Paul Butler Associates
Planning, Development & Heritage Consultants

# Clearbell Capital LLP

## Freetrade Exchange

## Heritage Addendum

12 December 2025

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**Professional Planning, Development & Heritage Advisors since 1992.**
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# 1. Introduction

1.1 This Heritage Addendum has been prepared by Paul Butler Associates on behalf of Clearbell Capital LLP. The statement has been provided in support of an application for Planning Permission and Listed Building Consent relating to the Freetrade Exchange building at 37 Peter Street, Manchester. The proposed scheme relates to the internal fit out of the 3rd floor office suite, with works primarily comprising the installation of solid and glazed partitions. The works also include minor works to the roof in the form of the addition of plant services.

1.2 The building is Grade II listed and located within the Deansgate Conservation Area. The main purpose of this statement is to consider the heritage significance of the building and to appraise the impact of the proposed scheme on this significance.

1.3 This statement has been prepared in accordance with the policies and procedures of the National Planning Policy Framework (NPPF) December 2024, following a visual and photographic survey of the affected part of the building (undertaken on 12th November 2025). In recent years, the building has undergone a comprehensive 'CAT A' refurbishment with some parts now occupied. Where appropriate, this statement will refer to previous reporting undertaken at the site rather than repeating this.

1.4 This addendum should be read alongside the Heritage Statement prepared by Stephen Levrant Heritage Architecture in relation to the broader refurbishment of the building (Dated June 2022); and the submitted Design and Access Statement and plans which have been prepared by Cubic Works. A photographic survey of the third-floor office suite is set out in Appendix A.

# 2. The Application Site and Surrounding Area

2.1 The Freetrade Exchange building is located within a prominent position at the junction of Peter Street and Southmill Street within Manchester City Centre. The building has recently undergone a comprehensive refurbishment to increase its attractiveness to high quality office occupiers, and to accommodate a restaurant operator at lower ground floor level. At the time of the subject application, the building is part occupied as offices and has a fully operational restaurant in the lower ground floor.

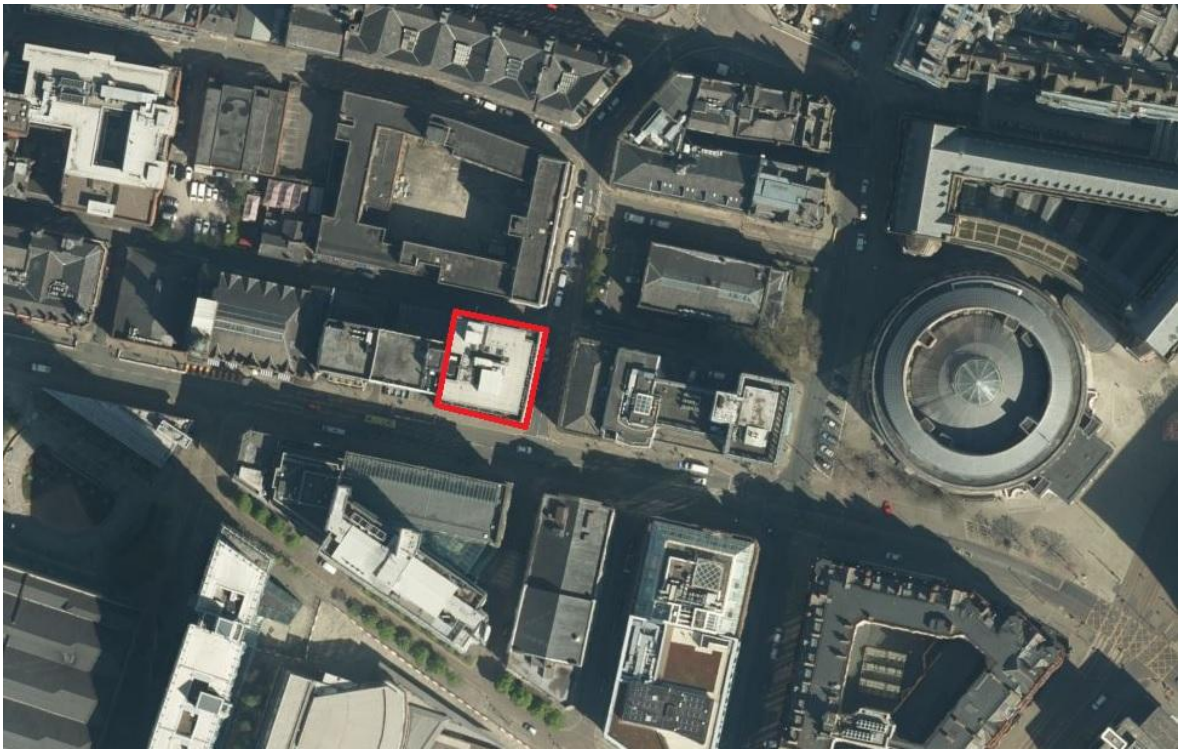


**Image 2.1:** Aerial Plan (Approximate site boundary in red edge).

2.2 The ground and five upper floors of the building are in office use, with the subject application relating to the third-floor office suite. The main reception and access point to the third floor is via the main entrance at the west side of the building on Peter Street, whilst there is a secondary access to the rear of the building on Bootle Street. There is also an access on Peter Street at the eastern side of the building which is the main entrance to the restaurant unit at lower ground floor level.

