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Cambridge Park Ltd

82-84 Market Street, Manchester

Heritage Statement

28 October 2025

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1. Introduction

1.1 This Heritage Statement has been prepared by Paul Butler Associates on behalf of Cambridge Park Ltd to support a planning application for works to convert 82-84 Market Street in Manchester City Centre for residential use. The planning application is for a proposed rear extension, alterations to the roof, conversion of the upper floors to accommodate 8 new residential apartments and the formation of a new residential entrance from Sickle Street. This Heritage Statement has been prepared to consider the potential impact of the scheme on the significance and setting of 82-84 Market Street, the Upper King Street Conservation Area and nearby listed buildings.

Approach and Methodology

1.2 This Heritage Statement has been prepared to comply with the tests and requirements of the National Planning Policy Framework (NPPF: 2024), specifically paragraphs 207 and 208, under which a description of the significance of a site, including any contribution made by its setting, must be provided to support any planning applications to assess the effect on significance of any proposed changes. There is also a requirement for applicants to make an informed assessment of heritage significance as part of a staged approach to decision-making.

1.3 The assessment follows the staged approach to decision-making set out this document broadly follows the staged approach to decision-making set out within Historic England Advice Note 3 - The Setting of Heritage Assets Historic Environment Good Practice Advice (Second Edition):

- Step 1: Identify which heritage assets and their settings are affected.
- Step 2: Assess the degree to which these settings contribute to the significance of the heritage asset(s) or allow significance to be appreciated.
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm.
- Step 5: Make and document the decision and monitor outcomes.

1.4 Research has been primarily desk-based, consulting historic mapping and written secondary sources. A visual and photographic survey of the subject building, its surroundings and nearby heritage assets was undertaken on 6th June 2024 with a further external visit being made on 18th February 2025. The site environs were visited again on 10 June 2025.

2. The Application Site and its Surroundings

Application Site

2.1 The application site is located at the corner of Market Street and the corner of Sickle Street. It is situated in Manchester City Centre opposite the Arndale Centre. The subject premises is not a listed building but does lie within the Upper King Street Conservation area. 82-84 King Street is a historic building that has been considered by Manchester City Council in previous decision-making to be a Non-Designated Heritage Asset (NDHA) due the age of its façade walls and the architectural composition of the principal Market Street elevation. The ground floor is occupied by 'Greggs' and the upper floors are vacant (Figure 2.1).



Figure 2.1: View of the building from Market Street.

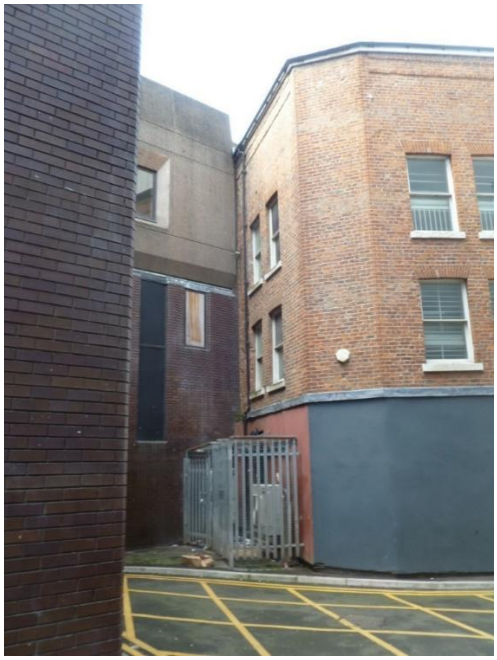


Figure 2.2: View of the rear elevation of the building from Sickle St showing the ground floor.

82-84 Market Street

2.2 The ground floor is mostly occupied by a Greggs Bakery, and to the side of Sickle Street the walls of the subject building at ground level are rendered (see Figure 2.2). Above Greggs is three storeys of red brick in a Georgian style. The first and second floors have rectangular timber sash windows. The fenestration at third storey level is more elaborate with arched window heads and stone embellishment, with the outermost windows having stone keystones. All windows are formed in modern timber and at third floor do not replicate the glazing bars of the windows apparent on the 1908 archive images.

2.3 Originally the building may have terminated at the stone cornice. The stone cornice and window cills are now painted white. The brick parapet atop the building is possibly a later addition, perhaps when the roof was altered. To the rear of the building on Sickle Street is a metal cage which accommodates plant associated with Greggs and also provides access to the rear entrance and staircore/lift which give access to the upper floors of the building. The cage spans the height of the ground floor and is constructed of steel fencing and wire mesh (Figure 2.2).

2.4 The interior of the building is largely of late 20th century/ early 21st century construction (Appendix 2). The superstructure structure of the building is also contemporary with the external walls supported by an internal steel frame (Figure 2.4). Within the offices there are no historic finishes such as timber doors, door frames, picture rail or skirtings nor are their lime plastered walls or ceilings. Internally no meaningful evidence of Georgian occupation remains. The roof has been extensively altered and the coverings re-laid. There is a 20th century lift installation in what was likely formerly a light well.

2.5 As noted the building is supported by a steel frame structure and at first floor there is a false ceiling which is lower than the height of the windows to Market Street. The first floor appears to have been used for offices whilst the floors above are part converted. Running throughout the building are inserted ventilation ducts which run upwards to a roof deck plant area aside Sickle Street. The building shows signs of damp with the third floor in particular showing signs of water ingress.



Figure 2.3 Street View of the site, 19th February 2025



Figure 2.4 Second floor showing inserted steel frame encased in fire/sound insulation.

The Surrounding Area

2.6 The site is located within the heart of Manchester City Centre, facing the Arndale Shopping Centre and fronting onto Market Street. Market Street is a busy shopping street pedestrianised between Cross Street and Fountain Street.

2.7 The surrounding area is predominantly characterised by retail and commercial uses although a number of residential developments contribute to the diversity of the area. Residential uses are predominantly located on the upper floors of buildings with the ground floors generally being in retail, commercial, restaurant and café uses. To the opposite side of Sickle Street is a converted office building now in commercial use at ground floor with residential use above.

Designations

2.8 The site is located within Upper King Street Conservation Area which encompasses all the properties on the southern side of Market Street aside from the southern extension to the Arndale Centre (Boots block), the Arndale being excluded from the Conservation Area. None of the buildings which form the northern boundary of the Conservation Area to Market Street are listed (see Figure 2.5 below). Locations of the nearest listed buildings within the Conservation Area are also shown by Figure 2.5. To the east of the site and outside the boundary of the Upper King Street Conservation area is the Rylands Building (Grade II) at 109-127, Market Street (Figure 2.6 below) .

