

# Heritage Statement

## Renaissance, Manchester

November 2025

# Contents

|                                                             |                             |    |
|-------------------------------------------------------------|-----------------------------|----|
| 1.                                                          | Introduction                | 3  |
| 2.                                                          | History and Development     | 5  |
| 3.                                                          | Heritage Assets             | 10 |
| 4.                                                          | Assessments of Significance | 11 |
| 5.                                                          | Impact Assessment           | 14 |
| 6.                                                          | Summary and Conclusions     | 18 |
| Appendix 1: Legislation, National and Local Planning Policy |                             | 19 |

**Client**  
Property Alliance Group

**Our reference**  
PROH3016

November 2025

# 1. Introduction

- 1.1 This Heritage Statement has been prepared by Turley Heritage on behalf of Property Alliance Group ('the Applicant') in support of a full planning application for minor re-cladding works to parts of the southern and western facing elevations ('the Proposed Works') of the Multi Storey Car Park (MSCP) at the Renaissance complex in Manchester ('the Site').
- 1.2 The Site is located adjacent to the northern boundary of Parsonage Gardens Conservation Area. Whilst the setting of a conservation area is not protected by primary legislation, the National Planning Policy Framework (NPPF) does state that the setting of a designated heritage asset (including conservation areas) can contribute to its significance.
- 1.3 The NPPF provides the Government's national planning policy on the conservation of the historic environment. In respect of information requirements for applications, Paragraph 207 states the following:
- "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance".<sup>1</sup>*
- 1.4 To comply with these requirements, **Section 2** of this statement provides an overview of the history and development of the Site and surrounding area and **Section 3** identifies the relevant heritage assets with potential to be affected by the Proposed Works, namely Parsonage Gardens Conservation Area. **Section 4** provides an assessment of the significance, in terms of the character and appearance of Parsonage Gardens Conservation Area, proportionate to both the importance of the conservation area and the likely impacts of the application proposals. **Section 5** provides an assessment of the impact of the Proposed Works, in light of the statutory duty of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF, and local planning policy for the historic environment (set out in detail at **Appendix 1**). The Statement concludes with a summary and conclusions at **Section 6**.
- 1.5 This Heritage Statement has been undertaken on the basis of published information, proportionate archival research and an updated site visit undertaken during October 2025. It has been prepared in accordance with Historic England Advice Notes on 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' (HEAN 12)<sup>2</sup>, 'Conservation Area Appraisal, Designation and Management' (HEAN 1)<sup>3</sup>, Good

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<sup>1</sup> MHCLG (2025) National Planning Policy Framework (NPPF), Paragraph 200

<sup>2</sup> Historic England (2019) Historic England Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets

<sup>3</sup> Historic England (2019) Historic England Advice Note 1, Conservation Area Appraisal, Designation and Management

Practice Advice on 'Managing Significance in Decision Taking in the Historic Environment' (GPA 2)<sup>4</sup> and 'The Setting of Heritage Assets' (GPA 3)<sup>5</sup>.

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<sup>4</sup> Historic England (2015) Historic Environment Good Practice in Planning Note 2, Managing Significance in Decision Taking in the Historic Environment

<sup>5</sup> Historic England (2017) Historic Environment Good Practice in Planning Note 3, The Setting of Heritage Assets (2nd edition)

## 2. History and Development

### Site Description and Context

- 2.1 The Site is located on the northern side of Blackfriars Street and comprises a multi storey car park (MSCP). This occupies the western part of a larger substantial complex including the Treehouse Hotel. The MSCP occupies the lower stages of the complex, the levels of which are clearly visible from Blackfriars Street, beneath a mezzanine and a plain plant enclosure.

### History and Development of the Site and Surrounding Area

- 2.2 The Site is located in one the most historic surviving areas in Manchester. The surviving built form in the area illustrates and exemplifies most of the major stages of change and development in the city from the medieval era to the present day.
- 2.3 During the 15<sup>th</sup> and 16<sup>th</sup> century, Manchester Cathedral was transformed into a collegiate foundation that became one of the largest and most lavish collegiate churches in England. The domestic premises for the collegiate are now the Chethams Hospital buildings, also to the north of the site.
- 2.4 By the end of the 16<sup>th</sup> century the town had developed a leading role in the cloth trade. Wealth increased during the 17<sup>th</sup> century resulting in improved communications and by the second half of the 18<sup>th</sup> century the city centre was developed with high status residential buildings, benefiting from increasing demand and soaring land values. During the early 1700s the site and surrounding area was developed with small scale buildings and courts, in combination with 'The Old Bridge' and by the late 1700s the density of developed had increased, with buildings lining the River Irwell and evident within the Site. A footbridge was built at the site of the present Blackfriars Bridge.

