

26th June 2019

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1. Introduction

1. This Heritage Statement has been prepared to support an application for planning permission for: a) a Masterplan for the redevelopment of land on Pall Mall, at the rear of the former Exchange Station Liverpool and; b) full details of the development of Plot A with a new building for offices, following approval and implementation of a previous application for site remediation works. The statement aims to consider the heritage significance of the site and its setting and to assess the impact of the proposed works on that heritage significance and the townscape, through a Heritage Impact Assessment and Townscape Visual Impact Assessment.

2. This Heritage Statement has been informed by visits to the site, desk-based research and an inspection of the records on the site and adjacent sites at Liverpool Local Records Office.

3. The site itself is not a designated heritage asset but: it is on the edge of the boundary of medieval Liverpool; it is partly within the Castle Street Conservation Area; it is within the Buffer Zone of *Liverpool - Maritime Mercantile City* World Heritage Site and; it is within the setting of several listed buildings. The proposals thus have the potential to have an impact on designated heritage assets and/or their setting.

4. In preparing this Heritage Statement, regard has been paid to the advice in Para.s 189 and 190 of the National Planning Policy Framework (NPPF) 2019:

*189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. **The level of detail should be proportionate to the assets' importance** and no more than is sufficient to understand the potential impact of the proposal on their significance....*

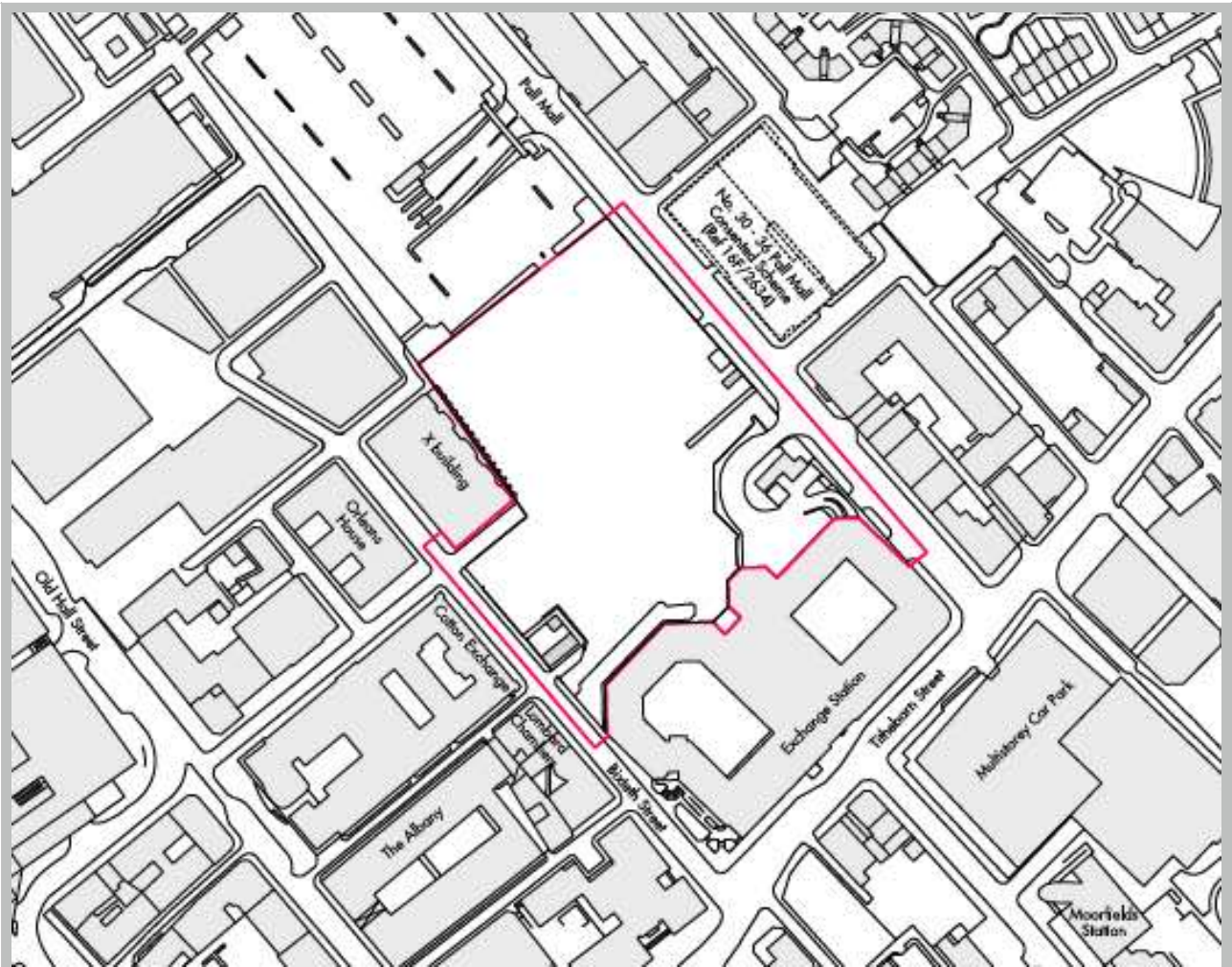
190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this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

5. The previous, implemented application for site clearance and remediation was supported by an Archaeological Assessment (*Archaeological Desk Based Assessment of a Plot of land at Pall Mall, Liverpool* (May 2017) by National Museums Liverpool) and associated conditions pertaining to archaeology have been discharged.

6. The proposals have been the subject of on-going consultations with officers of Liverpool City Council. Earlier versions of the proposal have been presented to Places Matter's Design Review Panel: the advice of the panel was generally supportive and the current proposals are a result of efforts to respond to the Panel's constructive advice. Historic England was consulted on earlier version of the proposals: the advice of Historic England was generally supportive and the current proposals are the result efforts to respond to the constructive advice of the Panel and Historic England.

7. This Heritage Statement has been prepared by John Hinchliffe BA (Hons), BPI, MSc (Btg Heritage & Conservation), IHBC, RTPI of Hinchliffe Heritage for BCA Architecture.

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Plan 1. Location Plan

2. Description of the Liverpool, the Site and its Setting

2.1 Liverpool

2.1.1 Liverpool is a dynamic city with a resident population of currently over 475,000 residents. The population of the city is currently stable but it has fallen dramatically from its peak of over 800,000 in the 1930s. Over 1,400,000 live in the wider Liverpool City Region, which includes the wide area of Sefton, Knowsley, St. Helens and Wirral.

2.1.2 Historically, the reason for Liverpool's development was its location on the East bank of the River Mersey which led to the establishment of the settlement adjacent to the river and the subsequent development of the docks in the tidal margins. The river, the dock and activities related to them, shaped the evolution of Liverpool and dominated its urban life and form, as it grew outwards in a fan shape, centred on the historic core around Castle Street and the Pier Head. Although more tonnage of goods now goes through Liverpool's new docks at Seaforth than ever before, the number of dock workers has dropped remarkably due to modern transfer facilities and the city can no longer rely upon the docks and associated industries to be the principal source of employment.

2.1.3 Liverpool now attracts people from far and wide for a wide variety of reasons: as a place of work; as a place to live; for study at the four universities or; just to visit its great sporting and cultural attractions. Liverpool is a sub-regional centre within the NW of England and for North Wales, with a variety of institutions and facilities associated with that role. It has colleges and four universities and has hospitals which are national centres of excellence.

2.1.4 Liverpool's current cultural renaissance was illustrated by its successful tenure as European Capital of Culture in 2008 - an honour which itself increased the city's confidence and capacity for organising large and successful cultural events.

2.1.5 The international heritage significance of Liverpool was marked in 2004 when a large part of the city, waterfront and historic docks were inscribed on to UNESCO's World Heritage list.

2.1.6 Liverpool continues to evolve to provide employment, health facilities and educational facilities for its residents into the future.

2.1.7 Topographically, Liverpool is on land which rises up from the River Mersey in the W to a ridge of the underlying red sandstone, which curves in an arc around the city centre and stretches from Allerton in the S to Everton in the N, with a high point at Edge Hill.

2.2 The Site

2.2.1 The site is an approximate rectangular shape on a SE-NW axis, with the NW corner cut out (where a block of apartments has recently been constructed) and with the SE corner cut out (where the service yard for Exchange Station is located). Most of the site is at a level approximately 3-4 metres above the surrounding streets, as it was raised during the construction of the station, in order to avoid conflict between the tracks and the roads but it is currently being lowered to the surrounding street levels, through site remediation works.

2.2.2 Until recently, the NW half of the site was wholly a roughly-surfaced single-level car park (Plates 1 and 2) which was accessed via a ramp from Pall Mall.

2.2.3 The site was previously occupied by the tracks, platforms and sheds of Exchange Railway Station. The SE half of the site was laid out as a landscaped park (Plates 3-6) at the same time as the construction of the offices at Mercury Court, following the demolition of the sheds. Although the

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park was privately owned, it was fully accessible to the public and had several paths of block paviors running through it which were freely used by the public, primarily as a route between Pall Mall and Bixteth Street and for relaxation. The park had several mature deciduous trees and large expanses of grass. It also had some large, brick-built circular seating structures, close to Exchange Station. Immediately outside the rear of Exchange Station was a large hexagonal area of block paving which is curiously closed off by 1 metre high railings. The park was looking somewhat dated but was used by workers from nearby offices as a lunch-time venue and with local residents at all times. The site is now surrounded by hoardings to create a secure site whilst the site remediation is undertaken.

2.2.4 In the middle of the Bixteth Street frontage of the park is an unsightly brick electricity sub-station (Plate 12) which has a flat roof and utilitarian railings on each side.

2.2.5 The service yard for Exchange Station at the SE corner is at a lower level. It contains refuse bins, a range of plant and a changing variety of service vehicles. It is enclosed by a variety of boundary treatments and is an obstacle to pedestrian permeability. Part of its boundary is a recent high quality cast iron railing (Plate 9) but other parts have a plain brick wall, topped by an unsightly security railing (Plate 8).

2.2.6 At the NW end on Pall Mall, the level difference is accommodated by the lowered retaining wall (Plates 10 and 11) of the former station. It has a blue brick chamfered plinth with pressed red brick upper section which has curtailed pilasters with stone bases. The wall also contains some former entrances with rusticated stone surrounds, including a blocked entrance to a former pedestrian subway which linked Prussia Street with St Paul's Square. On the site's Pall Mall boundary, at the junction of the park and the car park is a small surviving fragment of Exchange Station, in very poor condition.

2.2.7 At the SE end on both Pall Mall and Bixteth Street, the level difference is accommodated by ramped grass mounds and ramped footpaths.

2.2.8 Approximately 15 metres beneath the site run two railway tunnels which contain the two tracks of the Northern Line, which is part of Merseyrail's underground system. Although there is no evidence of them at ground level, they impose practical restrictions on the construction of buildings on the site.

2.2.9 At the time of preparing this Heritage Statement, the site is in the process of being cleared and remediated, in accordance with approval of application 18F/2614 on 5th February 2019.

2.3 The Surrounding Area

2.3.1 The application site is at the E edge of the central commercial district of Liverpool City Centre. It forms part of the site which formerly contained Exchange Railway Station and its associated railway sheds and tracks. The front and side elevations of the (2nd) former station building (Plates 13-15 and 18) which was built in the 1880s still stand immediately to the S of the site, although it closed as a station in 1977 and was redeveloped as offices in 1985. The offices have the main front door on Tithebarn Street but another principal doorway on the rear which connects directly on to the site. The office redevelopment also includes a lower service yard at the rear which is accessed from Pall Mall. Beyond the former station to the S and W is the fringe of the historic core of the city, with: Moorfields underground railway station; many historic pubs and commercial buildings, many now converted to apartments, hotels and leisure uses (Plates 16 and 19) and some more modern buildings of the late 20th and early 21st Cs. The main retail centre lies further to the S.

2.3.2 The main commercial centre of Liverpool lies immediately W of the site, across Bixteth Street and is contained within a mixture of historic commercial buildings of the 19th and early 20th Cs and a growing number of buildings of the late 20th and early 21st Cs (Plates 20-24). A block of

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residential apartments has recently been constructed between part of the site and Bixteth Street (Plate 22).

2.3.3 To the N of the site is a large single-level car park (which extended into part of the site) which is raised above the surrounding street level on the site of former rail tracks. Beyond the car park to the N is Leeds Street, which is part of the main city centre traffic circulation road system.

2.3.4 To the E of the site, is a mixed area of historic and new buildings (Plate 17) in commercial and residential use, both social housing and recently constructed private apartment blocks.



Plate 1. N end of site, before site remediation



Plate 2. N end of site, before site remediation



Plate 3. S end of site looking towards back of Exchange Station, before site remediation



Plate 4. S end of site looking towards back of Cotton Exchange, before site remediation

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Plate 5. S end of site looking towards back of surface car park, before site remediation



Plate 6. Curiously fenced off paving outside Exchange Station, before site remediation



Plate 6a. View W from Pall Mall during site remediation (May 2019)



Plate 6b. View NE across site during site remediation (May 2019)



Plate 6c. View NW from Pall Mall during site remediation (May 2019)



Plate 6d. View E from Bixteth Street during site remediation (May 2019)

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Plate 7. Low-level service yard at Exchange Station



Plate 8. Unsightly railings at service yard Exchange Station



Plate 9. High quality (but new) railings at service yard



Plate 10. Retaining wall at E side of site and entrance to subway, before site remediation



Plate 11. E side of site and entrance to landscape "park", before site remediation



Plate 12. Unsightly electricity sub-station on Bixteth Street, before site remediation

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Plate 13. Front of Exchange Station



Plate 14. Corresponding internal arches



Plate 15. Old and new Exchange Station on Bixteth Street



Plate 16. Churchill House, on Tithebarn Street



Plate 17. E side of Pall Mall



Plate 18. Exchange Station with Silkhouse Court beyond

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Plate 19. The Railway, The Lion and the courts



Plate 20. Bereys Buildings and Lombard Chambers, Bixteth St



Plate 21. The Cotton Exchange



Plate 22. The Cotton Exchange and new apartments

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Plate 23. Bereys Building, George Street



Plate 24. Windsor Building, George St



Plate 23. View W down Ormond Street



Plate 24. View E down Ormond Street to site

3. History of Liverpool and the Site (See Historic Maps at Appendix 1).

3.1 Liverpool

3.1.1 Origins

Liverpool was formally established by King John in 1207, as he needed a port in the NW of his kingdom which had easy access for voyages to Ireland and Wales. The settlement of Liverpool actually began before the royal charter, as a landing point on the East bank of the River Mersey for the ferries across the river which were run by the monks who were based in Birkenhead Priory on the West Bank. The Priory was founded around 1150 and is the oldest building in Merseyside - its setting regrettably destroyed by industrialisation of adjacent sites.

The settlement of Liverpool grew to around 500 people during the 13th Century and although no building survive from that period, the seven medieval streets laid out then, adjacent to the river in the form of a letter "H" do survive and help us to locate the starting point of the city: Castle Street, Old Hall Street and High Street, parallel to the river and Chapel Street, Water Street, Dale Street, and **Tithebarn Street** running towards the river. Successive redevelopments with newer and bigger buildings have transformed the area from a small fishing village to a modern city centre with many Georgian and Victorian buildings surviving. The reclamation of the tidal margins to create docks and the Pier Head has distanced the old centre from the river itself but some memory of its ancient past is evoked by wandering down the narrow cobbled alley of Hackins Hey and into the enclosed yard at the back of Thomas Rigby's Inn on Dale Street.

