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Manchester City Council
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9th June 2026

Dear Jennifer,

OBJECTION TO PLANNING APPLICATION 145583/FO/2026
Site Address: Downtown Victoria North II, 85 Rochdale Road, Manchester
Submitted on behalf of Marble Beers Ltd

INTRODUCTION

These representations are submitted on behalf of Marble Beers Ltd, owner and operator of the Grade II Listed Marble Arch Public House, Rochdale Road, Manchester. Marble Beers Ltd supports regeneration and redevelopment within this part of Manchester, as evidenced by positive engagement and not objecting to the principle of development for application 131708/FO/2021 (the development now being built out by McGoff). Marble do not object to development of the site in principle and recognises the significant transformation taking place across the Victoria North area.

This objection is directed towards the scale, massing and proximity of the proposed development and the resulting impacts upon the setting and significance of the Grade II Listed Marble Arch Public House, the continued operation of the business, local amenity and the wider planning balance.

Marble Beers considers that the proposal is too large and too close to one of Manchester's most distinctive surviving Victorian public houses. This is also the opinion of Jenny Wetton MSc (Arch Cons) IHBC whose own Heritage Assessment is attached; you will note Jenny Wetton concludes that the proposal would result in significant heritage harm and considers that the level of harm may, in her professional opinion, amount to substantial harm when assessed against national heritage policy. I have attached Jenny Wetton's report to the covering email.

THE MARBLE ARCH PUBLIC HOUSE

The Marble Arch is a Grade II Listed Building dating from 1888 and designed by the notable Manchester architectural practice of Darbyshire and Smith.

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The building is widely recognised as one of Manchester's most architecturally significant surviving public houses. Its distinctive form, decorative brickwork, chimneys and prominent corner location make it an important landmark within the city.

The significance of the building derives not only from its architectural and historic interest but also from its continued use as a public house. The building remains a successful independent hospitality business, an important local employer and a valued community asset which contributes significantly to Manchester's cultural, social and hospitality offer. Whilst substantial redevelopment has occurred within the surrounding area, the Marble Arch continues to retain a degree of visual prominence and legibility within the townscape. The remaining openness adjacent to the listed building contributes materially to its appreciation and significance.

The building is one of Manchester's most recognised historic public houses and remains a destination venue attracting visitors from across Greater Manchester and beyond.

HERITAGE HARM

The proposed development would result in harm to the setting and significance of the Grade II Listed Marble Arch. Marble Beers' concerns are supported by both Jenny Wetton MSc (Arch Cons) IHBC and the Victorian Society.

Jenny Wetton concludes that the existing openness of the application site contributes positively to the appreciation of the listed building and that the proposed tower would dominate and overwhelm the Marble Arch, distracting attention from it and diminishing its significance. Jenny Wetton concludes that the level of harm is significant and considers that it may, in her professional opinion, amount to substantial harm when assessed against national heritage policy.

The Victorian Society has similarly raised serious concerns regarding the proposal. Whilst acknowledging amendments made since the earlier pre-application proposals, the Society concludes that the scale, height, architectural language and proximity of the tower would cause harm to the setting of the listed building and recommends that the application be refused.

Significantly, both independent assessments identify the same issue. The concern is not merely that the building is tall. Manchester already contains many tall buildings. Rather, the concern arises from the extraordinary proximity of the proposed tower to the listed building. The proposed development would sit only a short distance, 3 metres at its closest, from the Marble Arch and would fundamentally alter the way in which the heritage asset is experienced and appreciated.

The proposal would replace one of the last remaining areas of openness adjacent to the listed building with a substantial 17-storey structure. The resulting relationship would be visually overbearing and oppressive.

Whilst the applicant's heritage assessment concludes that any harm falls within the category of less than substantial harm, Marble Beers considers that the harm sits towards the upper end of that spectrum.

The scheme would deliver 153 residential apartments but no affordable housing. The development therefore fails to provide one of the principal social benefits ordinarily associated with major residential development.

Furthermore, Manchester City Council currently benefits from a healthy housing land supply and the tilted balance in paragraph 11(d) of the National Planning Policy Framework is not engaged. Whilst the delivery of additional market housing is a benefit, it should not attract the exceptional weight that might be afforded in circumstances where a housing land supply shortfall exists.

The applicant's own Green and Blue Infrastructure Strategy states that the development will "celebrate the heritage of the site" and create a platform for community interaction. Marble Beers respectfully submits that those aspirations are difficult to reconcile with a scheme which would place a 17-storey tower only three metres from the Grade II Listed Marble Arch, result in the loss of the former Victoria Hotel and place at risk the continued operation of an established community asset which already contributes significantly to the social and cultural life of the area.

The claimed public realm and community benefits are further undermined by the submitted Wind Microclimate Assessment. Whilst the report concludes that surrounding areas are generally suitable for pedestrian movement and short-term standing, it does not appear to specifically assess the established outdoor hospitality areas associated with the Marble Arch, including the beer garden and private garden roof terrace; it does not conclude prolonged seating would be acceptable. These are spaces where customers (of the beer garden) and residents (of the flat) would normally be expected to remain seated for prolonged periods and therefore require a significantly higher level of wind comfort. The report provides no clear evidence that these existing amenity spaces would achieve an appropriate long-term sitting comfort classification following completion of the development. In the absence of such evidence, it cannot be assumed that the proposal will deliver the attractive, usable and community-focused public realm benefits claimed by the applicant.

The claimed public realm and placemaking benefits are also undermined by the harmful relationship created between the proposed tower and the Grade II Listed Marble Arch and demolition of the former Victoria Hotel. Rather than enhancing the setting of the heritage asset and creating a meaningful gateway space, the proposal would erode the openness around the listed building and diminish its prominence within the townscape. Even if the Local Planning Authority were to conclude that the proposal gives rise to less than substantial harm, that harm would clearly sit towards the upper end of the less than substantial harm spectrum and that harm would therefore attract considerable weight in the planning balance. Paragraph 205 of the NPPF requires great weight to be given to the conservation of designated heritage assets irrespective of the level of harm identified.

Consequently, there is substantial doubt that the public benefits relied upon by the applicant are sufficient to outweigh the identified heritage harm.

FAILURE TO REALISE THE NORTHERN GATEWAY VISION

The application site occupies a strategically important gateway location adjacent to the Marble Arch. The Northern Gateway Strategic Regeneration Framework envisaged the creation of high-quality public realm around the Marble Arch and identified the location as an important gateway into the wider regeneration area.

Instead of creating a meaningful space around the listed building, the proposal introduces a substantial tower immediately adjacent to it. The result is a development that competes with the listed building rather than complementing it. The proposal therefore represents a missed opportunity to deliver a scheme that responds positively to its historic context whilst still providing housing and regeneration benefits.

STRUCTURAL IMPACTS

Given the immediate proximity of the proposed development to a Grade II Listed Building, the application should be supported by a robust assessment of structural risks. The proposal involves substantial excavation and piling operations in very close proximity to the listed building and its cellar.

The applicant's own structural engineers (15286-BKP-V1-XX-RP-S-0001) acknowledge that the Grade II Listed Marble Arch represents a significant construction constraint requiring pre-condition surveys, vibration monitoring and specialist low-vibration piling techniques. The proposed tower is to be founded on approximately 29m deep piles socketed into sandstone bedrock, with the engineers expressly requiring the piling contractor to demonstrate how damage to surrounding buildings will be avoided. The submitted foundation drawings appear to show the nearest piled foundation located approximately 1.5 metres from the walls of the Marble Arch and its cellar. No detailed assessment has been provided demonstrating the likely vibration, settlement or structural impacts upon the Marble Arch, its historic cellar structures or associated boundary walls. In the absence of such evidence, the Council cannot be satisfied that the proposal would preserve the significance of the listed building or avoid harm during construction.

The submitted archaeological report (61328) confirms the presence of extensive historic sub-surface structures, cellars and former gasworks infrastructure beneath the site. This further underlines the need for a robust assessment of construction impacts upon the adjoining Grade II Listed Marble Arch and its cellar. Plate 8 of the archaeological report also identifies an "extant wall, likely associated with the former gas works, forming a boundary between the Site and the Marble Arch", indicating the potential presence of additional historic fabric immediately adjacent to the proposed works.

The applicant's own geo-environmental investigation (LKC251336) confirms that the understanding of below-ground conditions remains incomplete. The report states that additional drilling is still required and that parts of the site cannot presently be fully assessed

until existing structures are demolished. The report also identifies extensive made ground, buried structures, former foundations and potential obstructions beneath the site. Significantly, bored piling is specifically recommended because of the presence of historic buildings in the local area which could be affected by vibration. In these circumstances, and given the exceptionally close proximity of the proposed tower to the Grade II Listed Marble Arch, it is difficult to conclude that sufficient information has been provided to demonstrate that the listed building and its historic cellar structures can be adequately protected throughout demolition and construction, which is required by paragraphs 192, 205 and 206 of the NPPF.

At present there is insufficient information available to demonstrate how the significance and fabric of the listed building will be safeguarded throughout the construction process. The Local Planning Authority should require a comprehensive Structural Impact Assessment of the Marble Arch together with detailed construction methodologies before any permission is contemplated.

Should the Local Planning Authority be minded to approve the application, a comprehensive condition survey of the listed building should be undertaken by an appropriately qualified conservation specialist appointed on behalf of Marble Beers and funded by the applicant. The surveys should include the external elevations, roof structure, cellar and significant internal features and should establish a detailed baseline condition prior to commencement of any works.

