Built Heritage Statement.

YMCA Manchester, The Castlefield Hotel, Liverpool Road, Castlefield, Manchester.

On behalf of the YMCA Manchester.

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1. Introduction

1.1. Pegasus Group have been commissioned by the YMCA Manchester to prepare a Built Heritage Statement to consider the proposed development at the YMCA Manchester, The Castlefield Hotel, Liverpool Road, Castlefield, Manchester, as shown on the Site Location Plan provided at Plate 1: Site



Plate 1: Site Location Plan

1.2. The Site itself is not a Listed Building; however, it is situated within the bounds of the Castlefield Conservation Area. There are also several designated heritage assets situated within the vicinity of the Site, including Grade I and II Listed Buildings, as well as a Scheduled Monument.

1.3. The proposal seeks planning permission for the addition of flood resilience measures to the eastern side of the building.

1.4. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 207 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".[1]

1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 212 to 216 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

1.6. As required by paragraph 207 of the *NPPF*, the detail and assessment in this Report is considered to be "*proportionate to the assets' importance*".[2]

[1] Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, December 2024), para. 207.

[2] MHCLG, *NPPF*, para. 207.

2. Methodology

2.1. The aims of this Report are to assess the significance of the heritage resource within the Site, to assess any contribution that the site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

2.2. This assessment considers built heritage matters only.

Sources

2.3. The following key sources have been consulted as part of this assessment:

- The Greater Manchester Historic Environment Record (HER) accessed via Heritage Gateway for information on the recorded heritage resource in the vicinity of the site;
- The National Heritage List for England for information on designated heritage assets;
- Historic maps available online; and
- Google Earth satellite imagery.

Site Visit

2.4. A Site visit was undertaken by a Heritage Consultant from Pegasus Group on 18th March 2026, during which the Site and its surrounds were assessed.

Assessment Methodology

2.5. Full details of the assessment methodology used in the preparation of this Report are provided within ***Appendix 1***. However, for clarity, this methodology has been informed by the following:

- *Historic Environment Good Practice Advice in Planning: 2 - Managing Significance in Decision-Taking in the Historic Environment (*hereafter *GPA:2)*;[3]
- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) - The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter *GPA:3*);[4]

[3] Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment (GPA:2)* (2nd edition, Swindon, July 2015).

[4] Historic England, *Historic Environment Good Practice Advice in Planning Note 3 - The Setting of Heritage Assets (GPA:3)* (2nd edition, Swindon, December 2017).

- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter *HEAN:12*);[5] and
- *Conservation Principles: Polices and Guidance for the Sustainable Management of the Historic Environment*.[6]

[5] Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN:12)* (Swindon, October 2019).

[6] English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

3. Policy Framework

Legislation

3.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings.[7]

3.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[8]

3.3. Full details of the relevant legislation are provided in ***Appendix 2***.

National Planning Policy Guidance

3.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework* (*NPPF*), an updated version of which was published in December 2024. The *NPPF* is also supplemented by the national *Planning Policy Guidance* (*PPG*) which comprises a full and consolidated review of planning practice guidance documents to be read alongside the *NPPF* and which contains a section related to the Historic Environment.[9] The PPG also contains the *National Design Guide*.[10]

3.5. Full details of the relevant national policy guidance is provided within ***Appendix 3***.

The Development Plan

3.6. Planning applications in Manchester City Centre are currently considered against the policy and guidance set out within Manchester Local Development Framework Core Strategy, adopted 11th July 2012, as well as the Places for Everyone Joint Development Plan Document, adopted 21st March 2024.

3.7. Details of the policies specifically relevant to the application proposals are provided within ***Appendix 4***.

[7] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
[8] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).
[9] Ministry of Housing, Communities and Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 14th February 2024), https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment.
[10] Ministry of Housing, Communities and Local Government (MHCLG), *National Design Guide* (London, January 2021).

4. Site Description and Historic Development

Site Description

4.1. The Site covers a total area of *c.*0.22 hectares (ha), comprising the Castlefield Hotel, built *c.*1987. The building is formed of a four-storey broadly 'L' shaped structure to the north, with a five-storey block to the west, and a three-storey block to the south (Plate 2). The three-storey block represents the part of the building proposed for development, which includes the YMCA Manchester and the Y Club.

4.2. The building is constructed from red brick with blue brick dressings, with the northern extent of the structure including a pitched slate roof, with the southern blocks formed of flat roofing with blind parapets.

4.3. The building is bounded by Liverpool Road to the north, with the former Liverpool Road Station on the northern side of this road. The eastern side of the building is bounded by the former canal wharf and basin, which includes two canal arms adjacent to the building (Plate 3). Further east is the Castlefield Bowl music venue. The western side of the building is bounded by Potato Wharf (Plate 4), with the southern side of the building featuring a car park for the hotel, with railway lines present further south.



Plate 2: The Castlefield Hotel along Liverpool Road.



Plate 3: The Castlefield Hotel from the canal wharf.



Plate 4: The Castlefield Hotel from the Potato Wharf.

Site Development

4.4. The first available cartographic source to depict the Site is the 1800 Pocket Plan of Manchester and Salford (Plate 5). A small building is shown within the north-western extent of the Site, with what appears to be a yard to the east. Two buildings are shown to the east of this yard, outside the bounds of the Site. The southern extent of the Site is formed of open land, with two canal arms shown adjacent to the east of the Site, connecting with the canal to the south. A large rectangular building is shown over these canal arms, which likely formed a warehouse. Liverpool Road to the north of the Site had not been constructed by this date, with the Site otherwise surrounded by field plots.



Plate 5: The 1800 Pocket Plan of Manchester and Salford, with approximate Site location shown.

4.5. The 1848 First Edition Ordnance Survey Map shows that Liverpool Road had been established by the time this mapping was drawn (Plate 6). The northern extent of the Site bounding the road had comprised a range of attached structures. The building over the canal arms on the 1800 Plan appears to have either been extended or replaced with a new building, which extended within the boundaries of the Site. In between the two buildings on Site and further southwards was a large and open space, which may have served a wharf function. An early iteration of the Potato Wharf was present to the west of the Site, with the railway lines first shown bounding the southern side of the Site.