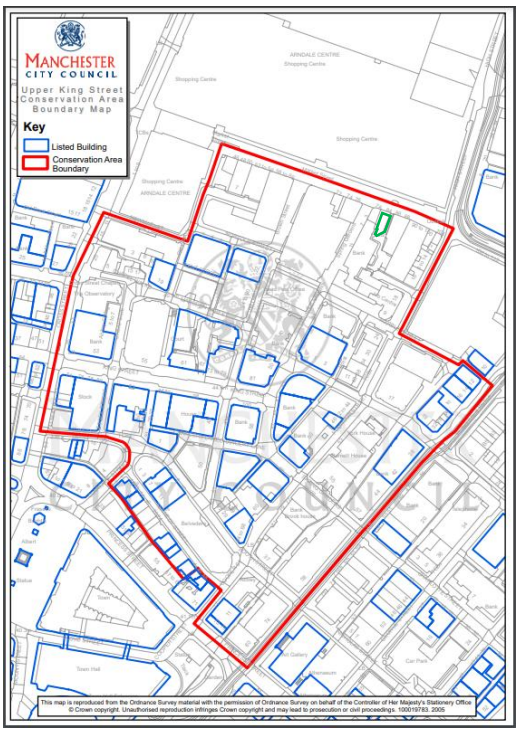


Figure 2.5 Plan showing the subject building (Green) within the Conservation Area

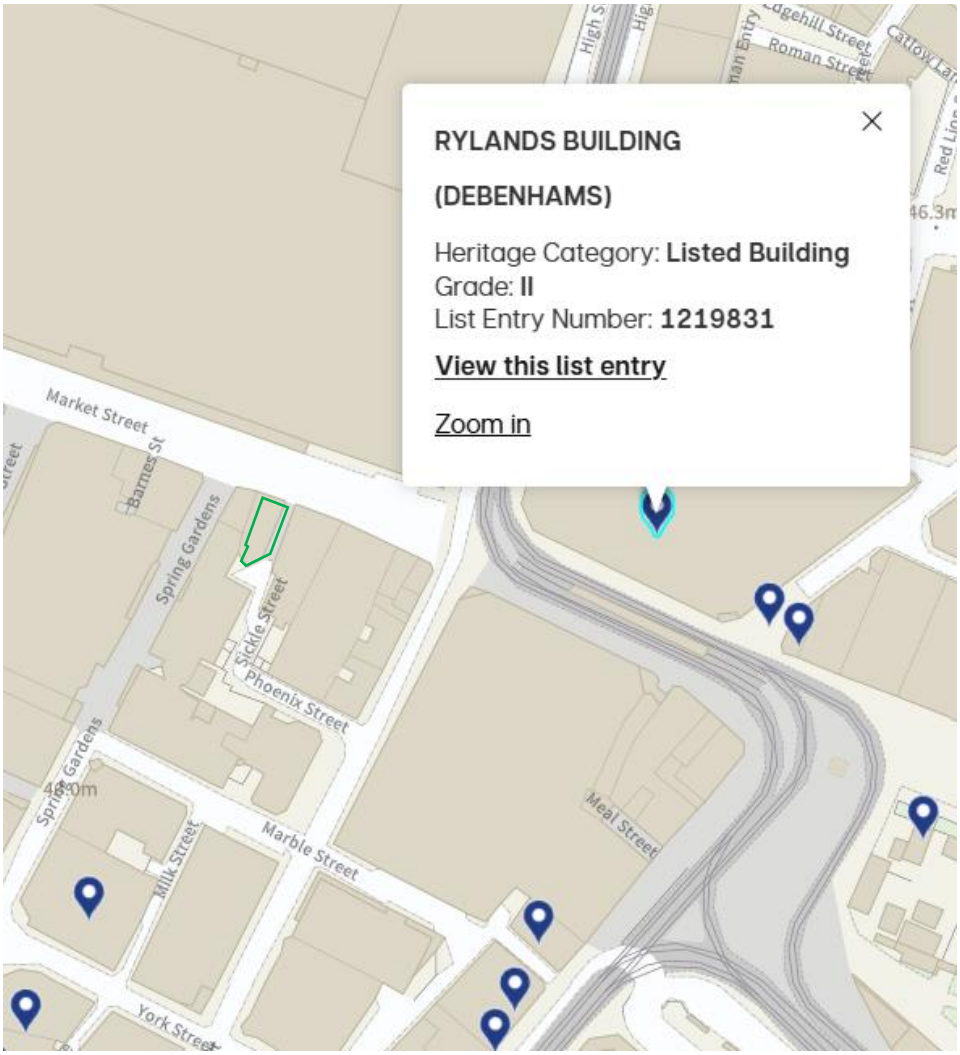


Figure 2.6 Plan showing the subject building (Green) in proximity to listed buildings (blue markers).

2.9 82-84 Market Street faces onto the pedestrianised area of Market Street which is one of the main retail streets within the City Centre. To the west is the 'Gong Cha' store which occupies the ground floor of a 19th century building and is also considered to be a NDHA. To the east of the building is a pedestrianised alley, Sickle Street, which runs south from Market Street opening out to become a public highway which serves commercial and office buildings to the south. These are predominantly 20th century or later developments.

2.10 The site accommodates no trees and is not subject to any Tree Preservation Orders.



Figure 2.7: Aerial view identifying 82-84 Market Street (Red), Manchester, M1 1PD.

3. Historic Development

Manchester

3.1 The industrial revolution in the late 18th and early 19th century is when Manchester expanded becoming a centre of the textile industry and for the distribution of raw cotton and spin yarn. This growth of industry needed appropriate infrastructure and so in 1761 the Bridgewater canal opened. By 1830 the first steam passenger railway in the world opened between Manchester and Liverpool. This allowed for not only people but goods to be easily moved in and out of the city.

3.2 The introduction of trams in 1877 was another big step forward for the city, at first they were horse drawn but by the very early 20th century electric trams were dominant. Following the interwar depression and the changing state of the textile industry, Manchester began to suffer. In World War Two, the city was heavily bombed, with the worst being the 'Christmas Blitz' of 1940, from which the cathedral took 20 years to rebuild. Manchester's decline continued post war. Firstly, with the decline of the textile industry and the closing of the canals, and later in the 1970s with the reduction in heavy industry. Since the 1980s, Manchester has begun to regenerate, with restoration projects such as Salford Quays, Manchester Arndale and the Metrolink being key. The city now holds the unofficial title of being the UK's second city.

Upper King Street Conservation Area

3.3 Up until a water pipe was laid in 1557, this area of Manchester was open fields with springs providing fresh water. Building development started during the late seventeenth century with the Chapel on Cross Street being one of the first substantial buildings to be completed in 1694. In the early 18th century development in this area was predominantly in the form of fashionable houses in what was then known as St James' Square but is now St Ann's Square. However, by the 19th century, these houses were being demolished to make way for commercially orientated buildings to serve the growing population as the city industrialised. By 1825, most houses in King Street had become offices. This trend continued in the area

until the mid-20th century, destroying many of the older buildings and replacing them with new development.