Little evidence of Liverpool's ancient origins survives, apart from the street plans and names. This illustrates a long-standing tradition of urban regeneration which has wiped away all buildings from the city's first 500 years, with the Bluecoat School (now a centre for contemporary art) in School Lane being the city's oldest surviving building. Opened in 1717, the Bluecoat celebrated its tri-centenary in 2017.

The growth of Liverpool as a port was despite, rather than because of, its natural geography of the river, which made it unsuitable for the mooring of ships and the loading and unloading of goods. Until the 17th century, the shoreline lay further inland from the present river wall: in the city centre, it was along the line of Strand Street, where the wall of St Nicholas's Church was the river wall, forming the line of the old quay and; further North, the shoreline was approximately along the line of the dock road. The Townsend Windmill, which was later on the E side of the dock road, was originally on the shoreline.

The town and its maritime activities grew slowly over the first four centuries but by the mid-16th century Liverpool's ships were regularly trading with Spain, Portugal and France, in addition to coastal trading with the rest of England, Wales Scotland and Ireland. When the Spanish Armada put to sea against England in 1588, it was the Liverpool merchant, Humphrey Brooke, who brought the news of the forthcoming attack back to this country. By the middle of the 17th century Liverpool merchants were trading further afield - with America and the Caribbean. For good reason, the statue of Columbus outside the Palm House in Liverpool's Sefton Park bears the inscription: *The discoverer of America was the maker of Liverpool.*

The first recorded American cargo to arrive was brought by James Jenkinson in *The Friendship*, in 1648 and consisted of 30 tons of tobacco. The foundation of European communities on the American continent and the formation of the British West Indian colonies heralded a new era of trade through the port and an increase in shipping across the Atlantic. English manufactured goods, coal and salt were exported and the new colonies sent back sugar, rum and cotton, much through the expanding town and port of Liverpool.

In 1665 a sugar-refining business was established in a building off Dale Street, processing sugar from the West Indies - a precursor to the later and much bigger Tate and Lyle refinery. The greatest

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trade in any one single cargo was the import of raw tobacco, mostly from Virginia. No such “evil weed” is imported into Liverpool but for centuries its storage and transformation into smoking and chewing tobacco and snuff was a staple in Liverpool’s economy. It generated the need for the construction of the Stanley Dock Tobacco warehouse in 1900 - its 27 million bricks making it the largest warehouse in the world!

By the end of the 17th C, Liverpool was the third trading port in England, behind only London and Bristol. It had 24 streets, and a population of about 6,000. Celia Fiennes, described it as *‘London in miniature...with long, handsome, well paved streets lined by...houses of brick and stone built high and even. It was very rich with an abundance of persons...very well dressed and of good fashion.’* Contemporary paintings of the waterfront show that the shoreline, then along the Strand, was dominated by Liverpool Castle (demolished in the 18th C), the Tower of Liverpool (re-built twice on the same site but still standing in the early 20th C incarnation) and the Church of St Nicholas (also still standing but rebuilt in stages).

3.1.2 Old Dock - The world’s first commercial enclosed wet dock

But the port facilities in Liverpool at the beginning of the 18th C were severely restricted and could not cope with the increasing size and numbers of ships. In any event, the port had developed despite its natural geographical conditions, not because of them. The river itself is an inhospitable harbour: with the second highest tidal range in the country - up to 12 metres (twice a day); mud banks along the waterfront at low tide; swirling eddies and rushing currents of up to 8mph in the river and; prevailing cross-winds. A natural tidal pool ran inland from the river front to the South of the town, following the present route of Thomas Steers Way, Paradise Street, and Whitechapel. The Pool was a “haven” from the turbulent river but it was of restricted size and became a muddy creek at low tide. Something had to be done to enable the port of Liverpool to continue to expand. The construction of a new enclosed wet dock, where water levels were maintained constant with the level of the quayside, was the answer. In November 1708, as the newly elected borough MPs, Sir Thomas Johnson and Richard Norris Esq. were empowered by Liverpool Corporation “...to treat with and agree a proper person to come to the town and view the ground and draw up a plan of an intended dock.” Liverpool’s first enclosed dock was built by Thomas Steers and opened on 31st August 1715. It is recorded in Nicholas Blundell’s contemporary diary that: “... *The Mulberry* , *The Batchelor* and *The Robert* came into the dock on that morning and that “*The Mulberry* was the first”. The dawn of a new age for the Port of Liverpool had begun. Not only was it Liverpool’s first true dock but it was the world’s first commercial enclosed wet dock. Old Dock (as it later became known) was infilled in 1826 and the site has been redeveloped three times since then but much of it still stands in the heart of the Liverpool One shopping development.

3.1.3 A Georgian Town

The growth of the port was accompanied by the growth of an elegant Georgian town and despite much loss of it since, beacons of classical architecture from that period illuminate the city’s streets. Initially, the Georgian buildings were built within and immediately surrounding the medieval town, close to the river. Liverpool Town Hall was built in 1754 to the designs of Bath’s architect John Wood, as an expression that Liverpool was a serious rival to Bath as a “centre of high culture”. The high-level friezes on its side elevations proudly display exotic people and animals in representation of Liverpool’s trade with Africa at that time, transporting goods and regrettably people - by force of the gun. Liverpool was not alone in profiting from the immoral trade in enslaved Africans but in the mid 18th C it was the pre-eminent port for the organisation of that trade. Liverpool is now seeking reconciliation - it has since apologised for its role, has established the International Slavery Museum and every year on 23rd August participates in Slavery Remembrance Day.

3.1.4 Victorian Glory

Liverpool is now a predominantly Victorian city and some say the country’s finest example, with stupendous banks, shipping offices, palaces of commerce, warehouses by the dozen and mansion houses, many displaying technological innovation as well as glorious decoration. Perhaps the grandest street is Castle Street, which despite its medieval origins is lined with buildings of

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Victorian splendour which are now changing into a popular cluster of bars, coffee shops and restaurants from where the architectural grandeur can be enjoyed rather than endured.

Perhaps the finest individual Victorian building is the magnificent St George's Hall- widely regarded as one of the finest neo-classical buildings in the world, designed by Harvey Lonsdale Elmes - when he was only 21 - a testament to Liverpool's faith in youth. It opened in 1854, but, he initially designed two buildings - a law courts and a music hall and only later was it decided to combine them as a single building. It resulted in the bizarre occurrence of people being sentenced to death in the courts whilst on the other side of the door people were enjoying an afternoon tea dance! It has undergone a major restoration and is now open as an attraction where visitor can shudder in fright in the cells and tremble in awe at the majesty of the Great Hall and, if lucky, enjoy a performance in the exquisite Small Concert Room.

In the 19th C, Liverpool was truly "Sailor Town", with many of its own population either a docker or a sailor and with an ever-changing population of sailors from around the world, enjoying the pleasures of the port whilst their ships were unloaded and refilled. The Liverpool Sailors' Home was built in 1852 to provide them with safe accommodation, away from the "...land-sharks, land-rats, and other vermin, which make the hapless mariner their prey." (Herman Melville's *Redburn*). It had a curiously elaborate Tudor exterior and a cast iron galleried interior but was scandalously demolished in the 1970s. Some of the cast iron panels of mermaids found their way to Portmeirion in North Wales and some into the Malmaison Hotel in Princes Dock but the Liverpool-themed, maritime gates had been consigned in 1952 to a car park in Sandwell, near Birmingham where they were like "a fish out of water". After much campaigning by Liverpool sea-dogs, the gates were returned to their ancestral home in 2011 and now act as a gateway on Paradise Street to Liverpool One, a testament to Liverpool's pride in its maritime heritage.

3.1.5 Jesse Hartley

Old Dock began Liverpool's rise to becoming one of the world's greatest seaports and the port continued to grow over the next two hundred years with an continual programme of dock construction stretching 7 miles along the East bank of the River Mersey - a remarkable achievement of civil engineering and commercial enterprise by the dock trustees and later the Mersey Docks and Harbour Board. Perhaps the greatest praise should go to Jesse Hartley, Dock Engineer to the Port of Liverpool 1824-60. In that time, he built or remodelled all of Liverpool's docks and built monumental warehouses at Albert Dock (transformed in the 1980s from dereliction to the most-visited free attraction in the NW), Wapping Dock and Stanley Dock (itself currently undergoing restoration. He also built the Victoria Clock Tower, as a gateway landmark at the entrance to the river and the docks, and much of the great Dock Wall of Liverpool.

3.1.6 The Fall and Rise

Liverpool reached a zenith in the early 20th C and nowhere can this be better seen than in the great expression of self-confidence illustrated by the four magnificent buildings at the Pier Head, on the site of the infilled George's Dock: The Royal Liver Building, the Cunard Building, the Port of Liverpool Building and the Tunnel Ventilation Tower by Liverpool's Herbert Rowse.

During the 20th C, Liverpool's fortunes faded as war-time bombing destroyed much of the city and the port. Containerisation, increased trade with Europe, poor industrial relations and a slowness to modernise left the port floundering and the historic docks were a scene of industrial obsolescence. Liverpool became a shrinking city as its population fell from 840k in 1930 to 440k in 2000. In the 1980s, some politicians and academics called for the managed decline of the city but the city refused to die. Its cosmopolitan character and collective strength created a vibrant cultural scene of music, theatre, sport and comedians. *The Beatles* were four lads from Liverpool who shook the world in the 1960s. Their legacy is as evident in the city today as ever, with: The Beatles Story at Albert Dock; Mathew Street a maze of Beatles bars; statues in abundance and; the homes of John and Paul open for pre-arranged visitors, courtesy of the National Trust.

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In the early 21st C, the port recovered and moved more tonnage of goods than ever before from its new facilities at Seaforth, in the hands of Peel Ports from 2007 and where £400m has been invested to create Liverpool 2 - a new river-side dock which opened in 2016 with facilities for the biggest container ships. Liverpool realised that its cultural strength and its maritime heritage were part of its USP and its future. In 2004, UNESCO recognised the Outstanding Universal Value of Liverpool and inscribed the historic docks and city on to its list of World Heritage Sites as “the supreme example of a commercial port at the time of Britain’s greatest global significance” - demonstrating that Liverpool is a truly historic city. In 2008, Liverpool was European Capital of Culture demonstrating that Liverpool is a truly cultural city. The designations increased the confidence and capacity of the city which is still going from strength to strength, as a unique place with high quality of life and as a visitor destination. New hotels, bars, shops, restaurants and venues are opening at a remarkable pace and, although much remains to be done to continue its renaissance.

As with many cities, the tourism and office-based industries form an increasingly crucial role in the economy and in providing employment. In order to facilitate these industries, it is essential to provide adequate hotel and high quality office space to meet the demands of tourists and businesses.

3.2 Transportation

Introduction

3.2.1 A transport revolution was one of the pre-requisites of: the Industrial Revolution; the growth of Liverpool’s port and; the phenomenal increase in the growth of trade. Improved transportation was essential to enable goods to be transported in greater bulk, more quickly, more reliably and more cheaply than before. Prior to the mid-18th century, transport of both goods and people by land was slow and inefficient due to the atrocious condition of the roads and there was neither the technology nor the capital resources available to make significant improvements. However, in the 18th and 19th centuries, the technology was developed to enable transport systems to be improved remarkably. Furthermore, the prospect of huge profits from transport and trade drove entrepreneurs, civil engineers and, to a lesser extent, public bodies to drive forward with the use of that technology. The accumulated wealth from the agricultural revolution and the slave trade helped to provide the resources to finance the huge cost of works on a grand scale.

Initial improvements in transportation involved creation of improved dock facilities, bigger and faster ships, provision of turnpike roads and several industrial canals or canalised rivers, notably the Leeds and Liverpool Canal, the full length of which opened in 1816. Important as the canals had been in improving inland communication and contributing to the economic growth of Liverpool in the 18th and early 19th Cs, they had severe limitations in the speed of transportation and the areas that they could serve. The most significant technological innovation in the world in the 19th C was the introduction of railways and Liverpool was at the forefront of that technology.

Railways

3.2.2 Railways were the first form of mass public transportation and they transformed the way of life of many people, as well as the economy and landscape of the country. As well as moving people quickly and reliably, the railways also transported goods to and from Liverpool’s docks. The Liverpool and Manchester Railway opened in 1830 and at that time its Liverpool Terminus for passengers was at Crown Street Station, immediately S of Paddington Village, and was reached via Crown Street Tunnel from Edge Hill Station.

The construction of Wapping Tunnel, to take goods to and from the South Docks, and located to the S of the Crown Street Tunnel, was started in 1827 and opened in 1830.

The separate Lime Street Tunnel from Edge Hill Station to Lime Street Station, took a further 6 years to excavate and it was completed in 1836. This tunnel was 2,230 yards long at a gradient of 1 in 93 and took the existing route through the site of Paddington Village. Initially it was 25ft wide

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and 17ft high and could only accommodate two tracks but in the 1880s it was widened to take four tracks and much of the rock over the tunnel was removed to create open cuttings, protected by the walls which are around them today.

It was soon decided that a further railway route, to the North Dock, was necessary and this was provided by creating two lengths of tunnel which opened in 1849. The first tunnel (1 mile and 947 yards in length and initially known as the Victoria Tunnel) was constructed from Edge Hill Station underneath the site of Paddington Village to an opening at Byrom Street. The second tunnel (852 yards in length) ran down initially to Waterloo Dock and Goods Station but was extended in 1895 to Riverside Station at Princes Dock so that passengers could be taken directly to ships, mostly whilst emigrating for a better life.

Railway companies continued to invest in facilities to service the port throughout the rest of the 19th century, creating huge marshalling yards at Edge Hill and Aintree, opening new lines, Exchange Station (see section 3.2.2) and Central Station. The railways became the premier means of transport for goods and people and were crucial to the port's continuing prosperity. The Liverpool Overhead Railway Company was formed in 1888 and building began in 1889 at the northern end of the line. The first train ran in 1892 and when it was formally opened in 1893, it became the world's first elevated electric railway, ran the full seven miles of the docks and had 17 stations. The Mersey Railway Tunnel was officially opened on 20th January 1886 by the Prince of Wales and on 1st February, the first passenger trains went through, carrying 36,000 people on that day.

The opening of the railway enabled goods arriving and departing from Liverpool Docks to be transported to other parts of Great Britain far more efficiently and speedily than before and the port came to depend upon the railways for maintaining its global trading position.

3.3 Exchange Station

The First Station (Plates 25, 26 and 26a)

3.3.1 The first Exchange Station opened in 1850, replacing an earlier temporary station further N at Great Howard Street. The station was designed by John Hawkshaw, a prominent railway architect, and was set back from Tithebarn Street and at a considerably higher level so that the N-S rail tracks were not in conflict with the E-W principle roads or the Leeds and Liverpool Canal. The building was in the Italianate style. The width of the station's site was restricted to being between Key Street (effectively the continuation of Moorfields) and Bixteth Street (Map 8) and the building itself had a frontage of 117 feet. To the rear were two single storey wings with refreshment and waiting rooms. The station was served by five tracks covered by two iron roofs. Stairs from the forecourt provided access to the higher level for pedestrians, a ramp was constructed for vehicles to the W and a service road ran at grade to the E.

