

Our Ref: 25325/SH/dm
Your Ref: PP-14503199

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24 November 2025

Manchester City Council,
Town Hall,
Albert Square,
Manchester,
M60 2LA

Dear Paul Mason / Michael Pearson,

LISTED BUILDING CONSENT 8TH FLOOR, 40 PRINCESS STREET, MANCHESTER, M1 6DE

We have been instructed by our client, Wittington Investments, to submit the enclosed listed building consent application online via the Planning Portal (ref. PP-14503199) for *“internal reconfiguration works to the eighth floor”* at 40 Princess Street, Manchester, M1 6DE.

In accordance with national and local validation requirements, the following documentation has been submitted in support of this application:

- Completed Listed Building Consent Application Forms;
- Completed CIL Form;
- Site Photographs (Appendix 1);
- Heritage Statement by BB Heritage Studio (Appendix 2);
- Site Location Plan;
- Block Plan;
- Finishes Schedule;
- **Development subject to the BNG de minimis exemption – there is 0sqm of onsite priority habitat; and**
- Drawings as follows:

Suite 8.2 Drawings		
Existing Plan	AXI – 00.82	Rev 00
Reflected Ceiling Plan & RCP Modifications Plan	AXI – 608.2	Rev 00
Floor Finishes Plan	AXI – 608.2	Rev 00
Wall Finishes Plan (incorrect title name)	AXI – 614.2	Rev 00
Ceiling Finishes Plan	AXI – 624.2	Rev 00
Skirting Finishes Plan	AXI – 648.2	Rev 00
General Arrangement Plan	AXI – 108.2	Rev 00
Door and Glazed Openings Schedule	AXI – 908.2-1	Rev 00
Door and Glazed Openings Schedule	AXI – 908.2-2	Rev 00
Door and Glazed Openings Schedule (dwg no. wrong)	AXI – 908.2-3	Rev 00
Internal Glazing Elevations	AXI – 909.2-4	Rev 00
Partition Plan and Details as Proposed	AXI – 408.2-1	Rev 00

Partition Plan and Head Abutment Details as Proposed	AXI – 408.2-2	Rev 00
Partition Plan and Wall Abutment Details as Proposed	AXI – 408.2-3	Rev 00

Table 1. List of drawings

No application fee is payable for Listed Building Consent applications.

Site Description

The application site is located in the heart of Central Manchester. It is bounded by Princess Street to the East and Harter Street to the South. The site consists of two adjoining structures: Eastern House, previously identified as 40–42 Princess Street, and Langley Buildings, formerly 44–46 (or 46A) Princess Street. Together, they are now collectively referred to as Forty Princess Street. Although each building holds its own Grade II listing, the two have been adapted and connected to function as a single unified property. The eighth floor is located within 40 Princess Street. The existing property consists of six stories above a basement, with a sub-basement extending beneath part of the footprint. The ground floor (Level 00) sits approximately 2 meters above the back-of-pavement level on Princess Street. The building extends to the rear as far as 113 Portland Street, with the south-east elevation forming a continuous boundary with 44–46 Princess Street. The application site is located within the Whitworth Street/Princess Street Conservation Area.

The building has been heavily altered over recent years, pursuant to the various permissions set out below. Most of these works are now complete, and this proposal relates to further revisions and additions to improve the layout, function and appearance of the commercial units in order to try and improve the occupancy rates at the building.



Figure 1. Application Site (Google Maps, 2022)

Relevant Planning History

A summary of the most relevant planning history has been provided below:

116551/LO/2017 and **116550/FO/2017** were granted on 25/10/2017. The works included a fourth floor rooftop extension, glazed roof over the lightwell, works to the lightwell including the installation of a glazed roof and an extension

through to ground floor level, the reconfiguration of the main entrance staircase, works to the roof to install a lift overrun, the creation of one A4 unit and one A3 or B1 unit on the ground floor, and change of use of the basement and sub-basement to a gym (D2).