The applicant should be required to make good any damage arising from demolition, excavation, piling or construction activity and should fund all remedial works identified through ongoing monitoring of the building during the construction process.

IMPACT UPON THE OPERATION OF THE MARBLE ARCH

The Marble Arch is an active independent business operating within a highly competitive hospitality sector. The application provides insufficient information regarding how the continued operation of the public house will be protected during what is likely to be a prolonged construction programme.

The applicant has indicated that piled foundations extending to approximately 25 metres below ground level will be required. Such works would occur in extremely close proximity, within 3 metres, to both the listed building and its historic cellar.

Construction activity of this nature has the potential to generate prolonged periods of vibration, noise, dust, restricted access and general disruption. Whilst construction impacts are often described as temporary, the reality is that the construction of a 17-storey building is likely to extend over a considerable period and comes on the back of ten years of significant regeneration locally.

The applicant's own Phase 1 scheme was anticipated to require a 24-month construction programme. It is therefore entirely reasonable to anticipate significant disruption over an extended period.

For a hospitality business dependent upon attracting customers on a daily basis, a sustained reduction in trade over a prolonged period cannot be dismissed as a temporary inconvenience.

The application fails to adequately explain how customer access, deliveries, servicing arrangements, vibration impacts, construction traffic and business continuity will be managed throughout the construction period.

The continued operation of the Marble Arch as a public house forms part of the significance of the heritage asset itself. Any development which places that ongoing use at risk should attract considerable weight.

Significantly, the applicant's own structural engineers identify the Marble Arch as a key site constraint and acknowledge that special measures will be required to ensure that the building remains suitable and functioning throughout the construction process.

The Marble Arch currently supports approximately 20 jobs. Any sustained reduction in trade arising from prolonged construction activity therefore has implications not only for the business itself but also for local employment and economic activity.

WIND, PRIVACY, SUNLIGHT AND OVERBEARING

Wind

The submitted Wind Microclimate Assessment concludes that wind comfort and safety criteria are satisfied. However, the assessment appears principally focused on circulation routes, entrances and the applicant's own public realm not upon the impact of wind on the private roof terrace of the Marble Arch or the beer garden.

The wind report for 131708/FO/2021 (the development now being built out by McGoff) acknowledged the sensitivity of wind conditions and relied on massing/orientation mitigation to avoid problematic downdraught conditions. The current proposal introduces a taller, more singular vertical form in a tighter urban condition, yet reaches uniformly benign conclusions with little evidence of adverse effects or trade-offs.

It remains unclear whether the established outdoor hospitality areas associated with the Marble Arch have been specifically assessed, it appears they have not. It is also unclear whether the private amenity space at first floor level, the garden of the first floor flat, has been assessed. Both these areas include the pub's beer garden and the first-floor roof terrace of the flat.

These are not transient pedestrian environments. They are: 1) an outdoor hospitality space where patrons are expected to remain seated for extended periods and should therefore be treated as sensitive amenity receptors and 2) a private residential garden where occupiers spend prolonged periods of time sitting outside.

Given the location of the proposed tower immediately adjacent to these areas, concerns remain regarding downdraught, wind acceleration and the suitability of these spaces for continued outdoor use.

The application does not adequately demonstrate that the operation and enjoyment of these established hospitality areas would remain unaffected by wind.

Sunlight, Daylight and Sense of Enclosure

The application site lies immediately to the east of the Marble Arch. The applicant's own Daylight and Sunlight Assessment confirms that the proposal would result in reductions in daylight and sunlight amenity. The report therefore accepts that harm will arise and instead seeks to justify that harm by reference to the changing character of the area.

Whilst the report seeks to justify these impacts by reference to the emerging high-density character of the area and the aspirations of the Victoria North Framework, the existence of a strategic aspiration for increased density does not automatically render all resulting impacts acceptable. Furthermore, the SRF Northern Gateway required space around the Marble Arch and any buildings in the vicinity of the Marble Arch to be maximum of 6 storeys in height. It is also noteworthy that the applicant's assessment does not rely solely upon the standard BRE daylight and sunlight criteria. Instead, the report adopts reduced "acceptable tolerance" thresholds, including a reduction in the Vertical Sky Component target from 27% to 21.6%, Annual Probable Sunlight Hours from 25% to 20% and Winter Probable Sunlight Hours from 5% to 4%. The effect is that the assessment is not undertaken solely against the standard BRE criteria but instead against alternative tolerance thresholds adopted by the consultant to reflect the urban context. The conclusions of the report should therefore be considered in that context.

The proposed development would also affect the roof terrace associated with the residential accommodation above the Marble Arch. Whilst the applicant's assessment seeks to quantify sunlight and daylight effects in isolation, it does not adequately address the cumulative impact of reduced sunlight, reduced daylight, increased enclosure and the presence of a 17-storey building only a few metres away. The roof terrace is an established private amenity space and the resulting sense of enclosure would be substantial. The proposal would introduce an unusually close relationship between this private residential garden and a building of considerable height and mass, materially diminishing the quality and enjoyment of the space.

The proposal would also affect the residential accommodation associated with the Marble Arch. In particular, the principal hall window serving the flat above the public house would be located approximately 13 metres from the proposed building. Such a relationship is unusually close for a development of this scale and would give rise to concerns regarding outlook, enclosure and the overbearing presence of the proposed development. Whilst this window may not fall within the scope of the applicant's BRE assessment, it nevertheless contributes to the amenity and character of the residential accommodation and forms part of the wider impact of the development upon the Marble Arch.

The impact upon the residential accommodation should also be considered in the context of the building's status as a Grade II Listed Building, where the significance of the asset derives not only from its architectural and historic interest but also from its continued use and occupation. The effects of the proposal on sunlight, daylight and outlook should therefore be considered alongside the wider heritage, amenity and business impacts identified elsewhere in this objection.

Privacy

There are scores of habitable room windows in tens of flats that will directly face the first floor roof terrace of the flat of the Marble Arch. These windows are 3 metres away from the private roof terrace and rise up for 16 storeys. The proposed development would create an unusually intense overlooking relationship between the proposed apartments and the private roof terrace associated with the flat above the Marble Arch. The terrace would be overlooked by a substantial number of habitable room windows located only a short distance away. This would materially diminish the enjoyment of the space and further contribute to the overbearing relationship created by the proposal.

AFFORDABLE HOUSING AND VIABILITY

The application proposes no affordable housing provision. The applicant seeks to justify this policy non-compliant position through a Financial Viability Assessment prepared by Savills. Marble Beers has reviewed that assessment and has concerns.

The viability assessment has been prepared by the same consultancy that prepared the viability evidence supporting the adjacent Downtown Victoria North Phase 1 development (131708/FO/2021 the scheme McGoff are building out now).

The adjacent scheme was approved following independent viability review on behalf of Manchester City Council. The Committee Report records that the Council's independent assessor concluded that the development would not be viable if affordable housing were included and accepted a benchmark land value of £1.215 million together with a developer return of 17% on GDV.

By contrast, the current application adopts a benchmark land value of only £566,500 and a target developer return of only 15% on cost, yet still concludes that the development is significantly unviable. With affordable housing the scheme is said to return a loss and even with 100% market housing the scheme is reported to return a loss.

The applicant has not explained why assumptions accepted by Savills, the Council and the Council's own independent assessor for the adjoining site 131708/FO/2021 should now be disregarded.

It is unclear how a scheme promoted by the same developer, in the same regeneration area and benefiting from the same strategic investment context can generate such markedly different viability outcomes. Particularly when the earlier scheme was assessed during a

period of substantially higher construction cost inflation, higher borrowing costs and greater market uncertainty.

It is very clear however that the absence of affordable housing materially reduces the public benefits arising from the development.

PLANNING BALANCE

The applicant places significant reliance upon public benefits including housing delivery, regeneration, employment creation, limited landscaping and limited public realm improvements. Whilst these benefits are acknowledged, they must be weighed against the substantial harm that would arise from the proposed development.

The proposal would:

- a) cause significant harm to the setting and significance of the Grade II Listed Marble Arch;
- b) undermine the Council's own aspirations for this gateway location;
- c) place the continued operation of a historic independent business at risk during a prolonged construction programme;
- d) give rise to unresolved concerns regarding structural impacts;
- e) fail to adequately assess impacts on amenity including:
 - Wind
 - Privacy
 - Sunlight Daylight
 - Sense of Enclosure
- f) deliver no affordable housing; and
- g) result in the loss of the former Victoria Hotel, a non-designated heritage asset.

The applicant's overheating assessment confirms that compliance relies upon permanently closed windows, hybrid mechanical ventilation and integrated cooling systems. The report further acknowledges that a number of apartments would fail overheating criteria under more prolonged future summer conditions. Whilst not a potential reason for refusal in itself, unlike points a) to g) raised above, this further illustrates the extent to which the scheme relies upon complex mitigation measures to overcome the constraints of this highly constrained site.

Marble Beers considers that the planning balance is far less favourable than suggested by the applicant. The applicant relies heavily upon claimed public benefits. However, many of those benefits are uncertain, contested or capable of being delivered through a less harmful form of development. By contrast, the harm to the setting of the Marble Arch and the impact upon its operation are immediate, direct and unavoidable.