Initially, the station was used by two railway companies and had two names because the joint owners could not agree on a name. The Lancashire and Yorkshire Railway (LYR) named the station Liverpool Exchange Station but the East Lancashire Railway (ELR) named it Liverpool Tithebarn Street Station. However, in 1859, the LYR absorbed the ELR, and from it became Liverpool Exchange Station. From 1850, trains of the Liverpool, Crosby and Southport Railway (LCSR) also began to run into Exchange Station with three companies using the terminus for a short time. The LCSR became part of the LYR in 1855 and so by 1859 the LYR had absorbed both of the other two companies using the terminus, making it the sole operator of the station.

The Second Station

3.3.2 With the rapid growth of Liverpool and its trade in the mid 19th C, the original station struggled to cope with demand and so within 20 years, it was decided to rebuild the station and increase its capacity by widening the approaches to accommodate more tracks. The station was extended to the E to Pall Mall and the new tracks were laid at a lower level than the earlier tracks to reduce the gradient and this phase was completed in 1886. The old station was then demolished and the new station was completed in 1888, to designs of the architect Henry Shelmerdine. The new station

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building, including a hotel, was set further forward on Tithebarn Street and at street level, with pedestrian access to the higher track level from within the station.

The site of the station platforms also expanded further N to cover Clarke's Basin (one of the original termini of the Leeds and Liverpool Canal). The station continued to be the Liverpool terminus of the LYR and was also the terminus of the company's Liverpool to Manchester line.

Under four extremely long glazed train-shed roofs lay ten platforms, with an access roadway between platforms 3 and 4. The station provided long-distance services to destinations such as Manchester Victoria, Blackpool North, the Lake District, Whitehaven, Glasgow Central, Bradford Exchange and Leeds Central, as well as more local destinations.

The author and First World War poet Siegfried Sassoon frequently lodged in the hotel adjoining Exchange station. In 1917, after having earlier written his *A Soldier's Declaration* (at his London club), which appeared in the press and was read to the House of Commons, Sassoon was visited at the hotel by Colonel Jones Williams who reprimanded him for his actions. It was from Exchange station that Sassoon made his famous trip to Formby the next day, ripped the ribbon of his Military Cross off his tunic and flung it into the waters at the mouth of the Mersey.

The approach tracks suffered bomb damage during WWII but were subsequently repaired and the station re-opened but as the 20th C progressed, lines began to be closed and/or services re-routed to Lime Street Station so that by the early 1970s, Exchange Station only served local lines towards Southport. With the opening of the Merseyrail Underground service which linked the Northern Line with the Wirral Loop Line at the nearby Moorfields underground station (and Central Station) in 1977, Exchange Station finally closed in 1977.

3.4 The Site

3.4.1 Liverpool was founded in 1207 and, very soon, the newly established town had seven medieval streets laid out, adjacent to the river in the form of a letter "H": Castle Street, Old Hall Street and High Street, parallel to the river and Chapel Street, Water Street, Dale Street, and **Tithebarn Street** running towards the river (see Map 1). The application site was probably outside the developed area of the town at that time as Tithebarn Street was initially only built-up at the W end even by the 14th C (see Map 1), but the site was adjacent to the route of Tithebarn Street.

Even by 1725 (Map 2), ten years after the start of Liverpool's period of great expansion with the opening of the first dock in 1715, only the block between Bixteth Street and Key Street (a northward extension of Moorfields) and the E side of Pall Mall were developed with what was probably a mix of houses and warehouses, and the rest of the site appears to have been open fields. By 1768/9, the E side of Pall Mall had been built (Maps 3 and 4) but E end of the application site had not and was owned by a Mr Grundy. Amongst the houses and warehouses, Perry's 1769 Map (Map 4) illustrates that a Dissenters Meeting House had been built on Key Street and a Roman Catholic Chapel (later known as St Mary's Church) had been built on around the W edge of the site.

By 1803 (Map 5), a pair of buildings had been constructed on "Tythebarn Street" (S of the site) and several buildings had been built at the N end of the site around Prussia Street but curiously much of the site remained undeveloped, even though the town was expanding around it. However, Swire's map of 1824 (Map 6) shows that by then the site had been fully developed and that one of the termini of the Leeds and Liverpool Canal had been created further N with a number of coal yards and wharfs. Gage's more detailed 1836 "Plan of the Town and Port of Liverpool" (Plan 6a) also illustrates that the site had been fully developed. Bennison's map of 1841 (Map 7) also confirms this complete development of the site and that a narrow street (MacVicker Street) ran into the site from Tithebarn Street.

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The next major change came with the construction of the first station in 1850, shown in detail on the 1864 OS Map (Map 8) between Key Street on the NE and Bixteth Street on the SW. The station building (Plates 25-27) was set back behind a wall, gate piers and a forecourt and at a higher level, with access roads on each side and steps from the town end of the site up to the centre of the building. The station had two main tracks plus a shorter track.

The station and tracks were soon found to be inadequate and so both were much enlarged in the 1880s in two phases, being completed in 1886 and 1888. The new station is shown in detail on the 1893 OS Map (Map 9) at its wider width (as now) from Bixteth Street to Pall Mall, and the sheds are shown as having a slightly tapering plan and extending NW, past St Paul's Church as far as Rigby Street. The station hotel is in the SW corner of the building and vehicles accessed the site from Pall Mall. A subway was created under the site from Prussia Street to St Paul's Square.

Although the city around the station grew and changed during the early mid-20th C, the site remained largely unchanged (Maps 10-12) until the closure of the station in 1977.

It was used for a few years as a covered car park but in 1985, an office development, named Mercury Court, was created within the station to designs by Kingham Knight Associates, although most of the interior, side and the rear elevations were demolished, rebuilt and extended, retaining just the front and part of the side elevations and the twin arches inside the central external arches. The platforms and sheds were extensively cleared, creating a landscaped open space immediately at the rear of the new offices, with a service yard from Pall Mall, and the rest of the site became a platform-level car park.

The offices were refreshed and rebranded as "Exchange Station" in 2013.



Plate 25. The first Exchange Station



Plate 26. A Herdman drawing of the first Exchange Station

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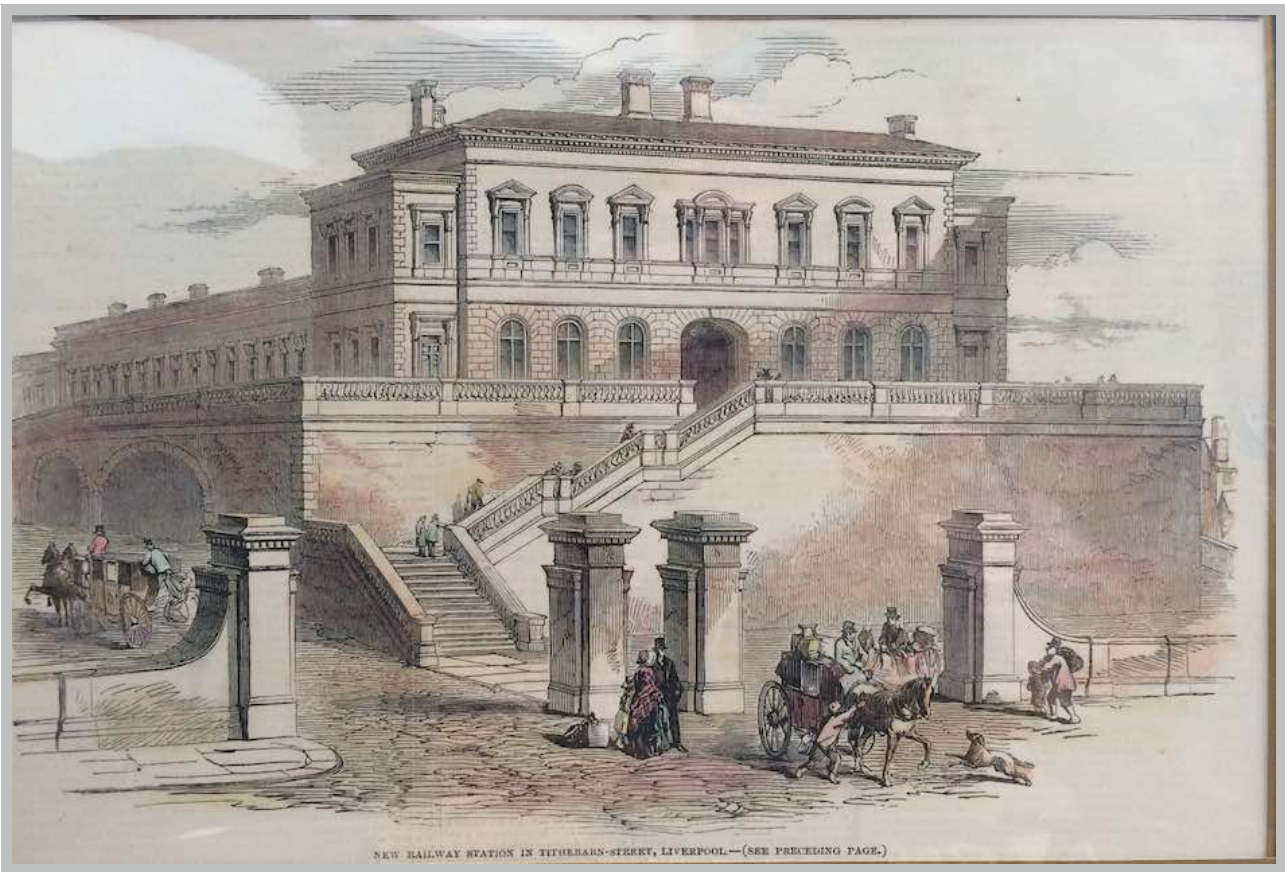


Plate 26a. The 1st Exchange Station from London Illustrated News 4th May 1850



Plate 28. 2nd Exchange Station in early 20th C



Plate 29. 2nd Exchange Station in C1920s

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Plate 30. 2nd Exchange Station in C1920s

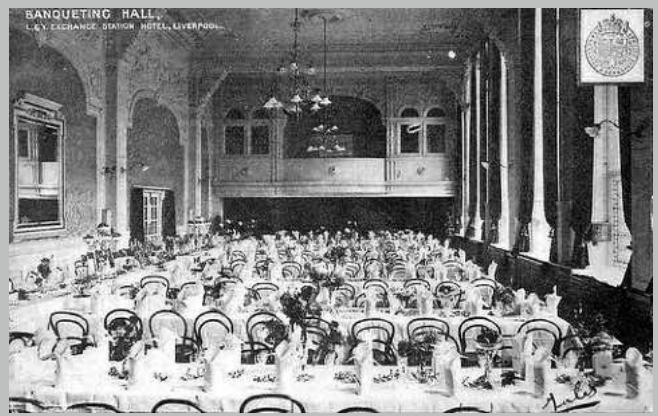


Plate 31. Banqueting Hall in Exchange Station



Plate 32. Sheds at 2nd Exchange Station



Plate 33. Sheds at Exchange Station in Mid 20th C



Plate 34. Interior of Exchange Station in 1934



Plate 35. Interior of Exchange Station in 1963

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Plate 36. Interior of Exchange Station after closure



Plate 37. Interior of Exchange Station after closure



Plate 38. Aerial view of Exchange Station in 1969

4. Heritage Designations

4.1 Castle Street Conservation Area

4.1.1 Only that part of the site which is the service yard for Exchange Station is within the Castle Street Conservation Area (shown in Plan 3). The conservation area was designated by Liverpool City Council in 1968, and extended in 1976, 1981, 1985 and 1996. The remainder of the application site is outside the conservation area but immediately abuts the conservation area on its SE boundary and a short length of its SW boundary, where it abuts the back of Exchange Station and Bixteth Street. The conservation area covers an extensive area from the River Mersey in the W to the top of William Brown Street in the E and from Old Hall Street in the N to Lord Street in the S. It includes the Pier Head to the W of The Strand as well as the much of the commercial district of the city to the E of The Strand.

4.1.2 No formal conservation area appraisal has been prepared by Liverpool City Council for the conservation area but the heritage significance of the CA is comprehensively described in the Liverpool WHS Nomination Document (2002), albeit in which the Pier Head is described as an area of separate townscape character from the commercial district. The Nomination Document summarises the “Castle Street/Dale Street/Old Hall Street Commercial Area” of the WHS:

The commercial centre equates roughly to the boundary of the medieval town of Liverpool. At its heart stands Exchange Flags, on which most commercial activity was focussed during the period of prosperity and expansion. The principal streets are Castle Street, Water Street, Old Hall Street, Dale Street and Victoria Street. The first four are of ancient origin, though they were widened in the 18th and early 19th centuries; the last dates only from the 1860s. These streets contain the most important commercial premises. Subsidiary thoroughfares, often very narrow, are lined by warehouses, workshops and more functional building types. The streetscape of the area is exceptional, the result of careful planning of the main streets over three centuries and organic growth in the Cavern Quarter, the spectacular riverside topography, and the grandeur of its architecture and monuments.

4.1.3 The Liverpool WHS SPD (2009) provides a more extensive description of the heritage significance of the “Castle Street/ Dale Street/ Old Hall Street Commercial District” of the CA. It states that the area:

...encapsulates the historic commercial and civic centre of the city. It contains a dense concentration of historic buildings that reflect the medieval origins of the city and its growth and development of over the course of the 18th, 19th and 20th centuries.

6.5.2 The architecture of the area has generally been of the highest quality, often displaying virtuosity and innovation, and in many cases was designed by the most accomplished British architects of their age. Examples of such buildings include Tower Buildings, the Royal Insurance Building, Oriel Chambers, 16 Cook Street, the City Building and the Cotton Exchange. The range of architectural styles also adds to the variety of the city centre and its skyline, which is characterised by its many turrets, towers, cupolas and domes.

6.5.3 The area also contains the city’s key civic buildings and commercial and financial institutions. The 18th century Town Hall being an example of the quality of civic architecture in the 18th and 19th centuries. It also marked Castle Street out as the commercial heart of the city. The significant civic, commercial and financial institutions that appeared along the streets to the east and west of Castle Street, such as Dale Street, Water Street, James Street, Lord Street and Victoria Street, reinforced the primacy of Castle Street and the surrounding streets as the commercial core of the city.

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6.5.4 The historical economic pressures to build larger, grander buildings meant that early and smaller scale buildings now only survive on the periphery, in the side alleys and at the east end of Dale Street - a few important fragments of Georgian Liverpool survive along Dale Street, such as the shops at the junction with Cheapside, and these have value in providing evidence of this layer of townscape and history. Development pressure has also led to buildings being built on relatively narrow plots and virtually no buildings stand below 3 storeys high. Even in the case of long warehouse elevations the historic gables that front onto the narrow streets give the impression of tall narrow frontages. Buildings throughout the area front directly onto the pavement and where this is not the case this usually detracts from historic character.

6.5.5. One feature of the area is the hierarchy of streets, with principal through routes and narrow side streets often in irregular patterns, which preserves the medieval street pattern. Examples of the latter include Sweeting Street, Leather Lane, Hackins Hey and Quaker's Alley. Castle Street, Water Street, Dale Street and Old Hall Street are medieval streets that have been widened in the late 18th and 19th century, while Victoria Street was cut through in the 1860s. Where narrow streets are not medieval they generally reflect the locations of the rear warehouses attached to commercial buildings with grander facades.