120503/LO/2018 and **120504/LO/2018** were granted on 10/08/2018. The works included a fourth floor rooftop extension, the installation of a glazed roof over the lightwell, the re-opening of historic windows, the reconfiguration of the main entrance staircase, the removal of existing entrance canopy, roller shutter and associated cladding, works to the lightwell including the installation of a glazed roof and an extension through to ground floor level, the provision of a new lift core and overrun, the reconfiguration of floor plates and the installation of modern WC facilities, the reconfiguration of external plant and equipment, provision of internal service risers, the fit out of the basement as a gym and the provision of a cycle store.

130043/LO/2021 and **130044/LO/2021** and **130099/FO/2021** were granted on 03/09/2021 for refurbishment and alterations comprising reconfiguration of floorplates to provide modern office accommodation, a fourth floor extension, reconfiguration of existing lightwell to facilitate new lift and relocated stair core, modification to roof structure and erection of new plant deck, alterations to the main entrance, the reinstatement of original facade openings, incorporation of new service risers, works to basement to enable its use as a gymnasium, repairs and removal of redundant fixtures and fittings; repair and reinstatement of windows, signage; and lighting.

Listed Building Consent (**138904/LO/2023**) was granted on 06/03/2024 for Listed Building Consent for the internal alteration of Suite 2.0 and Suite 10.2 including the erection of partitions, realignment of planned ceiling mounted M&E ducting, installation of wall mounted air con unit, installation of kitchens and boxing in exposed drainage pipes.

Most recently, Listed Building Consent (**141797/LO/2024**) was granted on 21/03/2025 for internal alterations to facilitate office fit-out. This application proposed fit out works to suite numbers 2.2, 4.1, 4.2, 6.1, 6.2, 8.2 and 10.1.

There is a Listed Building Consent application (**144273/LO/2025**) currently pending recommendation for reconfiguration works to the fourth floor (the seventh floor works were originally part of this but have been omitted at the Council's request, and submitted separately concurrently alongside this application).

Application Proposals

The application proposals seek to create flexible, high quality workspace suitable for a range of incoming tenants. As part of previous application ref. **141797/LO/2024**, permission was granted for the speculative fit-out of the eighth floor. Following this, this application seeks to make alterations to suite 8.2, in order to better suit potential tenants and generate more market interest.

The objectives of the application proposals are to deliver high-quality, refurbished CAT B office accommodation, through a series of reversible alterations, including the introduction of meeting rooms, board rooms and work pods, as well as high standard office furniture. Suites 8.2 will receive new floor finishes throughout, including vinyl flooring to the kitchen areas. The proposed internal walls will be painted, as will the existing steel columns and finials. Please refer to the separate ceiling, floor and wall finishes drawings, plus the finishes schedule, for information on materials and finishes.

The package of minor internal alterations will create a high quality office environment that is ready to be occupied by prospective tenants, something the building is in urgent need of having sat mostly vacant since the main CAT A fit-out works completed.

Details of the proposed alterations have been listed below:

Eighth Floor (Suite 8.2)

The application proposals consist of the installation of internal partition walls which will create 2no. meeting rooms and 2no. working pods. Office furniture is also proposed such as banquette seating, lockers, and a kitchen together with new finishes throughout.

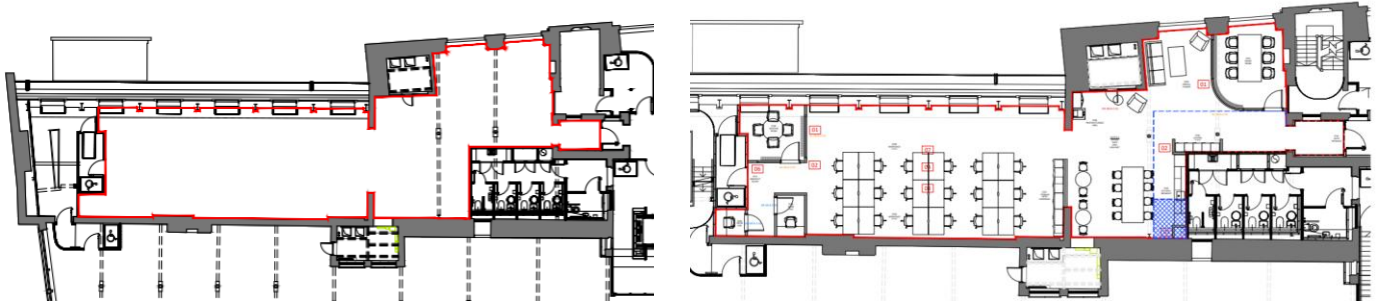


Figure 2. Suite 8.2 Existing (left) and proposed (right) floor plan

Relevant Planning Policy

National Planning Policy Framework (NPPF) (2024)