2.3 The building is located on the fringe of Manchester City Centre's Central Business District. The building is attached to Scottish Mutual House (35 Peter Street) to its west which is a 1960s office building, which also accommodates a bar and restaurant at ground floor level.

2.4 The application site covers an area of 0.07 Hectares. The building was previously known as 'Harvester House' and was constructed as a merchant's warehouse in 1868. It underwent a comprehensive refurbishment in 2007 whereupon it was relaunched as Freetrade Exchange, in reference to the Grade II* Free Trade Hall (now the Radisson Edwardian Hotel), located directly opposite the site. The more recent refurbishment of the building has enhanced it both on a heritage basis and in terms of it being able to meet the space and facilities' expectations of modern occupiers.



**Image 2.2:** Freetrade Exchange from Peter Street



**Image 2.3:** View from west

2.5 The building is square within the plot, with its primary south and east elevations in sandstone ashlar. The other two visible elevations (north and west) are in red brick and are of a more utilitarian design.

### Surrounding Area

2.6 The building is located within the Deansgate Conservation Area and within close proximity to a number of Grade II and Grade II* listed buildings. Designated in June 1985, the conservation area includes much of the area surrounding Peter Street and the junctions of Deansgate with both Quay Street and Bridge Street. The boundary of the St Peter's Square Conservation Area runs down Southmill Street thereby aligning with the boundary of the Deansgate Conservation Area.

2.7 The application proposals relate to the office suites at third floor level and to some minor works on the plant which is on the roof.

### Relevant Planning History

2.8 Planning Permission (133119/FO/2022) and Listed Building Consent (133282/LO/2022) was secured on 26 July 2022 for external works and the internal refurbishment of the Listed Building, as well as the change of use of the lower ground floor. Subsequently, a number of applications were submitted to discharge conditions attached to those consents. With regards to the third-floor office space, these were stripped back to reveal original and historic features, which were then refurbished to a 'CAT A' standard.

## 3. The Proposed Scheme

3.1 The proposed scheme involves the fit out of the building's vacant third floor office suite. This space has already undergone 'CAT A' refurbishment further to securing the 2022 consents mentioned above. The proposed operator of the suites, American Express Travel (AMEX) is now ready to occupy the suites but must make physical alterations to the spaces to enable them to be suitable for their operation. This application submission reflects AMEX's specific requirements for this floor. This section explains the occupier's specific requirements and sets out the physical works necessary to adapt the space for its use.

### American Express

3.2 AMEX was originally founded in the USA in 1850 when three people (Wells, Fargo and Butterfield) merged their companies. Initially the company was about express delivery, however now it is known for its credit cards, insurance and travel. The Manchester branch will be mostly used for the travel sector of the business.

3.3 The sensitive nature of AMEX's work results in specific requirements for their Manchester office which are reflected in the proposed layout. Visitors need to be able to access meeting rooms and the boardroom, hence these being located in the southern part of the plan. Whilst much of the layout, particularly in the east and north of the plan can remain open (a heritage benefit of the proposal), there is a requirement for breakout / kitchen spaces, and recreational / break space in the form of a 'social hub' to the less sensitive west part of the plan. Retaining the broadly open floorplan does mean that 2 'focus rooms' are required (located adjacent to lift core) which benefit from acoustic and visual privacy (by solid partition), which provides a place for employees to make highly confidential phone calls when necessary. The doors to these rooms are however glazed which help to reduce the visual impact of this intervention. There is also a wellness room which will also be located adjacent to the meeting rooms. Where partitions are necessary, these are mostly glazed as far as possible to retain the sense of openness across the floorplan, reflecting the original character of the warehouse.

### Proposed Physical Works

3.4 The works which require LBC primarily comprise the installation of partitions. These have been minimised as far as possible whilst also ensuring that the space meets the operational requirements of AMEX as discussed above. Partitions facing circulation space or the main office area will be glazed where possible, will be 2.4m in height, with a solid section to help obscure services / M&E. Partitions have been located to avoid historic architectural features as far as possible, whilst fixed storage units are proposed to non-original walls. Some minor adjustments to the internal 'CAT A' lighting scheme are proposed.

3.5 The proposed additional elements include:

- Demountable stud partitions with glazed doors.
- Demountable glazed partitions with glazed doors.
- Carpet and vinyl floor finishes.
- Minor alterations to the installed M&E equipment.
- Paint finishes / wall paints.
- Kitchen units and island.
- Plant to the roof.

3.6 The internal fit out has been designed to ensure that architectural features of heritage interest are maintained and remain exposed as far as possible. These features are limited to the columns, column heads, and external walls and windows, as well as the general open proportions of the historic spaces.

