DONALD INSALL
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Marlsbro House

4th Floor Panels LBC
Heritage Impact Assessment

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1. Summary of Heritage Impact Assessment

1.1. Introduction and Methodology

Donald Insall Associates were commissioned to assist in the development of proposals for Marlsbro House, 52-54 Newton Street, Manchester and the preparation of an application for listed building consent for the removal of panels and 4th floor.

This assessment has been prepared in accordance with the requirement of the National Planning Policy Framework (2024), paragraph 207, which asks that applicants 'describe the significance of any heritage assets affected' by proposals for change. This assessment takes account of the guidance provided by Historic England in 'Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12' (2019); IEMA, IHBC and CIfA: 'Principles of Cultural Heritage Impact Assessment in the UK' (2021).

This report is based on DIA's full Heritage Assessment (January 2022) which comprised historical research, using both archival and secondary material and consulting the relevant Historic Environment Record (HER), and a site inspection. A summary assessment of significance is provided in Section 2 of this report, the specific constraints for this building are summarised below and Section 5 provides a justification of the scheme according to the relevant legislation, planning policy and guidance.

1.2. The Building, its Legal Status and Policy Context

Marlsbro House is a Grade II-listed building located in the Stevenson Square Conservation Area in the City of Manchester. Alterations to a listed building generally require listed building consent; development in conservation areas or within the setting of a listed building or conservation area requires local authorities to assess the implications of proposals on built heritage.

The statutory list description of the listed building is included in Appendix I and a summary of guidance on the Stevenson Square Conservation Area provided by the local planning authority is in Appendix II alongside full relevant extracts of relevant law, policy and guidance for change in the historic environment which are summarised as follows.

1.2.1. The Planning (Listed Buildings and Conservation Areas) Act 1990

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Section 16 of the Act impose statutory duties upon local authorities to have special regard to the desirability of preserving a listed building or its setting, or any features of special architectural or historic interest which it possesses.

1.2.2. The Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the Site comprises the Manchester Core Strategy (adopted 2012) which stipulates that development works should preserve and enhance the existing historic environment. The plan also requires development to reinforce the overall character of the local area and contribute to a coherent physical environment.

1.2.3. The National Planning Policy Framework

The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework (2024) will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). At the heart of the Framework is 'a presumption in favour of sustainable development' and there are also specific policies relating to the historic environment.

The Framework requires that proposals for change give 'great weight' to the conservation of heritage assets (paragraph 212), that harm to the significance of heritage assets requires 'clear and convincing justification' (213), and that such harm is outweighed by public benefits. Harm is to be categorised as substantial (214) or less than substantial (215).

The Framework requires local planning authorities to look for positive opportunities for new development within conservation areas and within the setting of heritage assets. Proposals that preserve positive elements or enhance/ better reveal their significance, are required to be treated favourably (219).

1.2.4. The Draft National Planning Policy Framework

The draft NPPF December 2025 which has been issued for consultation is also a material consideration, which includes a new structure of the chapter 'Conserving and enhancing the historic environment'.

Policy HE4 would stipulate that heritage assets 'should be conserved and enhanced in a manner appropriate to their significance'; it also includes new policies relating to the historic environment.

Policy HE6 stipulates that 'substantial weight should be given to the asset's conservation' and that 'development proposal which would have a positive effect on designated heritage assets should be approved.' Policy HE6 also states that 'important public benefits can include securing the long-term re-use of a vacant or underused listed building and enabling energy efficiency and low carbon heating measures to be employed' and that such benefits can outweigh harm.

2. High Level Summary of Significance

A more detailed assessment of significance can be found in DIA's full Heritage Assessment, dated January 2022.