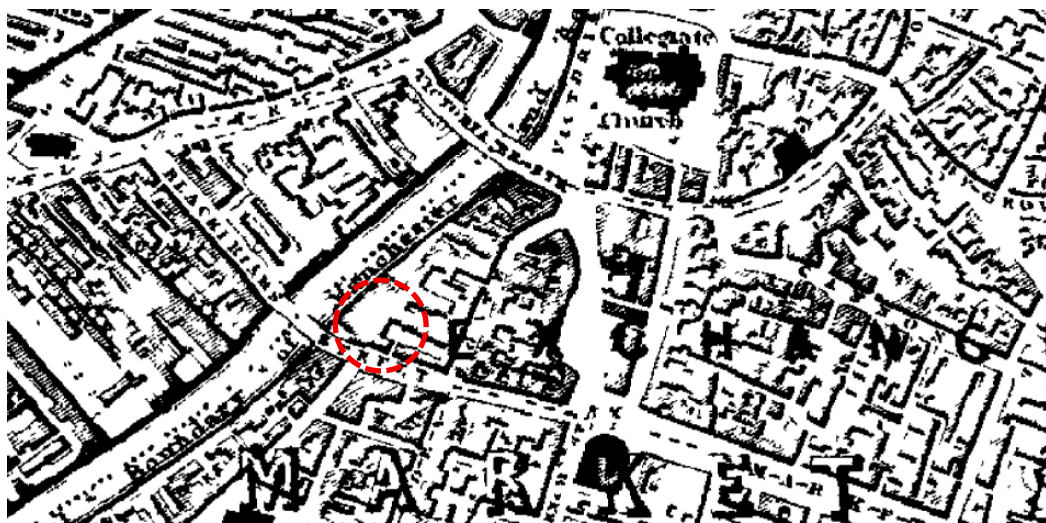


Figure 2.1: 1848 Ordnance Survey Map. The approximate location of the Site is circled in red

- 2.5 The early 19<sup>th</sup> century saw the real birth of the industrial revolution in Manchester and by 1848 the townscape had begun to change with the principal road network that exists today emerging. The city centre was largely re-built from the 1820s onwards in response to growing demand for commercial premises. During the 1870s and 1880s many streets, including Deansgate, were rebuilt and some of the larger buildings formerly within the Site were constructed during this period.
- 2.6 In 1886 the site contained a number of small scale units and courts but also larger scale buildings of the 19<sup>th</sup> century. Commercial functions prevailed on Deansgate and uses within the Application Site included the Grosvenor Hotel, the Deansgate Hotel, Shepherds Court (which contained a leather warehouse), yarn warehouses, Manchester Carriageworks and offices. To the southern side of the block was a tube factory, saw mill, billiard table factory, offices, and WH Smith and Son Stationers. During the 1930s the north side of Blackfriars Street was redeveloped with a modernist building (Woodhouse and Sons) with a distinctive curved frontage.

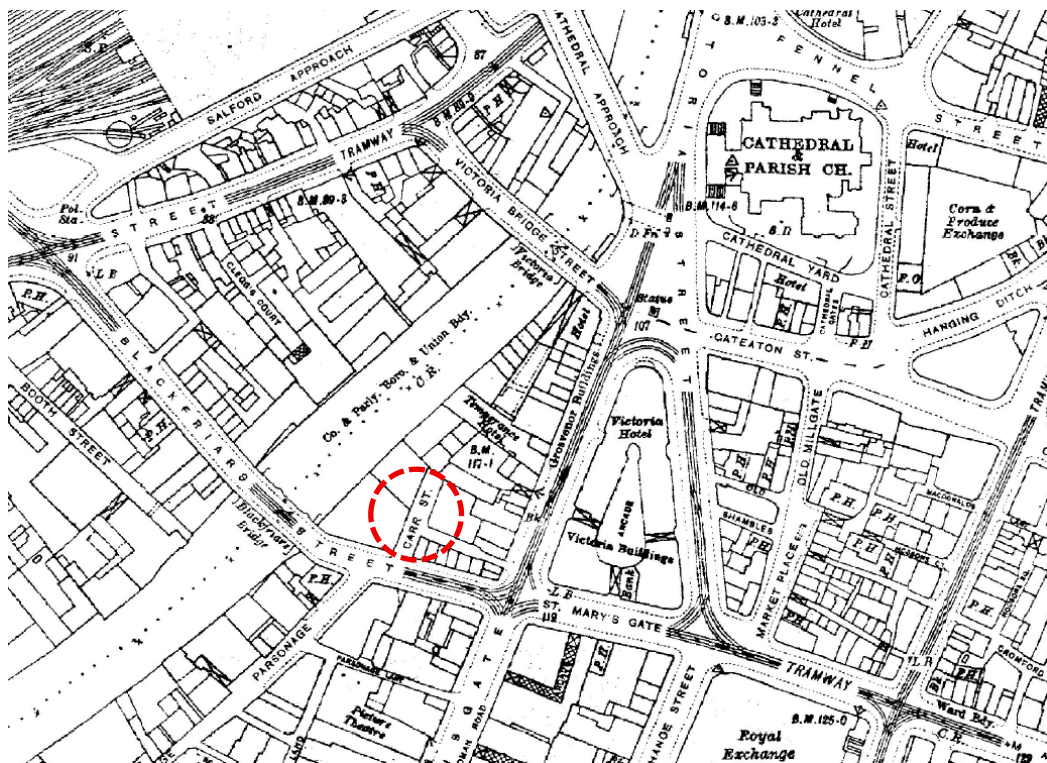


**Figure 2.2: 1930s Ordnance Survey Map. The approximate location of the Site is circled in red**

- 2.7 World War Two bombing in December 1940 resulted in significant damage in the city centre to the east of the Site. Victoria Buildings and others around Market Place were destroyed and resulted in the clearance of large areas of land, precipitating significant redevelopment of the retail core with the Market Street development during the 1960s.