3.4 Market Street is one of the oldest streets in the city and was originally part of the Roman road from Luton to Carlisle. Shops have dominated this road since the medieval period and continue to today. Despite its history and number of Georgian and Victorian buildings, those on Market Street are not considered to be of such high architectural merit as those elsewhere within the conservation area.[1] The original conservation area of Upper King Street was established in 1970, but Market Street was not added until 1985. The older buildings that survive on Market Street contrast with the modern Arndale shopping centre.

82-84 Market Street

3.5 The style of the building suggests that it dates from the Georgian period, and the plot is shown as developed on Tinker's 1772 Map (Figure 3.1) and Roper (1807), Pigot (1813) and Pigot (1821) although each of these do not have sufficient detail to categorically identify the plan of the building as being the same as today. It appears in some detail on the 1851 Town Plan (Figure 3.2) as being a similar footprint as the building present today. On this map, it can be seen on Market Street that the building is divided into at least two units, which is confirmed by a later archive photograph from 1908 (Figure 3.5). The Goad insurance map, drawn up in 1886 (Figure 3.3) confirms the building was 4 storeys high to Market Street and three storeys high to the rear. The Goad plan identifies the building as warehouses and offices with a restaurant in the basement. Next door, on the other side of Sickle Street, during this period were B. Hyam and Son, who were clothing manufacturers. Directly behind 82-84, was Dean Stanley, a Turkish Towel producer and warehouse owner.

3.6 The 1908 photos also reveal that one half of the building (82 Market Street) was a store for 'Manfield and Sons' who were a boot makers from Northampton. The Manchester branch had been there since at least 1883, with international branches of the company opening from 1889, the first being in Paris. Their Market Street shop included 78, 80 and 82 Market Street. 84 Market Street was an auctioneer that went by the name of 'City Auction Mart'. The upper floors of the building appear to have been rented out to other businesses

[1] https://www.manchester.gov.uk/info/511/conservation_areas/916/upper_king_street_conservation_area/3

including 'Mr West - Dentist' and a 'H. E Barnicott.' The 1908 Archive Photograph of Sickle Street (Figure 3.4) shows the subject building to have ground floor fenestration and doorways facing on to Sickle Street at this time.

3.7 In 1977 the subject building underwent redevelopment with internal alterations and the installation of a new shop front. In 1999 the building was proposed to be demolished and replaced by a new building however the submitted planning application file is marked 'not proceeded with'. The steel frame was likely inserted subsequently and the upper floors part converted to offices.



Figure 3.1 Tinker's 1772 Map of Manchester (Spring Gardens was known as Brown St)

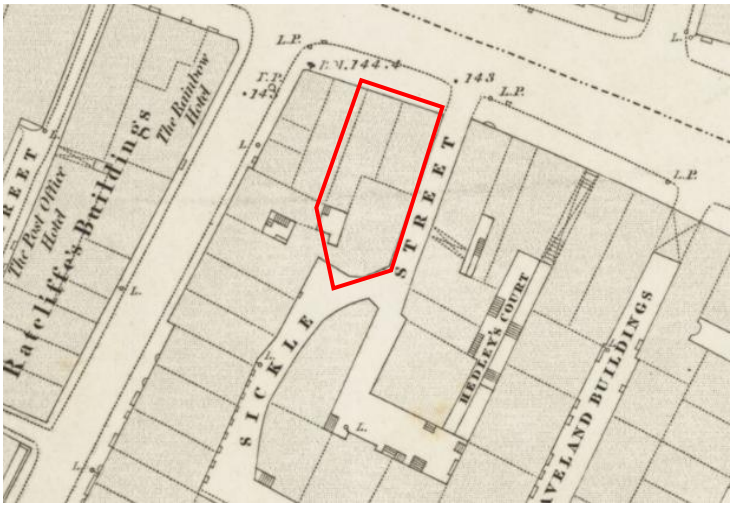


Figure 3.2: Map of the site, 1851



Figure 3.3 Goad Insurance Map 1886.



Figure 3.4 Sickle Street 1908, Source Manchester Local Studies Archive.

4. Assessment of Significance

4.1 Significance can be defined as the value of a heritage asset to this and future generations because of its heritage interest. The interest may be a combination of archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. The understanding of the significance of a place is vital to inform sensitively managed change. In accordance with Historic England Advice Note 12 – 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' the following criteria are employed within this report to assess significance:

4.2 Archaeological interest – Where the heritage asset holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

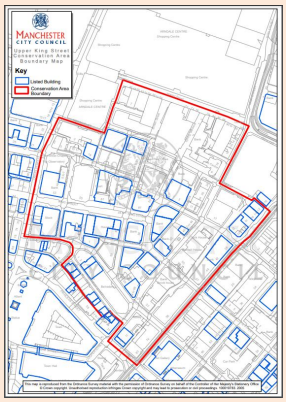
4.3 Architectural and artistic interest – These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.

4.4 Historic interest – An interest in past lives and events (including pre-historic) which heritage assets can illustrate or be associated with. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

4.5 The criteria for relative levels of significance of each asset is outlined below –

Significance	Criteria
Very High	Sites, buildings, landscapes and remains of 'exceptional', 'more than special interest' or sometimes considered nationally or internationally important. These include World Heritage Sites; Grade I Listed and Grade II* Listed assets; Scheduled Ancient Monuments or archaeological remains of equivalent significance.
High	Sites, buildings, landscapes and remains of acknowledged 'special interest' and sometimes considered nationally important. These include Conservation Areas; Grade II Listed Assets; and archaeological remains of national importance.
Medium	Sites, buildings, landscapes and remains of 'some interest' and generally considered of local or regional importance. These include Non-Designated Heritage Assets; Locally Listed Assets and archaeological remains of regional interest.
Low	Sites, buildings, landscapes and remains of 'limited interest'. These include historic sites that through level of alteration or typology are of insufficient significance to be considered Non-Designated Heritage Assets or Locally Listed.
Neutral	Sites, buildings, landscapes and remains of 'no or negligible interest'. These include sites or landscapes of no (or very minor) interest.
Intrusive / Detrimental	Sites, buildings, landscapes and remains of 'no or negligible interest' that harm the setting or significance of wider assets.

4.6 Significance of potentially affected heritage assets and the site building itself is tabulated on the following pages. As any potential impacts will predominantly relate to the setting of assets, for each the contribution made by setting is also outlined.