The NPPF provides the overarching planning policy guidance for development across England. It states:

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

Paragraph 85 states that planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt. As such, significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

Paragraph 131 outlines that good design is one of the fundamental factors in ensuring sustainable development and contributes to creating:

“Better places in which to live and work and helps make development acceptable to communities.”

Paragraph 210 states that in determining planning applications, local planning authorities should take account of:

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 213 advises that any harm to or loss of a designated heritage asset should require clear and convincing justification. Substantial harm or loss should be exceptional and substantial harm to or loss of designated heritage assets of the highest significance, including grade I and II* listed buildings should be wholly exceptional.

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 securing its optimum viable use.

Places for Everyone 2022-2039 (2024)

- **Policy JP-P 1** ‘Sustainable Places’ aims to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places.
- **Policy JP-P 2** ‘Heritage’ aims to proactively manage and work with partners to positively conserve, sustain and enhance its historic environment and heritage assets and their settings.

Manchester’s Core Strategy (2012)

- **Policy EN1** ‘Design Principles and Strategic Character Areas’ advises that developer’s will be expected to consider the City’s heritage, including its listed buildings, conservation areas, archaeological remains and historic street pattern.
- **Policy EN3** ‘Heritage’ advises that new developments must be designed so as to support the Council in preserving or, where possible, enhancing the historic environment.
- **Policy CC9** ‘Design and Heritage’ advises that development in Manchester should preserve or enhance the heritage assets affected.
- **Policy SP1** ‘Spatial Principles’ advises that development in all parts of the City should protect and enhance the built environment.
- **Policy DM1** ‘Development Management’ advises that all development should be appropriately sited, scaled, formed, massed and detailed with appropriate layout and materials and should have regard to the character of the surrounding area and effects on built heritage.

Planning and Heritage Statement

The application site is a Grade-II Listed Building, known as “Eastern House”. The official list entry (ref. 1247058) is as follows:

Includes: Nos.40 TO 46 Eastern House PRINCESS STREET. Shipping warehouse, now offices, club, etc. c.1870-80. Probably iron-framed, with cladding of red brick in Flemish bond, sandstone dressings, slate roof. Trapeziform plan on corner site, with loading at rear. Eclectic style. Five storeys with basement and attic, 3 bays, symmetrical, with stone-banded pilasters and bracketed cornice to ground floor, some stone bands to upper floors, moulded terracotta panels between 2nd and 3rd floors, plain frieze interrupted in the centre, steeply-pitched roof with hipped gable in the centre finished with a finial. Ground floor has square-headed doorway with moulded surround and plain frieze with attached lettering "PORTLAND HOUSE", flanked by pairs of segmental headed windows over basement openings; 1st, 2nd and 3rd floors have 3-light windows with stone mullions, those at 1st and 2nd floors of the centre in a segmental oriel with a carved panel between floors, segmental-headed lights to the upper floor, dentilled cornice and brick parapet, those at 1st floor of the outer bays with pilaster mullions and segmental pediments to the centre light, and those at 3rd floor segmental-headed with keystones; pairs of 1-light windows to 4th floor; flat-roofed dormers over the outer bays; gable chimneys. Left return (40 to 46 Princess Street), 7 bays in matching style, symmetrical, with hipped gables to the 2nd and 6th bays and square-headed loading bay entrance in the centre. Rear and interior not inspected. Forms group with No.101 (q.v.) on opposite corner of Princess Street; and with Nos 105 and 107, 109 and 111, and 113 to 119 to the right (q.v.), together comprising a complete block of former shipping warehouses.