**Figure 2.3: Manchester Bomb Damage Map.** The approximate location of the Site is circled in red

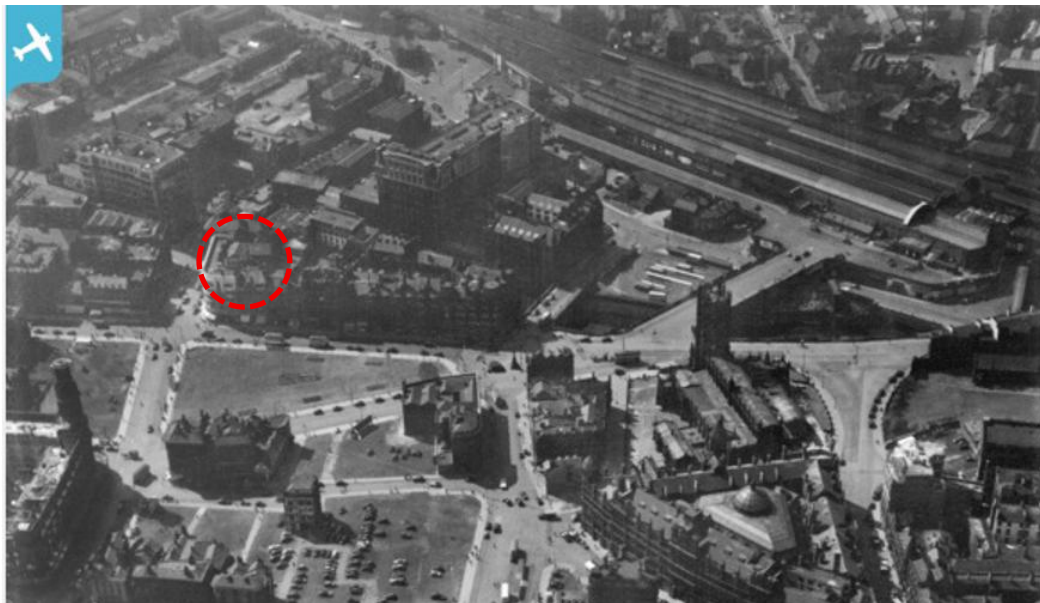


**Figure 2.4: 1948 Aerial showing the site following the Second World War;** the site of the former Victoria Buildings and much of the city centre south of the Site remained vacant. The approximate location of the Site is circled in red

- 2.8 During the late 1960s the land to the east of the Site was cleared and redeveloped with a large footprint 13 storey office building named 'Fairbairn House' which was completed in 1972. The building was designed by the Manchester architects Cruickshank and Seward and coincided with widespread redevelopment of the city centre. An original footbridge across Deansgate connected the building to the Market Place and the Arndale beyond. The building was designed with significant parking

provision for employees at the rear adjacent to the river, and to the frontage a ramp and raised walkway provided access to shops above street level. By the 1980s Fairbairn House had been re-fitted as the Renaissance Hotel.

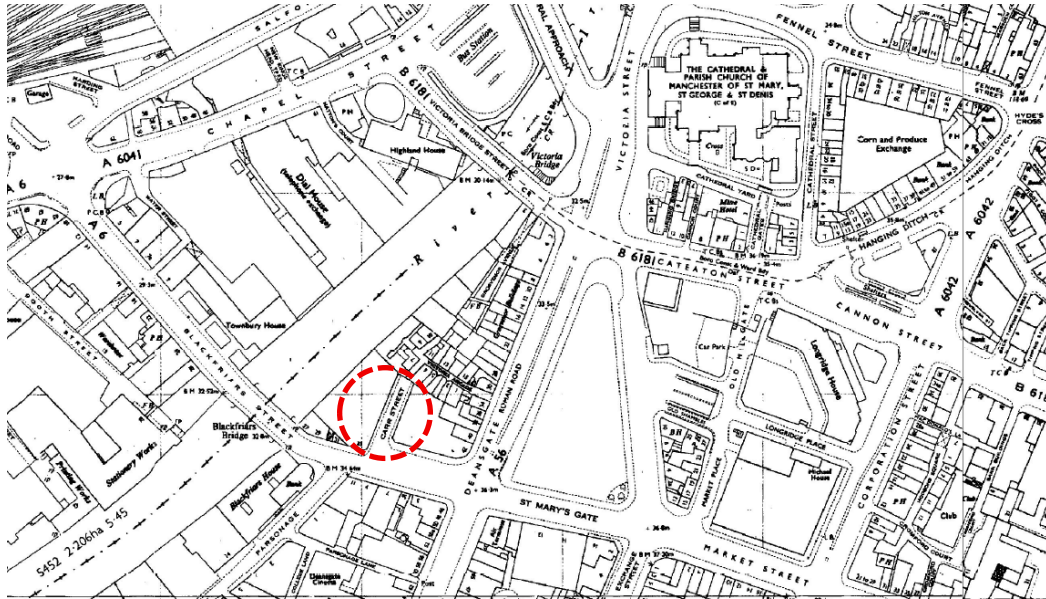


**Figure 2.5:** 1966-1971 Ordnance Survey Map showing the cleared sites following WW2 bombing and prior to the Market Place development. The approximate location of the Site is circled in red



**Figure 2.6:** Painting by Peter Sainsbury of the proposed development; the raised footbridge over Deansgate is visible. The approximate location of the Site is circled in red