Furthermore, paragraph 192 of the National Planning Policy Framework requires planning decisions to ensure that sites are suitable for their proposed use having regard to ground conditions and risks arising from land instability. The applicant's own geo-environmental assessment confirms that further site investigation is required and that below-ground conditions are not yet fully understood. In the absence of a complete understanding of ground conditions and the potential effects of deep piled foundations in close proximity to a Grade II Listed Building, the Local Planning Authority cannot be satisfied that the proposal has demonstrated compliance with national planning policy.

CONCLUSION

Marble Beers Ltd respectfully requests that planning permission be refused. Whilst redevelopment of the site is accepted in principle, the current proposal represents an excessive development at this site. The proposed tower is too large and too close to the Grade II Listed Marble Arch Public House. No affordable housing is proposed notwithstanding the scale of the development.

The resulting harm to the setting of the listed building, together with the wider impacts identified above, significantly outweigh the limited benefits put forward by the applicant. The public benefits claimed by McGoff are uncertain, whereas the harm to the Marble Arch is immediate and certain.

The applicant has not demonstrated that the significance and fabric of the Grade II Listed Marble Arch can be preserved during construction.

The current proposal fails to achieve an acceptable balance between regeneration and heritage protection. Marble Beers Ltd, respectfully requests that the application is refused.

Yours sincerely

Simon

Simon Plowman BA (Hons) BTP MA MRTPI
Plan:8 Town Planning Ltd
On behalf of Marble Beers Ltd

Site Adjacent to Marble Arch PH, Rochdale Road, Manchester Heritage Statement



JW | Conservation

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June 2026

**Site Adjacent to the Marble Arch PH, Rochdale Road, Manchester
Heritage Statement**

Prepared for Marble Beers Ltd.

by

Jenny Wetton Conservation

June 2026

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1 EXECUTIVE SUMMARY

This report was commissioned from Jenny Wetton Conservation in 2025 by Marble Beers Ltd. Its purpose is to assess the contribution made by an adjacent application site forming part of the setting to the significance of the Grade II-listed Marble Arch Inn and the impact of proposals to redevelop the site.

Section 3 summarises the development of the site. The building now called the Marble Arch public house was built to a design by local architects, Darbyshire and Smith, for McKenna's Brewery, is dated 1888 and appears on maps from 1889. It has been in use as a public house since its construction. The application site was occupied by a short terrace of shops, with the Victoria Hotel beyond. Slum clearance of terraces began in the late 20th century, with substantial demolition and clearance of redundant industrial buildings and sites since then, resulting in many areas of car parking. In the last ten years, substantial regeneration has taken place to the south-west of the Marble Arch, which now forms part of the Northern Gateway regeneration area.

Section 4 assesses the significance of the site and the contribution made by setting to the significance of the listed building. **The Marble Arch is significant for its external architectural design** and Hartwell, Hyde and Pevsner state of the building that it is 'the only one of the scattered pubs in the area of architectural pretention.' **The Marble Arch was built to a design by Manchester architects, Darbyshire and Smith**, who were also responsible for the Old Manchester and Salford pavilion at the Manchester Jubilee Exhibition, 1887, the Exeter Theatre, after the disaster in 1887 and the Palace of Varieties in Manchester. **The present Marble Arch was commissioned by east Manchester brewers and pub owners, B&J Mc Kenna**, who also owned the building now known as The Band on the Wall. **The listed building has additional significance for its aesthetic value** in an area where there are now so few historic buildings. The application site's only significance is the former Victoria Hotel, which could be considered as a non-designated heritage asset. Due to the degree of change which has taken place in this part of the setting, with the large number of tall blocks enclosing the street and limiting views, the **current openness on the application site makes an important contribution to the significance of the listed building**, enabling a better appreciation of its historic design, height and massing and allowing it some space. The few surviving historic buildings in the area add important visual interest in an area of modern architecture and provide some contact with the past. The former Victoria Hotel makes a positive contribution to the setting of the listed building in this respect, although it is now in a poor and neglected condition.

Section 5 outlines the heritage planning policy context. The 1990 Planning (Listed Buildings and Conservation Areas) Act is the primary legislative document; there is a presumption in favour of preserving and enhancing heritage assets. For listed buildings, **the planning authority 'shall have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses'** [author's emphasis] (section 66). The NPPF provides national policy on heritage assets and development and sets out a proportionate approach taking account of significance.

Section 6 assesses the impact of the proposals. The proposed tower will be of 17 storeys and the former Victoria Hotel will be demolished. The tower will **dominate and overwhelm the listed building in views along Rochdale Road and will distract attention from it**. The proposed development goes against the vision behind the development at 87 Rochdale Road, in which the space adjacent to the Marble Arch was presented in use as public realm as part of the City Council's published coordinated place-making approach. The proposal also **goes against the Council's published intention for a Gateway Square to be located on the application site, adjacent to the Marble Arch**. This is published in the *Strategic Regeneration Framework: Manchester Northern Gateway*, which is a material consideration.

The proposals are contrary to the City Council's Core Strategy Policy EN2 Tall Buildings. Given the City Council's intention to create a Gateway Square adjacent to the Marble Arch in the SRF, the proposals would **clearly not play a positive role in the published coordinated place-making approach**, contrary to Policy EN2.

The proposed development would affect the ability to appreciate the designated asset and **negatively affect its setting, thereby diminishing the significance of the building**. It would so dominate and overwhelm the listed building and distract attention from it that the proposal **could be considered as 'substantial harm'** in planning terms.

Under the '*Places for Everyone Joint Development Plan Document*' Policy JP-P2: Heritage, 'Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.' Policy 206 of the NPPF states that substantial harm to a grade II listed building should be exceptional and policy 207 states that

'...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.'

The City Council will need to decide whether the significant harm, possibly substantial harm in planning terms, that will be caused by the proposals is outweighed by sufficient public benefits. It is not considered by the present author that the harm caused by the proposals is outweighed by the public benefits put forward by the applicant. In any case, the applicant's Financial Viability Assessment concludes that the scheme is not financially viable.

Given the **close proximity of the development to the historic cellar, there are concerns about the structural impact of the development on the Marble Arch** as well as about the impact on its setting. The applicant should fund a full condition survey of the listed building by a suitably qualified and experienced contractor and any specified repairs. This would constitute a heritage public benefit, which would help to mitigate some of the harm caused by the proposals, although the scheme would still need to be significantly reduced in height and massing.

The Planning Department is strongly urged to reject the proposals, which are considered to be contrary to both local and national planning policy.

2 INTRODUCTION

2.1 Background to the Report

This report was commissioned from Jenny Wetton Conservation in 2025 by Marble Beers Ltd. Its purpose is to assess the contribution made by an application site to the east to the significance of the Grade II-listed Marble Arch Inn and to assess the impact of recent proposals to redevelop the site (Planning Ref. 145583/FO/2026). The assessment of significance was carried out in October 2025. The NPPF requires significance to be assessed when changes are proposed to heritage assets, and for the impact of proposals to be assessed in relation to significance.

2.2 Purpose of the Report

The report is designed to provide the author's professional opinion of:

- A summary of the history and development of the site;
- An assessment of its significance;
- An assessment of the impact of the proposals.

This report has been written by Jenny Wetton, BA MSc (Arch Cons) IHBC, independent Consultant, based on documentary sources and a survey of the site. The author is a full member of the IHBC and has an ethical duty to promote conservation.

2.3 Copyright

This report is the copyright of Jenny Wetton as a self-employed person and is for the sole use of the individuals or organisations to which it is addressed. Jenny Wetton grants these individuals or organisations a licence to use the report for planning purposes or for the sale of the property covered by the report. Jenny Wetton does not accept liability for any loss or damage arising from any unauthorised use of this report. © Jenny Wetton (2026).

3 HISTORY

3.1 History of Site

According to Hartwell, Ancoats was largely open land until development began in the late 18th century. Within a few decades it had become 'one of the most intensely developed industrial centres in the world¹', with the pace of development being given impetus by the construction of the Rochdale canal, which opened in 1804. Hartwell explains that, although there was slum housing, even the better housing deteriorated due to overcrowding and lack of maintenance.

By the mid-19th century, the area around what is now Rochdale Road - then called St Georges Street - had developed on a largely grid-iron pattern of terraced housing, with the Corporation's second gas works on Gould Street to the north-west and Oldham Road station to the south-east

The application site is shown as part of a development of buildings on the corner with Gould Street on the 1848 map. Potts states that the site of the present Marble Arch PH was occupied by the Wellington Inn, which was licensed in 1829 and nicknamed 'Marble Arch' after architectural features². He also states that it was called the Wellington Head in the 1864 directory. A year earlier, the Wellington had been purchased by McKenna's Brewery³.

The building now called the Marble Arch public house was built on the site of the earlier building, to a design by local architects, Darbyshire and Smith⁴ for McKenna's Brewery⁵ and is dated 1888. It is shown on the map surveyed a year later as the Wellington Inn, on an L plan and has been marked as number 97, with a rear access off Gould Street. The application site was occupied by five terraced houses, a short street called Ashley Street with a urinal at the end and the Victoria Hotel, with Back Ashley Street behind as another short street, curtailed by part of the very large Rochdale Road gas works. Potts states that the Victoria Hotel was licensed in around 1870. Rochdale Road is shown on the map to have been serviced by trams and crossed by a rail track from the Oldham Road goods station to the south to the gas works.