6.5.6 Twentieth century development in the area has generally enriched its character, with the use of high quality stone facades and Art Deco and modernist influenced buildings. There are however a number of poor buildings and open spaces where former buildings once stood, that degrade the historic character of the area. Many of the new buildings around the edges of the Character Area are of high quality and contribute to the historic character of the city centre.

4.1.4 Liverpool City Council began a Conservation Area Appraisal in 2004, which included the assessment:

Castle Street Conservation Area contains many contrasts, from the grandeur of the Pier Head to the elegance of Castle Street and the Town Hall, from the broad commercial streets such as Water Street and Victoria Street to the tight knit streets of warehouses around Temple Court and to either side of Dale Street.

It is the eastern end of the conservation area, typified by narrow courts and alleys linking broad commercial streets. The area has two faces, the commercial office, exchange or bank with its high quality materials and elaborate architectural design facing the main streets, and the more modest, utilitarian warehouses and back offices lining the narrow side streets.

Many of the commercial and office buildings in this area are listed and include outstanding buildings with significant townscape value such as the Prudential Assurance Building (A. Waterhouse, Grade II), Royal Insurance Building (Francis Doyle, Grade II), The Temple (J. Picton, Grade II) and the Municipal Buildings (J. Wateman, Grade II*).*

A wide range of materials can be seen; terracotta, stucco, limestone, sandstone and granite masonry, lead, gold leaf, clay tile, grey and green slate roofs. Architectural styles run the full gamut of the Victorian and Edwardian periods; Neo Classical, Italianate, English Gothic, Venetian Gothic, Dutch and French Renaissance and Baroque. The scale of the commercial streets is large; the streets wide and the buildings tall, typically four storeys or more.

The back streets contain buildings which until recently have been under valued and few are listed, except where they form the rear of a listed commercial building. A more limited range of materials is seen, mainly common or glazed brick and cast iron. The buildings were designed with an eye to utility rather than fashion, but as with vernacular buildings

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everywhere achieve much dignity and delight. The buildings are as tall as their commercial companions, in some instances rising to six storeys, their height emphasised by narrow frontages and vertical features such as goods hoists. Fronting onto narrow streets and lanes they create canyon like effects.

The contrast between these two characters is striking and adds greatly to the richness of the area. The dense network of streets, mainly following a grid iron pattern makes the area both legible and permeable, especially to the pedestrian. Glimpses of gleaming domes and towers provide clear landmarks punctuating the area and tell of the Victorian wealth and confidence that Castle Street Conservation Area represents.

4.2 Listed Buildings

4.2.1 There are no listed buildings on the application site. The former Exchange Station is not a listed building.

4.2.2 Several listed buildings are within the immediate vicinity, several more within the wider area.

4.2.3 The listed buildings which are nearest to the application site, the immediate setting of which could potentially be affected by development at the site, are shown on Plan 3 and in Table 1, with their grades and levels of heritage significance. These levels of significance have been assessed using the ICOMOS criteria (see S.5.2). The Albany and Orleans House have High Heritage Significance as they are Grade II* listed buildings. The Cotton Exchange also has High Heritage Significance due to its important links to the cotton trade in Liverpool and its strong contribution to the outstanding universal value WHS, albeit that the original frontage on Old Hall Street has been demolished and redeveloped. The other listed buildings have Medium Heritage Significance.

Table 1. Listed Buildings in Immediate vicinity of Application Site

Listed Building	Grade	Heritage Significance (using the ICOMOS Criteria for level of significance)
59-61 TITHEBARN STREET	II	Medium
67, Lion Tavern, MOORFIELDS	II	Medium
No 35 Windsor Building, GEORGE STREET	II	Medium
The Albany, OLD HALL STREET (east side)	II*	High
No 33 Bereys' Buildings, GEORGE STREET	II	Medium
No 12 (Lombard Chambers), ORMOND STREET	II	Medium
Cotton Exchange - Building (formerly listed 14.3.75 under Edmund Street), OLD HALL STREET	II	High
Orleans House (formerly listed under Bixteth Street), EDMUND STREET	II*	High

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4.2.4 Heritage Significance of the Listed Buildings and their Settings

The heritage significance of these listed buildings varies considerably, due to their varied dates, architects, functions, materials etc. but, as they are all outside the application site, it is the contribution of the site to their setting (if any) and the impact of the proposal on their setting which is more relevant to this Heritage Statement and TVIA than the heritage significance per se of each individual building. The listing descriptions for the listed buildings included in Table 1 are provided at Appendix 2 but these are for identification only and do not necessarily provide full descriptions of their heritage significance.

All of the listed buildings identified in Table 1 have an immediate setting which is restricted to their own plots, their immediate neighbours and the pavements, as they are all sited at the back of the pavement within a tight urban grain and without any forecourt or garden. The intermediate setting of each building is formed by the width, orientation and surface material of the street on which they are located and the combined effects of their neighbouring buildings. All are actually located on straight streets with an orthogonal grain. The width and surfaces of the streets varies but few (if any) original historic surfaces survive and the general narrowness of the streets restricts many long-range full-on views, with the effect that most are seen: full-on only at close-range or; at an acute angle.

Historically, the railway sheds on the application site would have prevented views over the site towards the listed buildings on Bixteth Street but their demolition created a somewhat temporary and false void in the townscape and enabled some temporary views of the surrounding buildings, over the cleared site. Even then, the raised platform levels and the retaining walls along Pall Mall prevented some views across from Pall Mall to those listed buildings with a frontage on to Bixteth Street. Thus, whilst the openness of the application site and its currently lowered ground level enables views over the site towards them and contributes to the setting of those buildings and the appreciation of them at mid-range, this is not a view which has been available historically and is not part of their historic setting. The openness of the site is not an attribute which is consistent with the prevailing character of the adjacent part of the WHS and CA, where there is the tight urban grain of the city centre (except where sites have still not been redeveloped since war-time destruction or are currently being redeveloped).

Many other listed buildings of Grades I, II* and II are located further to the S, SW and SE of the application site (see Plans 2 and 3) within the Castle Street CA and the WHS and some have a more open setting, notably the four principal buildings at the Pier Head (Port of Liverpool Building, Cunard Building, Royal Liver Building and the Tunnel Ventilation Tower). Other more prominent buildings are where the building is seen as a focal point, facing the end of a street, such as the Town Hall at the end of Castle Street. The proposed development of the site has the potential to have an impact on the wider setting of these listed buildings and the townscape and skyline which they help to create.

4.3 Liverpool World Heritage Site

4.3.1 The application site is not within the *Liverpool - Maritime Mercantile City* World Heritage Site (WHS) but the SW and SE boundaries of the site immediately abut it and the site is within its Buffer Zone. The WHS was inscribed on to UNESCO's World Heritage list in 2004 under the theme: "Liverpool is the supreme example of a commercial port at the time of Britain's greatest global significance". UNESCO therefore considers that the WHS as a totality has Outstanding Universal Value (OUV), although it accepts that not every building within the boundary possesses OUV.

4.3.2 The WHS stretches from Lime Street Station to the waterfront (Plan 4) and is divided into six areas of distinct townscape character. The application site is adjacent to Character Area 4 "The Castle Street/Dale Street/Old Hall Street Commercial Centre" of the WHS. The Buffer Zone of the WHS was drawn widely around the WHS, primarily in order to protect the visual setting of the WHS.

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4.3.3 A “Statement of Outstanding Universal Value” for the WHS was approved by UNESCO’s World Heritage Committee in 2010. It represents a succinct explanation of why the Liverpool WHS has OUV.

4.3.4 The Statement lists the relevant generic criteria for OUV and explains how the Liverpool WHS meets them:

Generic Criterion (ii):

Exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town planning or landscape design.

How Liverpool meets the criterion:

Liverpool was a major centre generating innovative technologies and methods in dock construction and port management in the 18th, 19th and early 20th centuries. It thus contributed to the building up of the international mercantile systems throughout the British Commonwealth.

Generic Criterion (iii):

Bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared.

How Liverpool meets the criterion:

The city and the port of Liverpool are an exceptional testimony to the development of maritime mercantile culture in the 18th, 19th and early 20th centuries, contributing to the building up of the British Empire. It was a centre for the slave trade, until its abolition in 1807, and for emigration from northern Europe to America.

Criterion (iv):

Be an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.

How Liverpool meets the criterion:

Liverpool is an outstanding example of a world mercantile port city, which represents the early development of global trading and cultural connections throughout the British Empire.

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Plan 2. Part of WHS, BZ and Castle Street Conservation Area and Listed Buildings

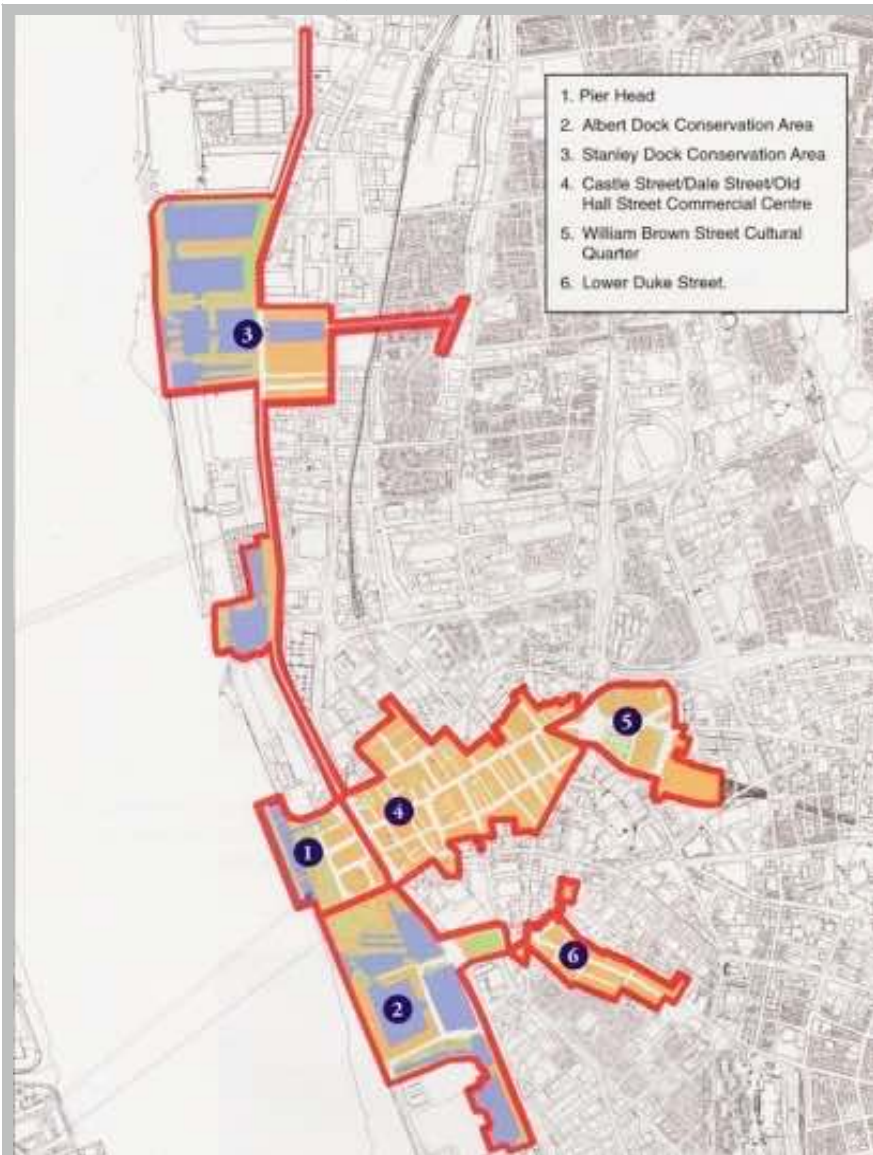


Plan 3. Detail of Part of WHS, BZ and Castle Street Conservation Area and Listed Buildings

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Legend for Plans 2 and 3



Plan 4. The six areas of Liverpool's World Heritage Site

4.4 Archaeological Interest

4.1 A separate archaeological assessment (*Archaeological Desk Based Assessment of a Plot of land at Pall Mall, Liverpool [May 2017]*) was prepared for the site by National Museums Liverpool. It concludes at Page 16:

In conclusion the archaeological potential of the site is generally low. It is possible that heavily truncated remains of the Civil War defences survive in some areas of the site though these remain unlocated. Remains of early and mid-19th century

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structures may survive within the eastern half of the site, though these are likely to have been extensively disturbed. The remains relating to the railway station are late, extensively disturbed and of low archaeological significance.

5. Heritage Significance

5.1 Introduction to Heritage Significance

5.1.1 Definitions

Heritage assets are defined in the glossary of the NPPF (2019) as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Designated heritage assets are defined in the NPPF as:

A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Significance (for heritage policy) is defined in the NPPF as:

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Setting of a heritage asset is defined in the NPPF 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.

5.1.2 Heritage Values

In *Conservation Principles*, Historic England suggest that heritage values of heritage assets fall into one or more of four types of heritage values:

*Evidential value
Historical value
Aesthetic value
Communal value*

The NPPF states slightly differently that categories that heritage interest may be:

*archaeological
architectural,
artistic or
historic.*

5.1.3 Conservation Principles also clarifies that:

3.2 The significance of a place embraces all the diverse cultural and natural heritage values that people associate with it, or which prompt them to respond to it. These values tend to grow in strength and complexity over time, as understanding deepens and people's perceptions of a place evolve.

3.3 In order to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:

- who values the place, and why they do so
- how those values relate to its fabric
- their relative importance
- whether associated objects contribute to them
- the contribution made by the setting and context of the place
- how the place compares with others sharing similar values.

3.4 Understanding and articulating the values and significance of a place is necessary to inform decisions about its future. The degree of significance determines what, if any, protection, including statutory designation, is appropriate under law and policy.

5.1.4 In Historic England's *Informed Conservation*, Kate Clark advises that:

Significance lies at the heart of every conservation action, which for the historic environment means the recognition of a public value in what may well be private property. Historic buildings and their landscapes are significant for many different cultural reasons: for their architecture, for their archaeological significance, for their aesthetic qualities, for their association with people and memories, beliefs and events or simply because they are old. They can tell us about technology, innovation, conflicts and triumphs. Their interest may lie in the materials used or in the decorative finishes, in the grouping of landscape, building and place. That significance may be personal, local, regional, national or international; it may be academic, economic or social...