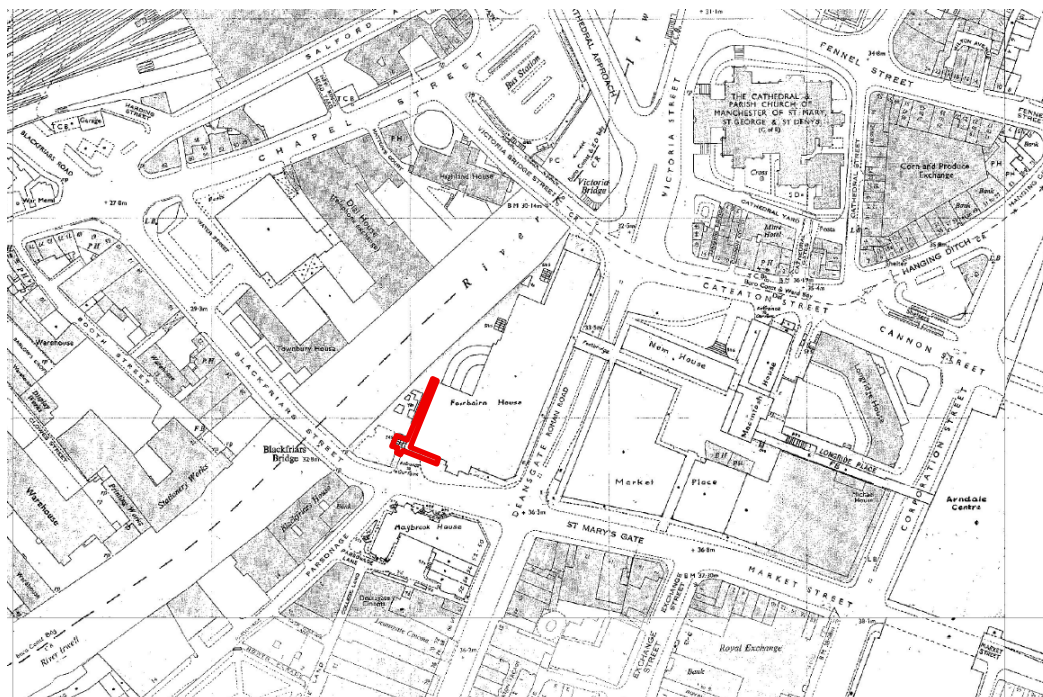


**Figure 2.7: 1978 Ordnance Survey Map. The approximate location of the Site is outlined in red**

The 1996 IRA bomb resulted in widespread damage to Manchester City Centre principally to the Market Place and Arndale area. The subsequent removal of the footbridge and later redevelopment of the retail core with New Cathedral Street and the Selfridges/Marks and Spencer building, as well as the Arndale extension, severed the Renaissance complex from the wider retail core of the city.

- 2.9 Since 2000 Manchester has seen significant development of new large scale and tall commercial and residential buildings, and there has been much change in the area surrounding the Site, particularly to the north and west where groupings of tall buildings have been developed in the Chapel Street/ River Irwell area of Salford.
- 2.10 The Site forms a part of the wider Renaissance complex, and represents the final phase of regeneration within the 1999 Manchester City Centre Renewal Masterplan area. Planning permission was granted in August 2021 for the refurbishment and rebranding of the former Renaissance Hotel as the Treehouse Hotel, followed by planning applications for the demolition and re-build of the Premier House office scheme in August 2022/January 2023, and a 26 storey residential tower in February 2023. The hotel element has been completed and opened in March 2025. The remainder of the development is due to proceed.

### 3. Heritage Assets

- 3.1 The NPPF defines a heritage asset 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.”<sup>6</sup>*

#### **Designated Heritage Assets**

- 3.2 Designated heritage assets are those which possess a level of heritage interest that justifies designation under the relevant legislation and are then subject to particular procedures in planning decisions that involve them.

#### **Conservation Areas**

- 3.3 The Site is located adjacent to the northern boundary of **Parsonage Gardens Conservation Area**, designated by Manchester City Council (MCC) in June 1985. There is no published character appraisal of Parsonage Gardens Conservation Area, however there is information published by the Council on its website.<sup>7</sup>

#### **Listed Buildings**

- 3.4 The Site is also close to a number of listed buildings. The disposition of the Proposed Works, the nature of interposing built development, when considered together with the individual significance of approximate listed buildings, ensures that any potential impacts of the Proposed Development would not impact the listed buildings through development within their setting, and have been scoped out of this Statement.

#### **Non-Designated Heritage Assets**

- 3.5 The NPPF differentiates between designated and non-designated heritage assets. Non-designated heritage assets are those identified by the local planning authority (including local listing). Historic England’s guidance on ‘Managing Significance in Decision Taking in the Historic Environment’ (2015) clarifies that:

*“Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering an application.”<sup>8</sup>*

- 3.6 MCC does not have a local list of heritage assets. No additional potential non-designated heritage assets have been identified with the potential to be impacted by the Proposed Works.

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<sup>6</sup> MHCLG (2025) National Planning Policy Framework (NPPF) – Annex 2: Glossary

<sup>7</sup> Manchester City Council (2025) Parsonage Gardens Conservation Area

[[https://www.manchester.gov.uk/info/511/conservation\\_areas/1100/parsonage\\_gardens\\_conservation\\_area](https://www.manchester.gov.uk/info/511/conservation_areas/1100/parsonage_gardens_conservation_area)]

<sup>8</sup> Historic England (2015) Historic Environment Good Practice in Planning Note 2, Managing Significance in Decision Taking in the Historic Environment. pg. 1.