2.1. Marlsbro House

Marlsbro House is Grade II-listed and is located within the Stevenson Square Conservation Area. As one of Manchester's most recent listings, Historic England's description is detailed and it summarises that the building is primarily listed for its architectural and historic interest: as a rare early example of heavy-timber floor construction - which strongly influenced the mid-19th century design of industrial buildings in the USA; for its unusual roof construction and use of iron ring-beams within the walls - all of which is little altered. Its historic interest comes from its role as early-19th century former factory in the world's first industrial city, located outside the more typical mill areas of Ancoats and Chorlton-on-Medlock.

In terms of its **cultural and communal value** - whilst Marlsbro House has been a key component of Manchester's music scene for the past 10 years, it ultimately lacks the same musical heritage significance as some of the other studio spaces in Greater Manchester with affiliations to the punk movement of the 1970s and the 'Madchester' scene of the 1980s and 90s. Nevertheless, it represents the continuation of a DIY approach to Manchester's live music culture, one which involves the appropriate of the city's robust post-industrial fabric to provide affordable and authentic spaces in which artists and musicians can rehearse, record and perform.[1]

Externally, the building has been much-altered but retains its original form, fenestration pattern (but not windows), roof and late-Victorian fire escapes – these elements of the building are of **moderate to high significance.** The chequerboard render distinguishes this building from others in the area and makes it a local landmark however it has significantly compromised its legibility as a historic mill.

Despite the alterations to the building, **internally** it retains elements of the original mill structure and subsequent historic features, including:

- Cast iron columns and ring beams
- Timber beams
- Timber floorboards
- Timber stair and glazed stair enclosure (the latter at first floor)
- Brickwork to external walls
- Fenestration pattern
- Timber clad lift shaft and car
- The composite timber and iron roof structure

1 This report goes some way to recording the building's previous uses in order to ascertain its communal value – compiled from archival research and secondary sources - this knowledge could be furthered with the assistance of those who have occupied and used the building.

- Timber panelling to the eaves and exit stairs at attic level (fourth floor)
- Interwar 'cold room' in the attic
- Remaining lifting mechanisms – attic level
- Attic windows (though many have been replaced).

The studio partitions have now been removed and revealed the original open plan spaces and features of the building. These spaces and the above elements are of **evidential, aesthetic and historic value** in understanding the original and evolved use of the building and are of **moderate to high significance.** Most of the internal 1960 and later alterations (largely now removed) are of little or no significance, but further detail of these can be found in the main Heritage Assessment (January 2022).

The building has been stood vacant for a number of years and is suffering from water ingress with a number of areas now suffering from deterioration of fabric.

2.2. Stevenson Square Conservation Area

The area retains its historic street pattern laid down in the late-18th century and overset by Victorian industrial development; with principal streets such as Oldham Street, Piccadilly, Newton Street, Port Street, Dale Street, Hilton Street and Stevenson Square and narrower lanes such as Little Lever Street. The urban grain of Stevenson Square, Oldham Street and Newton Street is tight – bar the obvious open space at Stevenson Square – and most buildings are distinctive with large footprints, placed hard up against the pavements in the main streets and often the narrower lanes – creating a canyon effect. There is an unusual survival of buildings predating 1850, including 69-77 Lever Street as well as many fine Victorian and Edwardian buildings, many of which are listed – most at Grade II.

The large surviving Victorian warehouses are of high architectural value and are a dominant characteristic of the area of analysis, however the original character of the area was largely consistent of early brick cotton mills, which no longer is readily evident to the passerby. The majority of the buildings are commercial, though regeneration has seen the conversion of the former post office depot and mills to residential use. There are elements of the original canal network/basins around Hilton Street and Ancoats, some of the wharves and warehouse sites have been redeveloped for housing, whilst some open areas have remained as surface carparks – allowing a series of long-range views particularly towards Marlsbro House. The remaining dense urban layout of the area affords short-to-mid-range views of the varying streetscapes. In townscape terms, Newton Street has a fragmented and disconnected nature and it frames views north towards Ancoats. Its remaining historic buildings often stand in isolation, and in a pronounced contrast with nearby new developments.[2]

Marlsbro House is prominently sited at the junction of Hilton Street and Newton Street. It is also bound by Faraday Street to the north-east and the rears of property on Port Street to the south-east. It is a prominent building both within and outwith the conservation area and whilst its former use a cotton mill is largely concealed beneath its chequerboard render, it has a distinct landmark character – which divides opinion. Its rear elevation with late-Victorian fire

2 SLHA, Marlsbro House Heritage Appraisal, 2019, p49

escapes and roofscape suggests a more historic industrial use and belie its otherwise modern appearance.

