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Our Ref: 25325/SH/ak
Your Ref: PP-14939718
Email: sharper@firstplan.co.uk

15 May 2026

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

Dear Sir or Madam,

LISTED BUILDING CONSENT IN RESPECT OF 40 PRINCESS STREET, MANCHESTER, M1 6DE

We have been instructed by our client, Wittington Investments, to submit the enclosed listed building consent application online via the Planning Portal (ref. PP-14939718) for *internal reconfiguration and refurbishment works to the ground, second, fourth, sixth, and tenth floors* at 40 Princess Street, Manchester, M1 6DE.

A separate application (ref. PP-14939738) has been submitted for works to the lower ground, first, third, fifth, and ninth floors, which are located within 46A Princess Street, also known as 'Langley Buildings', and is to run concurrently.

A further application (ref. PP-14939742) has been submitted in respect of the lower ground floor of 46A only, should the intended tenant not proceed with their occupation of this space. This provides maximum flexibility noting the evolving letting position throughout the building.

Combined, these applications propose a package of minor reconfiguration works necessary to facilitate the improved occupation of the building.

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

- Completed Listed Building Consent Application Forms;
- Community Infrastructure Levy Form 1;
- Planning, Heritage, Design and Access Statement (this letter);
- Site Photographs (**Appendix 1**);
- Site Location Plan;
- Block Plan
- Finishes Schedule (Blok Projects); and,
- Suite of Drawings (Blok Projects) (**Appendix 2**).

No application fee is payable for Listed Building Consent applications. The remainder of this letter sets out the supporting statement regarding the application proposals.

Site Description

The application site is located in the heart of Central Manchester. It is bounded by Princess Street to the East and Harter Street to the South. The site consists of two adjoining structures: Eastern House, previously identified as 40–42 Princess Street, and Langley Buildings, formerly 44–46 (or 46A) Princess Street. Together, they are now collectively referred to

as Forty Princess Street. Although each building holds its own Grade II listing, the two have been adapted and connected to function as a single unified property. **Specifically, the ground, second, fourth, sixth, and tenth floors are located within 40 Princess Street**.

The existing property consists of six stories above a basement, with a sub-basement extending beneath part of the footprint. The ground floor (Level 00) sits approximately 2 meters above the back-of-pavement level on Princess Street. The building extends to the rear as far as 113 Portland Street, with the south-east elevation forming a continuous boundary with 44–46 Princess Street. The application site is also located within the Whitworth Street/Princess Street Conservation Area.

Historically, it is understood that the building was a shipping warehouse, dating from between 1870-1880. The building has since been heavily altered over recent years, pursuant to the various permissions set out below, notably those relating to office fit-out. Most of these works are now complete, and this proposal relates to further revisions and additions to improve the layout, function and appearance of the commercial units in order to try and improve the occupancy rates at the building.



Figure 1. Application Site (Google Streetview, 2025)

Relevant Planning History

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

116551/LO/2017 and **116550/FO/2017** were granted on 25/10/2017. The works included a fourth floor rooftop extension, glazed roof over the lightwell, works to the lightwell including the installation of a glazed roof and an extension through to ground floor level, the reconfiguration of the main entrance staircase, works to the roof to install a lift overrun, the creation of one A4 unit and one A3 or B1 unit on the ground floor, and change of use of the basement and subbasement to a gym (D2).

120503/LO/2018 and **120504/LO/2018** were granted on 10/08/2018. The works included a fourth floor rooftop extension, the installation of a glazed roof over the lightwell, the re-opening of historic windows, the reconfiguration of the main entrance staircase, the removal of existing entrance canopy, roller shutter and associated cladding, works to

the lightwell including the installation of a glazed roof and an extension through to ground floor level, the provision of a new lift core and overrun, the reconfiguration of floor plates and the installation of modern WC facilities, the reconfiguration of external plant and equipment, provision of internal service risers, the fit out of the basement as a gym and the provision of a cycle store.

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

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

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

Listed Building Consent application (**144273/LO/2025**) was granted on 10/12/2025 for reconfiguration works to the fourth floor (the seventh-floor works were originally part of this but were omitted at the Council's request).

Listed Building Consent application (**144628/LO/2025**) was granted on 12/01/2026 for internal reconfiguration works to the seventh floor.

Most recently, Listed Building Consent (**144627/LO/2025**) was granted on 12/01/2026 for internal works to the eighth floor.

Application Proposals

Commented [AK1]: SH - why was ground floor and ninth floor most sensitive ? If remeerbing correctly

Commented [SH2R1]: they weren't just were going to come through first, now theyre not!

The application proposals seek create flexible, high-quality workspace suitable for a range of incoming tenants and generate market interest. The package of minor internal alterations will create a high-quality office environment that is ready to be occupied by prospective tenants, something the building is in urgent need of having sat mostly vacant since the main CAT A fit-out works completed. The methodology and approach follow the package of works proposed and approved by **144627/LO/2025, 144628/LO/2025, and 144273/LO/2025**). These works are now complete and have delivered successful lettings in the relevant spaces.

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

Full details of the proposals are contained within the suite of drawings prepared by Blok Projects. Nonetheless, a high-level summary of the proposed alterations has been listed below.

Ground Floor

As part of application refs. ***130043/LO/2021*** *and* ***130099/FO/2021***, permission was granted for the CAT A fit-out of the ground floor. Following this, this application proposes CAT B fit-out of the office space to facilitate occupation.

The application proposals seek the installation of new partitions and glazing within Suite 0.1 to create 1no. board meeting room, 1no. meeting room, and 1no. work pod. Office furniture including storage cupboards, new workspace desks, an arrival lounge, a high collaboration table, and a kitchen and breakout area with individual breakout spots as well as a banqueting table, together with new finishes throughout.

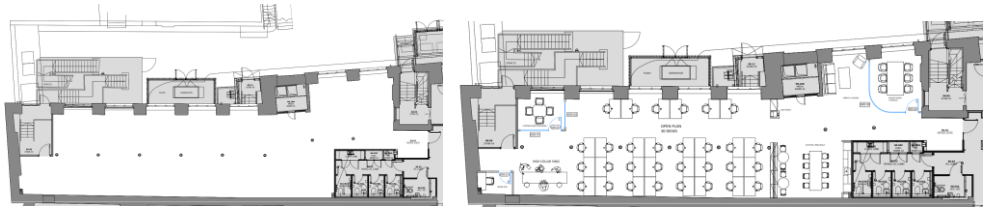


Figure 2. Suite 0.2 Existing (left) and Proposed (right) Floor Plan

Second Floor

As part of previous application ref. ***141797/LO/2024***, permission was granted for the speculative fit-out of the second floor. Following this, this application seeks to make internal alterations to Suite 2.2.

Specifically, the application proposals seek the installation of new partitions and glazing to create 1no. board meeting room, 1no. meeting room, and 1no. work pod. Office furniture including storage cupboards, new workspace desks, an arrival lounge, a high collaboration table, and a kitchen and breakout area with individual breakout spots as well as a banqueting table, together with new finishes throughout.



Figure 3. Suite 2.2 Existing (left) and Proposed (right) Floor Plan

Fourth Floor

As part of previous application ref. ***144273/LO/2025***, permission was granted for the speculative fit-out of the fourth floor. Following this, this application seeks to make internal alterations to Suite 4.2.

Specifically, the application proposals seek the installation of new partitions and glazing to create 1no. board meeting room, 1no. meeting room, and 1no. work pod. Office furniture including storage cupboards, new workspace desks, an arrival lounge, a high collaboration table, and a kitchen and breakout area with individual breakout spots as well as a banqueting table, together with new finishes throughout.



Figure 4. Suite 4.2 Existing (left) and Proposed (right) Floor Plan

Sixth Floor

As part of previous application ref. ***141797/LO/2024***, permission was granted for the speculative fit-out of the sixth floor. Following this, this application seeks to make internal alterations to Suites 6.1 and 6.2.

With regards to Suite 6.1, the application proposals consist of the installation of new partitions and glazing to create 1no. meeting room, 1no. board meeting room, and 2no. work pods. Office furniture is also proposed including an arrival lounge, new workspace desks, storage cupboards, and a kitchen / breakout area, together with a series of new finishes throughout.

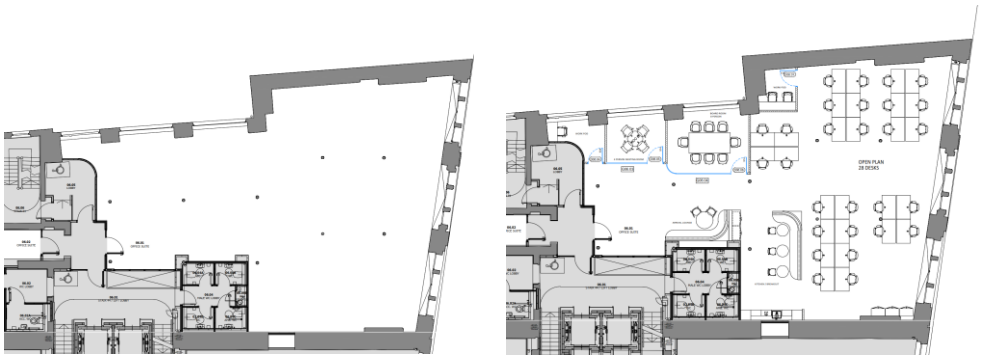


Figure 5. Suite 6.1 Existing (left) and Proposed (right) Floor Plan

Turning to Suite 6.2, the application proposals consist also of the installation of new partitions and glazing to create 1no. meeting room, 1no. board meeting room, and 1no. work pod. Office furniture is also proposed including an arrival lounge, new workspace desks, a kitchen / breakout area, and banqueting seating.



Figure 6. Suite 6.2 Existing (left) and Proposed (right) Floor Plan

Tenth Floor (Suite 10.01)

As part of previous application ref. ***141797/LO/2024***, permission was granted for the speculative fit-out of the tenth floor. Following this, this application seeks to make internal alterations to suite 10.1.

Specifically, the application proposals consist of the installation of internal partition walls which will create 2no. board meeting rooms. Office furniture is also proposed such as new workspace desks, storage cupboards, a kitchen, breakout individual seating areas, and banquette seating, together with a series of new finishes throughout. Alterations are deliberately kept away from the windows.