3.7 In order to allow these areas of interest to be appreciated whilst also enabling the floor area to be subdivided, all meeting / board rooms and the social hub are located in the western half of the plan. This means that a fully open undivided office space can be provided to the eastern half of the plan, enabling long views of the external walls / windows and historic columns and beams. Despite the subdivision, the historic proportions of the space can continue to be understood.

3.8 All proposed solid partitions have been detailed to present a shadow gap at any abutments with heritage ceilings/soffits and walls. The scheme has been designed so that no partitions will abut historic columns.

3.9 Only minor alterations are proposed to the CAT A ceiling arrangement. This includes minor changes to the M&E ventilation equipment where this is necessary, to serve the proposed layout.

3.10 A light touch design approach has been taken to ensure that the impact of the proposed works on the fabric of the Listed Building is as limited as possible. This includes with regards to the other proposed works which are set out above, all of which have been designed to be sensitive to the character of the Listed Building whilst also providing an office accommodation suitable for AMEX.

3.11 The works to the roof involve the addition of plant, of which there is some in place already. This will therefore not interfere with the sensitive character of the building but allow the site to continue to be functional and so protect its historic asset status.

### Pre-Application Consultation

3.12 MCC officers have been involved in the application proposals as these have been developed. PBA initially consulted MCC by email on 27th October 2025, and a response from MCC was received on 28th October. A number of issues were raised by officers which are set out within the table below, with responses provided where appropriate.

| Query | Response |
|---|---|
| MCC find the layout largely agreeable however they do require cross sections of the property's plant space, to show where the proposed plant unit would sit. | Proposed sectional elevations have been produced by Cubic Works. |
| MCC commented that some of the partitions are solid, and that they should be glazed in order to enable greater views through the ceilings floorplate. The social hub is the most critical of this as it prevents the most southerly line from being seen clearly and so appreciated. | The solid partition which MCC had identified as being most critical to change (which separated the Social Hub from the Collaboration Space) will now be glazed. In order to ensure acoustic / visual privacy it has not been possible to fully accommodate MCC's request, but overall, |

| Query | Response |
|---|---|
| | the layout is more open and sensitive than layouts approved to other floors within the building. |
| MCC note that some of the partitions (in blue on the map), would be harmful as they would obscure the columns. Partitions should be rearranged to allow them to be unobscured, which may require the relocating of the study pods to elsewhere within the floorplate. | The locations of the partitions and study pods have been slightly adjusted so that now the historic columns will be visible within the respective meeting rooms rather than being enclosed within the partitions as has been requested. Sufficient space remains for the study pods which have been retained in their proposed position. |

## 4. The Policy Context

4.1 Section 3 of the Heritage Statement: Significance Appraisal & Impact Assessment prepared by Stephen Levrant Heritage Architecture (dated June 2022 – REV A) ('the SLHA statement') and submitted in support of the applications for the broader refurbishment of the building sets out the Policy Context. The following are referred to:

- The Planning (Listed Building and Conservation Areas) Act 1990
- National Planning Policy Framework (2021)
- Planning Practice Guidance (PPG) (2019 and as subsequently amended)
- Manchester City Council Local Planning Policy.
- Historic England Guidance including:
    - Advice Note 12 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' (2019)
    - Historic Environment Good Practice Advice in Planning: 2 'Managing Significance in Decision-Taking in the Historic Environment' (2015).

4.2 The above documents remain the key policy and guidance relevant to the application proposals. Since the SLHA statement was issued in June 2022, there have been further updates to the NPPF (most recent December 2024), along with adoption of the 'Places for

Everyone' development plan, but this has not resulted in any policy implications relating to the proposed scheme.

## 5. Statement of Significance

5.1 A Heritage Statement (dated June 2022) was prepared by Stephen Levrant Heritage Architecture (SLHA) and submitted in support of applications 133119/FO/2022 and Listed Building Consent 133282/LO/2022 which were approved on 26 July 2022. This included a review of the site's historical development (Section 4), a description of the building (Section 5), and significance appraisal (Chapter 6). With regards to the significance appraisal, this primarily focuses on the building's external elevations where its significance is highest.

5.2 The roof is not an element of the building that is seen as important in the significance of the site. Unlike the primary elevations (on Peter and Southmill Street), it has modern elements such as a rooftop extension, coverings and existing plant. This is similar to the neighbouring buildings, and those within the setting of the site. It has limited historic elements in the form of decorative balustrades; however, these are to the very edges of the roof and are more a feature of the elevations as opposed to the roof itself. This means that the roof has minimal historic fabric or decoration and therefore adds little to no historical or architectural significance to the site.

5.3 The elements of significance which are of relevance to the submitted proposals are set out at Section 6.3 and summarised below:

- The building's internal planform demonstrates its primary function as a packing warehouse. The internal plan form and structure have architectural interest in the use of decorative ironwork within industrial buildings and historic interest in evidencing the functional form of a packing warehouse.

5.4 Within the Statement of Significance, the surviving components of the building determined to be of high significance include the original timber sash and case windows, cast iron columns, beams and original floor structure – albeit this is not visible within the 3rd floor due to there being a raised access floor in place.