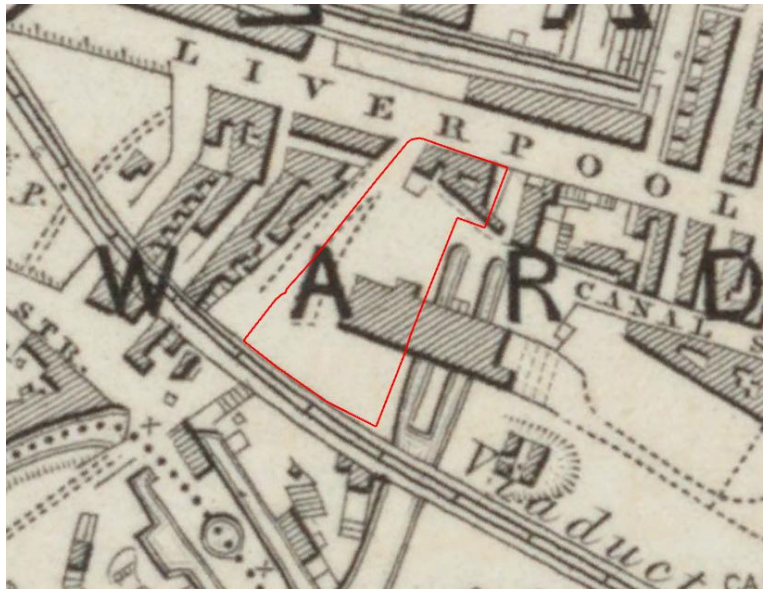


Plate 6: The 1848 Ordnance Survey, with approximate Site boundary (NLSM).

4.6. The 1851 Town Plan provided a clearer depiction of the layout of the Site (Plate 7). This showed a range of structures present within the northern extent of the Site, the largest of which was noted as '*The Queen's Arms Inn*'. The building within the southern extent of the Site over the canal arms was noted as '*Staffordshire Warehouse*', shown with various cranes surrounding the structure.

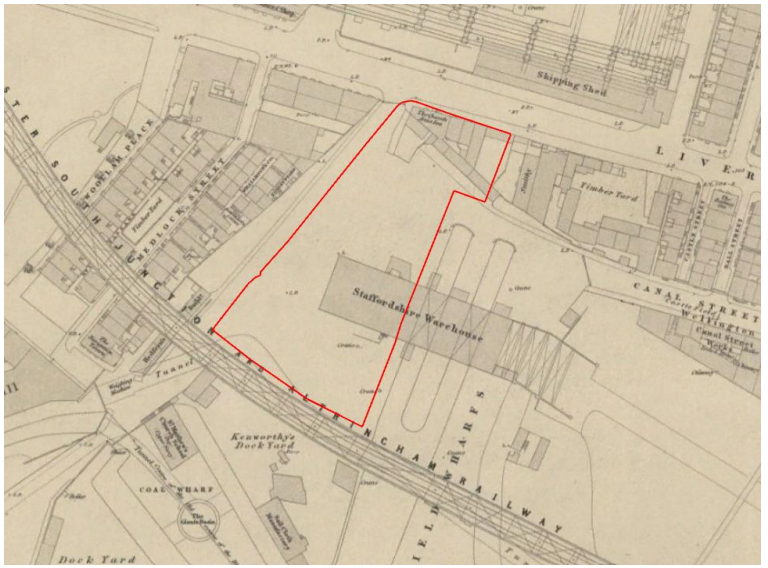


Plate 7: The 1851 Town Plan, with approximate Site boundary (NLSM).

4.7. By the time the 1891 Town Plan was drawn, an additional structure had been added to the northern extent of the Site, with the northern component now labelled as '*Queen's Arms Hotel*' (Plate 8). A timber yard was noted to the east of these structures within the Site. The Staffordshire Warehouse had remained present within the southern extent of the Site, and had seen various extensions outside the boundaries of the Site. Several small detached structures were also shown within the southern extent of the Site.

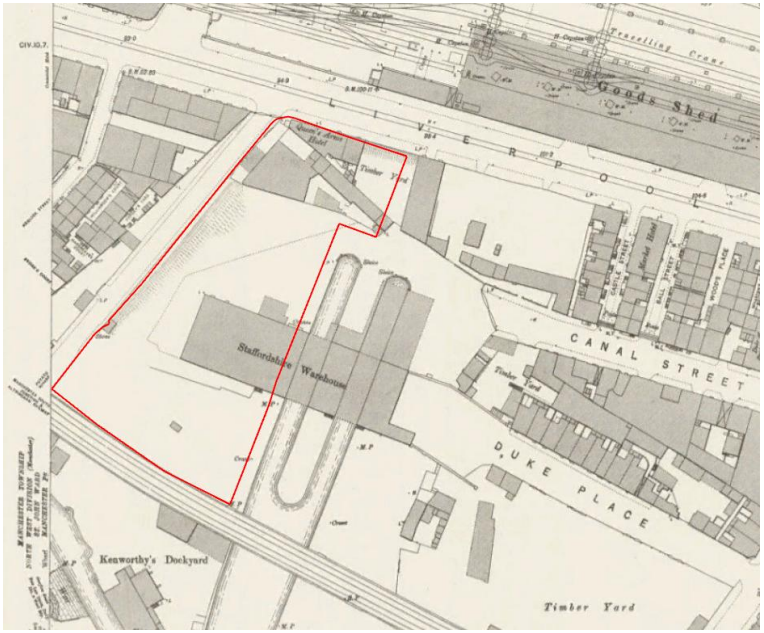


Plate 8: The 1891 Ordnance Survey Map, with approximate Site boundary (NLSM).

4.8. The 1923 Ordnance Survey Map showed that a range of new structures had been built within the western extent of the Site, off Potato Wharf, with no other notable changes identified (Plate 9).



Plate 9: The 1923 Ordnance Survey Map, with approximate Site location (NLSM).

4.9. By the time the 1934 Ordnance Map was drawn, a large rectangular warehouse had been added to the southern extent of the Site, extending partly over the canal arms adjacent to the east (Plate 10).

