A National Amenity Society

Ms Jennifer Atkinson
Planning Case Officer
Manchester City Council
By email: j.atkinson@manchester.gov.uk

4th July 2018

Dear Ms Atkinson

Land Bounded By Worsley Street, Arundel Street, Ellesmere Street And Egerton Street
Manchester M15 4JZ. Application No. 118045/FO/2017

Thank you for consulting the Council for British Archaeology (CBA) on the above case.

Summary
The CBA has concerns regarding the impact of the above application on the setting of the Listed Grade II* Church of Saint George, the setting of other Listed Grade II buildings in the vicinity and the character and appearance of the Castlefield Conservation Area. We raise the following points:

• We fundamentally disagree with bullet point 6 of the summary and conclusions within the Heritage Statement.
• We fundamentally disagree with bullet point 10 of the summary and conclusions within the Heritage Statement.
• We fundamentally disagree with bullet point 11 of the summary and conclusions within the Heritage Statement.

Significance
The Castlefield’s area of Manchester is one of Manchester’s largest conservation areas and contains numerous historic former commercial and residential buildings associated with the Bridgewater canal and other transport infrastructure. The adjacent St George’s Church is Listed Grade II*, constructed in the early 19th century by the architect Francis Goodwin and restored in the late 19th century by J S Crowther. The churchyard walls, gate piers and gates are separately Listed Grade II. The church tower is a significant feature within the surrounding townscape and despite new development in the vicinity, still retains its dominance.

Comments
Whilst we fully appreciate the overall quality of the Heritage Statement prepared by Stephen Levrant Heritage Architecture Ltd and the assessment of views, we disagree with several points highlighted in their summary and conclusions.
Bullet point 6 asserts, “the proposed development will result in seven instances of low adverse impact and one instance of low beneficial impact in heritage terms.” The CBA strongly believes that the height and massing of the proposed structures will have a high adverse impact on the setting of the Listed Grade II* St George’s Church and the character and appearance of this part of the Castlefield Conservation Area. Viewpoint 5 and viewpoint 6 (pg. 54 and 55 of the heritage statement) clearly illustrate this. The current visual dominance of St George’s Church will be substantially impacted through the current proposals.

Bullet point 10 asserts, “the Proposed Development will maintain the character and appearance of the Castlefield Conservation Area overall and encourage further exploration into the Conservation Area from the south.” The CBA does not accept this. We do not believe that the proposal fully meets the saved UDP, Policy EN2: Tall Buildings in that we dispute that the development as proposed is “appropriately located...” or “…contribute[s] positively to place making...”. The Council’s web site contains the following relating to the control of development in the Castlefields Conservation Area, “…The purpose of a conservation area is to preserve, and even enhance, the character of those elements which are of historic significance, but this does not rule out further development provided that it respects the character of the area...”. It is our view that the proposal as it stands does not “enhance” or “respect” character or setting of heritage assets in the area by its height and massing.

Bullet point 11 states, “The proposals amount to “less than substantial harm” to the identified heritage assets within the terms of the NPPF and comply with national and local planning policy.” As we have said above, the CBA believes that the height and massing of the proposed development will have a high adverse impact on the setting of the Listed Grade II* St George’s Church and the character and appearance of this part of the Castlefield Conservation Area. We believe that this amounts to substantial harm and therefore does not meet the requirements of the National Planning Policy Framework (NPPF), specifically paragraph 132 which states, “Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification...Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”

Recommendation
The CBA believes that this proposal should be scaled down and should deliver a more thoughtful enhancement of the area that better addresses the setting of St George’s Church and the character and appearance of the conservation area. The CBA objects to this application as it stands.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.
The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in ODPM Circular 09/2005 and in Welsh Office Circulars 61/96 & 1/98.