¹ Hartwell, C. *Manchester, Pevsner Architectural Guide* (London: Yale, 2002), 273

² Potts, B. *Old Pubs of Rochdale Road and Neighbourhood* (Manchester: Neil Richardson, 1985)

³ 2nd & 3rd Generations [online]. Available at: <https://bandonthewall.org/history/19th-century-history/chapter-3-the-mckennas/2nd-3rd-generations/> [Accessed 2.10.2025]

⁴ Hartwell, C., Hyde, M., and Pevsner, N. *Buildings of England: Lancashire: Manchester and the South-East* (Yale, 2004), 384

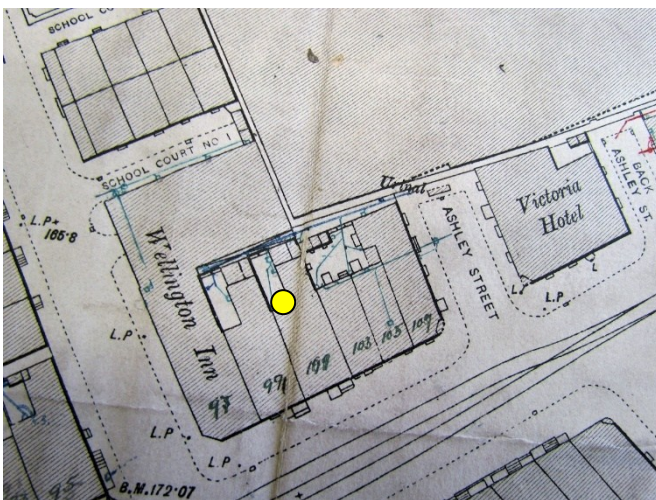
⁵ GMHER record no. 8587.1.0



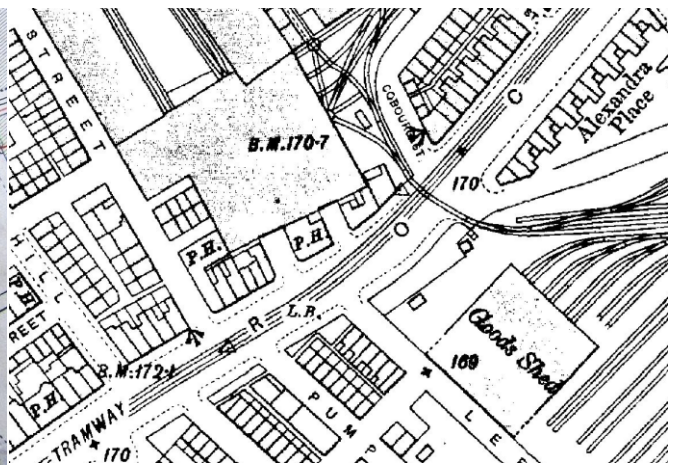
OS 1848 Showing Site



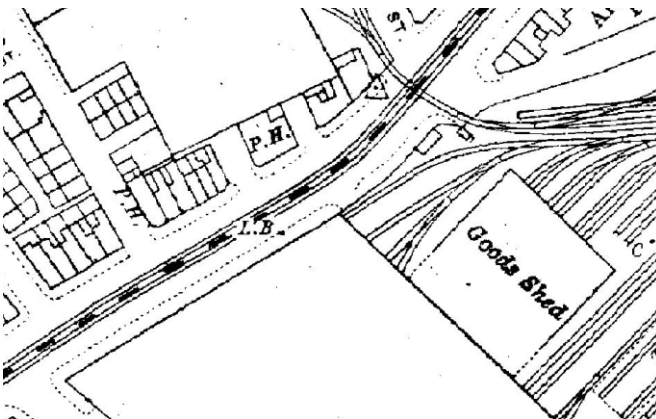
Date on Marble Arch PH



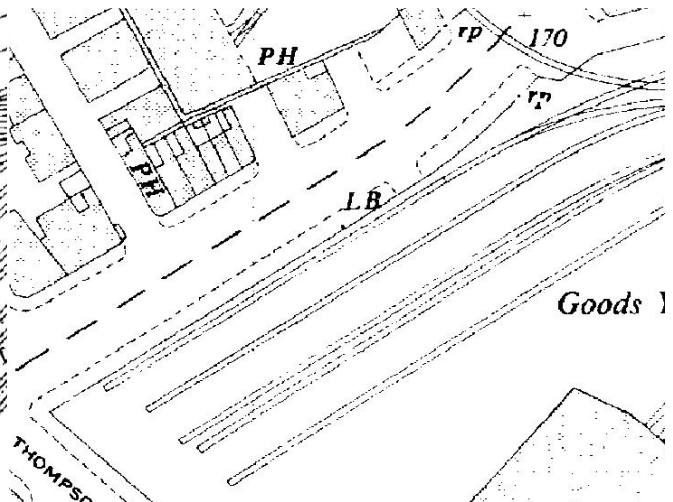
OS 1889 Showing Site



OS 1908



OS 1922-33



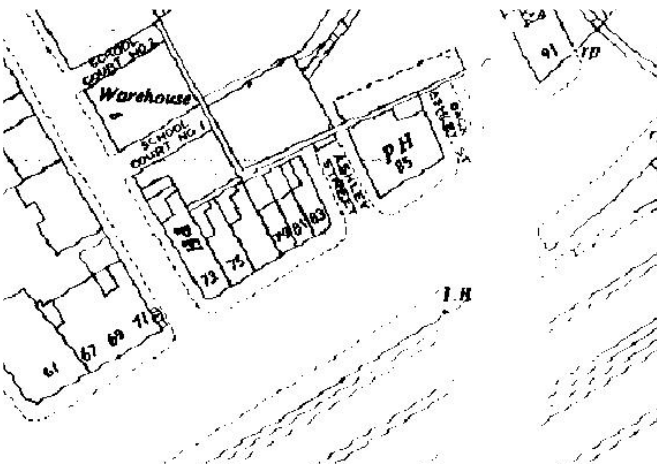
OS 1951



Wellington Vaults, 1958 (Image courtesy of Manchester Libraries, ref. m50767)



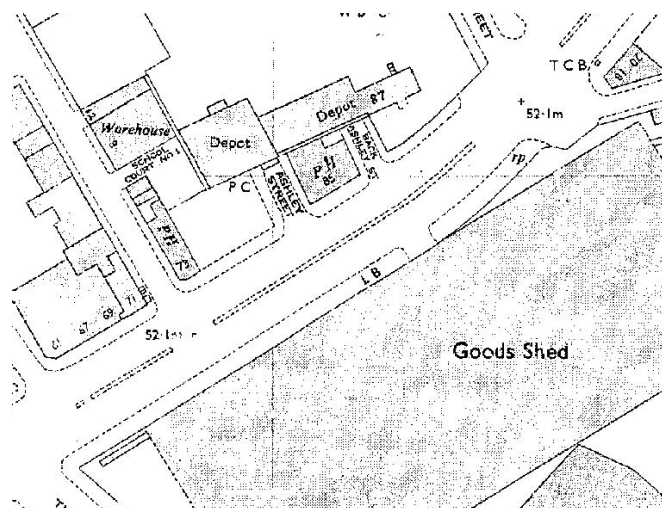
Victoria Hotel, 1958 (Image courtesy of Manchester Libraries, ref. m50724)



OS 1966-69



1971 (Image courtesy of Manchester Libraries, ref. m50768)



OS 1977-90

The 1922-33 map shows the rear yard behind the Marble Arch, but there is no change on the application site.

By 1951, the short terrace on the north side of Back Ashley Street had been demolished. A historic photograph from 1958 shows the appearance of the Marble

Arch, then called the Wellington Vaults, with the two-storey terrace beyond, the ground floor of which was occupied by shops. The Victoria Hotel is shown in a further photograph from the same date, with an arched front entrance and another on Ashley Street. It had arched windows on the part-rendered front elevation and one on the return, with a sill band across the elevation and a moulded cornice above the front windows. The ground-floor windows on the side elevation were flat-headed. A first-floor sill band ran across both elevations with segmentally-arched windows with key stones and a head band outlining two-over-two sash windows.

By 1966, the street had been renumbered. A further historic photograph from 1971 shows the appearance of the Wellington Vaults, with a three-to-four storey warehouse behind on Gould Street and an advertising hoarding to the right. The 1977-90 map shows that the terrace here had been demolished. The warehouse on Gould Street was later demolished and the site used as a car park.

3.2 Planning History

Listed below are related records from the Council's online planning portal:

Ref. No: 094156/FO/2010/N1 Change of use of basement from use as part of Public House to Health Club (sui generis) with erection of single storey side extension to create entrance 85 Rochdale Road Ancoats Manchester M4 4HY | Validated: Tue 31 Aug 2010 | Status: Decided

Ref. No: 092396/FO/2010/N1 Change of use of existing basement to health club (sui generis) 85 Rochdale Road Ancoats Manchester M4 4HY | Validated: Tue 23 Feb 2010 | Status: Decided

Ref. No: 058685/AOH/NORTH2/00 External overhead illumination of existing static 2 X 48 sheet free-standing advert hoarding. Site of 75/83 Rochdale Road, Ancoats | Validated: Mon 28 Feb 2000 | Status: Decided

4 SIGNIFICANCE

4.1 Assessing significance

Assessing significance is a key principle for managing change to heritage assets and is embedded within current government policy; NPPF policies 127 and 128 (DLUHC, *National Planning Policy Framework*, 2023). A key objective in the NPPF is 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation ...' (NPPF Para. 203). The NPPF advises that the more significant the heritage asset the greater the presumption in favour of its conservation (policy 205).