Heritage Asset	Summary of Significance	Level of Significance
Upper King Street Conservation Area  	A summary of the Conservation Area's special interest is outlined below – The Conservation Area's most important features are considered to be: *King Street is on a gentle slope, and this enhances the grandeur of its buildings. There is a rich variety, from the intricately detailed Gothic tracery of the Manchester Club to the stark mechanical precision of Pall Mall Court. Some new buildings, including these, are of very high quality and are satisfactory neighbours to the richly-detailed stonework of earlier times.* *Some of the oldest buildings in the conservation area are the warehouses on Mosley Street in the Italian Palazzo style. Nos.14-16, was designed by Edward Walters for Richard Cobden. It was the first of many Manchester warehouses built in this style.* *The most important building in the conservation area, and the oldest in King Street, is the Trustee Savings Bank at no. 82. It was originally the Manchester branch of the Bank of England. It was designed by Charles R. Cockerel in the Classical style, and has a dignity and grandeur far in excess of its modest size. Its large semi-circular arched windows are echoed in the Midland Bank higher up the street. This is a much plainer building designed in 1929 by Sir Edwin Lutyens, the last great exponent of the Classical style. It is a large construction in Portland stone, an unusual building material for Manchester. Also built of Portland stone, Lloyd's Bank on the corner of Cross Street was designed by Charles Heathcote in 1913. In a very elaborate Baroque style, it is alive with sculptures and rich detailing.* *Along Market Street, buildings are not considered to be of such high architectural merit. Nevertheless, some are fine buildings, dating from mid-Victorian times to the present day. They contrast sharply with the bland facade of the Arndale Centre opposite.*	High

Heritage Asset	Summary of Significance	Level of Significance
	Whilst many buildings are large scale, smaller buildings are noted to form an important part of the townscape of parts of the Conservation Area including Market Street and Kennedy Street: *The south side of Market Street remains as it has always been, presenting a rich tapestry of varied buildings with narrow frontages.* *On the south side of the conservation area at Kennedy Street, the small-scale Georgian property boundaries are still evident, though most buildings were reconstructed in the 19th century.* *Many different building materials have been used in the Upper King Street conservation area. These include variously-coloured brick, stone (predominantly yellow sandstone), exposed aggregate pre-cast concrete, bronze-coloured glass in metal frames, clear glass in concrete frames, and various modern materials.* *Very often the top floor is differently treated also - perhaps with a mansard roof or a projecting cornice, or the roof-line may be elaborately decorated with pediments, cupolas, dormer windows and chimneys. Entrances are always clearly emphasised, being surrounded by architraves and set in a door-case with carved mouldings, often surmounted by a projecting balcony.* *Windows are mostly vertically proportioned, of the vertical sliding-sash type, and nearly always grouped in twos or threes. Unless the fenestration is composed of projecting bay or oriel windows, it is always set well back from the facade of the building, creating an interesting three-dimensional modelling.* **Setting makes a high contribution to significance.**	

Heritage Asset	Summary of Significance	Level of Significance
Rylands Building (former Debenhams), 109-127, Market Street (Grade II) 	The Ryland Building is a former wholesale textile warehouse, rebuilt as a department store in 1932, by Harry S.Fairhurst, for Rylands and Sons. It has a steel frame with cladding of Portland stone designed in modernist classical style. The building has a large plan form being seven storeys high. The listed description describes the building as having '*Grid-iron rectilinear facade above ground floor, with chamfered piers and enriched panels between floors; 6-pane windows, very high parapet; broad and emphatic canted corner turrets with 4-storey windows and arcaded drums with sloped roofs. One of the last and biggest textile warehouses built in the city'.* The former textile warehouse/department store is an imposing asset at a prominent junction within the City. Built in Portland stone cladding it has a good survival of fabric/features and this along with the historic interest are considered the core values of significance. The setting of the building is largely formed by the prominent corner location with the Primark building opposite affording enclosure to the street. The elevated tram stop aside the Market Street frontage of the listed building is a substantial barrier and detracts from the setting of the building. **Setting makes a low contribution to significance.**	High
Former National Westminster bank on corner at junction with spring gardens (Grade II*) 	The list entry notes this building to have been built in 1902 by Charles Heathcote, for Parr's Bank. It is constructed in a distinctive red sandstone above a grey granite plinth in an Edwardian Baroque style. The primary elevations meet at the corner of Spring Gardens where the building rises into a cylindrical Baroque turret with prominent modillioned cornice and domed lead roof with a lantern.	High

Heritage Asset	Summary of Significance	Level of Significance
	The grandeur of surrounding buildings, many formerly associated with finance and banking contributing greatly to significance in the form of setting. **Setting makes a high contribution to significance.**	
82-84 Market Street (NDHA)  	The building originated in the Georgan period and the footprint of the building is representative of the narrow frontages which can still be seen on the southern side of Market Street. Archaeological: It is likely buildings existed on the site before the erection of this building, however, the subject building has a basement which will have likely removed any remains and therefore, the archaeological significance is low. Historical: This building derives most of its historical significance from being a surviving example of a Georgian building. The site has been associated with warehousing and retailing for many years. During the late Victorian period, it was the retail premises of Manfield and Sons, a Northampton based shoe making company. The upper floors of the building have accommodated various commercial uses. The building has medium-low historic interest. Architectural: The site retains a façade which appears to be of Georgian origin including the brickwork and the shaped white painted cornice, although the ground floor shop has been replaced. The windows are constructed in modern timbers and are replacements. Internally the upper floors of the building contain little if any historic fabric, being largely made up a late C20th/early C21st inserted steel frame and associated office fit outs. As a result of the surviving fabric the architectural significance is judged to be medium-low. The building has limited architectural embellishment and lacks the grandeur of the ornate buildings of Conservation Area which	Low – Medium

Heritage Asset	Summary of Significance	Level of Significance
	followed. The highways of Market Street and Sickle Street have provided access to the building since constructed and setting makes a medium-low contribution to significance. Overall significance: Despite the premises having a Georgian façade at the upper levels, the building has been extensively altered. The interior lacks fabric of interest with the internal layout of the building reworked and altered during the late C20th/early C21st. The ground floor facades are altered likewise having been rendered. The upper floors retain a Georgian aesthetic and are of local interest with the building making a positive contribution to the narrow frontages of this part of the conservation area fronting Market Street. The overall significance of the building is medium-low although is of sufficient interest to be considered a Non-Designated Heritage Asset.	

5. The Heritage Planning Context

Town and Country Planning Act 1990

5.1 Section 38(6) of the Planning Act states that the determination of planning applications must be made in accordance with the Development Plan unless other material considerations indicate otherwise. This establishes the Development Plan as the primary decision-making document when considering planning applications.

5.2 In this instance the development plan comprises the Manchester City Council Core Strategy (2012) and Places for Everyone (2024). The provision of this document is discussed below.

Planning (Listed Buildings and Conservation Areas) Act 1990

5.3 The Planning Act (1990) defines a conservation area as '*an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance*'. Paragraph 72 states that '*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*'.