5.5 Whilst there have been some minor policy changes since the SLHA report was completed and some additional guidance published, none of this would impact upon the way the report was completed or its findings and the statement of significance is therefore regarded as being up to date. Further information on the significance of Freetrade Exchange is set out within the SLHA report.

## 6. Impact upon Significance

6.1 This section appraises the proposals against the heritage significance of the building. It should be highlighted that from the outset of developing the proposed scheme, the architect has sought to design a solution which has little or no impact upon the Listed Building's heritage significance. The scheme involves the works set out within Section 3.

6.2 The works have been designed in such a way as to have as limited an impact as possible on the fabric of the listed building, as well as seeking to ensure that the internal elements of significance and the historical operation of the spaces can continue to be read and understood as far as possible.

6.3 Heritage impact is defined as the potential level of harm or benefit to the special architectural or historic interest caused by a proposed development. The NPPF stresses that impacts on heritage assets should be avoided and if it cannot be avoided, it should be minimised or mitigated. The NPPF does not prescribe a format for analysis of heritage significance and/or impact.

6.4 Scale or severity of impacts or changes can be judged taking into account their direct and indirect effects and whether they are temporary or permanent, reversible or irreversible. The cumulative effect of separate impacts should also be considered. Change can be either harmful or beneficial to heritage significance.

6.5 The following methodology is based on the guidance set out by ICOMOS (2011) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties. Although intended for World Heritage Sites it provides a sliding scale of impacts that can be applied to assets on all significance levels.

| Impact Grading | Criteria |
|---|---|
| High Beneficial | Comprehensive changes to an asset or its setting resulting in a major enhancement of significance. |
| Medium Beneficial | Significant changes to an asset or its setting resulting in a notable enhancement of significance. |
| Low Beneficial | Modest changes to an asset or its setting resulting in a slight enhancement of significance. |
| Neutral | No or negligible change to an asset or its setting resulting in no or negligible change to significance. |
| Low Adverse | Modest changes to an asset or its setting resulting in slight harm to significance. |
| Medium Adverse | Significant changes to an asset or its setting resulting in notable harm to significance. |
| High Adverse | Comprehensive changes to an asset or its setting resulting in major harm to significance. |

6.6 The following section gives a breakdown of the proposals, providing a background justification for each element and an associated impact upon significance. Any mitigation which has been undertaken or could further reduce harm has also been identified.

6.7 The proposed works relate to internal works on the third floor of the building with some small external works to the roof in the form of plant. When assessing potential heritage impacts associated with the proposed scheme the key heritage issue to consider relates to both the direct impact on this floor and the roof.

6.8 As there are external works proposed it is necessary to consider direct impacts on the external appearance of the building, upon the setting of nearby listed buildings, and upon the setting of the Deansgate Conservation Area.

6.9 The impact of the proposed works on the application building are assessed in the table below, with appropriate mitigation identified where appropriate.

| | Proposed Works | Impact on significance | Mitigation required to be undertaken |
|---|---|---|---|
| | **Third Floor** | | |
| 1. | Installation of new internal partition walls, which are | The subdivision of the space does result in some adverse impact due to it resulting in the enclosure of spaces that historically would | Samples of materials and method |

| | Proposed Works | Impact on significance | Mitigation required to be undertaken |
|---|---|---|---|
| | necessary in order to meet the operational requirements of AMEX. | have been open (as a packing warehouse), and also some physical impact where partitions are required to abut / connect to original external walls, beams, and soffits.<br><br>A positive element of the design is that the office space retains a large open plan area within the eastern part of the floorplan ensuring that the original proportions of the space can continue to be understood.<br><br>The adverse impact of the installation of partitions / meeting rooms has been mitigated-by-design, through the use of glazed partitions where possible, the incorporation of a shadow gap where partitions meet historic walls or beams, and the sensitive fixing to original fabric.<br><br>A minimum of 50mm spacing between the column capitals and partitions has been included to enable those features to continue to be fully appreciated.<br><br>The extent of subdivision has been limited as far as possible, whilst also ensuring the space will meet AMEX's sensitive operational requirements.<br><br>The heritage impact is **low adverse**. | statement for installation to be submitted. |
| 2. | Laying of new floor finishes throughout including a mixture of golden oak, LVT tiles and carpet, depending on the requirements of the individual rooms. | Due to the presence throughout of a raised access deck, installation of floor finishes will not affect any historic fabric, and its installation will be reversible. The heritage impact is **neutral**. | No mitigation required. |
| 3. | New decoration finishes throughout to walls. This includes making | Redecoration will only affect historic fabric were making good of the white matt paint to external walls were necessary. A breathable | No mitigation required. |