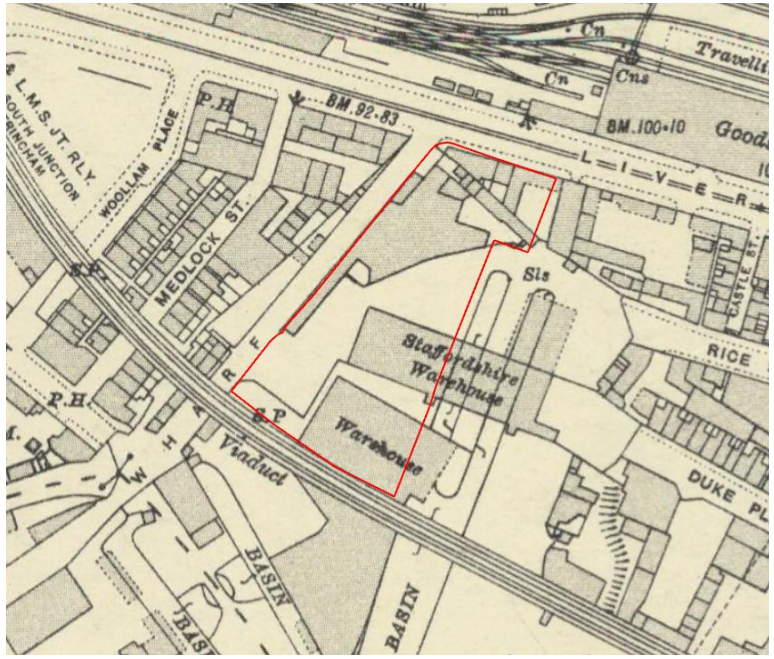


Plate 10: The 1934 Ordnance Survey Map, with approximate Site boundary (NLSM).

4.10. The 1965 Ordnance Survey Map showed that a range of changes had taken place for the Site and its immediate surrounds (Plate 11). The Staffordshire Warehouse had been removed, and replaced with several small structures. At this time, the canal arms appear to have been partly covered over or infilled, remaining extant adjacent to the south-eastern extent of the Site. The buildings within the northern extent of the Site were labelled as '*Works*', and were shown as connecting with the southern warehouse via a road and yard.

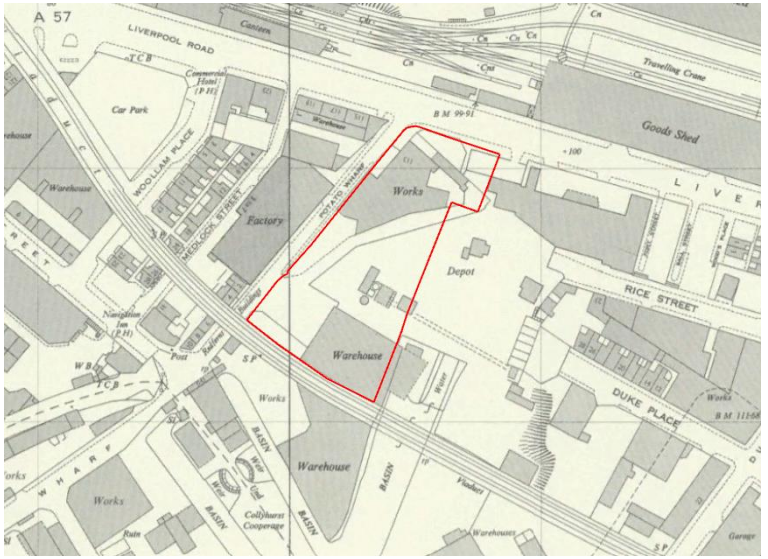


Plate 11: The 1965 Ordnance Survey Map, with approximate Site boundary (NLSM).

4.11. The Castlefield Hotel building was constructed in *c.*1987, first appearing on satellite imagery from 2000 (Plate 12). By this date, the warehouse within the southern extent of the Site had been removed, with this area comprising a car park. The canal arms to the east of the Site had also been fully reinstated by this time, with the Castlefield Bowl music venue shown further eastwards.



Plate 12: Satellite imagery from 2000, with approximate Site boundary (Google Earth).

4.12. No other notable changes are identified for the Site and its immediate surrounds up to present day.

Planning History

4.13. A review of the planning history for the Site identified several relevant previous planning applications, as catalogued within Table 1.

4.14. Of particular note from the planning history, an application for demolition of buildings within a Conservation Area, as well as the construction of a hostel and recreational facility, were both approved on 30th April 1987 (Ref. Nos. 028915 & 028916). These applications were associated with the removal of the industrial buildings within the Site, and the construction of the Castlefield Hotel.

4.15. More recently, an application was submitted for the installation of photovoltaic panels to the roof of the building, which was approved 10th July 2024.

4.16. The Officer's report noted the following regarding the Site building, and its contribution to the Castlefield Conservation Area.

"***The hotel is a modern building constructed in red brick that isn't listed and isn't considered to be a non-designated heritage asset. It does currently make a generally positive contribution to the conservation area, but could be improved by the relocation of M&E equipment.***"

Table 1: Relevant planning history records for the Site.

Planning Reference	Description	Decision
028916	CONSERVATION AREA CONSENT Demolition of buildings within a Conservation Area	Approved 30th April 1987
028915	Erection of hostel & recreational facility comprising overnight accommodation, bar, restaurant, sports hall, swimming pool, gym and sauna	Approved 30th April 1987
035869	DETERMINATION BY THE CENTRAL MANCHESTER DEVELOPMENT CORPORATION Single storey extension to existing Sports Complex to provide 2 fives courts and spectator area	Approved 26th January 1990
047976	Four non illuminated elevational signs to YHA building and one associated free standing non illuminated car park sign	Approved 23rd June 1995
048052	Non illuminated individual letter name sign	Approved 25th August 1995
072565	Installation of 14 no. up /down lighters to illuminate building.	Approved 19th October 2004
071637	Installation of two halo-illuminated individual letter name signs, two non-illuminated banners sign and two non-illuminated entrance panel signs.	Approved 7th October 2004
114090	Extension at ground floor level and lower ground floor of health and fitness club.	Approved 7th December 2016
106043	Single storey extension.	Approved 27th August 2014
117982	Installation of 3No. antennas on 3No. support poles fixed to building, and 3No. cabinets at ground level.	Approved 8th January 2018

Planning Reference	Description	Decision
129034	The installation of 3 no. antennas on 3 no. support poles fixed to the building with the antennas painted to match the brickwork, 3 no. ground based cabinets.	Approved 14th May 2021
139245/FO/2024	Installation of PV panels on the roof of the building	Approved 20th July 2024

5. Statement of Significance

5.1. The following Section provides an assessment of elements of the historic environment that have the potential to be impacted upon by the proposed development.