As is evident from the planning history section above, there have been various applications granted for internal alterations throughout the building. The most recent application made by the applicant (ref. 141797/LO/2024) was supported by a **Heritage Statement by BB Heritage Studio**. This statement provided a comprehensive heritage overview of the site, as well as an assessment regarding the new internal partitions and internal treatment of external walls, stating that:

“The works associated with this design intervention are considered to not cause harm and will protect and enhance the historic fabric and therefore be beneficial to the character of the historic building”.

The statement went on to conclude that

“These works have been assessed to cause less than substantial harm to the historic fabric, they will lead to a physical change but the principal historic architectural form will remain legible”.

It is plain that the same principles should apply to the proposed package of minor work hereby presented, all of which are reversible.

Furthermore, as the principle of the proposed works has already been assessed in heritage terms, as has the special significance of the building and the potential harm that may result from further modest interventions, a further detailed heritage assessment is not necessary here. For completeness though, the aforementioned Heritage Statement is provided at **Appendix 2**.

APPENDIX 2

An appropriately targeted assessment of the works in conjunction with the special significance / character of the heritage asset is set out below:

The application proposals seek to amend the previously approved proposals (ref. 141797/LO/2024), by altering the layout of Suite 8.2 only (separate submissions relate to the 4th and 7th floors). Pre-application discussions were held on 10th September 2025 with Paul Mason. The feedback concluded that the proposed plans were a significant improvement on the previously approved plans, with a better general arrangement with greater sense of openness.

Suite 8.2 is currently in a shell state, and in order to encourage a tenant to move into the space, a series of high-quality meeting rooms and break-out spaces are proposed with new decorative finishes and furniture. The interventions are of appropriately limited scale, resulting in an open-plan and free-flowing working space, which minimises the impact on the heritage asset, resulting in less than substantial harm, whilst maximising the chance of occupation by an office tenant.

The applicant is happy to evolve the scheme as per the pre-application discussions, and create a series of modest alterations that are appropriate for the heritage asset. The applicant is confident that the proposed alterations will deliver a high quality, secure tenant for the space.

The principle of internal fit-out works to Suite 8.2 was established as part of the previous application. This application simply seeks minor alterations to the previously approved arrangement. Indeed, the officer's report for the most recent works at the site (141797/LO/2024) was favourable:

“The meeting rooms, study rooms and the central subdivision within the suite would include a level of glazing, which would minimise the harm caused by subdividing these open floor

spaces, thus retaining an acceptable retention of the expression of volume within the spaces”.

As such, we assume that officers will take a similar approach to all of the proposed works as submitted.

The report also acknowledges the difficulties experienced at the site in attracting tenants to occupy the building and appreciates that the alterations and improvements to the suites were required in order to encourage companies to occupy the office space. Subsequently, the report concludes that:

“Whilst the proposals would cause less than substantial harm, they are justified by the public benefits which would include assisting in attracting tenants to occupy the building and provide jobs for the people of Manchester allowing the development to realise its potential contribution to this”.

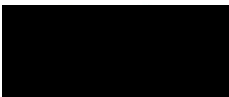
Applying the same logic in this case - as this is the driving force behind the proposed works – we trust that officers will consider the public benefits resulting from making these amendments, and the positive impact it will have on the leasing of the space (which remains mostly vacant).

Owing to the fact that the Council have supported various other internal alterations throughout the building in recent years, and based on recent pre-application discussions and discussions during the course of application ref: **144273/LO/2025** , it is clear that the proposals should continue to be considered in the same vein, with less than substantial harm resulting to the heritage asset.

As such, it is considered that the proposals should be supported on the basis that they successfully comply with and adhere to the relevant national and local planning policies.

We therefore trust that you have sufficient information to enable a positive determination of this Listed Building Consent application, and we look forward to receiving confirmation that the application has been validated. In the meantime, should you require any further information, please do not hesitate to contact me.

Yours faithfully,

A black rectangular box redacting the signature of Sam Harper.

SAM HARPER
Director