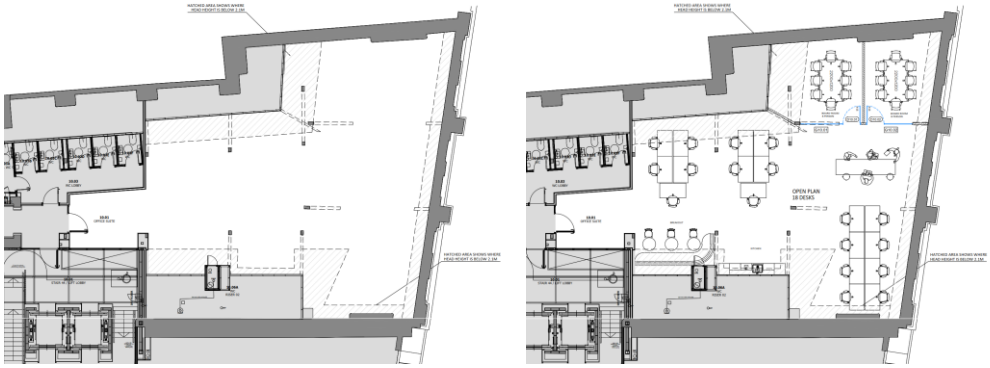


Figure 7. Suite 10.1 Existing (left) and Proposed (right) Floor Plan

Relevant Planning Policy

National Planning Policy Framework (NPPF) (2024)

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

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

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

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

> ***"Better places in which to live and work and helps make development acceptable to communities."***

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

a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) The desirability of new development making a positive contribution to local character and distinctiveness.

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

Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Places for Everyone 2022 – 2039 (2024)

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

Manchester's Core Strategy (2012)

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

Planning and Heritage Statement

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

> ***Includes: Nos.40 TO 46 Eastern House PRINCESS STREET. Shipping warehouse, now offices, club, etc. c.1870-80. Probably iron-framed, with cladding of red brick in Flemish bond, sandstone dressings, slate roof. Trapeziform plan on corner site, with loading at rear. Eclectic style. Five storeys with basement and attic, 3 bays, symmetrical, with stone-banded pilasters and bracketed cornice to ground floor, some stone bands to upper floors, moulded terracotta panels between 2nd and 3rd floors, plain frieze interrupted in the centre, steeply-pitched roof with hipped gable in the centre finished with a finial. Ground floor has square-headed doorway with moulded surround and plain frieze with attached lettering "PORTLAND HOUSE", flanked by pairs of segmental headed windows over basement openings; 1st, 2nd***

> ***and 3rd floors have 3-light windows with stone mullions, those at 1st and 2nd floors of the centre in a segmental oriel with a carved panel between floors, segmental-headed lights to the upper floor, dentilled cornice and brick parapet, those at 1st floor of the outer bays with pilaster mullions and segmental pediments to the centre light, and those at 3rd floor segmental-headed with keystones; pairs of 1-light windows to 4th floor; flat-roofed dormers over the outer bays; gable chimneys. Left return (40 to 46 Princess Street), 7 bays in matching style, symmetrical, with hipped gables to the 2nd and 6th bays and square-headed loading bay entrance in the centre. Rear and interior not inspected. Forms group with No.101 (q.v.) on opposite corner of Princess Street; and with Nos 105 and 107, 109 and 111, and 113 to 119 to the right (q.v.), together comprising a complete block of former shipping warehouses.***

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

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

The statement went on to conclude that:

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

It is plain that the same principles should apply to the proposed package of minor work hereby presented, all of which are reversible. Indeed, this view has also already been adopted in respect of application refs: **144627/LO/2025, 144628/LO/2025, and 144273/LO/2025** all of which proposed very similar minor CAT B type works (see below).

Furthermore, as the principle of the proposed works has already been assessed in heritage terms, as has the special significance of the building and the potential harm that may result from further modest interventions, a further detailed heritage assessment is not necessary here. For completeness though, the aforementioned Heritage Statement is provided at **Appendix 3**.

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

The application proposals seek to amend the previously approved proposals for the second, sixth, and tenth floors (**ref. 141797/LO/2024**), by altering the layout of Suites 2.2, 6.1, 6.2, and 10.1. Further amendment is sought for the previously approved proposal for the fourth floor (ref. **144273/LO/2025**), by altering the layout of Suite 4.2 only.

As part of application refs. **130043/LO/2021** and **130099/FO/2021**, permission was granted for the CAT A fit-out of the ground floor. Following this, this application proposes CAT B fit-out of the office space to facilitate occupation.

It is understood that suites 0.2, 2.2, 4.2, 6.1, 6.2, and 10.1 are currently in a shell state, and in order to encourage a tenant to move into the space, a series of high-quality meeting rooms and break-out spaces are proposed. The interventions are of appropriately limited scale, resulting in an open-plan and free-flowing workspace, which minimises the impact on the heritage asset, resulting in less than substantial harm, whilst maximising opportunity for occupation by an office tenant.

The principal of internal fit outs to the building generally is firmly established, as evidenced by its extensive and recent planning history set out above. Indeed, the officer's report attached to application ref. **141797/LO/2024** saw the internal reconfiguration works as favourable:

> ***"The meeting rooms, study rooms and the central subdivision within the suite would include a level of glazing, which would minimise the harm caused by subdividing these open floor spaces, thus retaining an acceptable retention of the expression of volume within the spaces".***

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

Moreover, the officer's report for the most recent approval at the eighth floor (ref. **144627/LO/2025**) acknowledges the difficulties experienced at the site in attracting tenants to occupy the building and appreciates that the alterations and improvements to the suite were required in order to encourage companies to occupy the office space. Subsequently, the report concludes that:

> ***"It is acknowledged that a very low level of less than substantial harm would be caused to the significance of the listed building. Notwithstanding this, it is considered there would be sufficient public benefit generated through its implementation that would outweigh the recognised harm, this being the increase in the attractiveness of the office space on site, thereby helping to secure the building's long-term occupation. Furthermore, the proposed alterations would be reversible ensuring no permanent damage to the listed building."***

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

Design and Access Statement

This Design and Access Statement is prepared in accordance with guidance set out within the National Planning Policy Framework and is proportionate to the complexity and nature of the proposals, which are minor.

Use

The application site is currently in use as offices (Class E(g)), and this will remain.

Amount and Scale

The works include minor alterations to facilitate the fit-out of the office spaces, necessary in securing tenant occupation of the mostly vacant building. There is no proposed increase in the amount or scale of development at the site and no increase footprint, with selective internal structural modifications to room sizes as noted on the suite of drawings prepared by Blok Projects.

Appearance and Materials

The office spaces will benefit from a series of new finishes throughout. Notably, vinyl flooring will be provided to breakout/kitchen areas for ease of maintenance. Proposed and existing partition walls will receive a new decoration painted finish. Existing columns will also receive a new decorative paint finish and remain within high visibility circulation spaces.

Please refer to the suite of drawings and the Finishes Schedule prepared by Blok Projects.

Layout

The layout of the suites will be altered marginally through the addition of meeting, boardrooms and work pods, which largely retain the openness of the floor layouts by virtue of the glazed partitions. The intention for the furniture is for this to be loose and fixed to divide the use of the floor plate and create more intimate work zones, fully aligned to a historically sensitive strategy of minimum structural interventions.

Access

The principal points of access and egress from the premises is via a levelled access from Princess Street and will be maintained.

Internally, the principal lift core and central staircases will be retained, which provide for vertical access to all floors across the building's entirety.

Biodiversity Net Gain Exemption

The proposed development is for internal works to an existing unit only; thus, it is subject to the BNG de minimis exemption by reason of there being 0sqm of onsite priority habitat.

Conclusions

Owing to the fact that the Council have supported various other internal alterations throughout the building in recent years, it is clear that the proposals should continue to be considered in the same vein, with significant public benefits outweighing the limited, less than substantial, harm resulting to the heritage asset.

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

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

Yours faithfully,



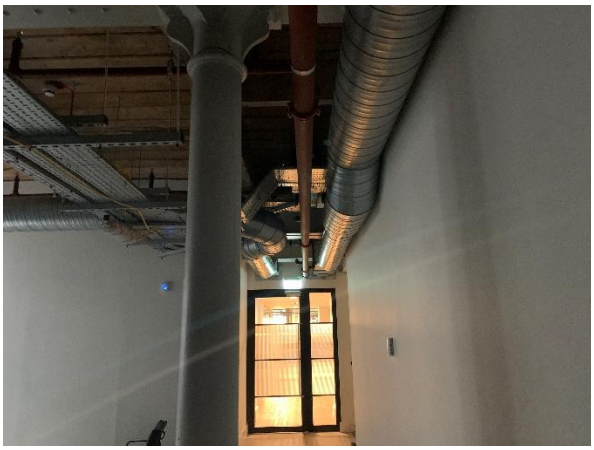
SAM HARPER
Director

APPENDIX 1: SITE PHOTOGRAPHS AND MONTAGES

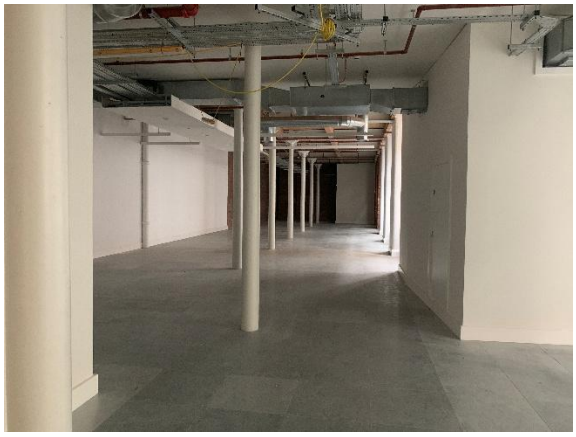
Photo Sheet

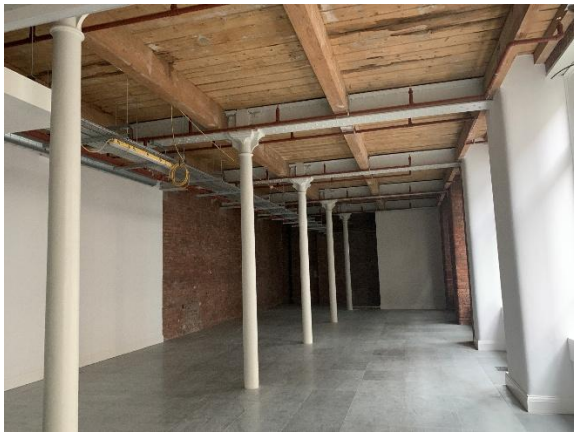
Ground Floor: Suite 0.0





Second Floor: Suite 2.2



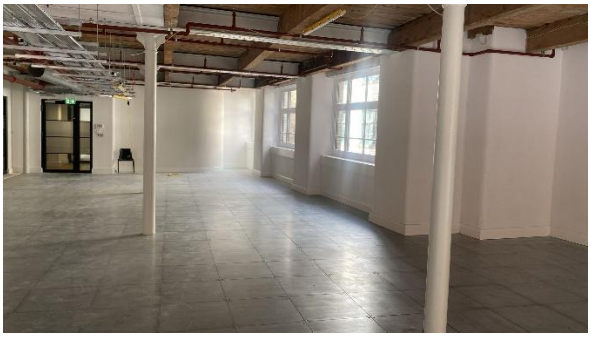
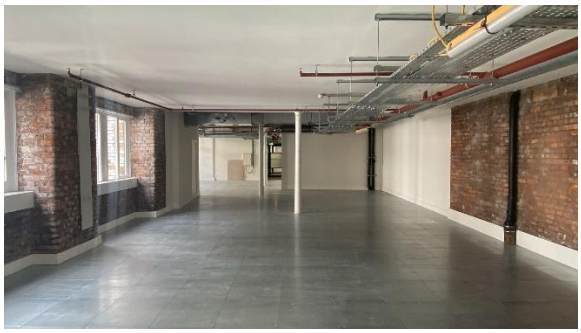
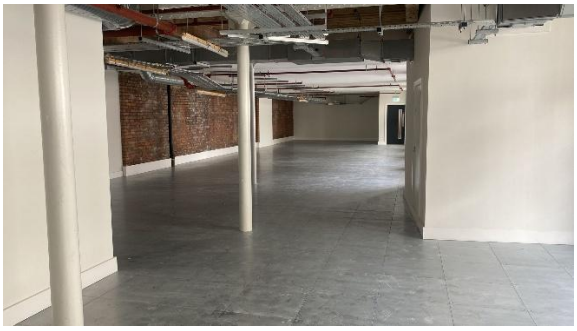