5.1.5 Other Considerations

Important considerations when assessing levels of heritage significance are the authenticity and integrity of the heritage assets. These are defined as:

Authenticity is a measure of truthfulness. Understanding of the concept of authenticity is guided by ICOMOS's *Nara Document on Authenticity* (1994)

Integrity is a measure of the wholeness and intactness of cultural heritage and its attributes

5.2 Levels of Heritage Significance

There is no definitive methodology for assessing levels of heritage significance but the International Council on Monuments and Sites (ICOMOS) prepared its *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties in 2011* and included defined criteria (provided below) for assessing levels of heritage significance which are relevant to this site. It recommends that heritage assets should be assessed into one of 5 levels of significance:

Very High

- Sites, structures or landscapes of acknowledged international importance inscribed as WHS Assets that contribute significantly to acknowledged international research objectives
- Urban landscapes of recognised international importance
- Associations with particular innovations or developments of global significance
- Associations with individuals of global importance

High

- Scheduled monuments and undesignated assets of such importance to be scheduled
- Grade I and II* listed buildings, and Grade II buildings with exceptional qualities
- Conservation Areas containing very important buildings
- Undesignated structures of clear national importance
- Urban/Rural landscapes of exceptional importance

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- Associations with particular innovations or developments of national significance
- Associations with individuals of national importance

Medium

- Designated or undesignated assets that contribute to regional research objectives
- Grade II listed buildings and undesignated buildings that have exceptional qualities or historical associations
- Conservation Areas that contain buildings that contribute significantly to its historic character
- Historic townscapes with important integrity in their buildings or built settings
- Associations with particular innovations or developments of regional or local significance
- Associations with individuals of regional importance

Low

- Designated or undesignated assets of local importance
- Assets compromised by poor preservation and/or poor survival of contextual associations
- Assets of limited value, but with potential to contribute to local research objectives
- Locally listed buildings
- Assets of modest quality in their fabric or historical associations
- Historic townscapes with limited integrity in their buildings or built settings
- Associations with individuals of local importance
- Poor survival of physical areas in which activities occur or are associated
- Assets with little or no surviving archaeological interest
- Buildings or urban landscapes of no architectural or historical merit and buildings of an intrusive character

Negligible

- Assets with little or no surviving archaeological interest
- Buildings or urban landscapes of no architectural or historical merit and buildings of an intrusive character

5.3 Heritage Significance of the Application Site and Its Setting

5.3.1 The application site does not include any designated heritage assets, although it is partly within the Castle Street Conservation Area and is within the Buffer Zone of the Liverpool WHS.

Although the Castle Street Conservation Area is generally assessed as having **High Heritage Significance**, that small part of the CA which is within the application site has **Negligible Heritage significance**. Similarly, the WHS has **Very High Heritage Significance**, but the application site is in the Buffer Zone and in its current state has **Negligible Heritage Significance** per se.

5.3.2 The application site has historic interest as a site: on the edge of Liverpool's former medieval town and close to one of its medieval streets; developed in the early 19th C, probably with houses, religious buildings and warehouses; partially redeveloped in 1850 with the first Exchange Station and; wholly redeveloped in the 1880s as part of the platforms, sheds and tracks of the second Exchange Station, although, following demolition of the platforms, sheds and tracks in the late 20th C, all that remains of the station in situ on the site are a much altered and reduced wall along Pall Mall and a former subway, which linked Pall Mall with Bixteth Street (and these too are currently being cleared). As such, the site has minimal historic integrity or authenticity per se.

The former subway, the retained building on Pall Mall and the retaining wall on Pall Mall are undesignated heritage assets of local importance and have **Low Heritage Significance**.

The archaeology of the site has no status and has **Low Heritage Significance**.

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5.3.3 The key heritage significance of the site has been in providing a temporary open setting for the surrounding historic commercial buildings and the surviving facades of Exchange Station, albeit that such open settings are uncharacteristic of this city centre location, which mostly has a dense urban grain. The temporary openness of the site enables some views over the site of the surrounding buildings but the relative newness and/or poor quality of the surfaces of the foreground in those views generally detracts from the heritage value and quality of those views. The site is a brownfield site, having been previously developed, and so the openness of the site could reasonably be expected to be temporary, pending redevelopment. Furthermore, the N part of the site is a rough surface-level car park which detracts from the historic setting of the surrounding buildings and the S part of the site was a publicly accessible private park, which was landscaped in the late 20th C and, notwithstanding that it had practical amenity value and visual amenity value as a result of the trees and greenery, it had no heritage value.

In its current state, the application site detracts from the setting of the surrounding buildings and thus has **Negligible Heritage Significance** in contributing to their historic setting.

6. Relevant Heritage Policy and Guidance

6.1 International, National Local and Policies and Guidance

a) The Operational Guidelines for the Implementation of the WH Convention (2017)

6.1.1 *The Operational Guidelines for the Implementation of the WH Convention (2017)* are the principal guidelines produced by UNESCO for the inscription and management of WHSs and are updated on a regular basis. The Guidelines require that:

103. Wherever necessary for the proper protection of the property, an adequate buffer zone should be provided.

The *Operational Guidelines* do not preclude development within or around WHSs but state at S. 119:

World Heritage properties may support a variety of ongoing and proposed uses that are ecologically and culturally sustainable and which may contribute to the quality of life of communities concerned. The State Party and its partners must ensure that such sustainable use or any other change does not impact adversely on the Outstanding Universal Value of the property.

b) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011)

6.1.2 The International Council on Monuments and Sites (ICOMOS) is the expert advisory body to UNESCO. *The Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011)* was produced by ICOMOS to provide a consistent methodology for assessing the potential impact of new development on WHSs.

The guidance advises that:

Proposals should be tested against existing policy frameworks and the management plan for the property and surrounding area.

The assessments in this document have been undertaken in the context of:

- international guidance from UNESCO and ICOMOS on World Heritage Sites, Historic Urban Landscapes and setting of heritage assets;
- national policy on the conservation of heritage assets as set out in the NPPF;
- national guidance on the management of heritage assets from Historic England (formerly English Heritage), which is the national advisory body on the conservation of England's cultural heritage and;
- local policies and guidance of Liverpool City Council, which is the Local Planning Authority for the site, notably as set out in the local plan and the Liverpool WHS supplementary Planning Document.

c) UNESCO's Vienna Memorandum

6.1.3 UNESCO's *VIENNA MEMORANDUM on "World Heritage and Contemporary Architecture – Managing the Historic Urban Landscape"* was adopted in 2005. The memorandum is clear that UNESCO supports the principle of properly considered new development in and around urban WHSs and indeed positively promotes appropriate sustainable development.

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The section on “Guidelines for Conservation Management” include:

19. A deep understanding of the history, culture and architecture of place, as opposed to object buildings only, is crucial to the development of a conservation framework and single architectural commissions should be informed by urbanism and its tools for analyses of typologies and morphologies.

*21. Taking into account the basic definition, urban planning, contemporary architecture and preservation of the historic urban landscape **should avoid all forms of pseudo-historical design, as they constitute a denial of both the historical and the contemporary alike.** One historical view should not supplant others, as history must remain readable, while continuity of culture through quality interventions is the ultimate goal.*

The section on “Guidelines for Urban Development” include:

22. Ethic standards and a demand for high-quality design and execution, sensitive to the cultural-historic context, are prerequisites for the planning process. Architecture of quality in historic areas should give proper consideration to the given scales, particularly with reference to building volumes and heights. It is important for new development to minimize direct impacts on important historic elements, such as significant structures or archaeological deposits.

23. Spatial structures in and around historic cities are to be enhanced through urban design and art as they are key elements of the renaissance of historic cities: urban design and art express their specific historical, social and economic components and transmit them to forthcoming generations.

26. As a general principle, proportion and design must fit into the particular type of historic pattern and architecture, while removing the core of building stock worthy of protection (“façadism”) does not constitute an appropriate mean of structural intervention. Special care should be taken to ensure that the development of contemporary architecture in World Heritage cities is complementary to values of the historic urban landscape and remains within limits in order not to compromise the historic nature of the city.

d) Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas

6.1.4 ICOMOS adopted the Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas in 2005. The declaration comprises principles and recommendations for the understanding, conservation, protection and management of WHSs and their setting. It includes:

1. The setting of a heritage structure, site or area is defined as the immediate and extended environment that is part of, or contributes to, its significance and distinctive character.

Beyond the physical and visual aspects, the setting includes interaction with the natural environment; past or present social or spiritual practices, customs, traditional knowledge, use or activities and other forms of intangible cultural heritage aspects that created and form the space as well as the current and dynamic cultural, social and economic context.

10. Change to the setting of heritage structures, sites and areas should be managed to retain cultural significance and distinctive character.

Managing change to the setting of heritage structures, sites and areas need not necessarily prevent or obstruct change.

e) Managing Cultural World Heritage (2013)

6.1.5 UNESCO and ICOMOS issues *Managing Cultural World Heritage* in 2103 as a means of improving understanding and implementation of the WH Convention and the *Operational Guidelines for Implementation of the WH Convention*.

It stresses the need to understand the outstanding universal value (OUV) of WHSs as a pre-requisite to properly conserving and managing WHSs.

It states:

Sustainable development is today the universally agreed and ubiquitous goal of nearly all development policies at local, national and global levels.

The document advocates the principle of sustainable development affecting WHSs, but states that:

In relation to cultural heritage, the issue of sustainable development can be understood in two ways:

1. As a concern for sustaining the heritage, considered as an end in itself, and part of the environmental/cultural resources that should be protected and transmitted to future generations to guarantee their development (intrinsic).

2. As the possible contribution that heritage and heritage conservation can make to the environmental, social and economic dimensions of sustainable development (instrumental)

6.2 National Policies and Guidance

National Policy

6.2.1 National Planning Policy is provided by the National Planning Policy Framework 2019 (NPPF). On “Conserving and enhancing the historic environment” it states, inter alia:

200. 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 or better reveal the significance of the asset should be treated favourably.

The NPPF effectively identifies four levels of harm to heritage assets: Total Loss; Substantial Harm; Less Than Substantial Harm and; No Harm. It states:

193. 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.

194. 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,*

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should be wholly exceptional.

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

National Guidance

6.2.2 The national government's *Planning Practice Guidance Further Guidance on WHSs* advises that,

In line with the National Planning Policy Framework, policy frameworks at all levels should conserve the Outstanding Universal Value, integrity and authenticity (where relevant for cultural or 'mixed' sites) of each World Heritage Site and its setting, including any buffer zone or equivalent.

and

When developing Local Plan policies to protect and enhance World Heritage Sites and their Outstanding Universal Value, local planning authorities, should aim to satisfy the following principles:

- *protecting the World Heritage Site and its setting, including any buffer zone, from inappropriate development*

It goes on to state:

The UNESCO Operational Guidelines seek protection of "the immediate setting" of each World Heritage Site, of "important views and other areas or attributes that are functionally important as a support to the Property" and suggest designation of a buffer zone wherever this may be necessary. A buffer zone is defined as an area surrounding the World Heritage Site which has complementary legal restrictions placed on its use and development to give an added layer of protection to the World Heritage Site. The buffer zone forms part of the setting of the World Heritage Site.

It may be appropriate to protect the setting of World Heritage Sites in other ways, for example by the protection of specific views and viewpoints. Other landscape designations may also prove effective in protecting the setting of a World Heritage Site. However it is intended to protect the setting, it will be essential to explain how this is to be done in the Local Plan.

Decisions on buffer zones are made on a case by case basis at the time of nomination and reviewed subsequently through the World Heritage Site Management Plan review process. Proposals to add or amend buffer zones following inscription are submitted by government for approval by the World Heritage Committee who will consider and adopt the proposals as appropriate.

The setting of a WHS is thus a material consideration in determining planning applications.

The *Planning Practice Guidance Further Guidance on WHSs* further advises that:

Applicants proposing change that might affect the Outstanding Universal Value, integrity and, where applicable, authenticity of a World Heritage Site through development within the Site or affecting its setting or buffer zone (or equivalent) need to submit sufficient information with their applications to enable assessment of impact on Outstanding Universal Value. This may include visual impact assessments, archeological data or historical information. In many cases this will form part of an Environment Statement.

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Applicants may find it helpful to use the approach set out in the International Council on Monuments and Sites's Heritage Impact Assessment guidelines and Historic England's guidance on setting and views.

6.2.3 Historic England Guidance

Historic England is the national advisory body on heritage issues. It provides national guidance to assist LPAs in making decisions about their own cultural heritage at a local level. The key Historic England guidance which is relevant to this proposal are listed below.

1. Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (2016)

This sets out ways to manage change in way that conserves and enhances historic areas through conservation area designation, appraisal and management. It provides detailed advice on how to undertake a conservation area appraisal and how to assess and define the character of a historic area.

2. The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (2017)

i) This reinforces the importance of the setting of heritage assets and provides guidance on managing development that may affect the setting of heritage assets. It begins by stressing the importance of setting and its careful management:

The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its setting – the surroundings in which it is experienced. The careful management of change within the surroundings of heritage assets therefore makes an important contribution to the quality of the places in which we live.

ii) It defines setting:

...as 'the surroundings in which [the 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'.

iii) It sets out key principles for the understanding of setting:

- *Setting is the surroundings in which an asset is experienced...*
- *The extent and importance of setting is often expressed by reference to visual considerations...*
- *Setting will, therefore, generally be more extensive than curtilage...*
- *The setting of a heritage asset can enhance its significance whether or not it was designed to do so. The formal parkland around a country house... may...contribute to the significance.*
- *The contribution that setting makes to the significance does not depend on there being public rights or an ability to access or experience that setting.*

iv) It provides guidance on assessing proposed and past changes:

11 Protection of the setting of heritage assets need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places are within the setting of a heritage asset and are subject to some degree of change over

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time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, Paragraphs 131-135 and 137).

v) In providing guidance on the management of development affecting the setting of heritage assets, it recommends the following broad approach:

Step 1: identify which heritage assets and their settings are affected;

Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);

Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;

Step 4: explore ways of maximising enhancement and avoiding or minimising harm;

Step 5: make and document the decision and monitor outcomes.

3. Conservation Principles. Policies and Guidance for the Management of the Historic Environment (2008)

This is an over-arching document which established general principles and policies. The document sets out a logical approach to making decisions and offering guidance about all aspects of the historic environment, and for reconciling its protection with the economic and social needs and aspirations of the people who live in it.

In particular, it accepts as one of its key principles:

4.1 Change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people's responses to social, economic and technological change.

4.2 Conservation is the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.

138. New work or alteration to a significant place should normally be acceptable if:

a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;

b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;

c. the proposals aspire to a quality of design and execution which may be valued now and in the future;

d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.

6.3 Local Policy and Guidance

Local Plan

6.3.1 Planning applications in Liverpool are currently decided upon primarily by using the saved policies of the Liverpool Unitary Development Plan (UDP), a statutory document which is a one of

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the documents that sits within the Local Plan. However, Liverpool City Council is now producing a new Local Plan for the whole city. The City Council consulted on the Pre-Submission Draft of the new Liverpool Local Plan between January 26th and 9th March 2018. The UDP is gradually being replaced as the new Liverpool Local Plan is adopted and is given greater weight, but until it is adopted, the UDP policies will still be used to determine planning applications.

The Unitary Development Plan was produced in 2002, before Liverpool's inscription as a WHS and so includes no policies on the WHS. However, the policies that are most relevant for the heritage and design aspects of the proposal under consideration are:

GEN 3 Heritage and Design in the Built Environment

The Plan aims to protect and enhance the built environment of the city by:

- *Preserving and enhancing historically and archaeologically important buildings and areas*
- *Encouraging a high standard of design and landscaping in developments*
- *Creating an attractive environment which is safe and secure both day and night.*

HD5 Development affecting the Setting of a Listed Building

Planning permission will only be granted for development affecting the setting of a Listed Building, which preserves the setting and important views of the building...

HD12 New Development Adjacent to Conservation Areas

Development on land adjacent to a conservation area will only be permitted if it protects the setting of the conservation area and important views into and out of it.