5.2. As set out in ***Section 1***, the Site itself does not include a Listed Building; however, it is located within the Castlefield Conservation Area. Within the immediate surrounds of the Site, there are three Grade I Listed Buildings, 18 Grade II Listed Buildings, and one Scheduled Monument.

5.3. With regards to other heritage assets within the surrounds of the Site, Step 1 of the methodology recommended by *GPA3* (see methodology), is to identify which heritage assets might be affected by a proposed development. [11]

5.4. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.

5.5. It is however widely accepted (paragraph 220 of the *NPPF*) that not all parts of a heritage asset will necessarily be of equal significance.[12] In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.

5.6. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.

5.7. Consideration, based upon professional judgement and on-site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the site as part of their setting, whether the site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.

5.8. It has been observed that the Castlefield Conservation Area represents the only designated heritage asset that has the potential to be sensitive to the development proposals and thus has been taken forward for further assessment below.

5.9. With regard to other heritage assets in the vicinity of the Site, assessment has concluded that the Site does not form any part of setting that positively contributes to overall heritage significance due to the nature of the asset and a lack of visual connections, spatial relationships or historic connections. Accordingly, the proposed development is not anticipated to result in a change that would impact upon the overall heritage significance of these assets. Other heritage assets have

[11] Historic England, *GPA:3*, p. 4.

[12] MHCLG, *NPPF*, para. 220.

therefore been excluded from further assessment within this Report.

Castlefield Conservation Area

5.10. The Castlefield Conservation Area was first designated on 13th October 1979, with an extension to the boundary on 26th June 1985 (Plate 13). At the time of writing, an appraisal document for the Conservation Area has yet to be published.

5.11. For reasons of proportionality, this assessment will focus on the part of the Conservation Area that encompasses the vicinity of the Site, although it is recognised that the Conservation Area covers a much larger area.



Plate 13: The boundary of the Castlefield Conservation Area (green), with the Site (red) highlighted.

5.12. The Castlefield area had first been settled in 79AD, when Roman soldiers, led by General Agricola, had marched into the north-west of England and built a fort called Mamucium. A village, known as a '*Vicus*' had been established nearby for supply needs, but following the collapse of the Roman empire, Mamucium was abandoned.

5.13. The new village of Manchester had been founded *c.*1km to the north-east of Mamucium. The vicus had then become known as the Old Town or Aldport, with a house and park established by the Mosley family in 1601. This was known as Aldport Lodge, and had been used by Lord Strange as a Royalist headquarters during the Siege of Manchester in 1642.

5.14. The start of the post-medieval industrialisation of the Castlefield area took place in the 1720s, when the River Irwell had been made navigable, allowing access to Liverpool connecting with the River Mersey. In 1734, the first quay on the Irwell had been financed by Edward Byrom, for the loading and unloading of goods. The installation of Quay Street at this time had connected Deansgate with the river.

5.15. The Rochdale Canal had been constructed and opened in 1804, which runs broadly west to east through the central-southern extent of the Conservation Area. This made Castlefield the hub of the canal network, which continued to be developed. A substantial range of warehouses were constructed off the canal, to supply the needs of a rapidly growing population in Manchester.

5.16. The canals were soon determined as not quick or efficient enough for the transportation of goods, which led to the construction of the railways. The Grade I Listed

Railway Station (NHLE 1291477) was the first passenger railway station ever built, and was constructed on Liverpool Road in the 1830s. The passenger terminal was short lived, ceasing function in 1844, though it continued to transport goods until 1975.

5.17. The canal and rail transport network in Castlefield had declined during the 20th century, where these were now primarily in use for leisure purposes. The substantial railway complex on Liverpool Road had been converted for use as the Museum of Science and Industry. The Urban Heritage Park, comprising the site of the Roman Fort, had also been established in 1982, which included the reconstruction of various building elements.

Character and Appearance

5.18. For the parts of the Conservation Area within the vicinity of the Site, the character and appearance of the Area is primarily dominated by its industrial character.

5.19. The historic buildings on Liverpool Road have been constructed of red brick and sandstone. These buildings are primarily of an industrial character, comprising goods sheds and warehouses. The Grade I Listed Station Masters House (NHLE 1291477) had been designed with a neo-Classical frontage (Plate 14). This is distinctive, with the building representing the first passenger terminus of its kind, and with this architectural style not taken forward with other buildings of this typology. The southern side of Liverpool Road features a range of modern buildings. These are primarily built from brick, and several, including the Site, have taken design cues from the industrial style of the historic buildings.

5.20. An important element of the character and appearance of the Conservation Area are the historic transportation systems. This includes the railway lines with viaducts, and the canal systems. A canal and former wharf are situated adjacent to the Site to the east, including two canal arms. These had been present on the early cartographic sources for the area.

5.21. The Site building, The Castlefield Hotel, bounds Liverpool Road within the Conservation Area. Dynamic views of the northern extent of the building are visible in views along this road, in combination with the surrounding historic built form (Plate 15). The southern extent of the building is located at a lower elevation, bounding the canal wharf and canal arms to the south of Liverpool Road (Plate 16).



Plate 14: The Station Masters House within the Conservation Area, along Liverpool Road.



Plate 15: View along Liverpool Road within the Conservation Area, including visibility of the Site.



Plate 16: The canal arms adjacent to the Site, within the Conservation Area.