Fourth Floor: Suite 4.2

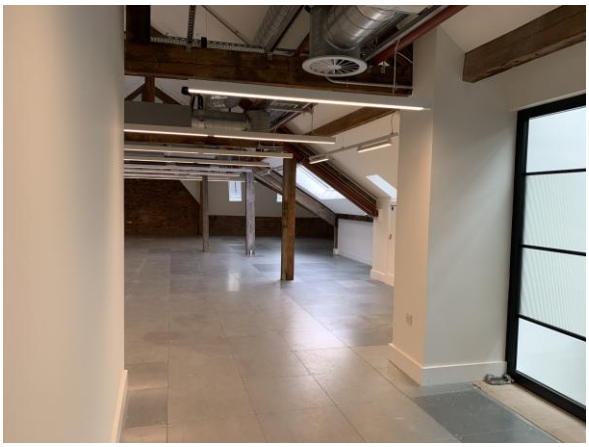




Sixth Floor: Suites 6.1 and 6.2

Tenth Floor: Suite 10.1

APPENDIX 2: SCHEDULE OF DRAWINGS (BLOK PROJECTS)

Drawing Reference	Drawing Title	Drawing Scale
ALL FLOORS DRAWINGS		
SP-LP-Eastern House	Site Plan (including red & blue boundaries)	1:1250
ALL-EH-DS	All Floors: Eastern House Door Schedule	1:20
ALL-EH-GOS-SH1	All Floors: Eastern House Glass Openings Sheet 1 of 5	1:20
ALL-EH-GOS-SH2	All Floors: Eastern House Glass Openings Sheet 2 of 5	1:20
ALL-EH-GOS-SH3	All Floors: Eastern House Glass Openings Sheet 3 of 5	1:20
ALL-EH-GOS-SH4	All Floors: Eastern House Glass Openings Sheet 4 of 5	1:20
ALL-EH-GOS-SH5	All Floors: Eastern House Glass Openings Sheet 5 of 5	1:20
ALL-PD	All Floors: Typical Partition Details	1:20
GROUND FLOOR DRAWINGS		
00-EX	Ground Floor: Existing Plan	1:100
00-GA	Ground Floor: General Arrangement	1:100
00-CFIN	Ground Floor: Ceiling Finishes Plan	1:100
00-FFIN	Ground Floor: Floor Finishes Plan	1:100
00-PSO	Ground Floor: Partition Setting Out	1:100
00-RCP	Ground Floor: Reflected Ceiling Plan	1:100
00-SKFIN	Ground Floor: Skirting Finishes Plan	1:100
00-WFIN	Ground Floor: Wall Finishes Plan	1:100
SECOND FLOOR DRAWINGS		

02-EX	Second Floor: Existing Plan	1:100
02-GA	Second Floor: General Arrangement	1:100
02-CFIN	Second Floor: Ceiling Finishes Plan	1:100
02-FFIN	Second Floor: Floor Finishes Plan	1:100
02-PSO	Second Floor: Partition Setting Out	1:100
02-RCP	Second Floor: Reflected Ceiling Plan	1:100
02-SKFIN	Second Floor: Skirting Finishes Plan	1:100
02-WFIN	Second Floor: Wall Finishes Plan	1:100
FOURTH FLOOR DRAWINGS		
04-EX	Fourth Floor: Existing Plan	1:100
04-GA	Fourth Floor: General Arrangement	1:100
04-CFIN	Fourth Floor: Ceiling Finishes Plan	1:100
04-FFIN	Fourth Floor: Floor Finishes Plan	1:100
04-PSO	Fourth Floor: Partition Setting Out	1:100
04-RCP	Fourth Floor: Reflected Ceiling Plan	1:100
04-SKFIN	Fourth Floor: Skirting Finishes Plan	1:100
04-WFIN	Fourth Floor: Wall Finishes Plan	1:100
SIXTH FLOOR DRAWINGS		
06-EX	Sixth Floor: Existing Plan	1:100
06-GA	Sixth Floor: General Arrangement	1:100
06-CFIN	Sixth Floor: Ceiling Finishes Plan	1:100
06-FFIN	Sixth Floor: Floor Finishes Plan	1:100
06-PSO	Sixth Floor: Partition Setting Out	1:100
06-RCP	Sixth Floor: Reflected Ceiling Plan	1:100

06-SKFIN	Sixth Floor: Skirting Finishes Plan	1:100
06-WFIN	Sixth Floor: Wall Finishes Plan	1:100
TENTH FLOOR DRAWINGS		
10-EX	Tenth Floor: Existing Plan	1:100
10-GA	Tenth Floor: General Arrangement	1:100
10-CFIN	Tenth Floor: Ceiling Finishes Plan	1:100
10-FFIN	Tenth Floor: Floor Finishes Plan	1:100
10-PSO	Tenth Floor: Partition Setting Out	1:100
10-RCP	Tenth Floor: Reflected Ceiling Plan	1:100
10-SKFIN	Tenth Floor: Skirting Finishes Plan	1:100
10-WFIN	Tenth Floor: Wall Finishes Plan	1:100

APPENDIX 3: HERITAGE STATEMENT BY BB HERITAGE STUDIO

Heritage Statement (Rev 02: Sept 2022)

40-46 Princess Street, Manchester

Doc No: P0214_HS_REP001
Issue: FOR CONSENT
Rev: 02
Date: SEPT 2022

Contents

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2) Understanding the Site
3) Assessment of Significance
4) Proposed Works & Impact Assessment
5) Statutory Requirements
6) Conclusions

Appendix A: Significance Plans

1.0 Introduction / Purpose of Document

1.1 This Heritage Statement has been prepared by BB Heritage Studio to accompany the Planning and Listed Building Consent Applications, submitted by Paul Butler Associates on behalf of Wittington Investments (Properties) Limited, for the refurbishment, extension and partial change of use to 40-46 Princess Street (Eastern House and Langley Buildings), Manchester.

1.2 BB Heritage Studio provides built heritage advice and consultancy services. It is led by Bernadette Bone who is a qualified architect with 20 years experience of designing in historic environments. Bernadette is an RIBA Accredited Conservation Architect (RIBA CA) and has a Post Graduate Diploma in Building Conservation (GradDiplConsAA).

1.3 The site of 40-46 Princess Street contains two separately Grade II listed buildings (Eastern House and Langley Buildings) and is located in the Whitworth Street Conservation Area. As such this Heritage Statement has been prepared to satisfy the requirements of the National Planning Policy Framework (NPPF). As required by the NPPF the statement considers the characteristics of the site, the conservation area and adjacent heritage assets in sufficient detail to understand the potential impact of the proposals on their significance.

1.4 This report consists of six parts. Following this introduction the second section 'Understanding the Site' outlines the heritage context focussing principally on the characteristics of the Whitworth Street Conservation Area and describes the historic background and the buildings today. The third part contains an assessment of significance which is followed in section four by an outline of the proposed works and assessment of impact. The fifth part considers the statutory requirements and the sixth part contains the conclusions.

2.0 Understanding the site

2.1 HERITAGE CONTEXT

2.1.1 40-46 Princess Street is located within the Whitworth Street Conservation Area. The conservation area was designated in September 1974 and extended in June 1985. In describing the significance of the conservation area the online appraisal states;

'The Whitworth Street/Princess Street conservation area is uniquely Mancunian in character, its physical form being established by the wealth of fine Victorian and Edwardian buildings erected between 1850 and 1920. They reflect the historical importance of the textile industry in the city.'