## 4. Assessments of Significance

- 4.1 The NPPF defines the significance of a heritage asset 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.”<sup>9</sup>*

- 4.2 Historic England provide guidance on the assessment of significance of heritage assets.<sup>10</sup> This has been used as guidance for describing heritage significance.

### Conservation Areas

- 4.3 Conservation areas are designated on the basis of their special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Historic England has published guidance in respect of conservation areas which provides a framework for the appraisal and assessment of the special interest of a conservation area.<sup>11</sup>

### Setting

- 4.4 The NPPF defines the setting of a heritage asset 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.”<sup>12</sup>*

- 4.5 Historic England has published guidance<sup>13</sup> in respect of the setting of heritage assets, providing detail on understanding setting and the associated assessment of the impact of any changes. The guidance confirms that:

*“Setting is not a heritage asset, nor a heritage designation, rather its importance lies in what it contributes to the significance of the relevant heritage asset itself.”*

- 4.6 The guidance sets out a step-by-step process for proportionate assessment of the significance of a heritage asset that may be affected by a proposal.

- 4.7 Further guidance on the definition of setting and how it should be taken into account is set out in the latest National Planning Practice Guidance (‘NPPG’) relating to the historic environment. The NPPG sets out that:

*“The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way*

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<sup>9</sup> MHCLG (2025) National Planning Policy Framework (NPPF) – Annex 2: Glossary

<sup>10</sup> Historic England (2019) Heritage Advice Note 12 Statements of Heritage Significance: Analysing Significance in Heritage Assets

<sup>11</sup> Historic England (2019) Conservation Area Appraisal, Designation and Management

<sup>12</sup> MHCLG (2025) National Planning Policy Framework (NPPF) – Annex 2: Glossary

<sup>13</sup> Historic England (2017) Good Practice Advice Note 3: The Setting of Heritage Assets (2nd edition)

*in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.”<sup>14</sup>*

## **Assessment**

- 4.8 The following assessment of significance is proportionate to both the significance of the identified heritage asset and sufficient so as to understand the impact of the Proposed Works, given their nature and extent. The assessment has been undertaken on the basis of published information, archival research and on-site visual survey.

## **Parsonage Gardens Conservation Area**

### **Character and Appearance**

- 4.9 The Parsonage Gardens Conservation Area is focused on a small urban square of the same name and also contains an area of streets and buildings to the west of Deansgate and the south west of the River Irwell. It includes Parsonage, College Lane, Southgate and King Street West as well as the north side of Bridge Street.
- 4.10 The gardens are located on the site of the former St Marys Church, which was demolished in 1891 and the adjoining parsonage house, also demolished in 1897.
- 4.11 The gardens themselves are one of the few green spaces in the city centre. The space is roughly square in shape and is bisected into four by pathways from the corners, connecting at the centre. Trees have been planted to the boundaries. The square has a relatively tranquil character, in comparison with the busy nature of Deansgate, a short distance east.
- 4.12 The square is enclosed by a mix of buildings of differing period, style and material, but their consistent building line and 6-7 storey height results in a formality and enclosure. Key buildings enclosing the square include the Portland Stone Arkwright House which dates to 1929, and the red brick and terracotta National Buildings.
- 4.13 Bridge Street comprises a well preserved grouping of Victorian and Edwardian shops which retain consistency due to their function and building line, despite variety in height, materials and detailing and the application of modern signage and fascias to many. The street contrasts with others in the area as a result of its surviving smaller scale buildings and 2-3 storey heights, which results in a more intimate character.
- 4.14 College Land, which connects the northern and southern parts of the conservation area, is enclosed by the rear elevations and servicing areas of buildings to Deansgate and has a secondary and ancillary quality as a result.
- 4.15 The conservation area also encloses part of the river frontage to the Irwell and part of the bridge to Blackfriars Street.

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<sup>14</sup> MHCLG (2019) National Planning Practice Guidance. Paragraph: 013 Reference ID: 18a-013-20190723

## **Contribution made by Setting to Significance**

### ***Physical Surroundings***

- 4.16 The conservation area is defined by Blackfriars Street, Deansgate, Bridge Street and St Mary's Parsonage. To the west is the River Irwell. To the east, beyond Deansgate, is the St Ann's Square Conservation Area.

### ***Experience of the Asset***

- 4.17 The conservation area is contiguous with Manchester City centre and the surrounding area contains the continuing complex and varied townscape which includes densely developed buildings of different periods, heights and scales, roads and infrastructure. It is experienced as part of the continuous urban townscape, and due to the enclosure of streets the central part of the conservation area, particularly the gardens, is not readily visible from the surrounding townscape. Bridge Street and King Street West however are longer streets which extend to the east and west outside the designated area, and therefore there are longer vistas available along these routes.
- 4.18 Deansgate is a key feature in the surrounding area as an important route through central Manchester bisecting the east and west side of the city.