| | Proposed Works | Impact on significance | Mitigation required to be undertaken |
|---|---|---|---|
| | good of matt paint (in Dulux trade, Diamond Matt) where necessary to external walls and some tiling. | paint will be used. The heritage impact is **neutral**. | |
| 4. | Installation of focus rooms and one meeting room with MF ceilings. | The works will not directly affect historic fabric. The installation of the MF ceilings will attach to non original walls / partitions. They will enclose the ceiling above creating a void, but will only affect a very small part of the floor plan, already to be enclosed by partitions and where an existing bulkhead already would be located above part of the spaces. The heritage impact is **low adverse**. | No mitigation required. |
| 5. | Minor alterations to recently installed mechanical and electrical system. This will also include acoustic rafts taken from AMEX's current office. | The works will adapt an existing system and will not result in a greater amount of equipment, nor will the alterations create any additional impact to historic fabric or features. The acoustic rafts will be suspended below the ceiling and will not significantly affect the openness of the internal space. The changes are considered to have a **neutral** impact. | No mitigation required. |
| 6. | Installation of glazed doors. | The installation of new doors does not affect historic fabric. The use of glazed doors minimises their heritage impact by allowing views through, and reducing their visual impact upon the spaces. The heritage impact is **neutral**. | No mitigation required. |
| 7. | Installation of 2 condenser plant units to roof. | No historic or original fabric will be affected. The condenser unit will be located set-back from the northern roof edge, located behind an existing plant screen, adjacent to existing plant and enclosures. Due to the plant screen, existing plant and roof top enclosures, the plant will not be visible from the west or south, and due to the heights and positioning of buildings to the east, will not materially impact any views from the east. The condenser unit will be visible from oblique views from the new St Michael's office building to the north, but again is of such a limited size, within an existing | No mitigation required. |

| | Proposed Works | Impact on significance | Mitigation required to be undertaken |
|---|---|---|---|
| | | context of roof plant, that it will not be materially visible. The plant will not be visible from street level from any vista.<br>Therefore, the heritage impact is **neutral.** | |

### Cumulative Impact

6.10 The table above has identified the impact of a range of works on the significance of the building. The works proposed primarily affect later fabric and will not have a direct adverse impact on any original or historic fabric. The works will enable the spaces to be used by the confirmed operator, AMEX, thus helping to facilitate the ongoing use and reuse of the building. As such there may be indirect positive impacts linked to bringing the spaces back into use. Moreover, through helping to facilitate the active economic reuse of the building this will have a significant beneficial impact on this part of the City Centre. Historic features that have been exposed within the spaces (i.e. steel columns) which were revealed as part of the broader 'CAT A' refurbishment of the building will remain exposed.

### Indirect Impact on Freetrade Exchange, nearby listed buildings and the Deansgate Conservation Area

6.11 The proposed works relate to internal fabric on the third floor of the building and externally with some additional plant to be added to the roof. The visibility of the proposed roof top plant from other buildings and from within the conservation area, will be minimal. There will be no visibility of the proposed plant from street level at any angle and only some visibility from the upper floor of the St Michael's office building to the north. As there is already extensive plant and other enclosures on the roof of the building, the impact of additional works will be negligible. Also, the roof is a to a modern 5th floor rooftop extension therefore the installation of plant will have no direct impact upon any historic / original fabric. Overall, the impact upon the settings of the conservation area and nearby listed buildings, will be negligible / nil.

6.12 Indirectly however, the scheme will help to improve the attractiveness of the subject spaces helping to facilitate their continued use / re-use. This in turn will have beneficial impacts for the Listed Building, helping to secure its future.

### Overview of Heritage Impact and Assessment against Planning Legislation and Policy

6.13 This Heritage Addendum has confirmed that the majority of the proposed works will have a 'neutral' impact on the building's significance, whilst the installation of partitions and small areas of MF ceiling will have a 'low adverse' impact. This low level of harm is considered to be at the lowest end of the scale of 'less than substantial' as per paragraph 208. The works will however enable the internal floors to be re-used by AMEX whilst ensuring that the historic internal character of the spaces are preserved. This represents a public benefit to be weighed in support of the application proposal. As such it is demonstrated that the proposal is consistent with paragraph 208 of the NPPF which requires that harm to the significance of a heritage asset 'should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Similarly, the proposal is consistent with relevant legislation, policy and guidance set out and referred to within Section 4.

6.14 The proposed works are largely internal to the building, with only a minimal addition of plant to the roof. This will therefore only have a negligible impact on the conservation area and surrounding listed buildings. The size and positioning of the plant, it is located in the north western corner of the building b, means that it is not visible from ground level at all (see fig 6.1) and only partially visible from the upper floor of a new office building to the north. This is particularly relevant when looking at Bootle Street, as the position of the plant is closest to this street. Any harm that could be measured, would be at the lowest end of less than substantial, due to the limited visibility of the proposed works. Approval and delivery of the proposed scheme will help to secure the future of the Listed Building which significantly contributes to the significance of the Deansgate Conservation Area.

## 7. Conclusion

7.1 This Heritage Addendum sets out analysis of the heritage significance of Freetrade Exchange, Manchester with specific analysis to the affected parts of the building which the subject applications relates to.

7.2 The broader internal and external refurbishment of this building has preserved and enhanced its architectural significance whilst also making it fit for contemporary professional use. The proposed fit-out and adaptation of the space will make it suitable for use by AMEX– a global finance, insurance and travel company. The design and layout has sought to limit any adverse heritage impact as far as possible.