In 2019, Historic England issued guidance on assessing significance in keeping with the NPPF, *Statements of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12*. There are four levels of significance as well as neutral and an intrusive grade:

Exceptional Level of Significance

The element is relatively intact, has a special interest, and makes an important contribution to the wider significance of the site. This would correspond to an individual grade I or II* listing. The NPPF advises that substantial harm should be wholly exceptional.

High Level of Significance

A designated asset important at national and regional level, including Grade II listed buildings. The NPPF advises that substantial harm should be exceptional.

Medium Level of Significance

An undesignated asset important at a local to regional level, including locally (non-statutory) listed buildings and buildings which make a positive contribution to a conservation area. The element has been altered, has less special interest, and its contribution to the wider significance of the site is less important. May include less significant parts of listed buildings. Buildings and parts of structures in this category should be retained where possible, although there is usually scope for adaptation.

Low Level of Significance

An undesignated asset important at a local level. The element has been significantly altered, has a low level of integrity, the special interest has been lost and it makes little contribution to the wider significance of the site. Buildings and parts of structures in this category should be retained where possible, although there is more scope for adaptation.

Neutral

The element is historically unimportant but does not have a negative visual impact on the surrounding buildings. May include insignificant interventions to listed buildings and buildings that do not contribute positively to a conservation area. The removal or adaptation of structures in this category is usually acceptable where the work will enhance a related heritage asset.

Intrusive

The element is historically unimportant and has a negative visual impact on the surrounding buildings. Wherever practicable, removal of negative features should be considered, taking account of setting and opportunities for enhancement.

4.2 Significance of Site at 75-85 Rochdale Road

Evidential Value:

The former Victoria Hotel was licensed in around 1870 and appears on maps from 1889. The former terrace at 75-83 was demolished in the late 20th century and the site is currently occupied by construction site fencing and units.

There is only a record relating to the Marble Arch on the Greater Manchester Historic Environment Record, not for the application cabins.

Architectural Value:

The former Victoria Hotel has been substantially altered, with a large sign over the front doorway, which is roller shuttered, the removal of the render from the ground floor of the front elevation, the replacement of all the windows with uPVC, infilling of the ground-floor arched window on the west return and the replacement of the roof with concrete tiles and consequent loss of the chimneys. However, it retains its historic height and massing, the ground-floor front elevation window surrounds and the first-floor arched and keyed window heads and band.



Front and East Elevations

West Elevation

Historical Value:

The Victoria Hotel formerly had communal value as a meeting place until it was closed.

In summary, it is considered that the Victoria Hotel constitutes a non-designated heritage asset in planning terms.

4.3 Contribution of Setting to Significance of Listed Building

The NPPF defines the setting of a heritage asset 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’.

Historic England’s *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (Second Edition) explains:

‘Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated.... Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.’⁶

The existing Marble Arch was built in an industrial and urban townscape with a mixture of large industrial buildings and terraced housing and shops for workers. The setting has changed substantially, with significant demolition of slum housing and redundant buildings and structures and the regeneration of the area from the city centre outwards. The setting can now be defined as Rochdale Road in both directions and Gould Street looking south-east. Views are discussed below, under ‘Experience of the Assets.’

This analysis will use the non-exhaustive checklist given in Step 3 of the Historic England guidance, *Setting of Heritage Assets* (2nd edition, 2017). This guidance starts by giving general advice on understanding setting and how it may contribute to the significance of heritage assets, before adding advice on how views play a part in setting; it ends by suggesting a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets.

Significance of Listed Building

The Marble Arch is significant for its external architectural design. The two-storey Marble Arch is constructed in buff brick with polished pink granite to the ground floor, covered with a hipped slate roof and occupies a corner site. The west elevation is 5 bays in width with a splayed corner and 2-bay return to Rochdale Road. The ground floor retains a moulded plinth and a frieze and cornice carried round. A corner entrance is recessed in a 3-sided granite-columned porch with "Caernarvon" arches over. The building retains further entrances to the centre and left end of the Gould Street façade; these are both round-headed with 2-centred arched hoodmoulds; and "Caernarvon" arched windows, those to Gould Street being coupled, with central colonettes. The first floor has similarly shaped windows, that in the centre of the Gould Street facade under a pentice canopy, a gable with a terracotta panel dated 1888 and flanked by very tall, corniced chimneys. The first floor also retains three square-headed windows to the corner, and an enriched eaves cornice of red terracotta carried round. Hartwell, Hyde and Pevsner state of the building that it is ‘the only one of the scattered pubs in the area of architectural pretention’⁷.

⁶ Historic England *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (Second Edition), 4

⁷ Hartwell, C., Hyde, M., and Pevsner, N. *Buildings of England: Lancashire: Manchester and the South-East* (Yale, 2004), 384



West Elevation



Front Elevation



East Elevation



North Elevation

The east elevation is blind and rendered, having historically been built onto a terrace.

The north elevation is partly covered by a historic service access which retains historic buff brick with polished pink granite to the west elevation and the legible outline of the former opening, which has been partly infilled and fitted with a modern double-leaf door to provide additional space. The north wall of this area appears to be of modern brick, a roof-top garden is surrounded by a timber fence. The first floor of the historic building retains an infilled opening and a similar cornice.

The Marble Arch was built to a design by Manchester architects, Darbyshire and Smith. The Victorian Society website, *Architects of Greater Manchester 1800-1940* provides useful information about the architectural partnership and the buildings they designed⁸. Alfred Darbyshire was born in Salford and educated at the Quaker School at Ackworth near Pontefract in Yorkshire. In 1855, Darbyshire was articled to the Manchester architect, Peter B. Alley, and joined the Manchester School of Art under the mastership of J.A. Hammersley⁹. In 1862, Darbyshire set up practice on his own

⁸ Darbyshire and Smith [online]. Available at: <https://manchestervictorianarchitects.org.uk/partnerships/darbyshire-and-smith> [Accessed 24.09.25]

⁹ Alfred Darbyshire [online]. Available at: <https://manchestervictorianarchitects.org.uk/architects/alfred-darbyshire> [Accessed 24.09.25]

account, with offices in St James Square in Manchester. In 1886, he formed a partnership with Frederick Bennett Smith who was born in Stockport and educated at Manchester Grammar School before also being articled to architect, Peter B. Alley¹⁰. The website summarises the extensive output of the practice:

'The partnership was responsible for a number of major projects including Old Manchester and Salford at the Manchester Jubilee Exhibition, 1887; Exeter Theatre, after the disaster in 1887; Palace of Varieties, Manchester; Glossop Library; Ordsall Hall restoration and church for Earl Egerton of Tatton; Galtee Castle, Ireland; various Reform and Conservative clubs; schools; business premises and private residences...'

Hartwell, Hyde and Pevsner note that Darbyshire had considerable experience of designing fireproof cotton mills and fire safety theatre designs with Henry Irving¹¹. He was to use this knowledge in his design for the interior of the present Marble Arch. Brandwood, Davison and Slaughter comment on a frieze of lettered tiles just below the ceiling which lists the range of drinks available¹².

The present Marble Arch was commissioned by locally important east Manchester brewers and pub owners, B&J Mc Kenna. The Band on the Wall website has useful information about the McKenna family¹³; that building was also owned by the McKenna family. B & J McKenna owned at least four pubs by the 1860s, including the old Wellington Inn. They commissioned architects, Gregory & Haynes, to design the Harpurhey Brewery on Rochdale Road¹⁴. Although described as '...an architectural ornament to Harpurhey' and erected

'at great expense, the object of the proprietors being to exemplify the various processes of the brewing industry upon the most improved and scientific principles...'

it has subsequently been demolished. The McKennas went on to acquire at least fourteen other pubs in east Manchester.

The assets' physical surroundings

- Aspect: The Marble Arch faces onto both Rochdale Road and Gould Street.
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains): the former Victoria Hotel (discussed above in Section 4.2) retains its historic height, massing and some of its historic design and could be considered as a non-designated heritage asset. The building at 18-20 Rochdale Road, known as Alexandra Place, occupying an angled corner site at the junction with Sudell Street, is an early 20th century survivor in the area and retains its historic four-storey height and massing, together with Classical revival detailing including moulded cornices

¹⁰ Frederick Bennett Smith [online]. Available at:

<https://manchestervictorianarchitects.org.uk/architects/frederick-bennett-smith> [Accessed 24.09.25]

¹¹ Hartwell, C., Hyde, M., and Pevsner, N. Buildings of England: Lancashire: Manchester and the South-East (Yale, 2004), 384

¹² Brandwood, G., Davidson, A. and Slaughter, M. *Licensed to Sell: the History and Heritage of the Public House* (London: English Heritage, 2005), 138

¹³ A Pub Dynasty [online]. Available at: <https://bandonthewall.org/history/19th-century-history/chapter-3-the-mckennas-a-pub-dynasty/> [Accessed 24.09.25]

¹⁴ Harpurhey Brewery, Rochdale Road, Harpurhey [online]. Available at: <https://manchestervictorianarchitects.org.uk/index.php/buildings/harpurhey-brewery-rochdale-road-harpurhey> [Accessed 24.09.25]

and elaborate window heads; the Sudell Street elevation is simpler in design. This building is considered to constitute a non-designated heritage asset. These buildings contribute positively to the setting of the listed building.

- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces: the streetscape to the west of the listed building is largely grid-iron, formerly of two-storey terraced housing with shops on the main road, there were several other public houses and the Particular Baptist Chapel further to the south. Much of the area has been substantially redeveloped, with 8-10 storey rectangular blocks providing mixed use on the lower levels with accommodation above, faced in a variety of brick, white and dark panelling, and largely modernist and bland in character. The block between Gould Street and Ludgate Hill, opposite the Marble Arch, is seven storeys stepping down to six nearer the listed building but the block between Thompson Street and Bendix Street, opposite to the south, is 15 storeys. The few surviving historic buildings in the area provide visual interest with their varied rooflines, chimneys and front detailing.
- Historic materials and surfaces: Historic building materials are largely red brick with sandstone detailing and slate roofs.
- Green space, trees and vegetation: There are very few trees locally and only beyond the junction of Rochdale Road with Sudell Street.
- Openness, enclosure and boundaries: Due to the height of the blocks along Rochdale Road, there is a feeling of enclosure along the road. The application site to the north-east of the listed building is a vacant site, currently occupied by construction site cabins, but still providing welcome openness between the listed building and the former Victoria Hotel.
- Functional relationships and communications: There is a historic relationship between the listed building and the street layout.
- History and degree of change over time: By 1889, the area to the north of and behind the listed building was occupied by the very large Rochdale Road gas works. This has now been demolished and the site is currently used for car parking. To the south-east of the listed building was the Oldham Road goods station with several sheds and a railway line leading across the road into the gas works. This has also now been demolished and partly replaced by a fire station and training centre, with car parking along Rochdale Road, surrounded by a high brick wall along Rochdale Road and Thompson Street. As above, there has also been substantial replacement of terraced housing and shops with tall residential blocks, significantly changing the character of the area.



Alexandra Place



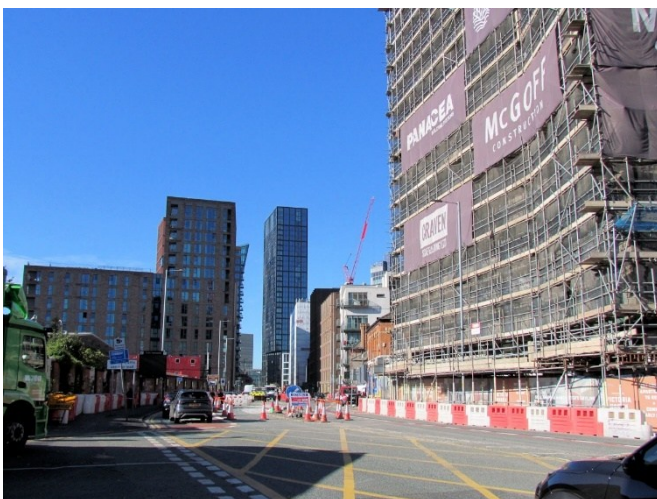
View North-east Along Rochdale Road



***View North-east Along Rochdale Road,
Towards Application Site***



View South-west Along Rochdale Road



View South-west Along Rochdale Road



View South-east Along Gould Street

Experience of the assets

- Surrounding landscape or townscape character: The surrounding streetscape is now very much urban in character.
- Views from, towards, through, across and including the asset: Views in both directions along Rochdale Road and south-east along Gould Street provide important

information about the design of the Marble Arch, although views south-west include the late 20th century, rendered east wall of the listed building, which gives a poor aspect to the designated asset. Views from Thompson Street to the south are obscured by the high brick wall around the car park. Views north-east including the listed building also include the historic Alexandra Place, which acts as a landmark due to its interesting design and location on a corner site.

- Intentional intervisibility with other historic and natural features: N/A
- Visual dominance, prominence or role as focal point: Due to its limited frontage on Rochdale Road, the Marble Arch is not prominent in the streetscape, but its presence should not be lost amongst other, larger buildings.
- Noise, vibration and other nuisances: Rochdale Road is a very busy main road, with much construction work currently underway.
- Tranquillity, remoteness, 'wildness': N/A.
- Busyness, bustle, movement and activity: The buildings on both sides of Rochdale Road are occupied night and day and there is a lot of traffic on the road.
- Diurnal changes: At night, light comes from occupied buildings, streetlights and vehicles on the road.
- Sense of enclosure, seclusion, intimacy or privacy: N/A.
- Land use: Mixed use and residential blocks along Rochdale Road, with car parking to the north and a fire station and training centre, with car parking along Rochdale Road to the south-east of the listed building.
- Accessibility, permeability and patterns of movement: Rochdale Road is busy with traffic with side streets providing access behind the main road.
- Degree of interpretation or promotion to the public: None
- Cultural associations: None
- Celebrated artistic representations: Steven Scholes is a living artist and has painted *The Wellington Vaults* as the area would have appeared in the past, showing the gas works beyond¹⁵.

Summary of Contribution to Significance Made by Setting

Due to the degree of change which has taken place in this part of the setting, with the large number of tall blocks enclosing the street and limiting views, the current openness on the application site makes an important contribution to the significance of the listed building, enabling a better appreciation of its historic design, height and massing and allowing it some space. The few surviving historic buildings in the area add important visual interest in an area of bland modern architecture and provide some contact with the past. The former Victoria Hotel makes a positive contribution to the setting of the listed building in this respect, although it is now in a poor and neglected condition.

There has been much demolition in this part of the setting, due to slum clearance and the removal of redundant buildings and sites. The area has been identified as an area for regeneration and change by Manchester City Council. The *Northern Gateway Strategic Regeneration Framework* states:

¹⁵ The Wellington Vaults Rochdale Road [online]. Available at: <https://www.mutualart.com/Artwork/The-Wellington-Vaults--Rochdale-Road/2690CE71E8C0732A5CD55C22E8300C7A> [Accessed 28.09.25]

'The physical evolution of the area during the twentieth and twenty-first centuries has been characterised by the reduction in the density of the built form and the creation of extensive areas of cleared land. The impact of continual urban transformation within the Northern Gateway has resulted in a loss of the earlier, historic fabric, which has led to the origins of the area being obscured.¹⁶'

¹⁶ Manchester City Council. *Strategic Regeneration Framework: Manchester Northern Gateway* (February 2019), 19

5 HERITAGE PLANNING CONTEXT

5.1 National Planning Policy Framework (Dec. 2024)

The national legislative framework for development affecting listed buildings and conservation areas is provided by the Planning (Listed Buildings and Conservation Areas) Act 1990; often referred to as the Listed Buildings Act. This sets out the duty on local planning authorities with regard to listed buildings and any buildings or land within a conservation area, when determining applications for planning permission. It is essential that these legal duties are considered, alongside the contents of the NPPF and other planning policies and guidance.

For listed buildings, the planning authority *'shall have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses'* (section 66).

Listed building consent is required for alterations which are likely to affect the character and special interest (significance) of the building. It is not required for like-for-like repairs, nor for alterations to modern fixtures and fittings which will not affect historic fabric, such as the removal of a modern partition.

The National Planning Policy Framework (NPPF) was updated in December 2024 replacing all former planning policy statements (previous editions NPPF etc). *The Planning Practice Guide: Conserving and Enhancing the Historic Environment* should be read in the light of the NPPF and does not comprise policy.

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. The Government has three interdependent objectives to sustainable development: economic, social and environmental. The latter objective includes contributing to 'protecting and enhancing our natural, built and historic environment.' So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development**. Chapter 16 is related to conserving and enhancing the historic environment.

The *Planning Practice Guide* states: 'In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time.'

Policy 206 states: 'Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.'

Policies 206 and 207 of the NPPF require planning applicants and local planning authorities to assess 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 sufficient to understand the potential impact of

the proposal on their significance. Local planning authorities should take this assessment into account when considering the potential impact of proposed development to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Policy 209 states: Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

The *Planning Practice Guide* gives further guidance:

'Disrepair and damage and their impact on viability can be a material consideration in deciding an application. However, where there is evidence of deliberate damage to or neglect of a heritage asset in the hope of making consent or permission easier to gain the local planning authority should disregard the deteriorated state of the asset (National Planning Policy Framework paragraph 202). Local planning authorities may need to consider exercising their repair and compulsory purchase powers to remedy deliberate neglect or damage¹⁷.'

Policy 210 states: '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.'

Policy 212 states: '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 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.'

Policy 213 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. 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.

Policy 214 states: '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

¹⁷ Paragraph: 014 Reference ID: 18a-014-20190723

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.'

The *Planning Practice Guide* gives guidance on how to assess if there is substantial harm:

'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 harm¹⁸.'

Policy 215 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, where appropriate, securing its optimum viable use.'

Policy 216 states: '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.'

The *Planning Practice Guide* defines a non-designated heritage asset:

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

¹⁸ Paragraph: 018 Reference ID: 18a-018-20190723

'A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets¹⁹.'

Policy 218 states: 'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.'

Policy 219 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.'

Policy 220 states: 'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. 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.'

5.2 Manchester City Council Core Strategy 2012

Policy EN 2 Tall Buildings

Tall buildings are defined as buildings which are substantially taller than their neighbourhoods and/or which significantly change the skyline.

Proposals for tall buildings will be supported where it can be demonstrated that they

- Are of excellent design quality,
- Are appropriately located,
- Contribute positively to sustainability,
- Contribute positively to place making, for example as a landmark, by terminating a view, or by signposting a facility of significance, and
- Will bring significant regeneration benefits.