5.4 In considering development affecting Listed Buildings, special regard will be given to the desirability of preserving the building, its setting or any features of special architectural or historic interest (Section 66, Planning [Listed Buildings and Conservation Areas] Act 1990).

National Planning Policy Framework

5.5 The Revised NPPF which was published in July 2018 and most recently updated in December 2024, sets out the Government's planning policies regarding the conservation of the historic environment.

5.6 Section 16, Conserving and Enhancing the Historic Environment, and policies 202-221 of the NPPF sets out the heritage context. The NPPF states that heritage assets are '*an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*' (Para 202).

5.7 Paragraphs 207 and 208 require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting; and that 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; local planning authorities should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

5.8 Paragraph 203 sets out three considerations which local planning authorities should consider when determining applications-

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

5.9 Paragraph 212 notes 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. Paragraph 213 follows that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

5.10 Paragraph 214 identifies a series of criteria that must be met where substantial harm to or total loss of significance will be caused to a designated heritage asset; it has to be demonstrated that substantial loss or harm is necessary to achieve substantial public benefits that outweigh that harm or loss. Paragraph 215 states that where a development 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.

5.11 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required

having regard to the scale of any harm or loss and the significance of the heritage asset (para 216).

5.12 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; and, that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

National Planning Practice Guidance (NPPG)

5.13 The NPPG was published in March 2014 (updated 2023). The Guidance includes a section on the historic environment. Relevant paragraphs from the Guidance are set out below:

5.14 All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

5.15 What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

5.16 Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework apply.

5.17 An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building.

5.18 The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives.

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

5.20 With regard to assessing substantial harm, National Planning Practice Guidance advises: 'Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.' (Paragraph: 018 Reference ID: 18a-018-20190723).

Manchester Development Plan

5.21 Section 38(6) of the Town and Country Planning Act 2004 states that applications for development should be determined in accordance with the Development Plan unless material considerations indicate otherwise. In the case of Manchester City Council, the adopted Development Plan consists of the Places for Everyone (adopted March 2024), the Core Strategy (adopted 2012) and the Saved Policies of the Manchester Unitary Development Plan (adopted 1995). Due consideration in the determination of the application will also need to be afforded to national policies in the National Planning Policy Framework (NPPF) which represents a significant material consideration.

<u>City Council Core Strategy (2012)</u>

5.22 The policies of the Core Strategy in relation to heritage are outlined below –

5.23 Policy CC9 Design and Heritage: This advises that the design of new buildings will need to be of the highest standard in terms of appearance and function. Development in Manchester City Centre should preserve or enhance heritage assets including listed buildings and conservation areas. CC9 confirms that the Council will support higher density

and mixed-use development in the City Centre, but developers must recognise the specific design challenges that must be overcome to ensure complementarity of function and form. New development should aim to contribute to a coherent and integrated physical environment.

5.24 Policy EN3 Heritage Throughout the City: This advises that 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.

Saved Policies of the Unitary Development Plan (UDP) for the City of Manchester (adopted 1995)

5.25 The UDP was superseded by the Core Strategy. However, a number of UDP polices have been 'saved'. Extant polices contained within the UDP which are relevant to the proposed scheme include:

- Policy DC18 'Conservation Areas' which states that the Council will seek to preserve and enhance the character of its designated conservation areas.

- Policy DC19 'Listed Buildings' which seeks to ensure that development does not have a detrimental impact upon the setting of listed buildings.

Places for Everyone (2024)

5.26 The Places for Everyone Plan (2024) has been adopted by Manchester City Council in March 2024, the policy relevant to heritage states (Policy JP-P2: Heritage) –

5.27 *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….This knowledge should be used to inform*

the positive management and integration of our heritage by: Setting out a clear vision that recognises and embeds the role of heritage in place-making; Ensuring that the heritage significance of a site or area is considered in accordance with national planning policy in the planning and design process and opportunities for interpretation and local engagement are optimised; Integrating the conservation and enhancement of heritage assets and their settings, with creative contextual architectural responses that contribute to their significance and sense of place; Delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing; and Exploring opportunities to reduce greenhouse gas emissions that restoration of historic buildings offer.

5.28 *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.*

5.29 *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.*

Historic Environment Good Practice Advice 2: 'Managing Significance in Decision-Taking in the Historic Environment' (2015)

5.30 This document provides advice to local authorities, planning and other consultants, owners, applicants and other interested parties. It sets out practical guidance to assist interested parties in making an assessment of the impact of proposals on the significance of heritage assets.

Historic England Advice Note 3: The Setting of Heritage Assets (2nd Edition)

5.31 Published in December 2017, this document sets out guidance on managing change within the setting of heritage assets, including historic buildings, sites, areas and landscapes. Building on the historic environment provisions of national planning policy, the document provides advice on the definition of 'setting' before setting out key principles for assessing the implications of development proposals on the settings of heritage assets.

Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets

5.32 This Guidance was published in October 2019 and covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for changes to heritage assets.

Historic England: Conservation Principles Policies and Guidance

5.33 This Guidance was published by Historic England (then English Heritage) in April 2008. The Document is designed to provide a logical approach to making decisions and offering guidance on all aspects of England's historic environment. Guidance is provided on understanding heritage values (evidential, historical, aesthetic, and communal), and assessing heritage significance.

6. Impact Assessment

6.1 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 does not prescribe a format for analysis of heritage significance and/or impact.

6.2 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.

6.3 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.

6.4 Following understanding significance, all proposals should be tested against the potential impact upon this significance and whether this causes harm.

6.5 Justification relies on the balance between harm and benefit. The benefits of a proposal must be in the public interest.

Assessment of Impacts

6.6 The interior of the building is largely without significance and likely to date from the late 20th/early 21st century when a new contemporary superstructure was installed. Within the interior there are no historic finishes such as timber doors, door frames, picture rail or skirtings nor are their lime plastered walls or ceilings. Internally no meaningful evidence of Georgian occupation remains in situ. The timbers of a broken roof lantern of possible late Georgian or early Victorian origin was observed in the roof void to the front of the building although this does not correspond to the position of either of the historic roof lanterns marked on the Goad plan both of which lie to the rear of the building. The significance of this to the site is hard to discern because the reason for it being there is unclear and because the hipped roof has been extensively altered and covers the lantern.

6.7 The masonry of the exterior façade of the building is where most of the architectural significance is found, attributable to the Georgian fabric which remains at first/second and third levels which includes brickwork, splayed window heads, regularly placed window openings with stone embellishment including cills and a projecting parapet. This fabric is retained by the conversion and safeguarded by the conversion works.

6.8 Changes to the roof are proposed in order to allow the upper floors to be repurposed and these include the removal of the existing rear slate roof and plant deck both of which are contemporary parts of the building. The front section of the roof is altered by removing the rear hip to allow the retained roof to link through to the new rear extension and as noted above this structure is extensively altered and has been recovered. The works propose the retention of the short brick parapet which lies above the cornice which possibly originally terminated the building.