### **Contribution made by the Site**

- 4.19 The Site is located to the north east of the Parsonage Gardens, adjacent to its northern boundary, running along Blackfriars Street. As part of a wider modern complex, it is not unusual in an area of Manchester that contains a greater variety of building ages than in other parts of the city. The area around the Site is highly mixed and there are a number of modern buildings at the junction of Blackfriars, Deansgate and St Mary's Gate and within Salford. In its current state and due to the blank elevations the MSCP presents to surrounding streets, the Site is not an aspect of the setting of Parsonage Gardens Conservation Area that contributes to its character and appearance (significance).

## 5. Impact Assessment

### Introduction

- 5.1 Whilst the setting of a conservation area is not protected by primary legislation, the National Planning Policy Framework (NPPF) does state that the setting of a designated heritage asset (including conservation areas) can contribute to its significance.
- 5.2 Paragraph 210 of the NPPF states that, in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, putting them into viable uses consistent with their conservation, as well as the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.3 Paragraph 212 requires, when considering the impact of development on the significance of a designated heritage asset, that great weight should be given to the asset's conservation. 'Conservation' is defined by the NPPF as 'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.'
- 5.4 Paragraphs 214 and 215 differentiate between 'substantial' and 'less than substantial harm' and provide a framework for the consideration of harm to the significance of designated heritage assets, where it arises, bearing in mind the considerable importance and weight that must be given to the statutory duties of the 1990 Act.
- 5.5 Paragraph 219 requires that local planning authorities look for opportunities for new development within conservation areas and within the setting of heritage assets to better reveal their significance. It states that proposals that preserve those elements of setting that make a positive contribution to, or better reveal the significance of the asset, should be treated favourably.

### Planning Context

- 5.6 The Site forms a part of the wider Renaissance/Treehouse Hotel complex, and represents the final phase of regeneration within the 1999 Manchester City Centre Renewal Masterplan area. The wider Renaissance site has been subject to a coordinated regeneration programme, including:
  - Refurbishment and rebranding of the former Renaissance Hotel as the Treehouse Hotel Manchester (Ref: 130446/FO/2021) – approved 26 August 2021;
  - Erection of a 5-storey building comprising of new office space and commercial units (former Premier House (Ref: 134640/FO/2022) – approved 27 January 2023.
  - Approved residential tower to the north of the hotel (Ref: 132088/FO/2021) – 28 February 2023; and

- Temporary permission for two padel courts and supporting facilities on the cleared Premier House plot (Ref: 140249/FO/2024) – approved 22 August 2024.

5.7 The hotel element has been completed and opened in March 2025. The remainder of the development is due to proceed.

### **The Proposed Works**

5.8 The Proposed Works are confined to the external façade of the Blackfriars Street frontage of the existing MSCP entrance and first floor window (**Figures 5.1-5.3**), and can be summarised as follows:

- Introduction of vertically laid timber panelling, consistent with the low-level canopy detail used at the Treehouse Hotel entrance;
- Repainting of the existing concrete columns in dark green and grey tones to match the hotel's recently refurbished colour palette; and
- Minor repair and refinishing works to existing surfaces where required.