3. Commentary on the Proposals

3.1. Introduction

It is proposed to remove timber panels set within the eaves at 4th floor level following a non-intrusive asbestos survey undertaken by Ranson Surveying Asbestos Consultancy, (Asbestos Refurbishment Survey, Appendix III), who advised that:

Regarding the timber cladding it has been stated in the survey that due to the extent of large redundant items it is recommended that all timber panelling be removed to complete the full safe removal of all ACMs to eaves areas.

We cannot also guarantee that if we left the panelling in position that it could be fully cleaned to remove any asbestos lodged or fibres settled.

3.2. Requirement



4th floor



Panels below clerestorey windows



4th floor



Panels below clerestorey windows

3.2.1. Civic Engineers

The roof structure at Marlsbro House compromises a combination of both cast/wrought iron and timber members in, what Civic believe, is a flawed adaptation of a ‘queen-post’ truss arrangement.

In some load cases it is thought the roof structural arrangement results in compression forces being applied through tie members of the truss that are only suitable to resist tension forces.

This is evident on site through the visible buckling of the wrought iron tension rods adjacent to the clerestory windows and the timber panelling forming the partition between the usable floor space and eaves storage space at fourth floor level. This structural defect has also resulted in the global horizontal and vertical distortion of the roof plane as visible when viewed along the eaves line and from above.

Further to the above, the observable condition of the roof structure is poor. Both the iron and the timber elements appear to be in poor condition as the result of exposure to damp conditions and water ingress through the roof, with little or no ongoing maintenance and repair.

In order to progress Civic’s understanding of the behaviour of the roof and allow design of any remedial structural interventions and repairs, we need to develop a fuller understanding of the structural arrangement, any subsequent alterations to each structural bay and the extent of distortion and deterioration of this unique roof structure. This will require a clear and unobstructed view of each structural roof member, including their connections and junctions, across the whole footprint of the building’s fourth floor and attic space.

This access is currently extremely limited due to a large proportion of the roof structure being concealed behind timber panelling with the presence of hazardous materials within the eaves voids, and within the timber panelling itself, preventing safe access to the fourth floor entirely. To allow Civic to progress our proposals for the careful and considerate redevelopment of the building, these timber panels will need to be removed and safe access provided across the floor plate.

3.2.2. Global Asbestos Solutions

The requirement for the removal of the panels also forms part of the wider asbestos removal strategy.

In simple terms, any proposal to retain the panels would need to clearly justify why operatives should be placed at increased risk in order to do so. Under current conditions, retaining the panels would require confined space working, intrusive cleaning, and prolonged handling within a contaminated enclosure, all of which present greater risk to operatives than controlled removal.

For these reasons, and given the limited historic significance of the panels compared to the wider structural timbers they obscure, we consider full removal to be the safest and most proportionate solution.

- The timber panels proposed for removal are contaminated as a result of Asbestos Insulating Board (AIB) being fixed over and through them, with

fixings penetrating the full depth of the panels. This configuration creates concealed fixing points and interfaces where asbestos fibres are likely to be embedded and cannot be reliably removed while the panels remain in situ.