6.9 Within the hipped roof, new dormer windows are proposed to serve the new accommodation with four dormers to be installed to the Sickle Street façade. Dormer windows are an established feature of roofs within the Conservation Area and are common place on buildings of varying dates and design. At 82-84 Market Street, the materiality of these can be selected to ensure they are appropriate which can be achieved by an appropriately worded planning condition.

6.10 When viewed from Market Street the roof of the building is not prominent when viewed from ground level. The white cornice should terminate the Georgian façade of the building when viewed from street level. The retention of the brick parapet will reduce the visibility of the new roof lights from some views from Market Street / Cross Street, where Debenhams former store is located, although the changes to the roof will be recessive in these views. The proposed roof extension/dormers will be visible from the junction of Sickle Street and Pheonix Street although the original fabric at first and second floor is retained, these streets are back alleyways and make a very limited contribution to the significance of the conservation area. The change is considered to be low adverse since the additional height is modest resulting in only slight change and slight harm to significance.

6.11 The addition of the rear extension is outweighed by a series of positive impacts on the Conservation Area. To the rear of the building, at street level, there is currently a metal cage which houses the plant and back entrance for Greggs, this cage detracts from the historic buildings and the conservation area. The roof alterations proposed allow relocation of this plant from the street to a position on the roof where it will not be visible. In place of the cage will be a new residential entrance to the building.

6.12 Four main beneficial impacts on the Conservation Area are thus noted to include; i) Removal of the cage and plant from the ground floor elevation adjacent to Sickle Street which will improve the public realm; ii) Vacant upper floors are brought into active use generating greater footfall and passive surveillance/security in the Conservation Area; iii) the creation of a new residential entrance on the corner of the building will help animate Sickle Street whilst new lighting and CCTV will improve public safety and iv) the provision of level access into the building is achieved. These benefits apply to the NDHA with equal measure.

6.13 With regard to the setting of the Debenhams building the new rooflights to Market Street will be recessive and part screened by the retained brick parapet. Any less than substantial negative impact will be balanced by the vacant upper floors of 82-84 being brought into active use generating greater footfall. No impacts were noted on the former Natwest Bank which has no intervisibility with the site.

Summary of Impacts

6.14 The following gives a summary of the impacts to each of the heritage assets and taking into account both beneficial and adverse impacts establishes a cumulative impact of the proposals on the asset's significance.

Heritage Asset / Designation	Significance	Commentary	Cumulative Impact
Upper King Street Conservation Area	High	+ Removal of cage and plant from ground floor elevation adjacent to Sickle Street will improve the public realm. + Vacant upper floors brought into active use generating greater footfall and passive surveillance in Conservation Area. + Creation of new corner residential entrance will help animate Sickle Street whilst new lighting and CCTV will improving public safety in the Conservation Area. + Provision of level access into and though the building. - Roof extension/dormers will be visible from some views along Sickle Street although part screened by the retained brick parapet wall.	Low Beneficial
Rylands Building (former Debenhams), 109-	High	+ Vacant upper floors brought into active use generating greater footfall and passive surveillance. - The new roof lights to Market Street may be partially visible from some views from Cross Street outside the former	Neutral

127, Market Street (Grade II)		Debenhams store looking toward along Market Street, although will not be prominent due to screening by the retained parapet wall.	
Former National Westminster bank on corner at junction with spring gardens (Grade II*)	High	No impacts	Neutral
82-84 Market Street (NDHA)	Low/ Medium	+ Removal of cage and plant from ground floor elevation adjacent to Sickle Street will improve the building. + Vacant upper floors brought into active use securing investment in the maintenance and retention of the subject building. + Creation of new corner residential entrance will help animate Sickle Street whilst new lighting and CCTV will improving public safety. + Provision of level access into and though the building. - Rear roof extension/dormers will be visible from some parts of Sickle Street although will not be prominent due to screening by the retained parapet wall.	Low Beneficial

Justification and Public Benefits

6.15 The proposed level of harm to the conservation area is less than substantial and categorised as low. Paragraph 215 advises 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*'. Cumulatively the proposals will be of beneficial to the significance of the Conservation Area.

6.16 For Debenhams, there are isolated instances of low levels of harm but these are balanced by the cumulative positive impacts of the scheme giving a neutral impact. No impacts were identified on the former Nat West Bank with a similar neutral impact noted.

6.17 Para 216 advises that *'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.* There are isolated instances of low levels of harm attributable to the rear roof extension/dormers but these are outweighed by those beneficial elements of the scheme giving a cumulative positive impact.

6.18 There are also numerous public benefits of the scheme which significantly outweigh any low levels of harm. The public benefits include:

- Economic: It is well documented that a shortage of housing can result in economic barriers. The provision of 8 apartments will make a meaningful contribution to Manchester's housing delivery targets. The provision of 1 bed and 2 bed accommodation may help to free up larger properties which are under single person occupancy. Nearby shops and businesses may also benefit as a result of the proposals increasing the customer base. Retention of the retail use at ground floor level on Market Street will retain the frontage in active economic use helping to protect the vitality and viability of this part of the City Centre.

- Social: The proposals will provide much needed housing in the city centre which has a full range of amenities, services and employment opportunities on the doorstep, also being well served by public transport. The proposed development will deliver good quality housing and contribute to the creation of a mixed and sustainable community.

- Environmental: The proposals will provide 8 residential apartments within an existing building, in a sustainable urban location. The scheme will provide much needed accommodation, which will help ease pressure on more sensitive greenfield and Green Belt sites. Future residents will benefit from the highly sustainable and

accessible nature of the development, thereby reducing the need to travel by car and helping to reduce carbon emissions and delivering improved air quality in contrast to a development with car parking. The visual environment will be greatly enhanced by the proposals, which in turn will have a positive impact on heritage assets.

6.19 The proposals will have a positive impact upon heritage assets that outweighs any individual instances of harm. The proposals therefore 'sustain and enhance' significance in ways which are compliant with the policies of the NPPF in relation to heritage and 'conserve the elements of significance' as per the Manchester Development Plan.

7. Conclusion

7.1 This Heritage Statement has been prepared in support of an application for planning permission relating to 82 to 84 Market Street, Manchester. The proposal involves a proposed rear extension, alterations to the roof, conversion of the upper floors to accommodate 8 new residential apartments and the formation of a new residential entrance from Sickle Street.

7.2 The works will bring the first, second and third floors of the building which are presently vacant back into active use. This Heritage Statement provides an analysis of the heritage significance of 82 to 84 Market Street which has been confirmed to constitute a Non Designated Heritage Asset. The report has considered the impact of works on the building and the impact of these works on the setting of the building and its contribution to Upper King Street Conservation Area and nearby listed buildings. The report has found that cumulatively the proposals will be beneficial to the significance of the heritage assets within the site and its vicinity. There are isolated instances of low levels of harm but these are outweighed by those beneficial elements of the scheme giving a cumulative positive impact. There are also many public benefits of the scheme which significantly outweigh low levels of harm.