A fundamental design objective will be to ensure that tall buildings complement the City's key existing building assets and make a positive contribution to the evolution of a unique, attractive and distinctive Manchester, including to its skyline and approach views.

Suitable locations will include sites within and immediately adjacent to the City Centre with particular encouragement given to non-conservation areas and sites which can easily be served by public transport nodes.

¹⁹ Paragraph: 039 Reference ID: 18a-039-20190723

Elsewhere within Manchester tall building development will only be supported where, in addition to the requirements listed above, it can be shown to play a positive role in a coordinated place-making approach to a wider area. Suitable locations are likely to relate to existing district centres. The height of tall buildings in such locations should relate more to the local, rather than the City Centre, urban context.

By their very size tall buildings can have a significant impact on the local environment and its micro-climate. It is therefore expected that this impact be modelled and that submissions for tall buildings also include appropriate measures to create an attractive, pedestrian friendly local environment.

It will be necessary for the applicant/developer to demonstrate that proposals for tall buildings are viable and deliverable.

5.3 Addendum to Manchester Core Strategy 2024

The 'Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 To 2039' was adopted on 21 March 2024.

The following Core Strategy (CS) policies have been partially replaced by Places for Everyone (PfE) policies. Any part of the policy that is not replaced remains part of Manchester's Core Strategy.

CS Policy EN3 Heritage

Section to be replaced:

- 2nd paragraph

Replaced by PfE Policy JP-P2

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.

5.4 The Strategic Regeneration Framework Development Framework (February 2019)

The SRF Development Framework Comprises:

- SRF-wide design and development principles that aim to guide the future development of the Northern Gateway. The design and development principles are grouped into eight overarching themes and are described in this section.
- Neighbourhood design and development principles that aim to guide development in each of the neighbourhoods. These neighbourhood design and development principles are described in the following section.

The Northern Gateway SRF will not form part of Manchester's statutory Development Plan. The SRF will be a material consideration in the determination of future planning applications within the Northern Gateway. The role of the SRF as a material consideration means that the principles within this SRF Development Framework do not constitute planning policy but if followed will help deliver the core objectives and Vision of this SRF.

SRF-Wide Design And Development Principles:

1. Building Residential-led City Neighbourhoods;
2. Delivering Social and Community Infrastructure;

3. Delivering Sustainable Movement and Transport Connectivity;
4. Urbanising Rochdale Road;
5. Enhancing the Green-Blue Infrastructure and Public Realm;
6. Creation of the Place;
7. Promoting Place Management and Design Quality; and
8. Planning for a Low Carbon Future.

Neighbourhood Design and Development Principles:

1. Transport, Accessibility and Permeability;
2. Land Use;
3. Scale, Density and Form; and
4. Public Realm and Public Spaces

6 HERITAGE IMPACT ASSESSMENT

6.1 The Proposals

McGoff Group have drawn up proposals to develop the application site with a tower block for residential development. This statement should be read in conjunction with the associated drawings.

Taking account of the assessment of significance and Policies 205 and 206 of the NPPF, the impact of the proposal on the aspects of significance is considered below. The Marble Arch PH is listed at Grade II and substantial harm should be exceptional.

6.2 Impact of the Development on the Significance of the Listed Building

This analysis will again use the non-exhaustive checklist given in Step 3 of the Historic England guidance, *Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3*. This will address the impact of the proposed development of the site on the setting of the listed public house.

Impact of New Development

Location and siting of development

- Proximity to assets: The nearest part of the proposed development lies around 3 metres from the historic public house cellar, ground floor kitchen/dining room and residential terrace above and nearly 13 metres from the east wall of the main range of the Marble Arch, with landscaping in between.
- Position in relation to relevant topography and watercourses: The site lies along the Rochdale Road.
- Position in relation to key views to, from and across: The site is prominent in the key views identified above in Section 4.3 in both directions along Rochdale Road and the development will be highly visible in the view south-east along Gould Street.
- Orientation: The proposed development will face onto Rochdale Road.
- Degree to which location will physically or visually isolate asset: The proposed development is set up to the pavement and will entirely obscure the Marble Arch in views south-west along Rochdale Road.

Form and appearance of development

- Prominence, dominance, or conspicuousness: The proposed tower will be 17 storeys in height and will dominate and overwhelm the listed building in views along Rochdale Road.
- Competition with or distraction from the asset: Although the development uses a contemporary style, the tower will dominate and overwhelm the listed building and distract attention from it.
- Dimensions, scale and massing: The proposed tower will be of 17 storeys and around ten bays in width.
- Visual permeability (extent to which it can be seen through), reflectivity: There is glazing proposed at ground level, enabling visual permeability but panels between windows at higher levels.

- Materials (texture, colour, reflectiveness, etc): The main proposed building material is red precast concrete cladding with a cast-in pattern with exposed aggregate concrete columns on the ground floor.
- Architectural and landscape style and/or design: The tower has been designed in a modernist style using rectangles with a largely flat character and is typical of bland modern buildings.
- Introduction of movement or activity: The site is currently occupied by construction cabins and movement would increase at all times of the day.
- Diurnal or seasonal change: Tree planting is proposed between the Marble Arch and the tower. At night, light would come from the occupied buildings.

Wider effects of the development

- Change to built surroundings and spaces: There will be a tower of 17 storeys where there is now a vacant site.
- Change to skyline, silhouette: There will be significant changes to the skyline.
- Noise, odour, vibration, dust, etc: There will be increase in noise when the towers are occupied.
- Lighting effects and 'light spill': There would be light spill at high levels for the first time, from occupied apartments.
- Change to general character (e.g., urbanising or industrialising): The proposed development is not considered to change the general character of this part of the setting. Construction is currently underway for a development to the east and north which will include two towers of 13 and 11 storeys (87 Rochdale Road).
- Changes to public access, use or amenity: The site will become accessible to occupants and there will be some public access.
- Changes to land use, land cover, tree cover: The development site will be occupied by a residential tower where it is now a vacant site and there will be a 'micro forest' between the tower and the Marble Arch. There will be a fence between the trees and Rochdale Road to control access. The trees are expected to reach maturity within 20–30 years and could affect the structural stability of the east wall of the public house and the south wall of the single-storey element.
- Changes to communications/accessibility/ permeability, including traffic, road junctions and car-parking, etc: The site will be accessible to occupants.
- Changes to ownership arrangements (fragmentation/permitted development/etc): The applicant has indicated that the apartments will be retained for private open market housing rent.
- Economic viability: According to the developer's *Financial Viability Assessment*, the development is not economically viable.

Permanence of the development

- Anticipated lifetime/temporariness: The lifetime of the development is likely to be fifty years or so, in common with many modern buildings.
- Recurrence: N/A
- Reversibility: The development will not be reversible.

6.3 Overall Impact of Changes

The Marble Arch has a relatively narrow street frontage onto Rochdale Road as it was historically part of a short two-storey terrace built in traditional materials. The proposals would result in **the loss of the Victoria Hotel, which is considered to constitute a non-designated heritage asset in planning terms**. A site does not need to be recorded on the Historic Environment Record or locally listed to be a non-designated heritage asset; each site should be assessed on its own merits.

While the listed building was not built in isolation, the proposed tower will be of 17 storeys and will **dominate and overwhelm the listed building in views along Rochdale Road and will distract attention from it**, as illustrated in the photomontages of the proposed buildings.



Photomontage of Proposed Phase 2 Building from Rochdale Road (Planit, View 2)



Photomontage of Proposed Phase 2 Building South-west from Rochdale Road (Planit, View 4)

In the Heritage Statement, the impact on the Marble Arch is considered:

'It is considered that the proposed development would result in a noticeably taller composition within the setting of the listed building, but one that must be considered in context of the existing taller built and consented development which lies in close proximity to the Marble Arch and already influences how it is viewed. The proposal also seeks to partly restore the built street frontage along Rochdale Road which contributed to the historic setting of the Marble Arch Inn. The proposal therefore would result in less than substantial harm at the lower end of the scale. This very minor less than substantial harm would need to be weighed and balanced against the public benefits of the scheme.²⁰'

While the development should be considered in context, the other development used to justify the scheme is further away and has less of an impact on the setting of the listed building. The historic built street frontage adjoining the Marble Arch was a short terrace of two-storeys and certainly not a large tower.

The applicant's Planning Statement goes on to list public benefits. While it is considered by the present author that the proposed trees of the 'micro forest' could provide welcome green space adjacent to the Marble Arch, this will be fenced off from Rochdale Road, the tree roots could cause structural problems to the listed building and there could be problems from drainage. The only heritage benefit put forward is that

²⁰ WSP. For McGoff Group Projects Ltd. HERITAGE STATEMENT: Land at 85 Rochdale Road, Manchester. UK0044544.9280 MARCH 2026, parag. 6.2.1

the development would reinstate the historic building line. While the development would regenerate a brownfield site, so would landscaping the whole site as a public square, as intended in the Council's *Strategic Regeneration Framework* – see below. The development will not include any social housing and it is understood that Manchester City Council has a 7.5 year supply of housing, well over the required 5 year supply.

The proposed development **goes against the vision behind the development at 87 Rochdale Road** (Ref. 131708/FO/2021), in which the space adjacent to the Marble Arch was presented in use as public realm, as part of the City Council's published coordinated place-making approach, and the Victoria Hotel was presented as being refurbished for residential use. It should be noted that the current application site was excluded from the application for the development at 87 Rochdale Road but did take Manchester City Council's published intention for a public realm use for the current application site into account.