HD18 General Design Requirements

When assessing proposals for new development, the City Council will require applications to comply with the following criteria, where appropriate, to ensure a high quality of design:

- i. the scale, density and massing of the proposed development relate well to its locality;*
- ii. the development includes characteristics of local distinctiveness in terms of design, layout and materials;*
- iii. the building lines and layout of the development relate to those of the locality;*
- iv. external boundary and surface treatment is included as part of the development and is of a design and materials which relate well to its surroundings;*
- v. all plant machinery and equipment are provided within the building envelope or at roof level as an integral part of the design;*
- vi. the development pays special attention to views into and out of any adjoining green space, or area of Green Belt;*
- vii. the development has regard to and does not detract from the city's skyline, roofscape and local views within the city;*
- viii. the satisfactory development or redevelopment of adjoining land is not prejudiced;*

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- ix. there is no severe loss of amenity or privacy to adjacent residents;*
- x. in the case of temporary buildings, the development is of a suitable design and not in a prominent location;*
- xi. adequate arrangements are made for the storage and collection of refuse within the curtilage of the site and the provision of litter bins where appropriate;*
- xii. the exterior of the development incorporates materials to discourage graffiti; and*
- xiii. adequate arrangements are made for pedestrian and vehicular access and for car parking.*

6.3.2 Liverpool Core Strategy Submission Draft (2012)

The “Vision” of the Core Strategy included that, by 2028:

The waterfront in particular, will be a focus for leisure and tourism activity. The internationally significant UNESCO World Heritage Site will have been sensitively managed, providing a catalyst for further economic regeneration within the City Centre and waterfront.

6.3.3 Liverpool Local Plan 2013-2033 Submission Draft May 2018

The “Vision” of the draft local plan includes:

The City Centre will continue to be a thriving regional centre for commercial and retail investment, cultural, tourist, art, civic, and leisure facilities. It will be welcoming and navigable for visitors and it will have maintained and enhanced its role as the economic hub for the City Region with world class educational and business uses. The waterfront in particular, will be a focus for leisure and tourism activity. The internationally significant UNESCO World Heritage Site will have been sensitively managed, providing a catalyst for further economic regeneration.

Its “Strategic Priorities” include:

Strengthen The City's Economy

To increase the City's economic performance by ensuring sustainable economic growth across all business sectors and areas with strong growth potential, for the benefit of the whole City to ensure economic disparities are reduced.

A High Quality Historic Environment

To protect and enhance the City's unique historic and architectural environment, including the World Heritage Site, Conservation Areas, Listed Buildings, Registered Parks and Gardens, Scheduled Monuments and heritage assets of local significance; to maximise the potential contribution they can play in delivering the social and economic objectives of the City; and to encourage their sustainable reuse or adaptation.

To deliver the “Strategic Priorities”, the plan includes some “Strategic Policies”, including:

STP1. Spatial Priorities for the Sustainable Growth of Liverpool

To create a robust and regionally significant competitive economy, and thriving and attractive residential neighbourhoods, development including the provision of new homes

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and land for employment uses will be located in sustainable locations. This will be achieved by:

*a. Focusing economic development in the City's key employment areas including – North Liverpool, **City Centre** (including the Knowledge Quarter (KQ Liverpool)), Stonebridge/ Gillmoss/ Aintree, Central Liverpool, South Liverpool (including Speke and Garston), and Enterprise Zones – Mersey Waters (Liverpool Waters) and Liverpool City;*

*c. Ensuring economic growth is the key priority within the **City Centre**, by supporting the growth of financial, business and professional services sector, knowledge-based and creative industries, and prioritising the City Centre as the location for regionally significant comparison goods retailing and culture, leisure and tourism activities;*

STP2. Sustainable Growth Principles and Managing Environmental Impacts

- 1. New development should seek to avoid negative impacts on the environment through adoption of best practice. Where a negative effect is identified this should be mitigated by appropriate measures. Specifically, to ensure the sustainable growth of the City, new development should:...*

g. Conserve and enhance the City's heritage assets including reflecting, protecting, and enhancing the area's historic character and environment;

The emerging Local Plan also has specific policies for heritage and design:

Policy UD1 Local Character and Distinctiveness

Development proposals should demonstrate that the following aspects have been taken into account:

a. Local grain and pattern of development, and where this has been fragmented, the opportunity to re-stitch damaged historic townscape;

b. Means and pattern of enclosure, and any intrinsic rhythms and patterns established by streets, spaces and built form;

c. Patterns of movement and street character;

d. The form, scale, proportion, building line, frontages, plot sizes, storey and absolute heights, rooflines, skyline, roofscape and ratios of solid to void within buildings;

e. Materials, colours, tones and textures, which should be appropriate to the characteristics of the local area;

f. Relationship and response to topography, and natural and built landscapes, including the underlying morphology of the area;

g. The need to preserve, improve and create views into and out of development and also across it;

h. Focal buildings, landmarks, compositions and building ensembles, nodes and gateways;

and

i. Designated and non-designated historic assets.

Policy HD1 Heritage Assets: Listed Buildings; Conservation Areas; Registered Parks and Gardens; Scheduled Ancient Monuments

1. *The City Council will support proposals which conserve or, where appropriate, enhance the historic environment of Liverpool.*

2. *Particular consideration will be given to ensure that the significance of those elements of its historic environment which contribute most to the City's distinctive identity and sense of place are not harmed. These include:*

The docks, warehouses, ropewalks, shipping offices, transport systems and other maritime structures associated with the City's role as one of the World's major ports and trading centres in the 18th, 19th and early 20th Centuries;

The architectural innovation and exuberance of the nineteenth and early Twentieth Century banks, exchanges and offices in the commercial centre;

The nineteenth Century Institutional buildings including its libraries, institutes, schools, university buildings, public baths and hospitals (particularly those which sprang from the City's role as an international port such as the seaman missions, sailors' homes and orphanages);

The City's mid and late nineteenth Century civic buildings;

The Georgian Terraces of the Canning Street area;

The extensive network of historic open spaces, parks, gardens, cemeteries and squares;

The dominance and views of its two Cathedrals;

The range, wealth and quality of its places of worship;

The distinctive designs and detailing of its surviving late 19th and early 20th Century public houses;

The eclectic mix of buildings associated with the oldest Chinese Quarter in Europe.

3. *Proposals affecting a designated heritage asset (or an archaeological site of national importance) should conserve those elements which contribute to its significance. Harm to such elements will be permitted only where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset (or an archaeological site of national importance) will be permitted only in exceptional circumstances.*

4. *Proposals which would remove, harm or undermine the significance of a non-designated heritage asset will only be permitted where the benefits are considered sufficient to outweigh the harm to the character of the local area.*

5. *Proposals affecting archaeological sites of less than national importance should conserve those elements which contribute to their significance in line with the importance of the remains. In those cases where development affecting such sites is acceptable in principle, mitigation of damage will be ensured through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development. Subsequent analysis, publication and dissemination of the findings will be*

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required to be submitted to the local planning authority and deposited with the Historic Environment Record.

6. Proposals affecting a Conservation Area should preserve or enhance those elements identified in any Conservation Area Appraisal as making a positive contribution to the significance of that area.

7. Proposals which will help to safeguard the significance of and secure a sustainable future for the City's heritage assets, especially those identified as being at greatest risk of loss or decay, will be supported.

8. Permission will not be granted for applications which are not fully justified and accompanied by full information necessary to assess the impact of the proposals on the heritage asset. Proposals that affect heritage assets should be accompanied by a Statement of Significance which may form part of a Design and Access Statement, and/or a Heritage Impact Assessment to demonstrate that the architectural and historic interest of the structure has been understood and accounted for in any proposals.

9. Where permission is granted for a development which would result in the total or partial loss of a designated heritage asset, approval will be conditional upon the asset being fully recorded and the record and commentary deposited with the Local Planning Authority and the Historic Environment Record.

Policy HD2 Liverpool Maritime Mercantile City World Heritage Site

1. The City Council will support proposals which conserve or, where appropriate, enhance the Outstanding Universal Value of the Liverpool Maritime Mercantile City World Heritage Site. In addition to the requirements of Policy HD1:

a. Permission will not be granted for proposals which would have an adverse impact upon the views of the Waterfront from the River Mersey, or of the key Landmark

Buildings and vistas identified in the Liverpool Maritime Mercantile City World Heritage Site SPD.

b. Proposals for the redevelopment or remodelling of buildings or sites which have a negative or neutral impact on the character of the World Heritage Site will be supported where it can be demonstrated that this will enhance or better reveal the Outstanding Universal Value of the World Heritage Site.

c. Proposals which would help to facilitate the reuse of vacant or under-used floorspace in buildings which make a positive contribution to the character of the area and the Outstanding Universal Value of the World Heritage Site will be supported.

d. Proposals for tall buildings in the World Heritage Site or its Buffer Zone will be assessed against Policy UD6.

2. Applications within the Liverpool Maritime Mercantile City World Heritage Site (or within its buffer Zone) which are likely to impact upon an element which contributes to its Outstanding Universal Value (including its archaeology) will not be granted unless they are accompanied by an appropriate Heritage Impact Assessment or archaeological assessment, as appropriate, which evaluates the likely effect of the proposals upon the attributes that contribute to the Outstanding Universal Value.

3. Proposals should accord with the design requirements set out in Policy CC10.

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4. *Proposals for development within the World Heritage Site or its Buffer Zone should accord with the advice set out in the Liverpool Maritime Mercantile City World Heritage Site Management Plan and the guidance in the Liverpool Maritime Mercantile City World Heritage Site SPD.*

6.3.4 Liverpool Commercial Business District Strategic Regeneration Framework (2019).

Liverpool City Council has recently commissioned consultants to prepare a *Liverpool Commercial Business District Strategic Regeneration Framework*. The Council approved a draft SRF on 7th June 2019 for public consultation. In Figure 66 “Commercial Office Opportunities” on Page 67, the draft SRF identifies the application site as a B01 site - suitable for “New Grade A High Quality Commercial Office Buildings (see Plan 5).



Plan 5. Extract from Draft CBD SRF

6.3.5 Liverpool World Heritage Site

The development site lies within the Buffer Zone of the WHS. Designation as a WHS carries no statutory powers, as there is no mention of WHSs in the England's primary planning legislation. However the WHS Management Plan (2017) and WHS SPD (2009) underline the international, national and local importance of the WHS and the need for high quality in design and construction of any new development which may affect the WHS. The NPPF also confirms that WHSs are designated heritage assets and are a material consideration in the planning process.

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Liverpool WHS Supplementary Planning Document (2009)

a) The SPD was prepared and adopted to guide conservation, development and regeneration in the WHS and its Buffer Zone. It provides guidance: in S.4 for the WHS and the Buffer Zone; in S.5 for the WHS only and; in S.6 for five of the six areas of distinctive townscape character which have been identified within the WHS. The character area nearest to the application site is the Castle Street/Dale Street/Old Hall Street Commercial Centre Character Area, immediately to the W and S of the site.

b) The SPD recognises that there are development opportunities in the Buffer Zone and identifies some of them, but it confirms that development needs to be sensitive to the requirements to preserve and enhance the setting, character and outstanding universal value of the WHS. For the Buffer Zone around the Castle Street/Dale Street/Old Hall Street Commercial Centre Character Area, the SPD identifies the whole car park on Pall Mall (including the N part of the application site) as a Development Opportunity (Plan 6a). It states:

6.5.21 The significant development opportunities within the Buffer Zone around the Character Area 4 include:

Various sites along Pall Mall, mostly along the west side. The Pall Mall development area, is part of the continuing expansion of the existing Commercial District, and is crucial to achieving continued economic regeneration of the city centre, in accordance with the Commercial District SPD.

c) Other relevant guidance in the SPD includes:

SPD 4.2: General Design Guidance

Applicants for development must demonstrate that they have understood the characteristics of the site and its environs and that the design proposals have responded to the OUV of the locality in terms of materials, layout, mass, relation to street, architectural detail and height.

The architectural quality of a proposal within the WHS and Buffer Zone must be of the highest quality of contemporary design but respect, respond to and enhance its highly sensitive and important historic context.

SPD 4.3: Movement and Public Realm

The public realm is a notable element of OUV, and paragraph 4.3.5 sets out a checklist of issues that applicants should address in their Design and Access Statements.

SPD 4.4: Views to, from and within the WHS (See plans at Appendices 3 and 4 of this statement).

The SPD identifies the key views to, from and within the WHS and states at 4.4.1:

Views of the site are an important aspect of visual character and directly contribute to OUV.

and at 4.4.14:

Whilst the City Council accepts that all developments have some impact upon views, it also accepts that some development can have a positive impact on views by enclosing space and creating framed views. The City Council expects that developments should not have a significant adverse impact on the key views to, from and within the WHS, by wholly obstructing a key public view of a landmark building or overly dominating a panorama.

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The SPD also identifies: the main landmark buildings in and around the WHS; the key Defined Vistas; General Views with a focal point and; General Views/Panoramas. The plan showing these important visual assets is provided at Appendix 3 of this Statement. The site is not within any of the defined vistas or views which were identified in the SPD.

SPD 4.6: Tall Buildings

The SPD states that the impact of tall buildings on the WHS and its assets should be minimised:

Tall buildings are recognised by the City Council as symbols of regeneration and can contribute positively to urban landscape. Opportunities are identified for tall building clusters within the Buffer Zone. Criteria for the location and design of tall buildings is established – including the existing urban structure, impacts on historic buildings and views and the need for the highest design quality.