7.3 Having regard to the direct impacts of the works on the building, it is concluded that any harm associated with the proposal is judged to be less than substantial and it is demonstrated that this harm is clearly outweighed by the wider public benefits of the proposed scheme which include securing the long-term retention of the building, creating homes and supporting employment opportunities. The public benefits include economic, social and environmental benefits.

7.4 The investment proposed by applicant is significant and will reinstate an active use to a vacant building and generate residential activity within Upper King Street Conservation Area which will positively contribute towards the local economy and area generally. For these reasons it is considered that the proposed scheme accords with relevant provisions of the NPPF and the Local Development Plan.

7.5 This Heritage 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.

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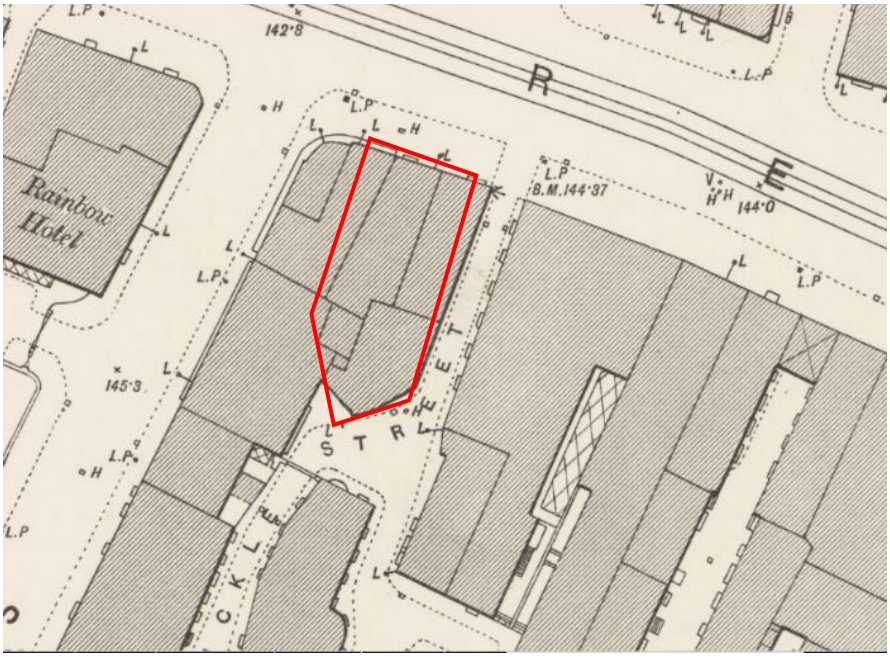
Appendix 1 – Historical Plans



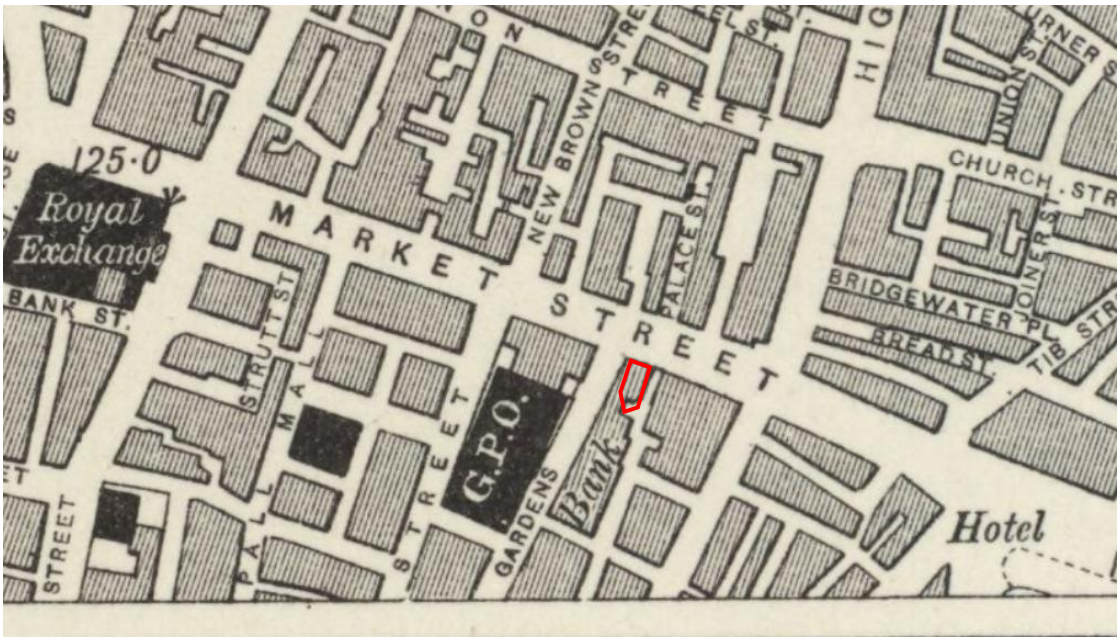
Tinker's 1772 Map of Manchester (Spring Gardens was known as Brown Street at this time)



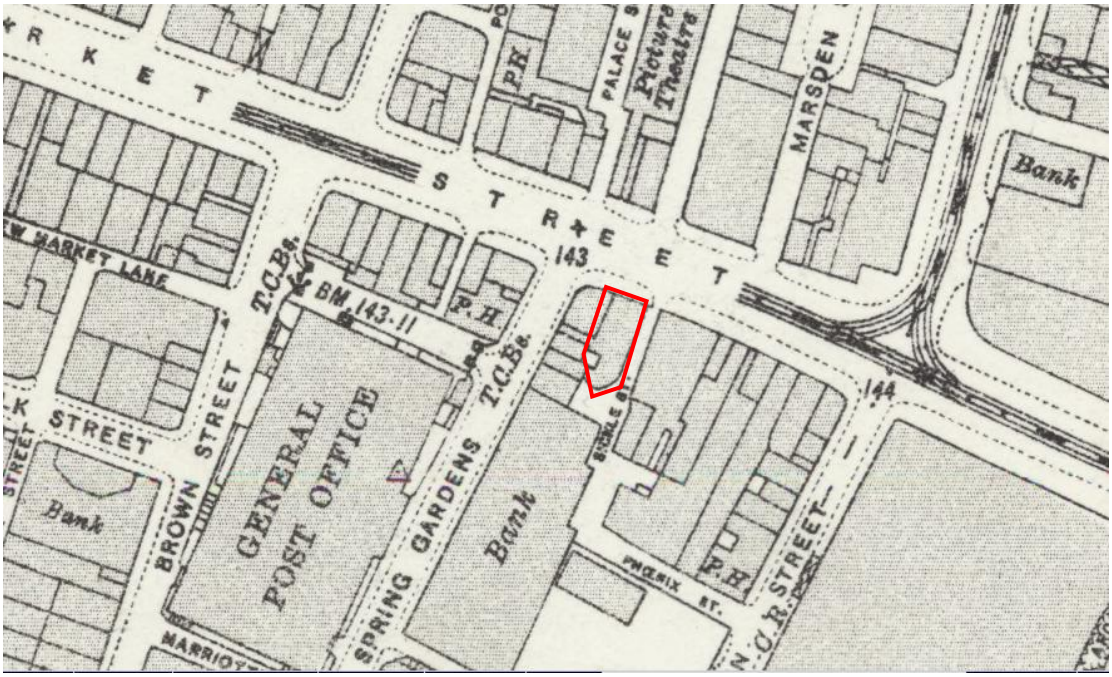
Archive Plan, 1851.