Verified View 5 as Existing (Jon Matthews Architects, D&AS)



Verified View 5 as Proposed (Jon Matthews Architects, D&AS)



Visualisation View A (Jon Matthews Architects, D&AS²¹)

²¹ Also used in Planning Committee Report Ref. 131708/FO/2021 Committee Date 20 Jan 2022 Ward Jenny Wetton Conservation

The proposal **goes against the Council's published intention for a Gateway Square to be located on the application site, adjacent to the Marble Arch.** This is published in the *Strategic Regeneration Framework: Manchester Northern Gateway*, which is a material consideration. The role of the SRF is explained:

'The Northern Gateway SRF will not form part of Manchester's statutory Development Plan. The SRF will be a material consideration in the determination of future planning applications within the Northern Gateway. The role of the SRF as a material consideration means that the principles within this SRF development Framework do not constitute planning policy but if followed will help deliver the core objectives and Vision of this SRF.^{22'}

The SRF goes on to explain the potential role of the Marble Arch within the regeneration of the area:

'Heritage assets such as the Marble Arch Inn and the Alexandra Place building provide a focus for enhanced public realm...²³.

'Marble Arch Square. There is an opportunity to create a high-quality Gateway Square adjacent to the Marble Arch Inn, adding value to the heritage asset and acting as an entrance point into the Northern Gateway, along Rochdale Road from the city centre. The Grade II Listed Inn will stand as a landmark and destination point at the intersection of Rochdale Road and Gould Street, framed by the distinctive Alexandra Place building opposite. The Gateway Square will provide a high-quality streetscape that respects the area's heritage, and activation through the provision of mixed-use active frontages.^{24'}

The SRF also publishes general intentions for building heights within the setting of the Marble Arch:

'Buildings framing the Marble Arch Inn should be no higher than 6 storeys, in order to respect and celebrate the character of the building.^{25'}

Furthermore, and on the following page, the MASSING PRINCIPLES AND INTERPRETATION diagrams specify a 'sensitive built form' around the Marble Arch.

Under the City Council's Core Strategy **Policy EN2 Tall Buildings**,

'...tall building development will only be supported where, in addition to the requirements listed above, it can be shown to play a positive role in a coordinated place-making approach to a wider area.'

Given the City Council's intention to create a Gateway Square adjacent to the Marble Arch in the SRF, the proposals would **clearly not play a positive role in the published coordinated place-making approach, contrary to Policy EN2.**

Piccadilly Ward.

²² Manchester City Council. *Strategic Regeneration Framework: Manchester Northern Gateway* (February 2019), 35

²³ Manchester City Council. *Strategic Regeneration Framework: Manchester Northern Gateway* (February 2019), 124

²⁴ Manchester City Council. *Strategic Regeneration Framework: Manchester Northern Gateway* (February 2019), 125

²⁵ Manchester City Council. *Strategic Regeneration Framework: Manchester Northern Gateway* (February 2019), 121

The proposed development would affect the ability to appreciate the designated asset and **negatively affect its setting, thereby diminishing the significance of the listed building**. It would so dominate and overwhelm the listed building and distract attention from it that the proposal **could be considered as 'substantial harm'** in planning terms. This is rightly a high bar and the *Planning Practice Guide* gives guidance:

'... 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.²⁶'

Under the 'Places for Everyone Joint Development Plan Document' Policy JP-P2: Heritage, 'Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.' Policy 206 of the NPPF states that substantial harm to a grade II listed building should be exceptional and policy 207 states that

'...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.'

The City Council will need to decide whether the significant harm, possibly substantial harm in planning terms, that will be caused by the proposals is outweighed by sufficient public benefits.

Given the **close proximity of the development to the historic cellar, there are concerns about the structural impact of the development on the Marble Arch** as well as about the impact on its setting. The applicant should fund an independent structural survey and a full condition survey of the listed building by suitably qualified and experienced conservation contractors and any specified repairs. The structural survey would identify what mitigation measures are required, what repairs need to be carried out before construction takes place and what work may be required afterwards. This would constitute a heritage public benefit, which would help to mitigate some of the harm caused by the proposals, although the scheme would still need to be significantly reduced in height and massing.

²⁶ Paragraph: 018 Reference ID: 18a-018-20190723

7 CONCLUSION

The information in Sections 3 and 4 of this report provides an assessment of the contribution made by an application site to the east to the setting to the significance of the Grade II-listed Marble Arch Inn. The Marble Arch public house was built to a design by local architects, Darbyshire and Smith, for McKenna's Brewery, is dated 1888 and appears on maps from 1889. It has been in use as a public house since its construction. The application site was historically occupied by a short terrace of shops, with the Victoria Hotel beyond. The terrace had been demolished by 1971.

The Marble Arch is considered to be significant for:

- Its external architectural design and Hartwell, Hyde and Pevsner state of the building that it is 'the only one of the scattered pubs in the area of architectural pretention.'
- Its construction to a design by Manchester architects, Darbyshire and Smith, who were also responsible for the Old Manchester and Salford pavilion at the Manchester Jubilee Exhibition, 1887, the Exeter Theatre, after the disaster in 1887 and the Palace of Varieties in Manchester.
- Its association with east Manchester brewers and pub owners, B&J Mc Kenna, who also owned the building now known as The Band on the Wall.
- The listed building has additional significance for its aesthetic value in an area where there are now so few historic buildings.

Due to the degree of change which has taken place in this part of the setting, with the large number of tall blocks enclosing the street and limiting views, **the current openness on the application site makes an important contribution to the significance of the listed building**, enabling a better appreciation of its historic design, height and massing and allowing it some space. The few surviving historic buildings in the area add important visual interest in an area of modern architecture and provide some contact with the past. **The former Victoria Hotel makes a positive contribution to the setting of the listed building in this respect**, although it is now in a poor and neglected condition.

Section 5 sets out the legislative and planning policy framework and gives guidance on the circumstances in which consent may be required. Policy 205 of the NPPF states that

'...**great weight should be given to the asset's conservation** (and the more important the 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.'

Under Policy 206, 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.

Section 6 provides an assessment of the impact of the proposals on the listed building and the contribution made by its setting. The proposed tower will be of 17 storeys and the former Victoria Hotel will be demolished. The tower will **dominate and overwhelm the listed building in views along Rochdale Road and will distract**

attention from it. The proposed development **goes against the vision behind the development at 87 Rochdale Road** (Ref. 131708/FO/2021), in which the space adjacent to the Marble Arch was presented in use as public realm as part of the City Council's published coordinated place-making approach. The proposal also **goes against the Council's published intention for a Gateway Square to be located on the application site, adjacent to the Marble Arch.** This is published in the *Strategic Regeneration Framework: Manchester Northern Gateway*, which is a material consideration.

The proposals are contrary to the City Council's Core Strategy Policy EN2 Tall Buildings. Given the City Council's intention to create a Gateway Square adjacent to the Marble Arch in the SRF, the proposals would **clearly not play a positive role in the published coordinated place-making approach**, contrary to Policy EN2.

The proposed development would affect the ability to appreciate the designated asset and **negatively affect its setting, thereby diminishing the significance of the building.** It would so dominate and overwhelm the listed building and distract attention from it that the proposal **could be considered as 'substantial harm'** in planning terms.

Under the '*Places for Everyone Joint Development Plan Document*' Policy JP-P2: Heritage, 'Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.' Policy 206 of the NPPF states that substantial harm to a grade II listed building should be exceptional and policy 207 states that

'...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.'

The City Council will need to decide whether the significant harm, possibly substantial harm in planning terms, that will be caused by the proposals is outweighed by sufficient public benefits. It is not considered by the present author that the harm caused by the proposals is outweighed by the public benefits put forward by the applicant. In any case, the applicant's Financial Viability Assessment concludes that the scheme is not financially viable.

Given the **close proximity of the development to the historic cellar, there are concerns about the structural impact of the development on the Marble Arch** as well as about the impact on its setting. The applicant should fund an independent structural survey and a full condition survey of the listed building by suitably qualified and experienced conservation contractors and any specified repairs. The structural survey would identify what mitigation measures are required, what repairs need to be carried out before construction takes place and what work may be required afterwards. This would constitute a heritage public benefit, which would help to mitigate some of the harm caused by the proposals, although the scheme would still need to be significantly reduced in height and massing.

The Planning Department is strongly urged to reject the proposals, which are considered to be contrary to both local and national planning policy.

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9 APPENDIX: LISTED BUILDING DESCRIPTION

ROCHDALE ROAD, Ancoats (West side) No.73 Marble Arch Inn

II

Public house. Dated 1888 in gable to Gould Street. Buff brick with polished pink granite to ground floor, hipped slate roof. Corner site. Two storeys; 5 bays to Gould Street with splayed corner and 2-bay return to Rochdale Road. The ground floor has a moulded plinth and a frieze and cornice carried round; a corner entrance recessed in a 3-sided granite-columned porch with "Caernarvon" arches over; further entrances to the centre and left end of the Gould Street facade, both round-headed with 2-centred arched hoodmoulds; and "Caernarvon" arched windows, those to Gould Street coupled, with central colonettes. The 1st floor has similarly-shaped windows, that in the centre of the Gould Street facade under a pentice canopy and a gable with a terracotta panel dated 1888 and flanked by very tall corniced chimneys, 3 square-headed windows to the corner, and an enriched eaves cornice of red terracotta carried round. Interior with original decorative features including much faience work..

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