- The retained structural timber elements are affected only by surface debris and can be safely treated through a controlled environmental clean, followed by verification under the four-stage asbestos clearance process.
- Retaining the contaminated tongue-and-groove panels would require intrusive post-drilling at each fixing location to ensure fibre removal, resulting in increased disturbance.
- Such treatment would leave the boards perforated with numerous drill holes, materially affecting their integrity and appearance.
- The process would also involve prolonged handling, fine cleaning, visual inspection, and completion of the four-stage clearance procedure, significantly increasing exposure risk to operatives within an already constrained and contaminated area.
- The removal of the tongue-and-groove panels is necessary to facilitate a fully compliant asbestos enclosure, avoiding confined-space working and allowing free and unobstructed air movement to achieve the required air changes under asbestos regulations. Retention of the panels would compromise enclosure performance and safe working conditions.
- If retained, the panels would need to be cleaned in situ and remain within the enclosure. Under asbestos regulations, no materials may leave the enclosure unless double bagged, at which point they are classed as contaminated hazardous waste and must be placed in a compliant asbestos waste storage skip.
- Any future reopening of double-bagged materials would only be permissible within a fully compliant negative-pressure enclosure, adding further risk, programme implications, and unnecessary handling.

3.3. Methodology

It is proposed to remove and bag the contaminated timber panelling as contaminated waste (please refer to Appendix IV for full methodology from Global Asbestos Solutions).

3.4. Impact and Justification

It was originally agreed as part of previously approved consents (121357/LO/2021) and pre-application discussions that the timber tongue and groove panelling at 4th floor would be removed on a localised basis as part of the asbestos removal and reviewed as to whether it could be reinstated with the aim for its reinstatement. However this element of the asbestos removal was not progressed and was omitted from the method statement agreed with MCC which related to the staircase only.

Many of the simple timber tongue and groove panels have become distorted over the years as the roof has settled. Owing to the current condition of the panels, the risk that detailed and intrusive cleaning would present both to the integrity of the panels (leaving them perforated with numerous drill holes) and to operatives through prolonged exposure it is the recommendation of Global Asbestos Solutions that they are removed in full based on their experience undertaking similar licensed asbestos works in constrained and historically sensitive environments,.

Whilst the early 20th century timber panelling has some significance as an illustration of a later phase of the building's evolution, this is comparatively minor in context of the building's primary interest founded in its earlier mill fabric and is very much secondary to the principal roof structure (which the panelling in part obscures). As such, any harm derived through its removal would be at the very lowest end of 'less than substantial' and presents a proportion approach whereby there would be a clear conservation and public benefit by enabling safe access for the cleaning, retention, and long-term protection of the more historically significant structural timbers and floorboards. Furthermore, they form part of essential works to allow the structural survey to be completed, to prevent further damage to fabric at 4th floor through water ingress and to facilitate the significant benefit that the adaptive reuse of the building would bring.

3.5. Policy

As explained in Section 1.2, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the building comprises **The Core Strategy (2012)** and saved policies from the **Unitary Development Plan (1995)**. **Policy EN3 Heritage in the Core Strategy** establishes a presumption in favour of 'development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods, including those of the city centre' and that 'proposals which enable the re-use of heritage assets will be encouraged where they are considered consistent with the significance of the heritage asset'. Similarly, **Policy 19 Listed Buildings of the UDP** indicates the 'council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of such buildings'...provided 'in its opinion, there would be an adverse effect on its architectural historic character'. The proposals form part of asbestos removal works required to allow the long-term protection of the more historically significant structural timbers and floorboards and to inform future proposals for the adaptive reuse of the vacant building which will secure its conservation in the long-term.

The thrust of the Core Strategy aligns with the **National Planning Policy Framework,** which seeks to ensure the heritage assets are conserved in a manner accordingly to their significance. As has been outlined in detail above, whilst the proposals will see the removal of historic fabric of some value, overall the proposals would sustain the significance of the listed building. As such they

would meet the tests for sustainable development as required by the NPPF. Likewise, the statutory duties of the **Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990** to preserve the special interest of the listed building would be met.