5.9 The existing vehicular and pedestrian access arrangements to the MSCP would remain unchanged.

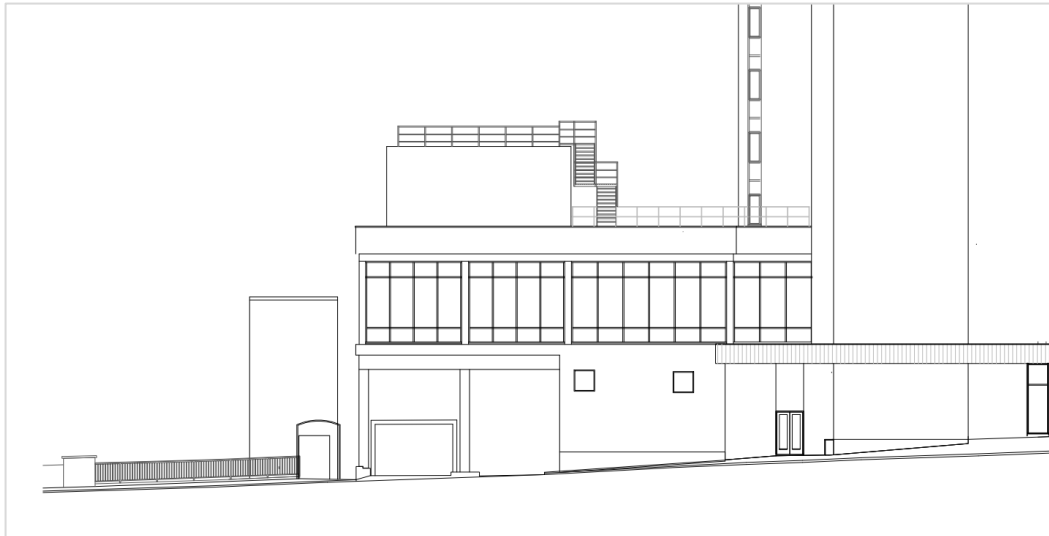


**Figure 5.1: Existing elevation to MSCP entrance, Blackfriars Street (image courtesy of CUBE Architecture and Design)**

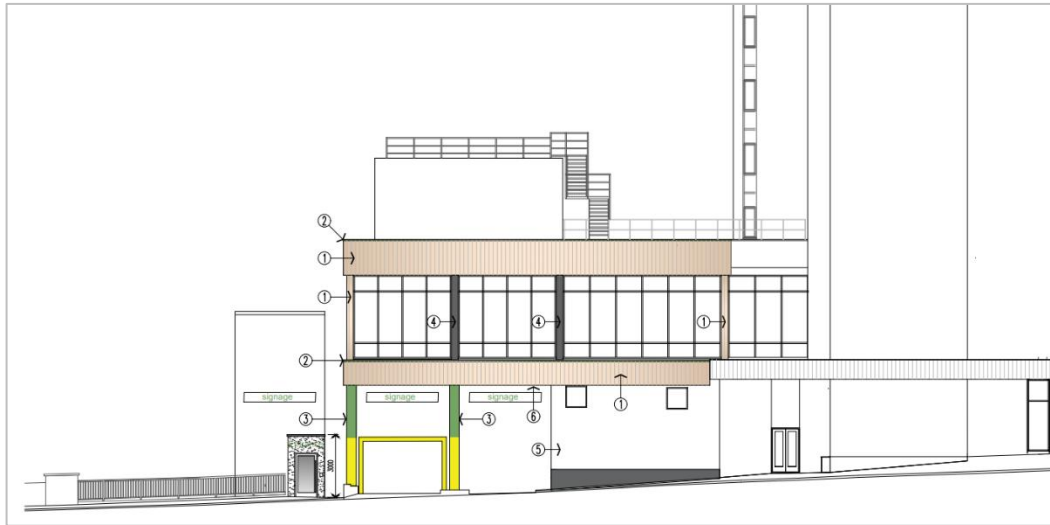


**Figure 5.2: Proposed elevation to MSCP entrance, Blackfriars Street (image courtesy of CUBE Architecture and Design)**



**Figure 5.3: Proposed concept image illustrating the proposed materiality of the scheme (extracted from the Design and Access Statement by CUBE Architecture and Design)**

### **Impact Assessment: Parsonage Gardens Conservation Area**

- 5.10 The setting of the conservation area is densely urbanised. It is enclosed by mixed built form varying in period, height and scale. In its current state and due to the blank elevations the MSCP presents to surrounding streets, the Site is not an aspect of the setting of Parsonage Gardens Conservation Area that contributes to its character and appearance (significance).
- 5.11 The Proposed Works would be clearly visible from the northern boundary of the conservation area, primarily from Blackfriars Street. The MSCP would become more animated through the application of the timber panelling and the building would therefore become more distinctive in appearance. It would correspond with the

existing façade design of the adjacent Treehouse Hotel, and form a cohesive frontage along Blackfriars Street. The Proposed Works, although minor in nature and extent would enhance the Blackfriars Street façade and improve the external appearance of the retained MSCP.

- 5.12 The Proposed Works would sustain the significance of Parsonage Gardens Conservation Area.

### **National and Local Planning Policy**

- 5.13 With respect to the core planning principle of the NPPF in relation to the historic environment, the Proposed Works would not harm Parsonage Gardens Conservation Area and will sustain its significance. The application proposals therefore meets the requirements of paragraph 207 and objectives of paragraphs 210 and 212 of the NPPF.
- 5.14 In accordance with Core Strategy (CS) Policy EN3 and Places for Everyone (PfE) Joint Development Plan Policy JP-P2, the Proposed Works sustains the significance of Parsonage Gardens Conservation Area. The proposals also comply with Unitary Development Plan (UDP) Policy DC18 by preserving the character of Parsonage Gardens Conservation Area.

## 6. Summary and Conclusions

- 6.1 This Heritage Statement has been prepared by Turley Heritage on behalf of Property Alliance Group ('the Applicant') in support of a full planning application for minor re-cladding works to parts of the southern and western facing elevations ('the Proposed Works') of the Multi Storey Car Park (MSCP) at the Renaissance complex in Manchester ('the Site').
- 6.2 The Site is located adjacent to the northern boundary of Parsonage Gardens Conservation Area. Whilst the setting of a conservation area is not protected by primary legislation, the National Planning Policy Framework (NPPF) does state that the setting of a designated heritage asset (including conservation areas) can contribute to its significance.
- 6.3 The Proposed Works are confined to the external façade of the Blackfriars Street frontage of the existing MSCP entrance and first floor window.
- 6.4 With respect to the core planning principle of the NPPF in relation to the historic environment, the Proposed Works would not harm Parsonage Gardens Conservation Area and will sustain its significance. The application proposals therefore meets the requirements of paragraph 207 and objectives of paragraphs 210 and 212 of the NPPF.
- 6.5 In accordance with CS Policy EN3 and PfE Policy JP-P2, the Proposed Works sustains the significance of Parsonage Gardens Conservation Area. The proposals also comply with UDP Policy DC18 by preserving the character of Parsonage Gardens Conservation Area.

# Appendix 1: Legislation, National and Local Planning Policy

## Legislation

### **The Planning (Listed Buildings and Conservation Areas) Act 1990**

The setting of conservation areas is not protected by primary legislation. However, in determining the submitted full planning application, the following statutory duty is placed on the decision maker:

*“s.72(1) 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.”*

Case law has confirmed that decision makers should give “*considerable importance and weight*” to the desirability of preserving the special interest and setting of listed buildings, where “*preserve*” means to “*to do no harm*”. The presumption is therefore that development proposals should not give rise to harm to the character and appearance of the conservation area. This duty must be borne in mind strongly when considering cases where harm may be considered to accrue, and then the balancing of such harm against public benefits as required by national planning policy.