7.3 The identified heritage significance has helped inform the design of the proposed works. The proposed works have been designed in such a way as to ensure that the appreciation of the heritage significance of the building is unaffected and interventions to the Listed Building's original fabric will be extremely minor and reversible.

7.4 This statement has been prepared in accordance with national and local planning policy guidance. The design team look forward to working further with the Council in progressing the proposals through to determination.

## **Appendix A**: Photographic Record

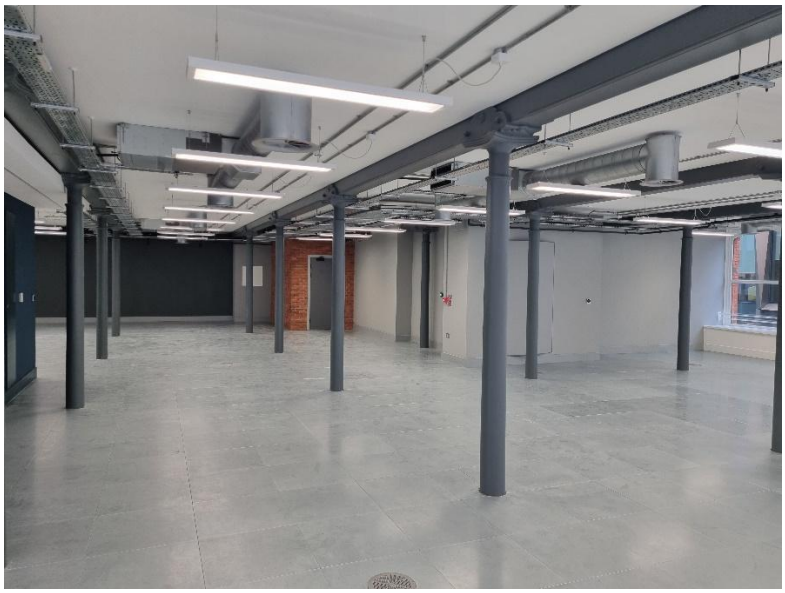


Image 1: Third Floor

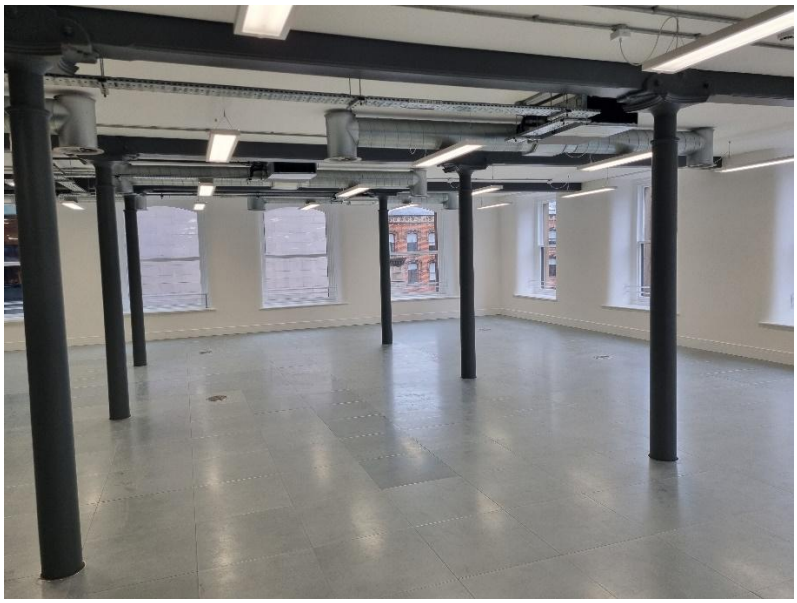


Image 2: Third Floor

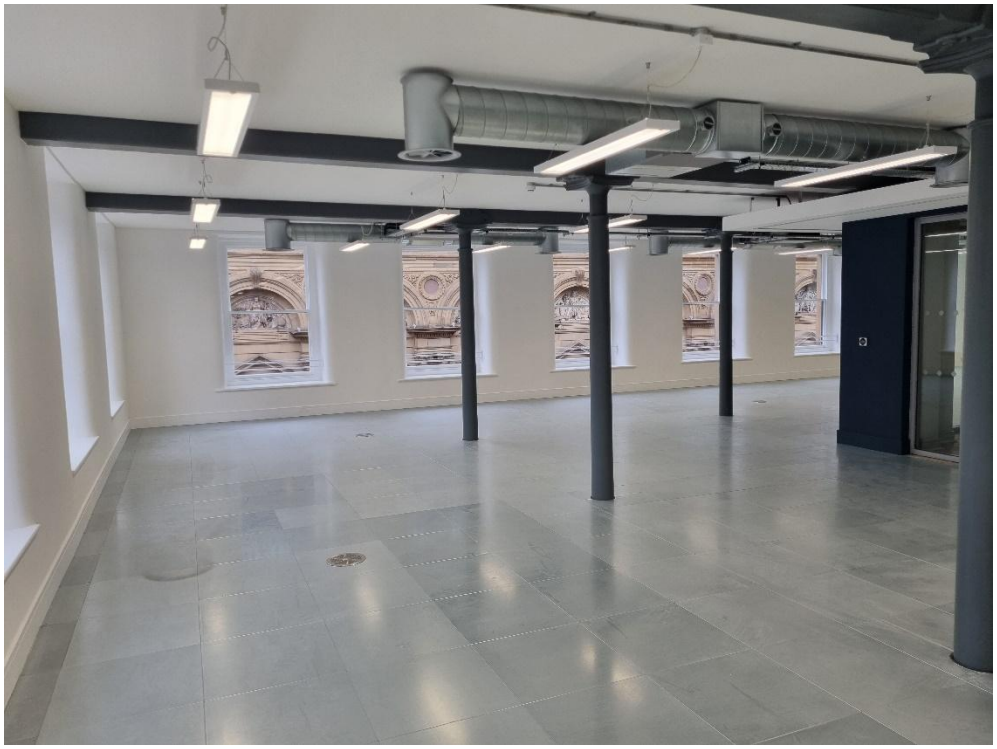


Image 3: Third Floor

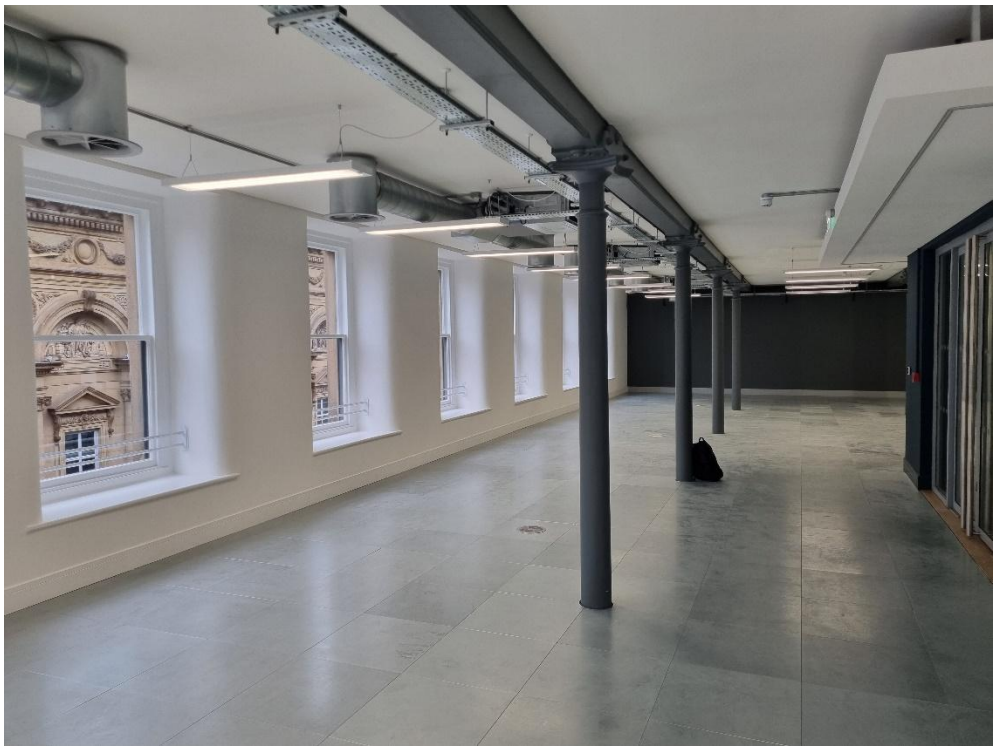