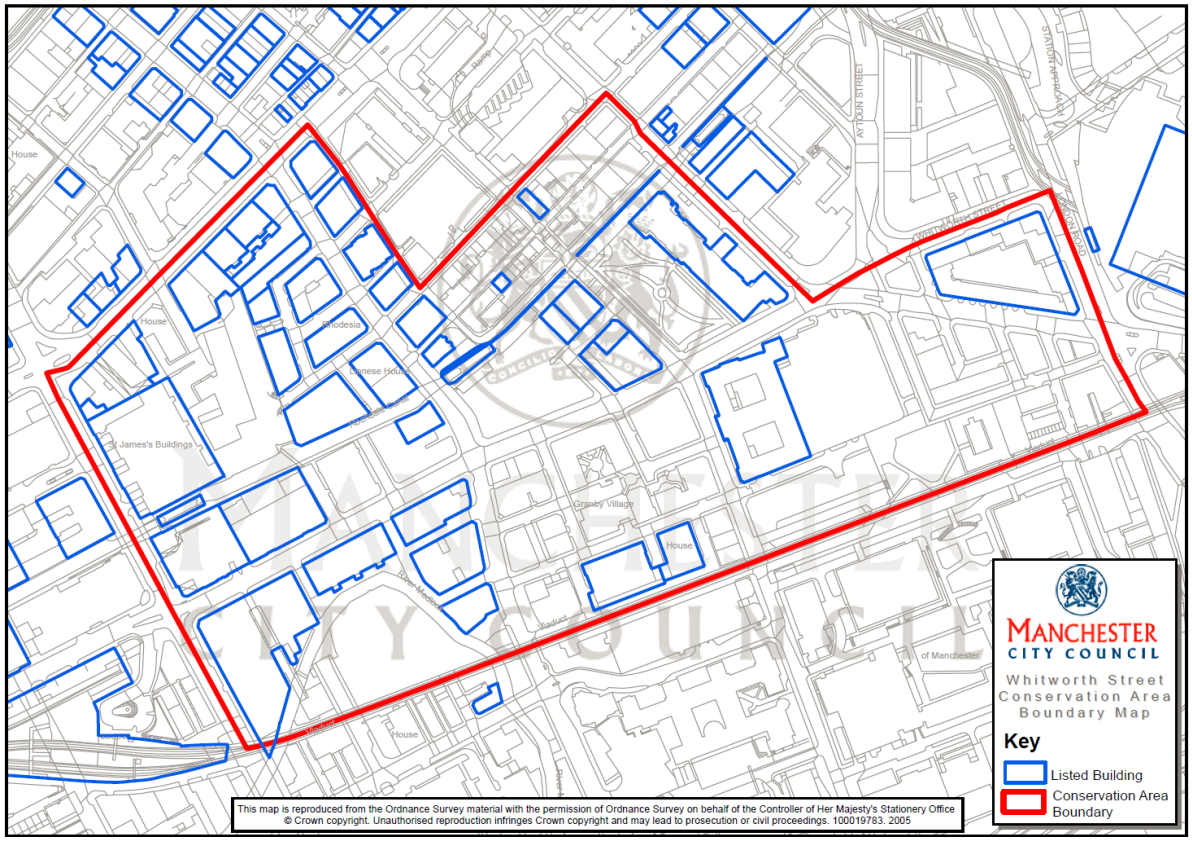


Fig.01 Whitworth Street Conservation Area Map

2.1.2 The appraisal goes on to explain that the buildings within the Whitworth Street Conservation Area are a result of Manchester's position as the largest textile centre in the world. The need for warehousing grew so that by the middle of the nineteenth century the warehouse buildings in the city centre were 'larger than before and built with considerable architectural characteristics'.

'The distinctive architecture which arose was both functional and expressive of the wealth of the owners. The front of the warehouses facing the main street was often used for offices whilst the rear of the building was used for storage space and for the inspection of the cotton goods in natural light. This led to six - or seven - storey buildings with opulent and deeply modelled front facades in brick and/or terracotta, whilst the rear was almost entirely glazed either in a vertical plane or stepped configuration. The building style reached its zenith in the early years of the twentieth century, and culminated in the grand Edwardian commercial architecture of Whitworth Street.'

2.1.3 The townscape assessment within the conservation area appraisal states;

'The Princess Street warehouses are relatively early in date, and for the most part are relatively plain and simplified developments of the Italian palazzo style….

Generally, slate is used to roof the buildings, though many are too high, or their roofs are too gently pitched, for this to be seen from ground level.

Windows, like those in most Manchester buildings of this period, are predominantly of the vertical sliding-sash type. They occur singly, but are more often seen in pairs, threes or occasionally in groups of four.

Entrance doors are very frequently located on the corners of buildings, and this is often associated with the further emphasis of a corner by means of elaborate detail, or by means of an extended roofline embellished with a tower or cupola.'

2.1.4 In relation to control of development and improvement and enhancement opportunities the appraisal states;

'The general policy in the conservation area is to retain existing structures where feasible, but where it can be shown that this is impossible, proposals for new buildings and extensions to existing ones must achieve a high standard of design which relates to the architectural and urban design character of the area.'

'There remains a large supply of existing vacant floor space within several significant buildings in the conservation area, and it is important in terms of the character of the area that this space is put to beneficial use.'

2.1.5 There are a number of other listed buildings in proximity to 40-46 Princess Street as shown to Fig. 01 including adjoining buildings along Princess Street / Portland Street and to Harter Street.

2.2 HISTORICAL BACKGROUND

2.2.1 This section provides a brief overview of the historical development of the site area to provide the context for the assessment of significance.



Fig.02 Left: William Green Map 1793

2.2.2
At the time of the William Green map in 1793 (see Fig. 02) the site area remains as unbuilt land. The north-eastern part of Portland Street is established by this date, as is Chorlton Street, Sackville Street and Abingdon Street. The line of Princess Street has been established but is named David Street to the late 1700's maps.

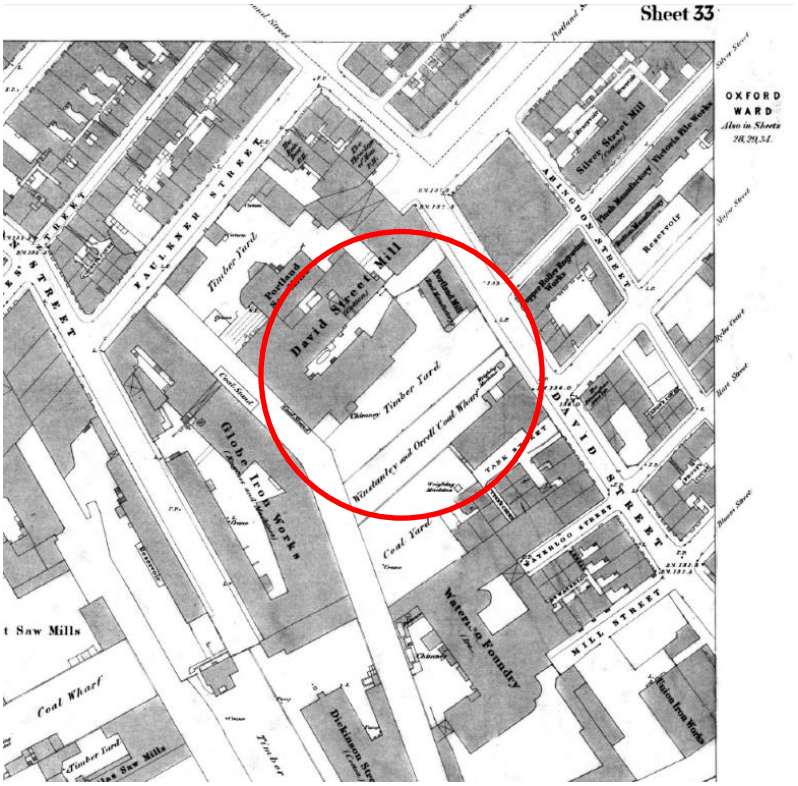


Fig.03 Left: 1849 Map

2.2.3
The line of Princess Street continues to be known as David Street into the 1800's. At the time of the 1849 map (see Fig. 03) Portland Street stops at the junction with David Street and there is built form on / adjacent to the proposed site area of 40-46 Princess Street.



Fig.04 Left: 1886 Goad Map (British Library)

2.2.4
By the time of this early Goad map the line of Portland Street had been continued and Princess Street named. This map shows the intended outline for construction on the corner of Portland Street and Princess Street (although labelled as 'ruins') with what is probably retained earlier construction associated with the former timber yard & coal wharf on the future site of Langley Buildings.

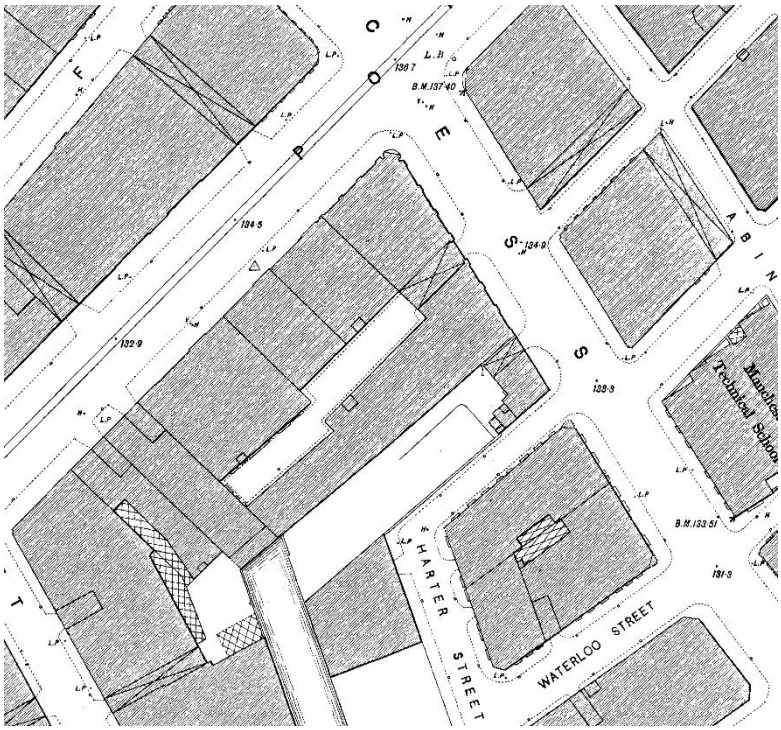


Fig.05 Left: 1891 OS Map

2.2.5
By 1891 the buildings to the corner of Portland Street and Princess Street had been constructed as well as Eastern House. On the site of Langley Buildings the earlier built form remains.

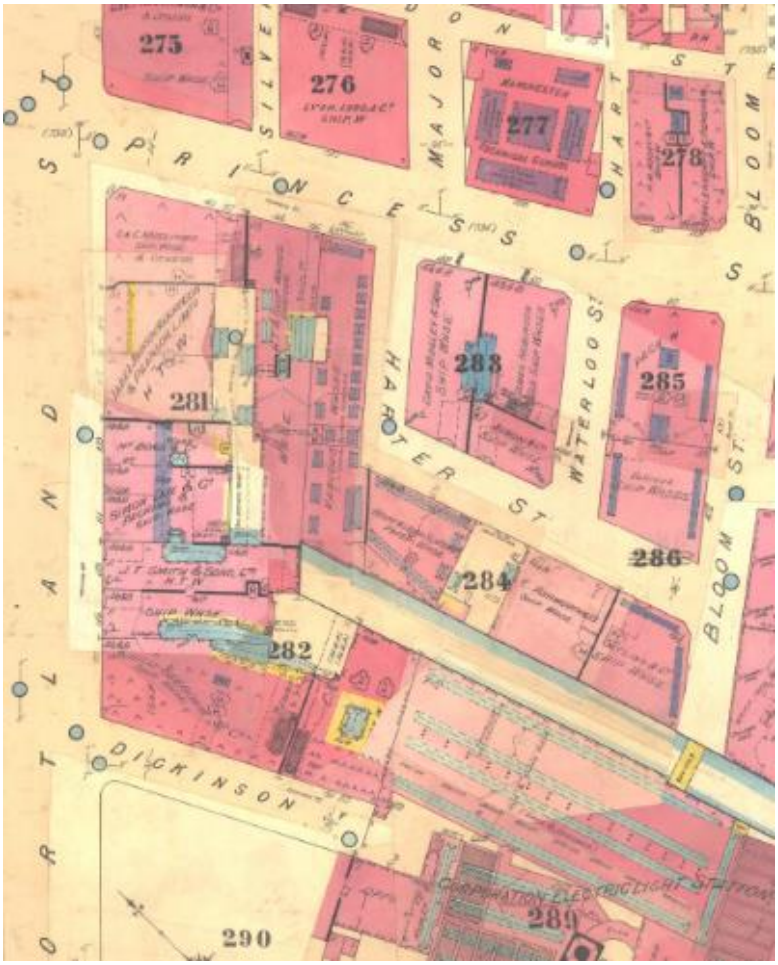


Fig.06 Left: Post 1895 Goad Insurance Plan

2.2.6
By the time of this revision of the Goad Insurance Plan both Eastern House and Langley Buildings have been constructed. The Goad Map shows the outline configuration of the buildings including stair and hoist locations, glazed light locations, the height and use of the buildings.