Statement of Significance

5.22. With specific regard to the part of the Conservation Area that encompasses the Site, the significance of this part of the Conservation Area is principally embodied in the elements of its intrinsic character and appearance as described above. These elements include the historic built form contained within its boundaries, the relationship between the buildings, and elements of the settlement layout, which together illustrate the historic development of the area.

5.23. The most important elements of character and appearance can be summarised as follows:

- Its designated heritage assets and non-designated historic buildings, primarily formed of 18th and 19th-century industrial buildings.
- The rugged style of the buildings, built predominantly of red brick or sandstone, which collectively contribute an industrial character.
- The street formation of the area, including Liverpool Street, which has historically formed an important area with the passenger terminus bounding the street.
- The transportation systems, including the railway and canal network, which allowed for the expansion of the area and its establishment as a transport hub.
- The green spaces of the Roman Fort, which contribute a quieter and semi-rural environment within the busy urban centre.

The Contribution of the Site

5.24. Historic cartographic sources show that the Site had previously formed a hotel to the north, with a central yard likely forming part of a wharf, and with the southern extent forming a warehouse that extended across the two canal arms, as well as industrial yards.

5.25. The Site now forms a modern hotel building, with no clear historic association to the development of the area to which the Conservation Area relates.

5.26. The building has, however, been designed in response to the character and appearance of the immediate surrounds of the Conservation Area. It is built from red brick with blue brick dressings, and whilst it clearly forms a modern hotel building, its size and formation have taken visual cues from the large goods sheds and warehouses to the north. Whilst the building on Site is congruous with the Conservation Area, it is not considered to make a positive contribution to its significance.

5.27. Overall, the Site is considered to make a **neutral contribution** to the significance of the Conservation Area, through its character and appearance.

6. Assessment of Impacts

6.1. This Section addresses the heritage planning issues that warrant consideration in the determination of the application for planning permission, in line with the proposals set out within ***Section 1*** of this Report.

6.2. As detailed above, the *Planning and Compulsory Purchase Act (2004)* requires that applications for Planning Permission are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.

6.3. The statutory requirement set out in Section 16 (2) and Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* confirms that special attention should be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

6.4. In addition, the *NPPF* states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Conservation Areas.

6.5. It is also important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "*substantial harm*" or "*less than substantial harm*" to the identified designated heritage assets, in the context of paragraphs 214 and 215 of the *NPPF*.[13] With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 216 of the *NPPF*.[14]

6.6. The *PPG* clarifies that within each category of harm ("*less than substantial*" or "*substantial*"), the extent of the harm may vary and should be clearly articulated.[15]

6.7. The guidance set out within the *PPG* also clarifies that "*substantial harm*" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development, which is to be assessed.[16] In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:

"...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."[17]

6.8. This Section will consider each element of the proposals and assess the impact of the proposed development—whether harmful or beneficial—on the significance identified above.

[13] MHCLG, *NPPF*, paras. 214 and 215.
[14] MHCLG, *NPPF*, para. 216.
[15] MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).
[16] MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).
[17] EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

Proposed Development

6.9. The proposed development would see the addition of flood resilience measures to the eastern side of the Site building (Plate 17 & Plate 18).

6.10. Following a flood event on New Years Day 2025, the YMCA building and Y Club are now completely uninsurable, leaving the organization at serious risk of business interruption and potential closure, should a similar event occur again.

6.11. The proposed works include four main measures, summarised as a combination of the following:

- Flood resilient replacement curtain walling;
- Flood resilient replacement window systems;
- Flood resilient replacement louvre system; and
- Flood resilient dwarf wall infills.

6.12. The replacement curtain walling would take place at the existing Y Club entrance. This would see the addition of a new brick archway, with high performance glazed curtain walling system. The previous curtain walling was identified as a key point of failure during the previous flooding. The new curtain walling would include minimal framing, to improve the flood resistance and thermal performance of the building.

6.13. These works would include a flood resistant double door to the curtain walling system, as well as new, high quality illuminated 'Y Club' signage.

6.14. For the row of ground floor window and vent apertures to the eastern side of the building, these would be replaced with new flood resilient window and louvre systems. These were both identified as other key points of failure during the previous flooding, with the intention to include minimal framing, noted as essential to improving flood resistance and thermal performance.

6.15. The new window system would be high performance, simplified framing to the louvre system simplified framing. Beneath the windows and vents, a new dwarf wall infill system would be installed, which would establish long-term flood resistance into the elevation adjacent to the canal.