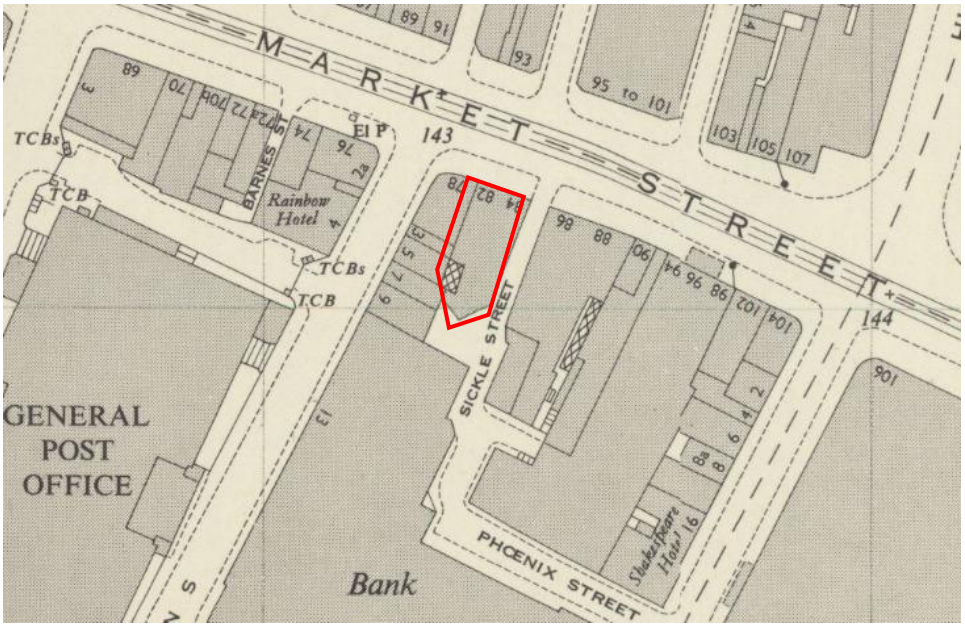
Archive Plan, 1891.



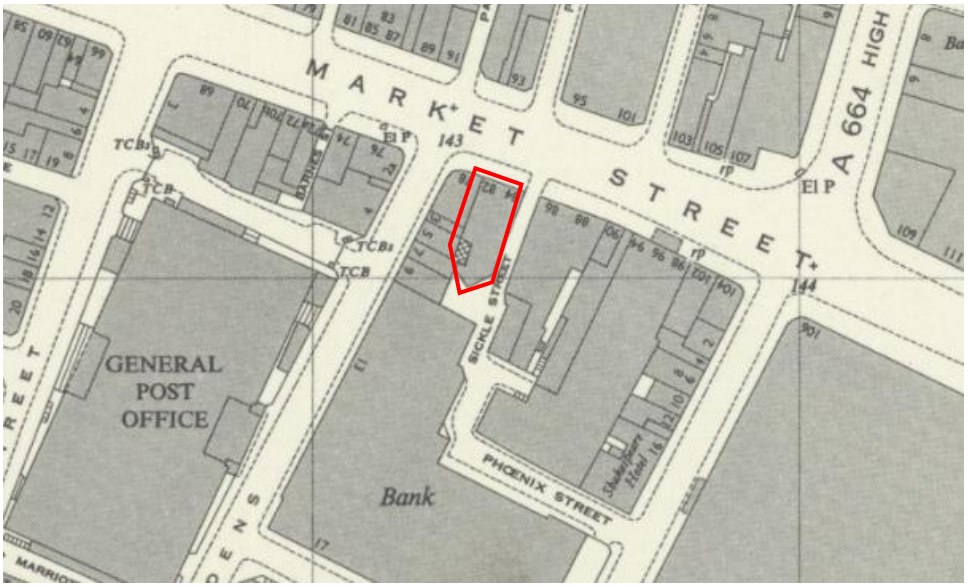
Archive Plan, 1909.



Archive Plan, 1933.



Archive Plan, 1949.



Archive Plan, 1965

Appendix 2: Internal Photographs of 82-84 Market Street



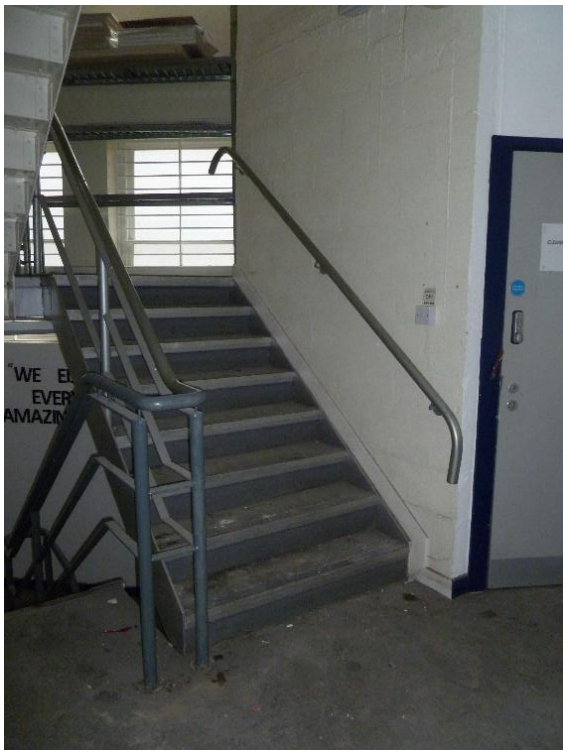
First Floor: No historic fabric.



Frist floor: No historic ceilings above suspended ceiling.



Second floor: no historic features aside from exposed brickwork.



Inserted staircase leading to all floors.



Third floor: Showing no ceilings or plasterwork are present.



Windows throughout are modern timber frames with modern thin double glazed units.