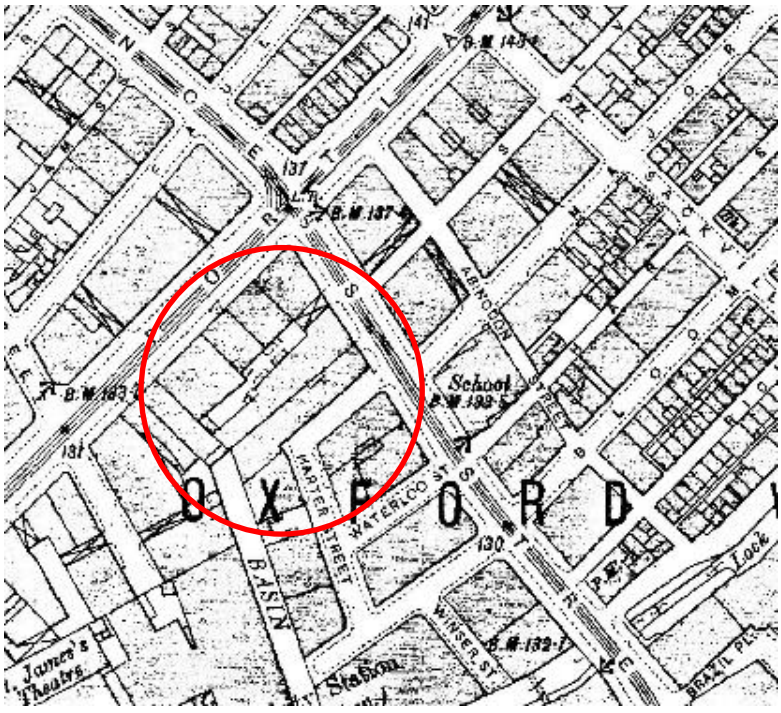


Fig.07 Left: 1908 OS Map

2.2.7
The 1908 OS map shows the built form of Eastern House and Langley Buildings. The canal basin remains directly to the south-west of Langley Buildings.

2.2.8 From the previous map sequence it can be seen that Eastern House was constructed first, as part of the phase of construction which included the buildings on the corner of Portland Street and Princess Street. Langley Buildings then followed.

2.2.9 Portland House including Eastern House was constructed in 1887 to designs by Pennington & Bridgen.[1] Described by Pevsner as '*a huge eclectic effort … red brick, with pale stone bands and hipped gables and finials*.' Pevsner then states '*Squashed up beside it No.46a LANGLEY BUILDINGS, c. 1895 by W.Waddington & Son, with a corner entrance with a ship's prow over it*.'

2.2.10 No archive plans have been located for Eastern House but the later Goad Insurance Plan provides some details. To this we can see the location of the hoists internally, one of the stairs from the courtyard and the location of glazed canopies and rooflights within the building footprint and to the courtyard.

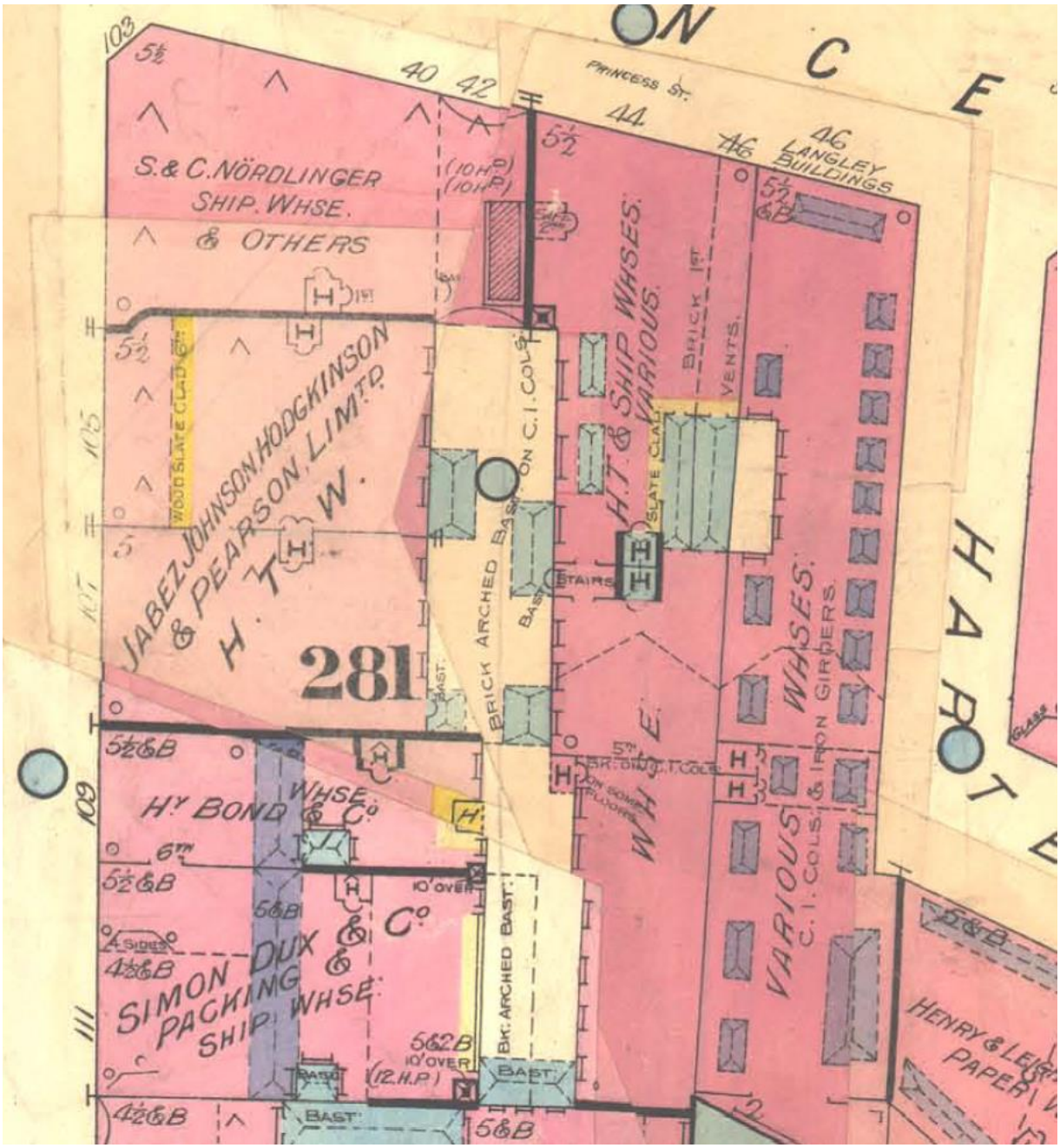


Fig.08: Later Goad Map as Fig 06 enlarged

[1] Clare Hartwell, Matthew Hyde and Nikolaus Pevsner '*The Buildings of England, Lancashire: Manchester and the South-East*', p330

2.2.11 Original plans survive in the Manchester Archives for Langley Buildings. The building was constructed to provide offices and warehouses. The archive plans show that the floor plate was predominantly open plan. An entrance from Princess Street formed a small internal lobby which accessed a curved staircase. A further entrance from Harter Street also then accessed directly a secondary staircase. The corner entrance then appears to have accessed the basement only. The hoists were located roughly midway along the party wall which then corresponded on the ground floor with the loading bay off Harter Street.