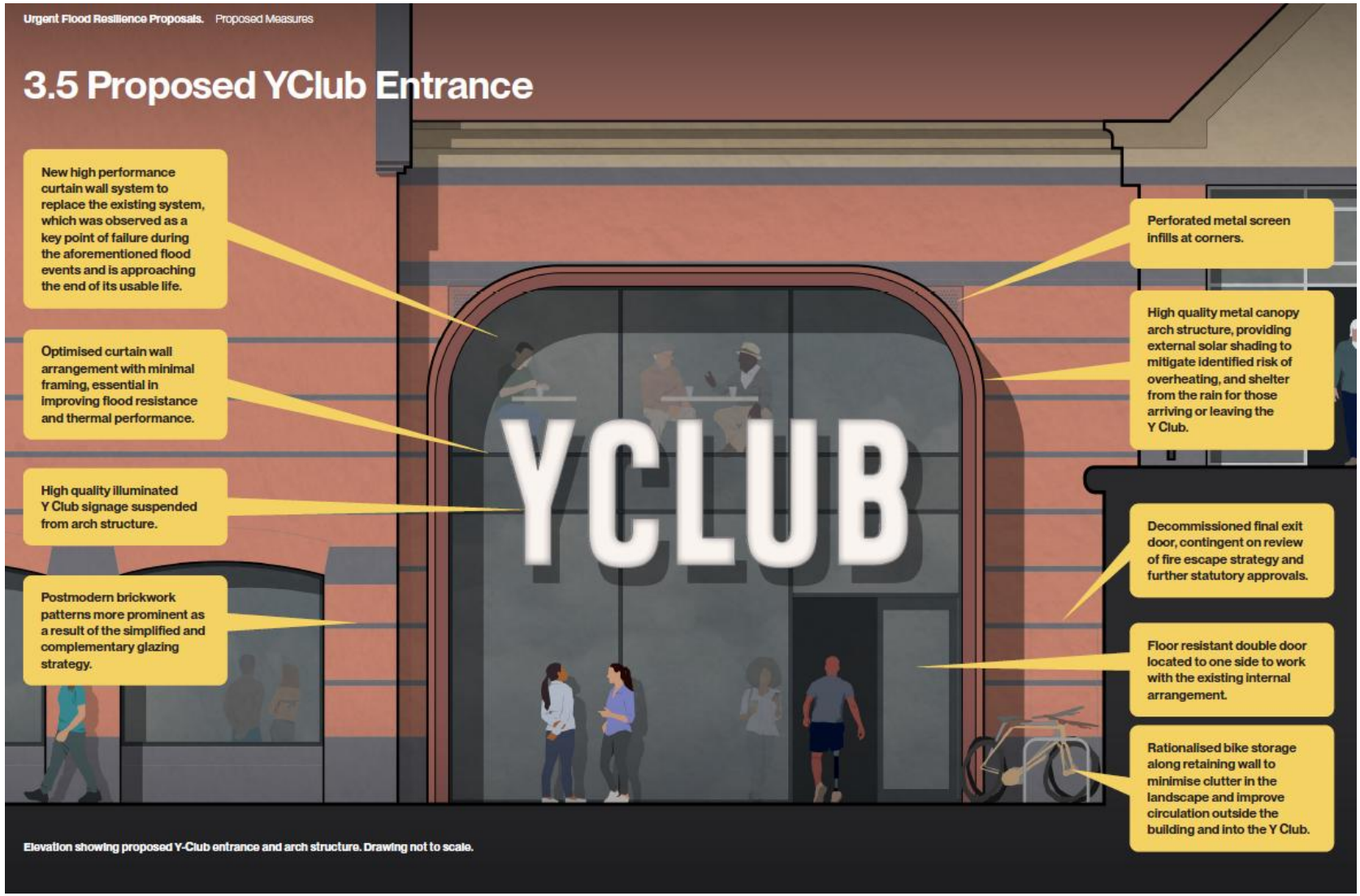


Plate 17: Proposed changes to the glazed curtain walling system for flood resilience measures.

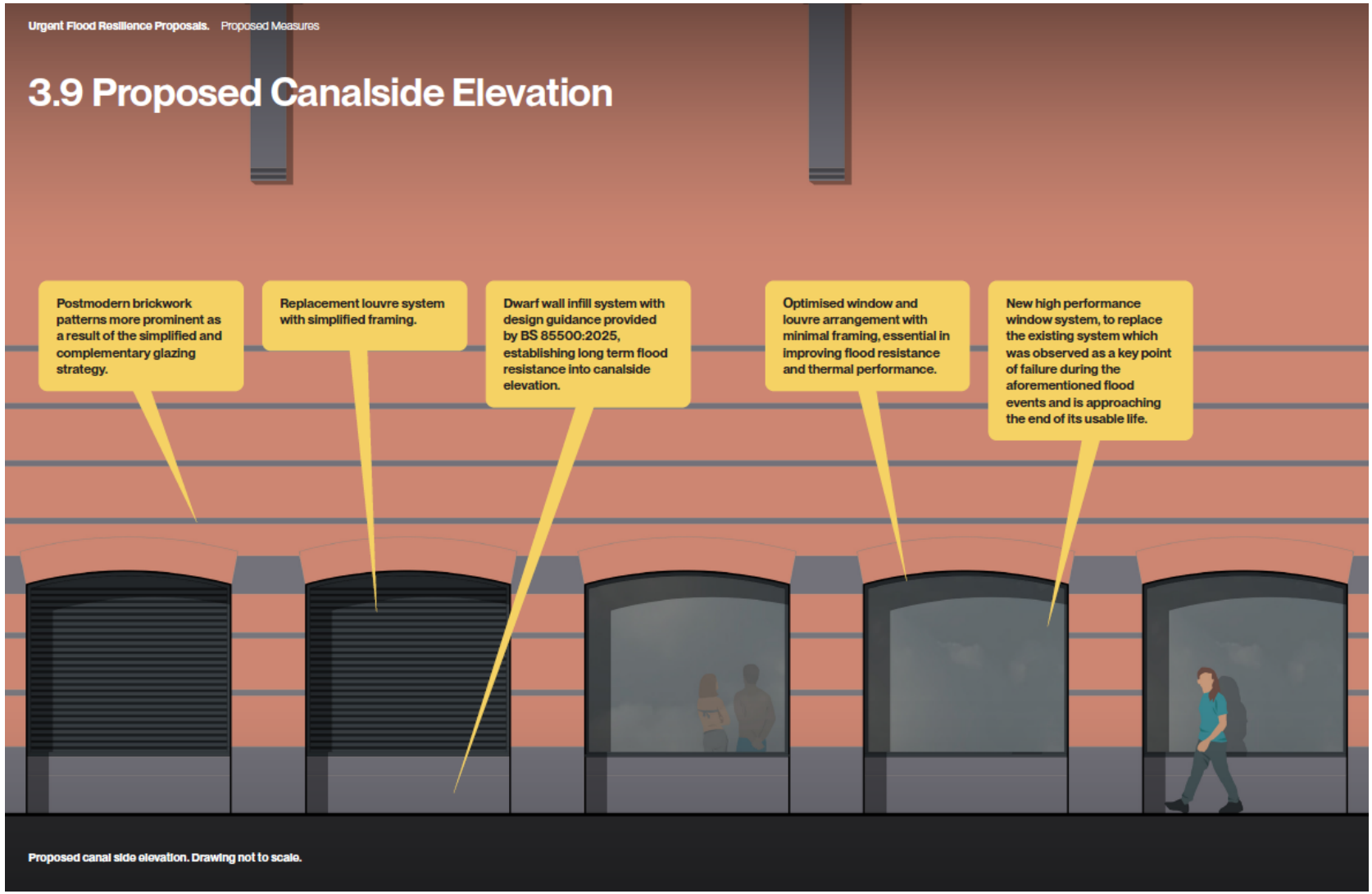


Plate 18: Proposed changes to the window and louvre vent systems.