## National Planning Policy

### **National Planning Policy Framework (NPPF) (2025)**

The National Planning Policy Framework provides a statement of Government planning policies with regard to the protection of all heritage assets. One of the core planning principles of the NPPF is that planning should:

*“conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.”*

Chapter 16 outlines the Government’s guidance regarding conserving and enhancing the historic environment.

Paragraph 207 outlines the information required to support planning applications affecting heritage assets, stating that applicants should provide a description of the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 210 states that with regard to determining planning applications planning authorities should take account of the desirability of sustaining and enhancing the significance of the heritage assets, and putting them into viable uses consistent with their conservation, as well as the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 212 confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. It is also confirmed that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Any harm to, or loss, of significance of a designated heritage asset should require clear and convincing justification.

Paragraph 213 confirms that 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.

Paragraph 214 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- (a) the nature of the heritage asset prevents all reasonable uses of the site; and
- (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- (c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- (d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Paragraph 219 states that local planning authorities should look for opportunities for new development 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 or better reveal the significance of a heritage asset should be treated favourably.

## **Local Planning Policy**

The Manchester Local Plan, previously known as the Local Development Framework, is formed of Places for Everyone (PfE) Joint Development Plan, Core Strategy (along with the Addendum to Manchester Core Strategy 2024) 2012-2027 and Proposals Map, the extant Unitary Development Plan (UDP) Policies and Greater Manchester Joint Waste and Minerals Development Plan Documents (DPDs).

### **Places for Everyone Joint Development Plan (adopted March 2024)**

Policy JP-P2 relates to Heritage and replaces paragraph 2 of Policy EN3 Heritage of the Manchester Core Strategy. It states that:

*“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.*

...

*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.*

...

*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.”*

#### **Manchester's Local Development Framework: Core Strategy Development Plan Document (adopted July 2012)**

Policy EN3 Heritage states:

Throughout the City, the Council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods, including those of the City Centre.

#### **Manchester Unitary Development Plan (saved policies)**

Policy DC18.1 (Conservation Areas) states that, the Council will give particularly careful consideration to development proposals within Conservation Areas. The Council will seek to preserve and enhance the character of its designated conservation areas by carefully considering the following issues:

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

## **Guidance**

### **National Planning Practice Guidance (PPG) (2023)**

Whilst not planning policy, Planning Practice Guidance provides a clear indication of the Government's approach to the application of national policy contained in the NPPF. Where there is conflict between the guidance in the PPG and earlier documents the PPG will take precedence.

This PPG advises on enhancing and conserving the historic environment. It clarifies that significance of the heritage assets is important as it enable authorities 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 (Paragraph 007).

Paragraph 013 describes the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

### **Historic England Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (2015)**

GPA Note 2 provides information to assist in implementing historic environment policy in the Framework and the related guidance given in the NPPG. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

### **Historic England Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017)**

Historic England has published revised guidance relating to the setting and views of heritage assets. The document gives general advice on understanding setting and how it may contribute to the significance of heritage assets. It also provides advice on how views play a part in setting. It suggests a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets.

The guidance clarifies that there can be a distinction between views that are valued for reasons other than their contribution to heritage significance such as reasons of landscape character or visual amenity.

It states that the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. It also clarifies that the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.

Paragraph 9 of the guidance states that setting is not itself a heritage asset. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.

The guidance highlights a series of other considerations that can be relevant to the assessing the impact of development such as 'change over time,' 'cumulative change,' 'access and setting,' 'buried assets and setting,' 'designed settings', 'setting and urban design', and 'setting and economic viability'.

It is identified within the guidance that views which contribute more to understanding the significance of a heritage asset include the following:

- Those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.
- Those where town- or village-scape reveals views with unplanned or unintended beauty.
- Those with historical associations.
- Those with cultural associations.
- Those where relationships between the asset and other heritage assets or natural features or phenomena are particularly relevant.

As set out above, a staged approach to assessment is advocated involving identification of the assets that may be affected, assessing the degree to which setting makes a contribution to the significance of the heritage asset or allows significance to be appreciated, assessing the effects of the proposed development and exploring ways to maximise enhancement and avoid or minimise harm.

In assessing the degree to which these settings and views make a contribution to the significance of the heritage assets or allow significance to be appreciated, the key attributes of the heritage asset should be addressed and then the following considered:

- The physical surroundings of the asset and its relationship with other assets;
- The asset's intangible associations with its surroundings, and patterns of use;
- The contribution made by noise, smells etc to significance; and
- The way views allow the significance of the asset to be appreciated.

The Step 2 Checklist provides a list of potential setting attributes that may help to elucidate its contribution to significance under the headings 'The asset's physical surroundings' and 'Experience of the asset'. The Step 3 Checklist provides a list of potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset including the 'Location and siting of development', the 'Form and appearance of development', 'Wider effects of the development' and 'Permanence of the development'.

**Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)**

This document provides guidance on analysing significance in heritage assets. It was released in 2019 by Historic England to support the National Planning Policy Framework's requirement for applicants to describe the 'heritage significance' of their proposals to assist Local Planning Authorities in making decisions on impact.

**Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management (2019)**

This Historic England Advice note supersedes Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management, first edition (2016). This 2<sup>nd</sup> edition updates the advice in light of the publication of the 2018 National Planning Policy Framework. It provides guidance on the appraisal of conservation areas.

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