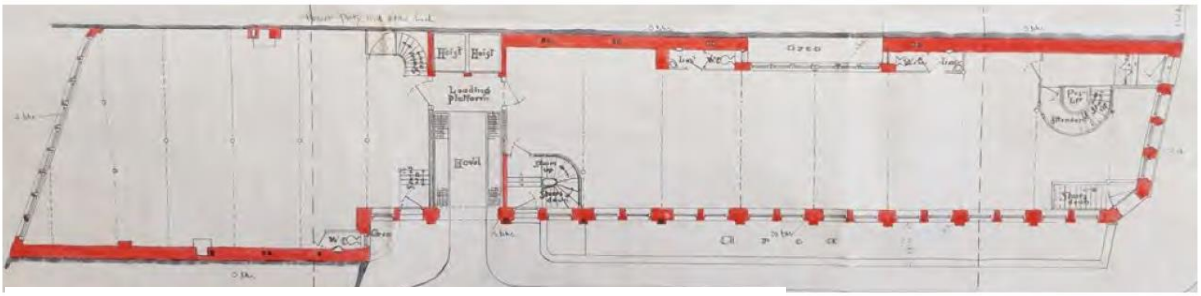


Fig.09: Langley Buildings 1895 Ground Floor Plan

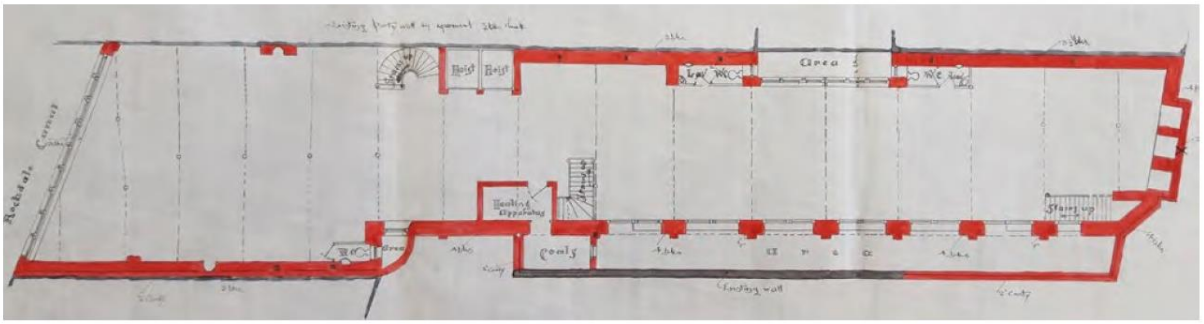


Fig.10: Langley Buildings 1895 Basement Plan

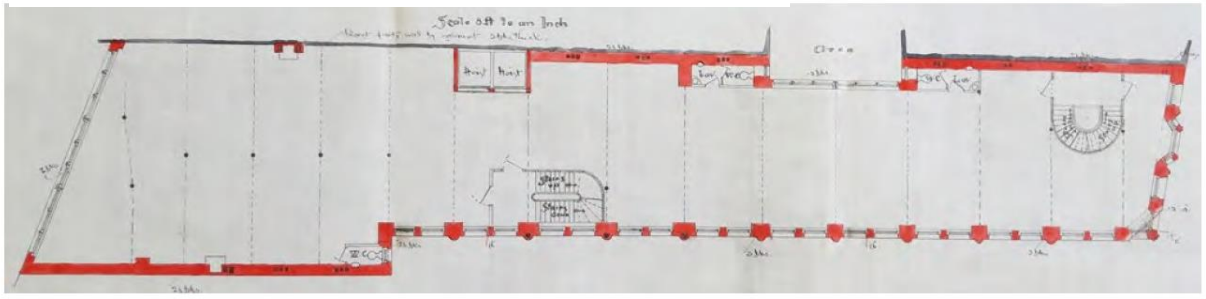


Fig.11: Langley Buildings 1895 First Floor Plan

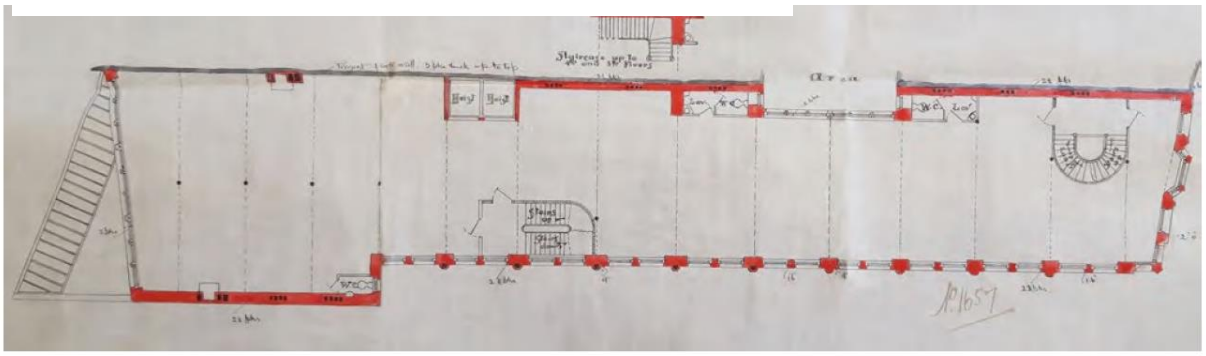


Fig.12: Langley Buildings 1895 Upper Floor Plan

2.3 EASTERN HOUSE & LANGLEY BUILDINGS TODAY

2.3.1 The buildings appear to have been used as warehouses into the mid-late 20th century. The planning history (refer to Paul Butler Associates planning statement) includes a change of use application for part of the site in January 1988 from a warehouse to a restaurant. From the late 20th century onwards the site was used as office space with the ground floor and basements used as restaurants and bars. Eastern House and Langley Buildings are currently in vacant and poor condition and require significant refurbishment to enable the two adjoining buildings to function as office space.

2.3.2 As noted within the D&A Statement the building has an extensive planning history. The recent applications since 2017 all relate to an aspiration for the comprehensive refurbishment, re-use and part extension to the buildings principally for B1 office use.

2.3.3 Listed Building Consent and Planning Consent applications in 2018 were approved and comprised a fourth floor rooftop extension, the installation of a glazed roof over the lightwell, the re-opening of historic windows, the reconfiguration of the main entrance staircase, the removal of existing entrance canopy, roller shutter and associated cladding, the provision of a new lift core and overrun, the reconfiguration of floor plates and the installation of modern WC facilities, the reconfiguration of external plant and equipment, provision of internal service risers, the fit out of the basement as a gym and the provision of a cycle store. Some unresolved technical issues have led to the fact that these proposals could not be taken forward to construction and as such Bridge Architects have been appointed to design the scheme from first principles.

2.3.4 Following the approval in 2018 soft strip out works have been undertaken. The historic plan form of the buildings as indicated to the later Goad Insurance Plan and archive drawings remains legible following these works. To Eastern House the centrally located workers stair accessed from the main courtyard and adjacent hoists as seen to the Goad Insurance Plan remain, with some alterations which have altered the historic fabric. The glazed canopies to the main courtyard are no longer extant. The form of the lightwell between Eastern House and Langley Buildings also remains legible, again with some alterations. In Langley Buildings the lobby and stair from Princess Street have been removed but sections of cornices to the ceiling indicate the previous lobby area. The workers stair from Harter Street remains, this had been concealed with plasterboard which has been removed as part of the post 2018 strip out works to reveal the historic detailing. The adjacent hoists in Langley Buildings also remain. (refer to the accompanying photo survey for images of these areas).

2.3.5 Within Eastern House, other than the retained central workers stair accessed from the courtyard, the original intended entrance sequence and vertical circulation is not clearly legible. The existing entrance into Eastern House from Princess Street is part of the later 20th century alterations to convert the building to office space. A staircase is located adjacent to this entrance area which contains some remnants of lath & plaster and what has been assessed to be its likely original plan form of curved corners. At upper levels this staircase has been considerably altered and the extant fabric appears to be patched together. The extent of retained historic fabric within this staircase which is considered to be of high significance is limited and is considered further to 4.7.

2.3.6 It is known that there were two fires in Eastern House in the early 1900's, evidence of fire damage can be seen to the underside of the floor at the upper level. It is likely that the staircase was damaged in these fires, resulting in the need to reconstruct the enclosure which would explain the patchy reconstruction. A newspaper article dated 15th July 1919 in The Guardian states;

'Cotton and woollen goods to the value of many thousands of pounds were destroyed by fire yesterday morning on a large block of buildings known as Eastern House, princess Street, Manchester and used as warehouses and offices by a number of firms. The fire brigade was successful in containing the outbreak to the upper portion of the building, where the fire originated. It is recalled that a serious fire occurred in the same building in 1916, and that the repairs following upon the former fire had scarcely been completed. The cause of the outbreak is not known.'

2.3.7 This staircase also appears to be located where offices that fronted Princess Street were then separated from the open warehouse space to the rear. This subdivision can be seen in remnants of plaster cornicing at level 02, although there isn't evidence for this subdivision on every floor.

2.3.8 The workers staircase in Langley Buildings which is accessed from Harter Street, has had some minor alterations but remains principally in its historic form throughout the buildings and is one of the elements of high heritage significance.

2.3.9 Significance plans have been produced for each level of the building (see Appendix A). These have been based on the documentary evidence (ie archive plans / Goad Insurance Plans) and site visits. They assess the fabric which is considered to be (1) of high heritage significance and therefore with a low capacity for change, (2) of medium heritage significance with a medium capacity for change and (3) of low heritage significance and therefore with a high capacity for change.

This assessment was undertaken to guide the developing design proposals. It is not intended that it completely restricts interventions to areas of high and medium significance but rather that the design proposals which require alteration to this fabric are carefully considered and justified.

In summary the elements of high significance which have a low capacity for change are those which are important to the historic character and appearance of the building and include;

- The external facades facing Princess Street, Harter Street and the main courtyard.
- The original internal principal structure of Eastern House which consists of cast iron columns, timber beams, timber floorboards and some remnants of decorative lath and plaster ceilings on level 02.
- The internal central workers staircase to Eastern House accessed from the courtyard shown to the Goad Insurance Plan.
- Remnants of retained lath & plaster to the principal staircase in Eastern House accessed from the Princess Street elevation.
- The original internal principal structure to Langley Buildings which includes steel columns and beams, timber floors and lath and plaster ceilings.
- The original staircase from Harter Street & adjacent hoists.

The elements of medium significance which have a medium capacity for change are those which are original to the building but have capacity for carefully considered and justified intervention, these include;

- The external walls forming the basement areas and the intermediate party wall between Eastern House and Langley Buildings.
- The walls forming the lightwell between Eastern House and Langley Buildings (apart from where of modern altered construction).
- The internal hoists within Eastern House which are shown to the Goad Insurance Plan, now altered.
- The roof structure.
- Altered fabric to the principal staircase in Eastern House (apart from where of modern plasterboard construction).
- Flat lath & plaster ceilings & lime plaster wall finishes in both buildings.
- The sprinkler system Christmas Tree Valves to the ground floor of Langley Buildings, limited areas of early sprinkler system pipework.

The elements of low significance which have a high capacity for change are principally where there have been modern interventions undertaken to date and include;

- Fit out and modern alterations to the basement areas.
- The later 20th century entrance into Eastern House from Princess Street including internal partitions.
- Internal connecting staircases between Eastern House and Langley Buildings.
- Later 20th century alterations to the principal staircase in Eastern House
- 20th century alterations to the lightwell
- 20th century external fire escapes
- Modern replacement rooflights
- Modern and altered sprinkler system

2.3.10 NOTE: Since the significance plans were produced planning and listed building consent has been granted for the refurbishment of the site (ref.'s CDN/21/0795 and CDN/21/0796). As such further strip out and fabric removal works have been undertaken, but as the works are still in progress the significance plans have not been updated.

2.3.11 The listing notices for the buildings contains the following information;

Name:	**Eastern House**
Grade:	II
List Entry Number:	1247058
Date First Listed:	06-Jun-1994

Listing Description:

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

Name:	**Langley Buildings**
Grade:	II
List Entry Number:	1247385
Date First Listed:	06-Jun-1994

Listing Description:

Textiles warehouse, now offices. c.1880-90, altered. Cast-iron frame with sandstone ashlar facade and red brick side (roof not visible). Narrow rectangular plan at right-angles to street, with chamfered corner. Eclectic style with some Jacobean detailing. Five storeys over basement, a 3-window facade plus the left corner, with cornice to ground floor, sill-bands to all floors, cornice to top floor with carved upstand at corner. The ground floor has a doorway to the right with 2-light overlight in Jacobean style and cornice over this lettered "LANGLEY BUILDINGS", coupled windows in the centre, a former window to the left altered as a doorway, and in the splayed corner a square-headed doorway with moulded surround and panelled door. Above the door is the moulded corbel to a right-angled 2-storey oriel which has a shaped parapet, above this a canted 3-light window which has a parapet with strap-work panels and urn finials, and at top floor a 2-light window and parapet inscribed "LANGLEY BUILDINGS". Otherwise, the main facade is symmetrical, with a recessed centre bay almost filled by a rectangular oriel with pilasters tiered through 3 floors, and finished with a parapet like the other, and flanked by exceptionally narrow sashed windows in the re-entrants. All windows sashed without glazing bars. Ten-bay return wall of brick, with semi-octagonal pilasters finished as short pinnacles, and coupled sashed windows. Forms part of uninterrupted linear group of similar buildings on this side of Princess Street. Included for group value..