Castlefield Conservation Area

6.16. The Site is located within the Castlefield Conservation Area, with the assessment concluding that the Castlefield Hotel, comprising the Site building, makes a **neutral contribution** to its significance.

6.17. The proposed works include modest changes to the eastern elevation of the building, forming part of the YMCA Manchester and Y Club. This part of the elevation is located along the canal wharf and adjacent to the canal arms, identified as an area susceptible to flooding.

6.18. The changes proposed are to a modern building within the Conservation Area, which was designed taking visual cues from the surrounding industrial buildings. The flood resilience measures have been designed to a high-quality standard, utilising existing apertures, and are in-keeping with the designs of the current modern building. These designs would work harmoniously with the character and appearance of the surrounding area.

6.19. Visibility of the proposed changes to the building within the Conservation Area will primarily be contained to the open wharf to the east. This is located at a lower elevation than Liverpool Road to the north, where views are anticipated to be only glimpsed at the junction to the roadside.

6.20. Overall, the proposed works are deemed to cause **no harm** to the significance of the Castlefield Conservation Area.

6.21. The designs ensure that the significance of the Conservation Area is preserved, as stipulated within the Planning (Listed Buildings and Conservation Areas) Act 1990, and ensure that the long-term flood resilience of the building is secured.

7. Conclusions

7.1. The Site itself is not a Listed Building; however, it is situated within the bounds of the Castlefield Conservation Area. There are also several designated heritage assets situated within the vicinity of the Site, including Grade I and II Listed Buildings, as well as a Scheduled Monument.

7.2. The Castlefield Conservation Area was identified as the only designated heritage asset that had the potential to be affected by the development proposals, and was thus taken forward for further assessment.

7.3. Overall, the Site is considered to make a **neutral contribution** to the significance of the Conservation Area, through its character and appearance.

7.4. The proposed development would see the addition of flood resilience measures to the eastern side of the Site building.

7.5. Overall, the proposed works are deemed to cause **no harm** to the significance of the Castlefield Conservation Area.

7.6. The proposals are thus in accordance with Sections 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990; the Manchester City Council Local Plan, and policies contained in Section 16 of the NPPF, and ensure that the long-term flood resilience of the building is secured.

Appendix 1: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

> ***"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[18]

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.[19]

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.[20] These essentially cover the heritage 'interests' given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.[21]

The *PPG* provides further information on the interests it identifies:

- ***Archaeological interest:*** *As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*

- ***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.

- ***Historic interest*:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. 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.[22]

[18] MHCLG, *NPPF*, Annex 2.
[19] Historic England, *GPA:2*.
[20] Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values are identified as being 'aesthetic', 'communal', 'historical' and 'evidential', see idem pp. 28–32.
[21] MHCLG, *NPPF, Annex 2*; MHCLG, *PPG, paragraph 006, reference ID: 18a-006-20190723*.
[22] MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

Significance results from a combination of any, some, or all of the interests described above.

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report. [23]

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the NPPF:

> ***"Significance derives not only from a heritage asset's physical presence, but also from its setting."*** [24]

Setting is defined as:

> ***"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."*** [25]

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of "*what matters and why*". [26]

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at

[23] Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).
[24] MHCLG, *NPPF*, Annex 2.
[25] MHCLG, *NPPF*, Annex 2.
[26] Historic England, *GPA:3*, pp. 8, 11.

paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

> ***Paragraph 25 – "But – again in the particular context of visual effects – I said that if "a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one's experience of the listed building in its surrounding landscape or townscape" (paragraph 56)".***
>
> ***Paragraph 26 – "This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building's setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, "the historic relationship between places". Historic England's advice in GPA3 was broadly to the same effect."*** [27]

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance,** as identified in paragraph 213 of the NPPF, comprising Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 75 of the NPPF;[28]

- **Designated heritage assets of less than the highest significance,** as identified in paragraph 213 of the NPPF, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);[29] and

[27] Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.
[28] MHCLG, *NPPF*, para. 213 and fn. 75.
[29] MHCLG, *NPPF,* para. 213.

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as "*buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets*".[30]

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

Grading significance

There is no definitive grading system for assessing or categorising significance outside of the categories of Designated Heritage Assets and Non-Designated Heritage Assets, specifically with regards to the relative significance of different parts of an asset.

ICOMOS guidance recognises that a degree of professional judgement is required when defining significance:

> ***"…the value of heritage attributes is assessed in relation to statutory designations, international or national, and priorities or recommendations set out in national research agendas, and ascribed values. Professional judgement is then used to determine the importance of the resource. Whilst this method should be used as objectively as possible, qualitative assessment using professional judgement is inevitably involved."***[31]

This assessment of significance adopts the following grading system:

- **Highest significance:** Parts or elements of a heritage asset, or its setting, that are of particular interest and are fundamental components of its archaeological, architectural, aesthetic or historic interest, and form a significant part of the reason for designation or its identification as a heritage asset. These are the areas or elements of the asset that are most likely to warrant retention, preservation or restoration.

- **Moderate significance:** Parts or elements of the heritage asset, or its setting, that are of some interest but make only a modest contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that might warrant retention but are capable of greater adaption and alteration due to their lesser relative significance.

- **Low or no significance:** Parts or elements of the heritage asset, or its setting, that make an insignificant, or relatively insignificant contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that can be removed, replaced or altered due to their minimal or lack of

[30] MHCLG, *PPG*, paragraph 039, reference ID: 18a-039-20190723.

[31] International Council on Monuments and Sites (ICOMOS), *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties* (Paris, January 2011), paras. 4-10.

significance and are areas and elements that have potential for restoration or enhancement through new work.

