 7 oeil-de-boeuf attic windows. Interior not inspected.

Listing NGR: **SJ8409498236**

Legacy

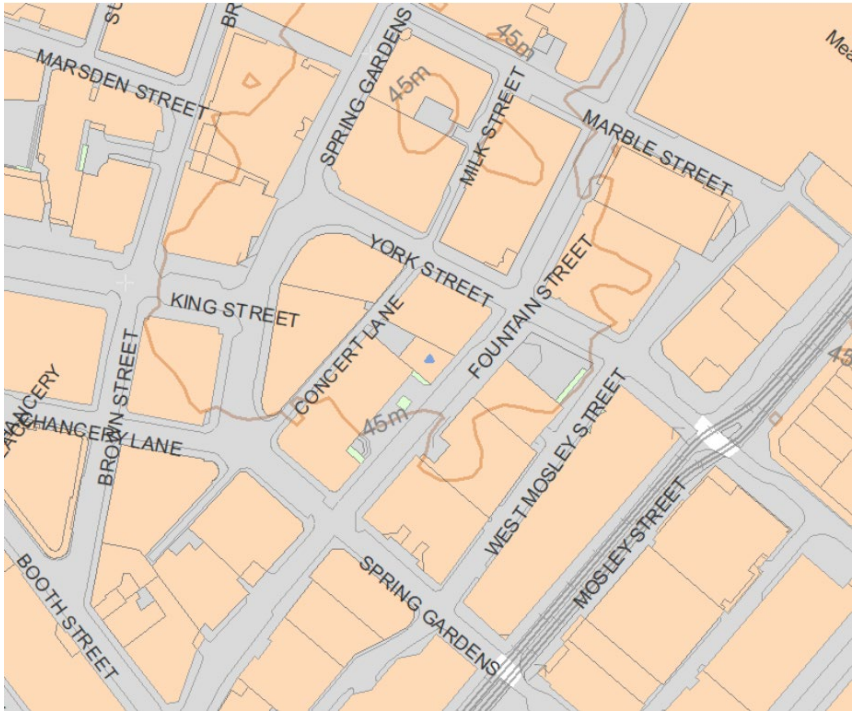
The contents of this record have been generated from a legacy data system.

Legacy System number: **388137**

Legacy System: **LBS**

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



End of official list entry

Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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