3.0 Assessment of Significance

3.1 An assessment of significance is a requirement for any planning application that affects a heritage asset. This section of the report provides an assessment of the heritage merit of the application site based on desk based research and site visits. The assessment has been carried out with reference to the heritage values as defined in the English Heritage document *Conservation Principles, Policies and Guidelines* which can be summarised as follows;

- Evidential value – the potential of a place to yield evidence about past human activity (i.e. archaeological interest)
- Historical value – the ways in which past people, events and aspects of life are connected through a place.
- Aesthetic value – the ways in which people draw sensory and intellectual stimulation from a place (i.e. architectural and artistic interest)
- Communal value – the meanings of a place for the people that relate to it.

3.2 A statement of significance follows uses the following 'grades' of significance

- Exceptional – the elements of the heritage asset which are of exceptional value (equivalent to Grade I)
- High – the elements of the heritage asset which are of high value (equivalent to Grade II*)
- Considerable – the elements of the heritage asset which are of moderate value (equivalent to Grade II)
- Some – the elements of the heritage asset which are of some value (equivalent to local listing status)
- Neutral – the elements of the heritage asset which have neutral value
- Negative – the elements of the heritage asset which have a negative impact or are visually intrusive
- Undefined – any elements which could be of heritage value but have yet to be determined due to lack of available information

3.3 **Evidential Value**

As noted above, evidential values are those that derive from the potential of a place to yield evidence about past human activity (Conservation Principles para.35). These values will usually comprise physical remains inherited from the past and tend to be primarily archaeological in form. Consequently, the ability to understand and interpret the evidence is diminished in proportion to the extent of its removal or replacement (Conservation Principles para.36).

The site of 40-46 Princess Street has the potential to yield evidence about the construction of the warehouse building typology across the period. The principal construction of both Eastern House and Langley Buildings remains largely unchanged with elements which correspond with the archive information. This has been partly diminished by some 20th century alterations but it is considered that the site has the potential to yield considerable evidential value, corresponding to its Grade II listing.

3.4 **Historical Value**

As noted above, historical values derive from the ways in which people, events and aspects of life can be connected through a place to the present day (Conservation Principles para.39). The evidence may be either illustrative or associative and is of relevance to the site of 40-46 Princess Street as the buildings provide both illustrative and associative evidence relating to Manchester's position as the largest textile centre in the world. There is historical value in the retained fabric which demonstrates the original design intent for the buildings and construction methods of the time.

3.5 Aesthetic Value

Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place (Conservation Principles para 46), in particular architectural and artistic interest.

The buildings are constructed at a time where more decorative expression is starting to be incorporated into the detailing of the external facades which therefore have considerable aesthetic value. The interiors are typically aesthetically robust and functional with limited areas of decorative expression but are still aesthetically important as examples of the building typology of the period.

3.6 Communal Value

Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory (Conservation principles para 54).

The strong association of the warehouse buildings with the historic development of this period in Manchester strengthens the communal value. However this value is limited by the specific use of the site.

4.0 Proposed Works & Impact Assessment

4.1 The proposed works are described in detail within the accompanying application documents which include the Design & Access Statement, the proposed drawings and schedule of works. As such the proposed works are summarised here in sufficient detail to provide the context for the assessment of impact.

4.2 The proposed works focus on the refurbishment and modernisation of the buildings to meet contemporary standards for commercial office space. The design objectives, as detailed in the D&A Statement are;

- To respect and celebrate the building's historic fabric.
- To make the existing building more legible, accessible, safe and welcoming.
- To provide a ground floor 'hub' space to provide a high quality reception and arrival experience into the building. This will include supplementary accommodation including meeting and breakout areas for the office spaces, with a dedicated entrance off Princess Street and DDA access.
- To provide basement ancillary accommodation for office users to include cycle storage areas and showers, with a dedicated entrance off the courtyard.
- To provide high quality, refurbished open plan office space to the upper floors with full DDA access throughout the building, with high quality common areas, circulation spaces and sanitary provisions, and with the addition of an extension at the rear rooftop level of Eastern House.
- To provide new space for gym use to the basement level with dedicated entrance and separately demised accommodation.
- To provide enhanced servicing provisions for refuse etc within the courtyard.
- To provide means of escape for building users that will comply with current legislation.
- To provide high quality new lift installations that will serve all levels of the building and provide DDA access throughout.
- To provide new mechanical and electrical installations that meet the requirements of contemporary use.
- To achieve BREEAM sustainability assessment method 'Good' rating.

4.3 To achieve this the design proposals include the following works;

- Reopening of blocked off historic windows.
- Localised façade repairs to existing masonry.
- Repair, maintenance and redecoration of existing windows.
- Removal of the existing entrance canopy, roller shutter and associated cladding and relocation of main entrance to offices and internal alterations to facilitate new stair and platform lift to the reception area.
- Removal (with part retention) of the principal staircase (Eastern House) and floor infill to adjacent removed lift shaft.
- Works associated with the detailed fire strategy to enable historic features such as the timber floors, panelled staircase etc to remain revealed.
- Retention and areas of repair to revealed historic features including secondary staircases, sprinkler system gauges, safe, columns, fireplaces and decorative plasterwork.
- New stair and lift core within lightwell; to include lift overrun and flat roof, providing interconnection between the two buildings and DDA access.
- Installation of new modern sanitary facilities.
- Removal of existing pitched roof and new fourth floor mansard roof extension to rear section of Eastern House.
- Reconfiguration of external plant and equipment and provision of internal service risers.
- Re-instatement of entrance to Langley Buildings at Harter Street/Princess Street corner to provide access to basement demise with internal alterations to provide stair and DDA platform lift.
- Provision of new cycle store and shower/changing facilities to the part basement area.
- New dedicated signage zones and lighting to elevations.
- Removal of Harter Street external metal fire escape stair.

PROPOSED FABRIC REMOVAL

4.4 Areas of fabric removal are required to enable the viable re-use of the buildings as shown to the demolition drawings (refer to the al(02) series drawings). Large areas of fabric removal are located to areas of previous interventions and therefore requires the removal non-original fabric. Some fabric removal to areas of medium and high significance is required to enable the refurbishment which includes;

- Corroded iron / steel beams within the basement.
- Builderswork openings to the Langley Buildings hoists to enable their use as M&E risers.
- Areas of floor / wall removal to enable structural works.
- An area of floor removal within the Langley Buildings to enable the substation.
- Limited areas of external walls forming the Langley Buildings and Eastern House elevations to the lightwell and this has been further limited to the latest revised proposals.
- Door linings / new door openings to the Eastern House central stair .
- Windows and stonework to the ground level of Eastern Buildings to enable the new accessible entrance.
- Removal of stair 12 to Eastern House which also includes areas of non-original fabric.
- Removal of door surrounds to the hoists in Eastern House.
- The timber roof structure and slate roof to the rear portion of Eastern House to enable the extension.
- A portion of the roof adjacent to the lightwell to both Langley Buildings and Eastern House to enable the new circulation core.
- The sprinkler system except for the Christmas Tree valves to the ground floor of Langley Buildings and the uncovered Mather & Platt fire alarm bells at level 00.

4.5 In all instances where the removal of historic fabric is required the design process has included careful consideration of any possible alternatives to ensure that the level of intervention is necessary to enable the works to take place. The following sections explain this in more detail. These cross reference to the description of the design proposals to section 5.0 of the D&A Statement.

INTERVENTION STUDIES

4.6 **Intervention Study 01: Proposed main entrance, reception and accessible entrance strategy**
A number of options have been considered for the primary entrance to the building including retaining the entrance in the existing location. To retain the entrance in the current location and enable DDA access requires the use of a retractable stair, as included in the previous proposals. Bridge Architects have sought to significantly improve the solutions for DDA compliance and in doing so this has necessitated relocating the entrance where there is more depth on plan due to the angled composition of the main elevation. Both of the other two bays on plan have been considered and providing the entrance to the central bay is the most successful architecturally as it locates the entrance below the existing projecting oriel at first and second floors, allowing the existing architectural features to signify the entrance location.

The works to provide the new entrance will require alterations to the existing façade which will have a physical impact on the fabric. The existing masonry will be carefully removed and where possible reused in the reconstruction of the façade to the former entrance location.

This design intervention will cause less than substantial harm to the historic fabric, it will lead to a physical change but the architectural appearance and character of the building will remain legible.

4.7 **Intervention Study 02: Eastern House – existing stair #12**
The previous strip out works have enabled a detailed inspection of this existing stair. As previously noted there is no archive information that shows this on a plan layout of the building, the Goad Insurance Plan just shows the

workers staircases and no other archive plans have been found for this building. However this is considered to be the historic location for the principal stair which separated offices to the Princess Street frontage and storage space to the rear, as evident to the layout of the plasterboard downstands and cornices on level 02.

The stair is not consistent in its detailing, there are obvious areas of significant modern plasterboard alterations (still extant following the strip out works) and at the upper levels a haphazard arrangement of plaster infill / plasterboard infill and glazed panels is different in its configuration from floor to floor. It is known that there were two fires in this building close together in years (1913 & 1916) and it is considered likely that the patched construction was a result of the rebuild after the fires. There is a section of curved lath and plaster to level 02 which corresponds to curved joinery to the stringer and as such this has been assessed to represent the most original configuration of the staircase. This section has been assessed to be of high significance whereas the remaining fabric which is significantly altered is considered to be of medium and low heritage significance.

At the outset of the design development the design team carefully assessed all stair locations in terms of their ability to provide the necessary means of escape to comply with current legislation. The design analysis has concluded that it is not possible to use this existing stair as a means of escape. In addition the stair position cannot be rationally integrated into the floor plate and core location. As such the proposals include the removal of this stair and the infills of the floors at each level. The section of curved lath and plaster will be retained at level 02 to provide evidence for the stair location.

This design intervention will cause less than substantial harm to the historic fabric, it will lead to a physical change but the elements of high heritage significance are retained.

4.8 **Intervention Study 03: Proposed lift installation, works to the lightwell and associated roof alterations**

At the outset of the design development, alongside the assessment of the existing stair locations, the design team undertook a series of design studies to determine the best location for a stair and lift core which could serve both buildings and provide the necessary DDA compliant circulation. The adjoining of the two buildings with a single core is not straightforward as the floor levels between Eastern House and Langley Buildings do not correspond and they diverge by differing amounts to each level.

Locating a new stair and lift core on the party wall line enables the core to address the differing levels and locating this within the existing lightwell enables minimum intervention to the party wall line of the building and therefore the roof form. The aim through the design development has been to ensure that the new lift core can be provided within the footprint of the existing lightwell, thereby ensuring that the required intervention to the lightwell itself and roof form around the lightwell is as minimal as possible.

The design of the new core substantially retains the historic structural elements of the lightwell but does require some fabric removal and physical intervention into areas assessed to be of medium and high significance. Recent design development revisions has amended the previous steel shaft to blockwork and this has enabled the reduction of fabric removal. This design intervention has been assessed to cause less than substantial harm to the historic fabric, it will lead to a physical change but the principal historic architectural form will remain legible.