Image 4: Third Floor



Image 5: Third Floor




Image 6: Third Floor



Image 7: Third Floor

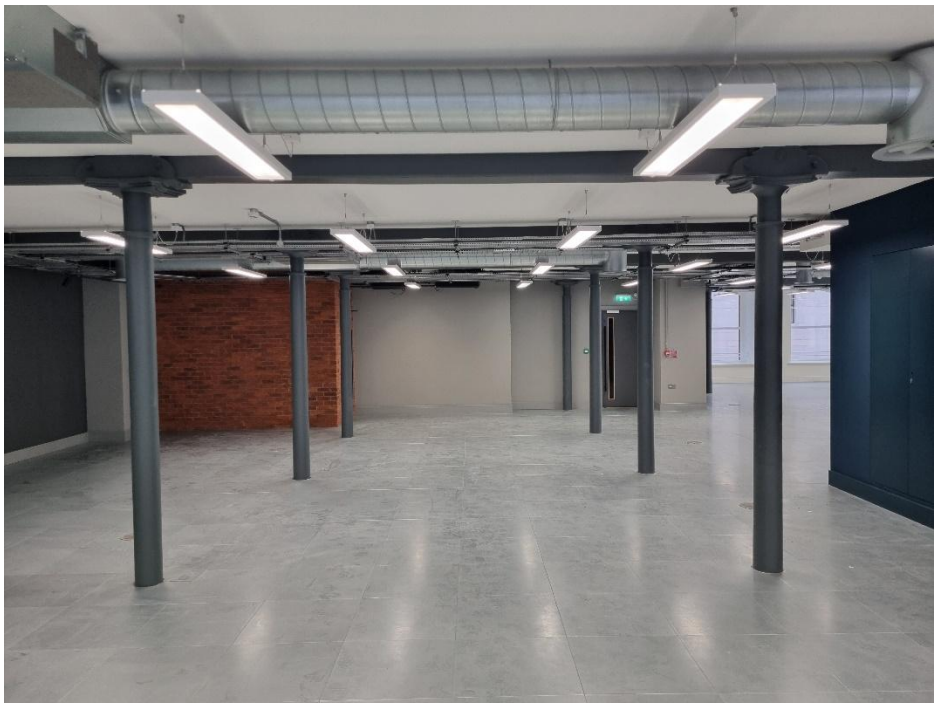


Image 8: Third Floor

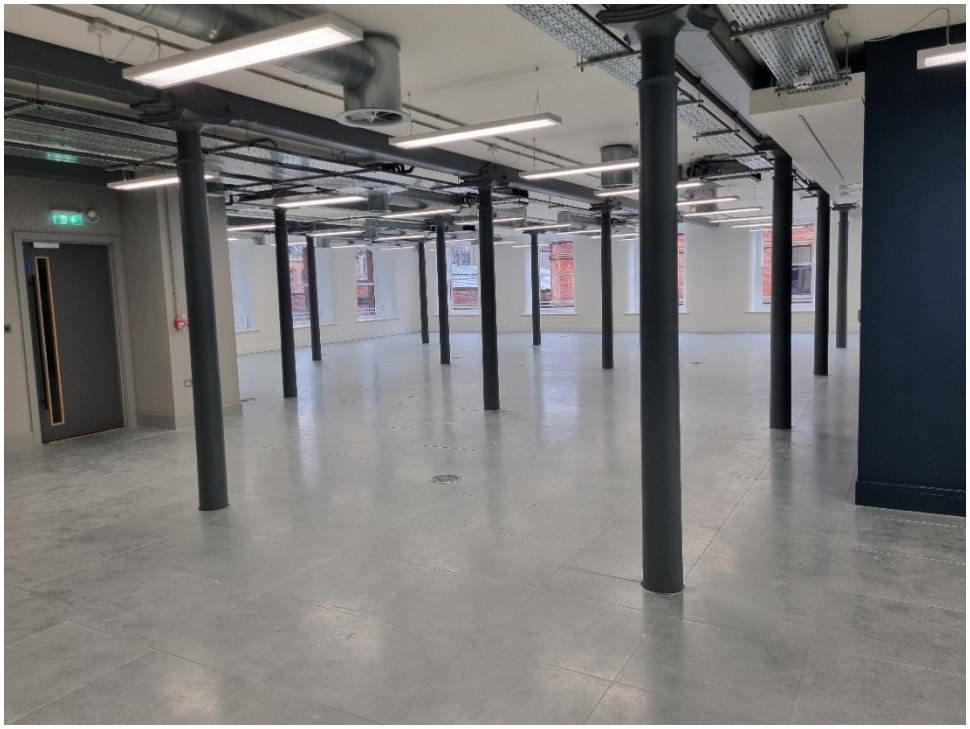


Image 9: Third Floor




Image 10: Roof Level



Image 11: Roof level



Image 12: Roof level



Image 13: Roof level

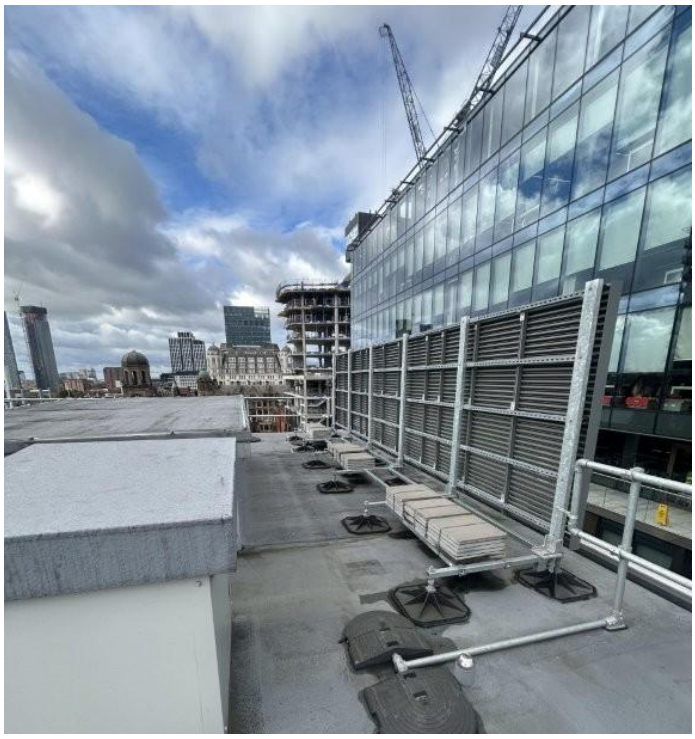


Image 14: Roof level – Location of proposed plant unit