The SPD identifies in its Figure 4.3 (Plan 6 of this Heritage Statement) that the Commercial District, outside the WHS, provides the potential for accommodating tall buildings and includes a map which approximately identifies potential opportunities for tall buildings. It states:

*4.6.16 The principal opportunity for high-rise buildings is in and around the existing cluster of tall buildings in the Commercial District (identified approximately on Figure 4.3), partly as this would strengthen the legibility of the city by signposting the location where most business exchange takes place. Tall buildings in this location firmly indicate that this area is the economic driver for the city and the city region. This cluster also provides a visual and activity focus for the commercial heart of the city and marks the northern edge of, and gateway to, the city centre core. It also emphasises the subtle, but important, change in topography, which rises up from the river. **The proposed Tall Buildings Cluster at the Commercial District should be centred on the King Edward Street/Old Hall Street/Tithebarn Street/Pall Mall/Leeds Street area, but will not be rigidly limited to these streets.***

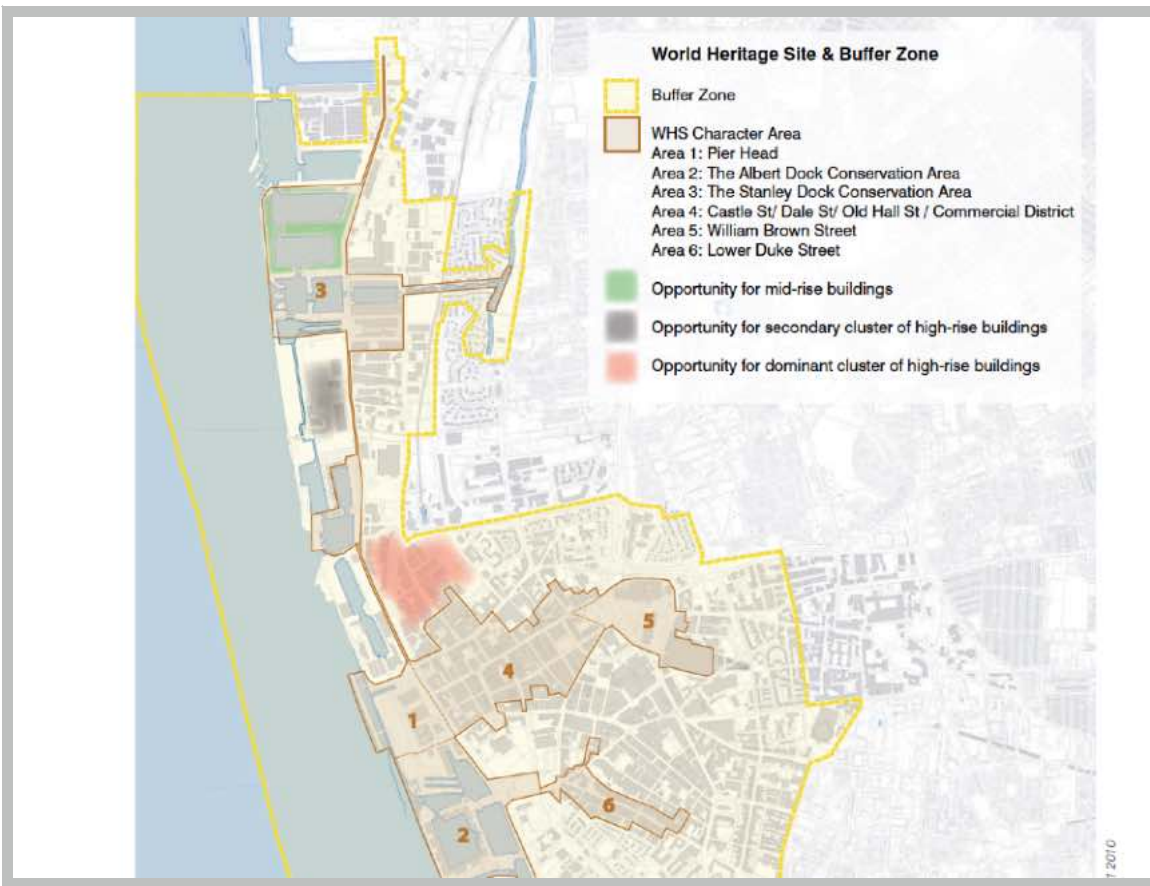
SPD 5.2: Buildings Heights in the WHS

The SPD guidance states that there is no uniformity of building heights within the WHS and that a variation of height is an aspect of character. It refers to one of the conditions imposed at the time of inscription of the WHS that 'the height of any new construction in the WHS should not exceed that of structures in the immediate surroundings'. This has led to the guidance that:

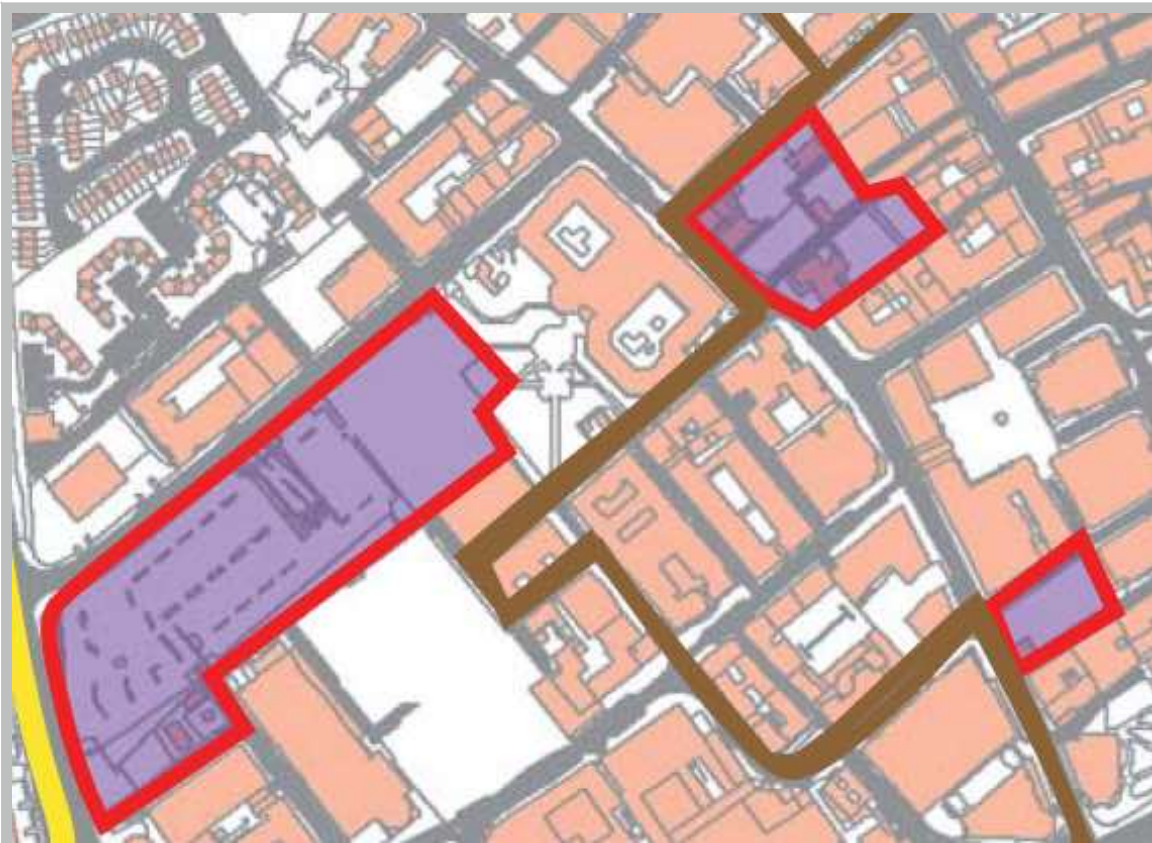
New buildings in the WHS should not generally exceed the height of the tallest building in the immediate vicinity of the street(s) that they address.

Although this guidance is directed specifically at the WHS, its principles are relevant for the immediate vicinity of the WHS, particularly where physical change has greater potential to alter the visual character of the WHS.

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Plan 6. Opportunities for Tall Buildings (Fig 4.3 in the WHS SPD)



Plan 6a. Development Opportunities (from WHS SPD) in purple

7. The Current Proposals

7.1 The planning application, which this Heritage Statement relates to, is a hybrid application, comprising proposals for:

- a) Outline planning permission for the masterplan for the site for mixed commercial and hotel uses and;
- b) Full planning permission for an office building comprising basement, ground floor flexible mixed uses and seven upper floors, with a large landscaped open area of grass and shrubs between Plots A and B

7.2 Outline planning permission for the masterplan for the site for mixed commercial and hotel uses

The Masterplan for the site incorporates the following principles:

- a) Four Principal Development Plots plus a central “pavilion” plot, as shown (not to scale) on Plan 7
- b) The buildings on the development plots to have uses and building heights:
 - A. Plot B: a hotel with a height parameter of up to Max 69.9m AOD;
 - B. Plot C: an office building with a height parameter of up to Max 72.3 AOD;
 - C. Plot D: an office building with a height parameter of up to Max 64.3m AOD and;
 - D. Plot E: a bar/restaurant pavilion with a height parameter of up to Max 25m
- c) Creation of new publicly accessible park, featuring:
 1. A “Winter Garden” between Plots C and D
 2. High Quality hard-surface treatments
 3. Planting of more trees than have been removed
 4. Unrestricted pedestrian permeability, including a pedestrian bridge link to Pall Mall

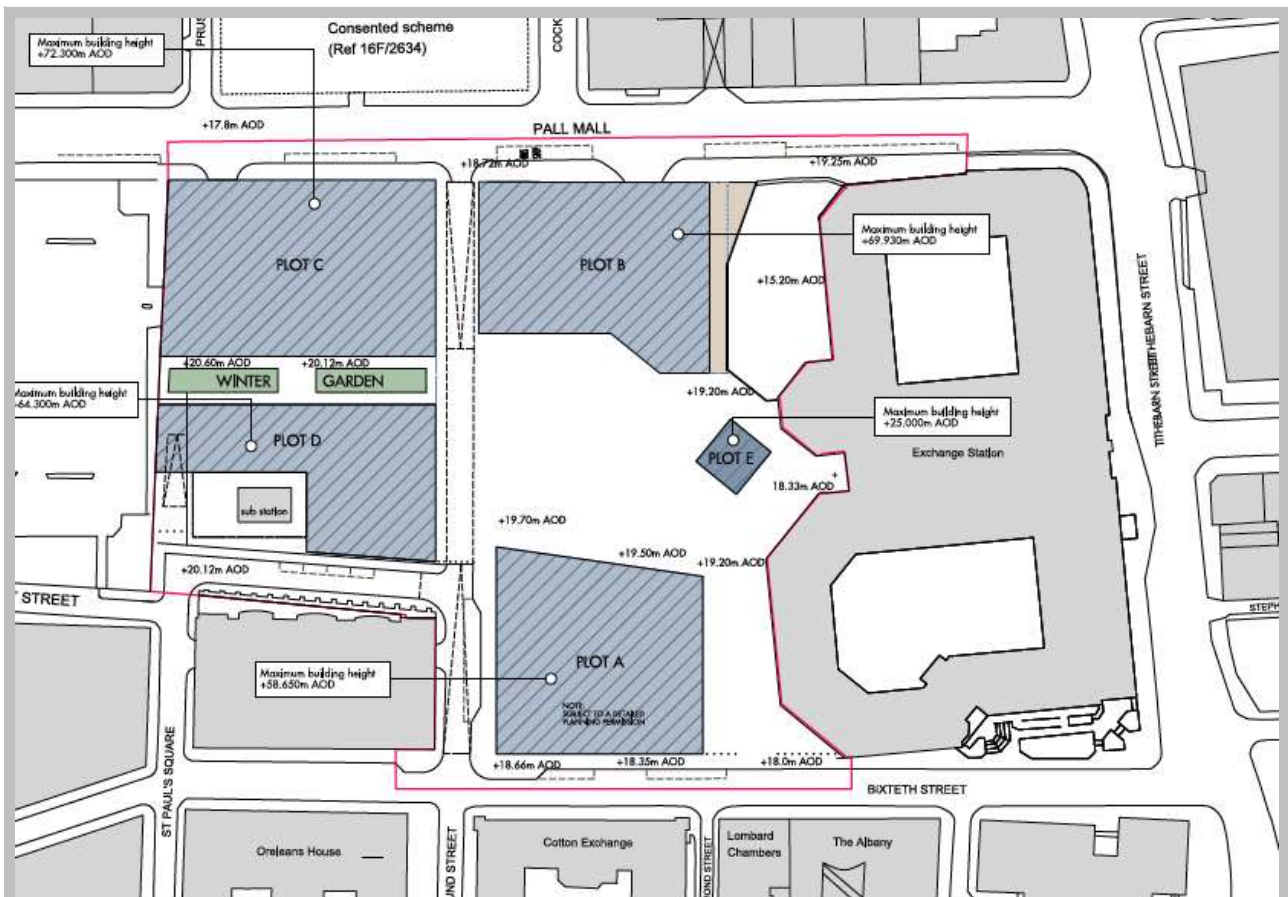
7.3 Full planning permission for a 9 storey office block on Plot A, including landscaping

The design principles of the proposed building are that it will:

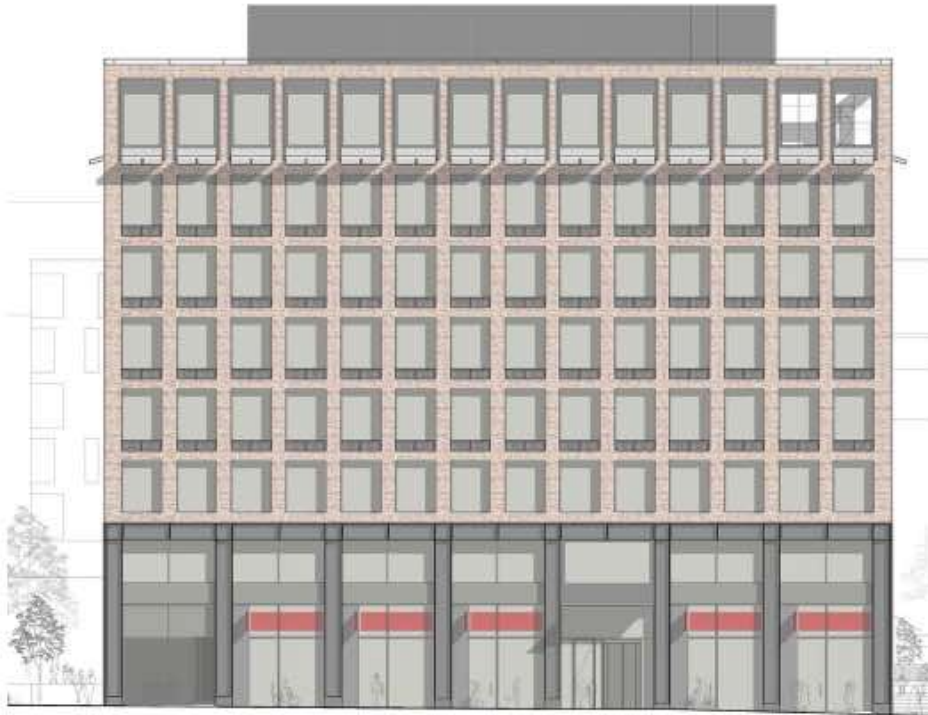
- provide Grade A offices with three units in flexible commercial use at Ground Floor level
- provide continuity of grain with the surrounding city centre
- have four frontages, as far as possible
- have a base, middle and a top, with a roof-top plant room being recessed back from all principal elevations
- have ordered grids of fenestration, with plain windows recessed (except at the top floor)
- have facing materials with an ordered articulation of brick, glass and metal

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- have columns and piloti at a double-height ground floor
- have metal reveals and spandrels at the windows
- have a projecting cornice at the top floor



Plan 7. Illustrative Master Plan



Bixteth Street elevation

Plan 8. Proposed Bixteth Street elevation of Plot A



Bixteth Walk elevation

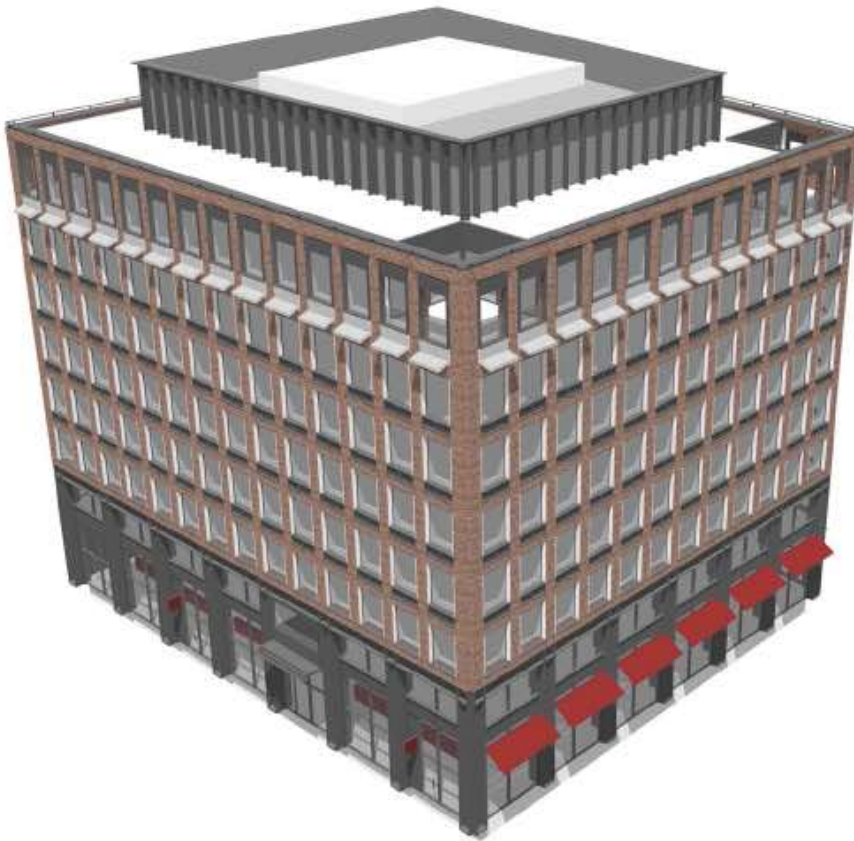
Plan 9. Proposed Bixteth Street elevation of Plot A