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighing exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would "*have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced*";[32] and

- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the *PPG* states:

> ***"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."***[33]

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the *NPPF* requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, "*preserving*" means doing "*no harm*".[34]

Preservation does not mean no change, it specifically means no harm. *GPA:2* states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*".[35] Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

[32] Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.
[33] MHCLG, *PPG*, paragraph 018, reference ID: 18a-018-20190723.
[34] R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).
[35] Historic England, *GPA:2*, p. 9.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of "*what matters and why*".[36] Of particular relevance is the checklist given on page 13 of *GPA:3*.[37]

It should be noted that this key document also states:

> ***"Setting is not itself a heritage asset, nor a heritage designation…"***[38]

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

> ***"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".***[39]

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.[40]

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

The *NPPF* (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.[41]

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.[42]

The *PPG* provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

> ***"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed***

[36] Historic England, *GPA:3*, p. 8.
[37] Historic England, *GPA:3*, p. 13.
[38] Historic England, *GPA:3*, p. 4.
[39] Historic England, *GPA 3*., p. 8.
[40] Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.
[41] MHCLG, *NPPF,* paras. 214 and 215.
[42] Including - Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin); MHCLG, *NPPF,* paras. 214 and 216.

private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation."***[43]

Any "*heritage benefits*" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

[43] MHCLG, *PPG*, paragraph 020, reference ID: 18a-020-20190723.

Appendix 2: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.[44] It does not provide statutory protection for non-designated or Locally Listed heritage assets.

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

> ***"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."***[45]

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[46]

[44] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
[45] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).
[46] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 3: National Policy Guidance

The National Planning Policy Framework (December 2024)

National policy and guidance is set out in the Government's *National Planning Policy Framework* (*NPPF*) published in December 2024. This replaced and updated the previous *NPPF* (December 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

> ***"Plans and decisions should apply a presumption in favour of sustainable development.***
>
> ***For plan-making this means that:***
>
> ***a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
>
> ***b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
>
> ***i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For decision-taking this means:

a. approving development proposals that accord with an up-to-date development plan without delay; or

b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."[47]

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

> ***"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change."***[48] (our emphasis)

The *NPPF* continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the *NPPF* as:

> ***"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage***

[47] MHCLG, *NPPF*, para. 11.

[48] MHCLG, *NPPF*, para. 11, fn. 7.

assets and assets identified by the local planning authority (including local listing)."[49]

The NPPF goes on to define a Designated Heritage Asset as a:

> ***"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."***[50]

As set out above, significance is also defined as:

> ***"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[51]

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 208 that:

> ***"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."***[52]

Paragraph 210 goes on to state 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."***[53]

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 212 and 213 are relevant and read as follows:

> ***"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the***

[49] MHCLG, *NPPF*, Annex 2.
[50] MHCLG, *NPPF*, Annex 2.
[51] MHCLG, *NPPF*, Annex 2.
[52] MHCLG, *NPPF*, para. 208.
[53] MHCLG, *NPPF*, para. 210.

asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."[54]

"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."[55]

Section b) of paragraph 213, which describes assets of the highest significance, also includes footnote 75 of the NPPF, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 214 reads as follows:

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

a. the nature of the heritage asset prevents all reasonable uses of the site; and

b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d. the harm or loss is outweighed by the benefit of bringing the site back into use."[56]

Paragraph 215 goes on to state:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."[57]

[54] MHCLG, *NPPF*, para. 212.
[55] MHCLG, *NPPF*, para. 213.
[56] MHCLG, *NPPF*, para. 214.
[57] MHCLG, *NPPF*, para. 215.

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 219 that:

> ***"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."***[58]

Paragraph 220 goes on to recognise that "*not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance*" and with regard to the potential harm from a proposed development states:

> ***"Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole."***[59] (our emphasis)

With regards to non-designated heritage assets, paragraph 216 of NPPF states 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."***[60]

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Ministry of Housing, Communities & Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

[58] MHCLG, *NPPF*, para 219.
[59] MHCLG, *NPPF*, para. 220.
[60] MHCLG, *NPPF*, para. 216.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of 'significance' in decision taking is important and states:

> ***"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."***[61]

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

> ***"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.***
>
> ***While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."***[62] (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

> ***"When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape."***[63]
>
> ***"Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way."***[64]

[61] MHCLG, *PPG*, paragraph 007, reference ID: 18a-007-20190723.
[62] MHCLG, *PPG*, paragraph 018, reference ID: 18a-018-20190723.
[63] MHCLG, *NDG*, para. 46.
[64] MHCLG, *NDG*, para. 47.

It goes on to state that:

> ***"Well-designed places and buildings are influenced positively by:***
>
> - ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***
> - ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
> - ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details - see Identity.***
>
> ***Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."***[65]

[65] MHCLG, *NDG*, paras. 48-49.

Appendix 4: Relevant Development Plan Policies

Applications for Planning Permission within Manchester City Centre are currently considered against the policy and guidance set out within the Core Strategy, which was adopted 11th July 2012, as well as the Places for Everyone Development Plan Document, adopted 21st March 2024.

The following policies of the development plan are deemed as being relevant to the proposed development works.

Core Strategy: Policy EN3 – Heritage

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

New developments must be designed so as to support the Council in preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance, including scheduled ancient monuments, listed buildings, registered parks and gardens, conservation areas and archaeological remains. **(This paragraph has now been superseded by Policy JP-P2 of the Development Plan).**

Proposals which enable the re-use of heritage assets will be encouraged where they are considered consistent with the significance of the heritage asset.

Development Plan: Policy JP-P2: Heritage

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. Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness and which should be the priority for conserving and enhancing in the future and demonstrate a clear understanding of the historic environment and the heritage values of sites, buildings or areas and their relationship with their surroundings. This knowledge should be used to inform the positive management and integration of our heritage by:

1. *Setting out a clear vision that recognises and embeds the role of heritage in place-making;*
2. *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;*
3. *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;*
4. *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

5. *Exploring opportunities to reduce greenhouse gas emissions that restoration of historic buildings offer.*

Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. These include historic town centres, places of worship, historic transport routes including the canal network, industrial buildings and structures including textile mills, farmsteads and other sites, buildings, and areas of identified archaeological, architectural, artistic and/or historic value.

Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy. Where heritage assets have been identified as being at risk, Local Plans should identify specific opportunities for them to contribute to regeneration and placemaking, and they should set out strategies for their repair and re-use. Development proposals which will help safeguard the significance of and secure a sustainable future for Greater Manchester's heritage at risk will be supported in principle, provided they are not contrary to national policy or other policies in the development plan.

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.

Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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