4.9 **Intervention Study 04: Basement use, access and tanking**

A Water Penetration and Damp Survey was undertaken by Hutton & Rostron in September 2019. This demonstrated that there are significant damp levels to the full perimeter and also the party wall between Eastern House and Langley Buildings. This had been a prolonged problem over a significant period of time and as such Hutton & Rostron recommended a drained cavity internal lining system to enable the basement to be used as a habitable space.

All tanking is now omitted from the scheme as it has been proven that water ingress issues have significantly improved since the construction works have started on site and drains repairs have been undertaken.

4.10 **Intervention Study 05: Roof top extension**

The roof top extension provides additional net office area in a mansard profiled form. The flat roof area provides a location for condenser units. The proposed design is a simple volume, it will have a negligible visual impact on the host building. The extension will require the removal of the existing roof structure, a space which is not currently accessible or used for accommodation.

As noted in the in the D&A Statement this area of the building is not visible from a public vantage point and therefore will not have a visual impact on the conservation area of adjacent heritage assets. This provides a suitable location for the condenser units because of the lack of visibility from adjacent areas.

This design intervention will cause less than substantial harm to the historic fabric, it will lead to a physical change but the principal architectural appearance and character of the building will remain legible.

4.11 **Intervention Study 06: External facades and street scene**

A series of works are proposed to the external facades which aim to improve and enhance both the historic fabric and the street scene. The works are detailed to the D&A Statement and aim to reveal and repair historic detailing and remove intrusive modern interventions.

Historic windows to Harter Street have been uncovered during the construction works. The proposed elevations and scope of works have been amended to include the retention and repair of these windows and decorative metal panels. In addition there have been other minor elevation changes which include the substation door and dry riser inlet box.

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

4.12 **Intervention Study 07: Eastern House – former hoist shafts**

The former hoist shafts are to be retained with some alterations which require some localised areas of fabric removal as detailed in the D&A Statement and to the demolition drawings.

This design intervention will cause less than substantial harm to the historic fabric, it will lead to a physical change but the plan layout of the hoist locations will remain legible.

4.13 **Intervention Study 08: Langley Buildings Workers Stair – existing stair #14**

As noted in the D&A Statement the fire escape strategy proposes the removal of the external metal stair between levels 05 and 09 and for this to be replaced with a new internal stair with protected lobbies internally that connects with the Langley Buildings workers stair (stair #14). For this existing stair to provide the means of escape protected lobbies are required at all levels and the stair enclosure and associated doors are required to achieve 30 minutes fire performance.

The Fire Engineering Consultant has confirmed that the fire performance can be provided by the provision of the plasterboard lining to the internal face of the stair enclosure with the addition of mineral wool insulation batts between the plasterboard lining and the existing or replacement timber panels. Timber panels will be reinstated to the upper sections where no longer extant and lost decorative mouldings will be reinstated and the panelling redecorated following paint analysis so that the historic detailing of this staircase will be fully visible from the office side.

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

4.14 **Intervention Study 09: Langley Buildings Workers Stair – existing stair #17, Harter Street entrance, substation and associated alterations**

Works are required to the Harter Street entrance of Langley Buildings to enable compliant means of escape and adjacent to this area is the proposed location for the new substation. The works are detailed within the D&A Statement and principally involve alterations to areas of low heritage significance. As such the works to this area are not considered to cause harm.

4.15 **Intervention Study 10: Courtyard interventions**

A series of works are proposed to the courtyard area and courtyard facing elevations which aim to improve and enhance both the historic fabric and the functioning of this space. The works are detailed to the D&A Statement and aim to reveal and repair historic detailing and remove intrusive modern interventions. Included in this scope are alteration works to the entrance gates, the proposed alterations are to be undertaken with a specialist metalworker and will retain and repair the existing elements whilst incorporating new mechanisms and a wider pass door.

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

4.16 **Intervention Study 11: Internal treatment of external walls and new internal partitions**

The internal wall finishes would have historically been lime plaster. Large areas of plaster have been removed, where there is evidence for the historic plaster finishes it is proposed that new lime plaster will be reinstated. Where areas of existing plaster remain insitu it is proposed that these are hammer tested and patch repaired where possible. Other areas of the building, principally the rear storage areas, were historically painted brickwork – these areas are to be repaired locally where necessary and redecorated with breathable paint.

As such the historic evidence for the finishes, which varies from building to building and floor to floor, is to be followed throughout for the proposed finishes thereby retaining the historic evidence and character of the building.

The revised proposals include the omission of some proposed painted masonry in lieu of exposed cleaned and repaired masonry.

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

4.17 **Intervention Study 12: Existing floors – floorboards and floor levelling**

The existing level differences across a typical floor plate vary considerably and in some areas these are exacerbated by areas of overboarding. As such it is proposed to remove the overboarding to localised areas and install a micro raised floor system. As well as addressing the level differences this will allow a services zone for small power and data thereby minimising works to existing walls and ceilings for electrical services installations.

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

4.18 **Intervention Study 13: Existing Ceilings – lath and plaster and exposed boards**

A survey of the condition of the existing lath and plaster ceilings was undertaken by Quadriga in October 2020. This concluded that extensive repair works were required to the ceilings and assessed the pros and cons of different repair techniques. It concluded that patch repair techniques would not be suitable due to the significant level of defects, thereby either complete removal would be required or overboarding. The latter enables the fire and acoustic requirements to be addressed (as detailed in the D&A Statement) whilst also enabling the maximum amount of historic fabric to be retained insitu.

The overboarding will be carefully detailed to ensure that the historic cornicing / beading details remain legible. Although the lath and plaster flat ceilings will not be legible they will be retained insitu. As such the works associated with this design intervention are considered to not cause harm and will protect the historic fabric and therefore be beneficial to the character of the historic building.

The overboarding will require the removal of the existing sprinkler system which is also required to be removed to enable the new M&E installations (see intervention study 14). The existing sprinkler system has been significantly modified a number of times, the most intact part is the 'Christmas Tree' valves at ground floor which are to be retained insitu. Limited areas include early sprinkler system pipework, it is not possible to retain these sections and undertake the necessary works, therefore there is some physical impact to this part of the historic fabric. These works are considered to cause less than substantial harm as although they remove a historic element the principal character of the building is not affected by these works.

Areas of lath and plaster ceilings which have been uncovered during the construction works are to be retained and repaired.

4.19 **Intervention Study 14: New mechanical and electrical installations**

The new mechanical and electrical installations require some associated builderswork which does include fabric removal to areas of high and medium heritage significance.

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

4.20 **Summary of Design Changes**

In summary the following design changes are proposed to the revised submission which are all neutral or beneficial in their heritage impact;

- Revised basement layout (neutral / no harmful impact to heritage asset)
- Alterations to the Harter Street elevation to include the refurbishment of the basement lights (beneficial impact)
- Lightwell redesign which reduces the fabric removal (beneficial impact)
- Alterations to areas of wall finishes to leave as exposed repaired masonry (neutral impact)
- Removal of tanking from the scope of works (beneficial impact)
- Retention and repair of uncovered original ceilings (beneficial impact)

5.0 Statutory Requirements

5.1 The aim of the following statement is to demonstrate that the proposed works meet the requirements of the Planning (Listed Buildings and Conservation) Act 1990 and the NPPF.

PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

5.2 Section 16 of the Act requires that;
(1) the local planning authority may grant or refuse an application for listed building consent and, if they grant consent, may grant it subject to conditions.
(2) in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interested which it possesses.
(3) Any listed building consent shall (except in so far as it otherwise provides) ensure for the benefit of the building and of all persons for the time being interested in it.

5.3 Section 66 of the Act requires that;
(1) in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

5.4 Section 72 requires that;
(1) in a conservation area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Response: In all instances where design interventions are required to enable the refurbishment of the building the design process has included careful consideration of any possible alternatives to ensure that the level of intervention is necessary to enable the works to take place. The proposals do require some intervention but predominantly retain, repair and enhance the historic fabric and enable the elements of historic interest to be retained and legible. As such the proposals have carefully considered the building, its setting and the features of special architectural and historic interest which it possesses.

NATIONAL PLANNING POLICY FRAMEWORK (2018)

5.5 Section 16 (paras 184 – 202) of the NPPF (February 2019) is specific to conserving and enhancing the historic environment.

5.6 Para 189 states *'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. 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.'*

5.7 Para 192 states *'In determining planning applications, local planning authorities should take account of:*

- *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.'*

5.8 Para 194 states *'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;*

> *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.'*

5.9 Para 196 states *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.'*

5.10 Para 200 states *'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.'*

Response: As previously noted, in all instances where design interventions are required to enable the refurbishment of the building the design process has included careful consideration of any possible alternatives to ensure that the level of intervention is necessary to enable the works to take place. As such clear justification has been provided for the alteration works in accordance with para 194.

The proposals do require some intervention but predominantly repair and enhance the historic fabric and enable the elements of historic interest to be retained and legible. Some interventions have been assessed to cause less than substantial harm. It is not considered that the harm is greater than 'less than substantial' as when the works are considered on the whole the character and appearance of the building, its setting and the features of special architectural and historic interest which it possesses still remain legible.

This assessed harm is considered to be outweighed by the benefits of the scheme including securing its optimum viable use. The benefits of the scheme are described in full in the Planning Statement and include;

- The sympathetic refurbishment of two Grade II Listed Buildings with office and gym uses which will have a positive impact on the regeneration of this part of the City Centre and help to secure the long-term future of the heritage assets.

- The adoption of a design approach for the development as a whole which relates well to the site, the heritage assets and the Conservation Area.

- The scheme will result in significant improvements to how the buildings are accessed, and to access within the buildings whilst ensuring that the intervention required to enable the new stair and lift core is minimised and simplified from previous proposals.

- The scheme includes the repair of key historic features such as the Langley Buildings workers' staircase.

- The removal of inappropriate and harmful alterations to the building which detract from the building's significance.

6.0 Conclusions

6.1 The NPPF requires planning applicants and local planning authorities to assess and understand the particular nature of the significance of heritage assets which will be affected by proposed development. Such assessment of heritage asset significance is necessary to understand the potential impact of proposed development.

6.2 This report considers the nature of the significance of the site of 40-46 Princess Street. The analysis shows that the Grade II listed buildings are an integral part of the Whitworth Street Conservation Area, and retain elements of heritage significance internally which are important to their character and heritage value, albeit altered.

6.3 The report identifies that the proposals will have some impact on the fabric of the heritage assets but that this is considered to be less than substantial harm and is outweighed by the benefits of the scheme.

6.4 The proposals therefore fulfil the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant sections of the NPPF.

Appendix A: Significance Plans