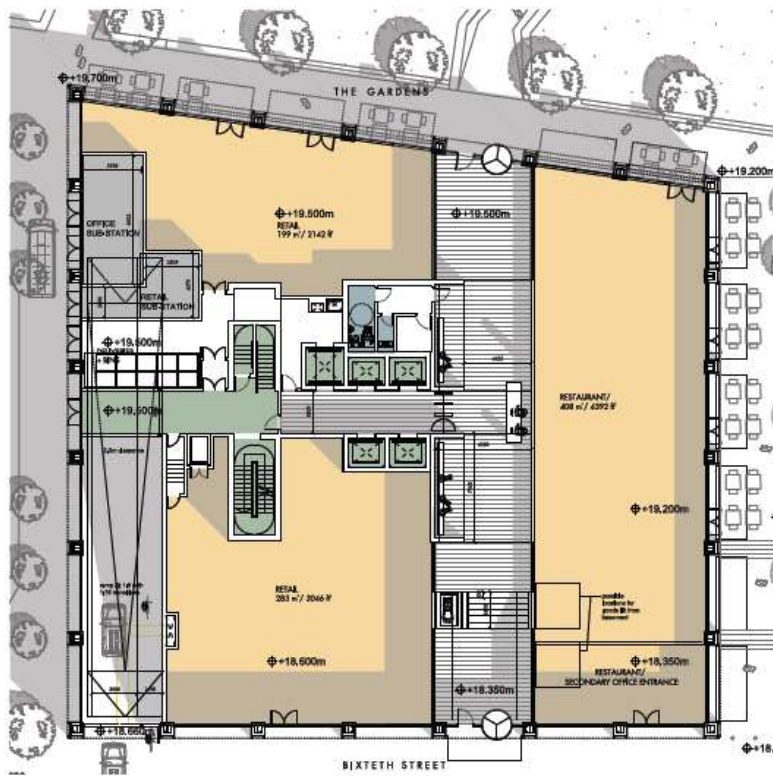
Plan 10. The Gardens elevation of Plot A



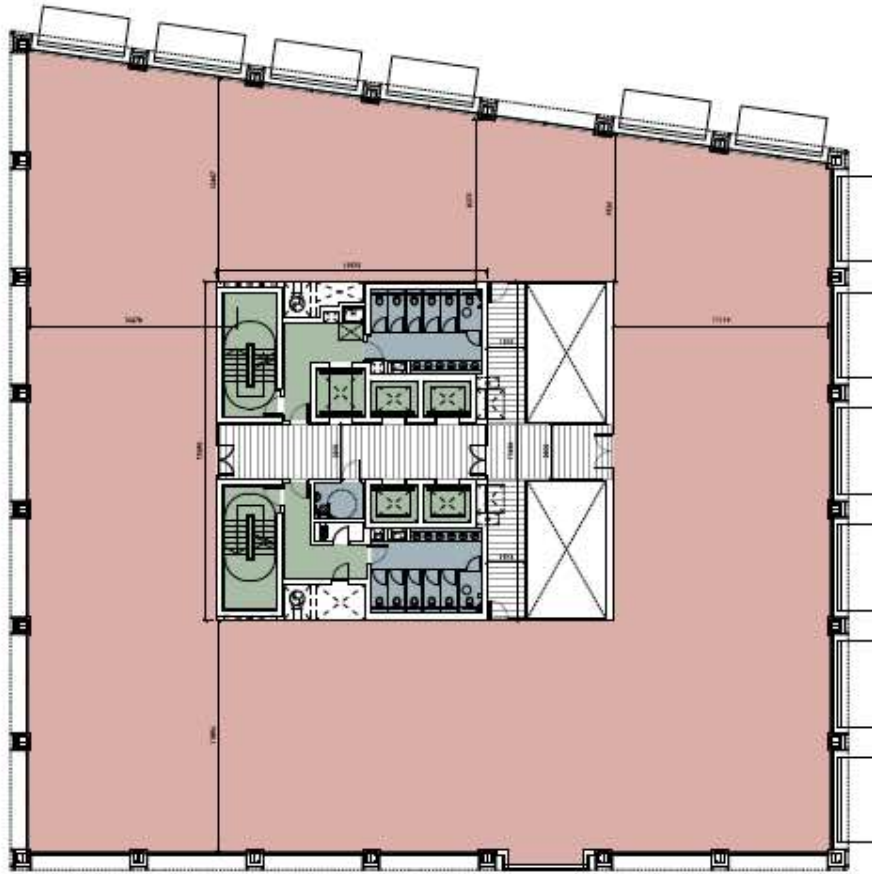
Plan 11. Edmund Street elevation of Plot A



Plan 12. Aerial View of Block A



Plan 13. Proposed Ground Floor of Block A



Plan 14. First floor plan of Block A

8. Heritage Impact Assessment and Townscape Visual Impact Assessment

8.1 The Heritage Impact Assessment (HIA) and Townscape Visual Impact Assessment (TVIA) Methodology

8.1.1 This heritage impact assessment has been undertaken to comprehensively, systematically and transparently assess the impact of the proposed development on the heritage significance and settings of the heritage assets at and around the site: the Castle Street Conservation Area; the Liverpool WHS and; the surrounding listed buildings. It uses the methodology recommended by ICOMOS (International Council on Monuments and Sites) in its *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (2011), as a basis. The methodology used in this Heritage Statement also incorporates the recommended methodology for assessing the impact of development on the setting of heritage assets recommended by Historic England in *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)* (2017), which acknowledges the Landscape Institute's advice on undertaking landscape visual impact assessments.

8.1.2 The ICOMOS *Guidance* accepts that:

In any proposal for change there will be many factors to be considered. Balanced and justifiable decisions about change depend upon who values a place and why they do so. This leads to clear statement of a place's significance and with it the ability to understand the impact of the proposed change on that significance.

8.2 Assessment of the Impact of the Proposed Development on Heritage Assets

8.2.1 The assessment process involves, in essence, three very simple stages:

1. *What is the heritage at risk and why is it important?*
2. *How will change or a development proposal impact on the significance of the heritage asset?*
3. *How can these effects be avoided, reduced, rehabilitated (mitigated) or compensated?*

8.2.2 *What is the heritage at risk and why is it important?*

Assessing the Value of the Heritage Assets

8.2.2.1 The ICOMOS *Guidance on Heritage Impact Assessments* (2011) recommends that heritage assets should be assessed in relation to their intrinsic importance against a range of values, as well as to their international, national and/or local statutory designations, linked clearly and objectively to their historic integrity and authenticity.

The importance of heritage assets at the application site and in its surroundings have been assessed in this way in the sections on History, Description, Designations and Statement of Significance above. In summary, the proposed development could have an impact on:

- a) The setting of the Liverpool WHS and its historic urban landscape/townscape: **Very High Heritage Significance**
- b) The setting of the Castle Street Conservation Area: **High Heritage Significance**
- c) The setting of the Listed Buildings in Immediate Vicinity:

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The Albany: **High Heritage Significance**

Cotton Exchange: **High Heritage Significance**

Orleans House: **High Heritage Significance**

59-61 Tithebarn Street: **Medium Heritage Significance**

The Lion: **Medium Heritage Significance**

Windsor Building: **Medium Heritage Significance**

Berry's Building: **Medium Heritage Significance**

Lombard Chambers: **Medium Heritage Significance**

d) Listed Buildings in Wider Townscape:

Many listed buildings of **Medium and High Heritage Significance**, as illustrated on Plan 2.

e) The Heritage Assets within the site:

The former subway, the retained building on Pall Mall, the retaining wall on Pall Mall and the archaeology of the site are undesignated heritage assets of local importance and have **Low Heritage Significance**. (In any event, these are currently being cleared under the approved application for site remediation and so the impact on them is not assessed any further.)

8.2.3 *How will change or a development proposal impact on the significance of the heritage asset?*

8.2.3.1 ICOMOS's *Guidance on Heritage Impact Assessments* (2011) recommends that:

***Scale or severity of impacts** or changes can be judged taking into account their direct and indirect effects and whether they are temporary or permanent, reversible or irreversible. The cumulative effect of separate impacts should also be considered. The scale or severity of impact can be ranked without regard to the value of the asset as:*

- *No change*
- *Negligible change*
- *Minor change*
- *Moderate change*
- *Major change*

***The significance of the effect of change** – i.e. the overall impact - on an attribute is a function of the importance of the attribute and the scale of change. This can be summarized for each attribute described using the following descriptors. As change or impacts may be adverse or beneficial, there is a nine-point scale with "neutral" as its centre point:*

- *Major beneficial*
- *Moderate beneficial*
- *Minor beneficial*

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- *Negligible beneficial*
- *Neutral*
- *Slight Adverse*
- *Moderate Adverse*
- *Large Adverse*
- *Very Large Adverse.*

8.2.3.2 A table (reproduced at Table 2 below) is included in the *Guidance on Heritage Impact Assessments* to act as a guide in aiding assessment of this balanced impact.

VALUE OF HERITAGE ASSET	SCALE & SEVERITY OF CHANGE/IMPACT				
	No Change	Negligible change	Minor change	Moderate change	Major change
For WH properties Very High – attributes which convey OUV	SIGNIFICANCE OF EFFECT OR OVERALL IMPACT (EITHER ADVERSE OR BENEFICIAL)				
	Neutral	Slight	Moderate/ Large	Large/very Large	Very Large

For other heritage assets or attributes	SIGNIFICANCE OF IMPACT (EITHER ADVERSE OR BENEFICIAL)				
Very High	Neutral	Slight	Moderate/ Large	Large/very Large	Very Large
High	Neutral	Slight	Moderate/ Slight	Moderate/ Large	Large/Very Large
Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/ Large
Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/ Moderate
Negligible	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight

Table 2. Matrix for assessing significance of impact from (ICOMOS Guidance)

8.2.4 *How can these effects be avoided, reduced, rehabilitated (mitigated) or compensated?*

8.2.4.1 These issues are considered at the end of the assessment of the impact.

8.3 The Heritage Impact Assessment (HIA) and Townscape Visual Impact Assessment (TVIA)

8.3.1 The Principle of Redeveloping the Site

Direct Impact on Designated Heritage Assets

8.3.1.1 The application site does not include any designated or undesignated heritage assets. Although it includes a small part of the Castle Street Conservation (which is a designated heritage asset), there are actually no historic features or buildings within that part of the CA. The principle of redeveloping the application site will thus effectively involve **no direct change** of any designated heritage assets.

The direct impact of the redevelopment of the site on Designated Heritage Assets will be
Neutral

Direct Impact on the Historic Urban Landscape

8.3.1.2 The application site is in the centre of the historic city of Liverpool and although it is a “brownfield” site which has previously been developed, it has recently been devoid of buildings and structures, apart from the unsightly sub-station, the raised ground level, the tunnel and part of the retaining wall on Pall Mall which are currently being cleared. The development of the site began in the early 19th C with houses, it was partly redeveloped for the first Exchange Station in the 1850s, wholly redeveloped again for the railway sheds of the second Exchange Station in the 1880s, substantially cleared in the 1980s and partially landscaped as a publicly accessible private park, before currently being completely cleared to create a developable site. Whilst the park had amenity value (which will be reinstated by the improved landscaped park) and the site enabled pedestrian permeability across it (which will be re-instated and enhanced), the fundamental openness of the site is atypical of the dense urban grain of the city centre and represents a gap in the urban fabric. The principle of redeveloping the site with suitable buildings, enhanced parkland and pedestrian permeability, should therefore help to stitch back together the urban fabric and integrate the site into its surroundings.

8.3.1.3 The site is not within the WHS but is immediately adjacent to it and within its Buffer Zone and its wider Historic Urban Landscape. UNESCO is not opposed in principle to developments in and around WHSs. Indeed, in its *Budapest Declaration* (2002), it states:

In view of the increasing challenges to our shared heritage, we will:...

*c. seek to ensure **an appropriate and equitable balance between conservation, sustainability and development**, so that World Heritage properties can be protected through appropriate activities contributing to the social and economic development and the quality of life of our communities;*

The principle of redeveloping the application site has the potential to achieve that appropriate and equitable balance.

8.3.1.4 UNESCO’s current thinking on urban development affecting WHSs, as established in its *Recommendation on the Historic Urban Landscape* (2011), is that careful consideration needs to be given to broader urban contexts rather than simply defined boundaries:

8. The historic urban landscape is the urban area understood as the result of a historic layering of cultural and natural values and attributes, extending beyond the notion of “historic centre” or “ensemble” to include the broader urban context and its geographical setting.

The Recommendation does **not** advise against the principle of development in historic urban areas but takes a balanced approach:

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17.On the one hand, urbanization provides economic, social and cultural opportunities that can enhance the quality of life and traditional character of urban areas; on the other hand, the unmanaged changes in urban density and growth can undermine the sense of place, the integrity of the urban fabric, and the identity of communities.

The principle of redeveloping the application site has the potential to replace an under-utilised site and a void in the townscape with a suitable development which will provide economic, social and cultural opportunities that can enhance the quality of life and traditional character of this part of Liverpool, without undermining the sense of place, the integrity of the urban fabric or the identity of communities. Indeed, given the poor environmental quality and function of the car park, the proposal has the potential to positively enhance the sense of place, the integrity of the urban fabric and the identity of communities.

The direct impact of the redevelopment of the site on broader Historic Urban Landscape has the potential to involve **Moderate Beneficial Change** which could have a **Large/Very Large** Beneficial Impact on the site, the immediate surrounding area and the setting of the WHS.

8.3.2 Impact of the Masterplan on the Site and the Immediate Setting of Surrounding Heritage Assets

8.3.2.1 The Masterplan (Plan 7) for the site incorporates a range of design principles and features which will ultimately be implemented throughout the site.

8.3.2.2 *Four of Principle Development Plots plus a central “pavilion” plot*

The previous building on the site (the shed of the 2nd Exchange Station Building) was almost orthogonal in plan, but was tapered in slightly towards the N and extended beyond the existing site to N and S the site. It was relatively low rise and had a series of pitched roofs. It was a building designed for a specific purpose. The masterplan does not seek to replicate the form, mass or plan form of the previous building, as there is little rationale for doing so, especially as the proposed buildings in the Masterplan are for totally different uses. Rather, the design rationale for the proposed layout of the site with four principle development plots is that they will be laid out orthogonally, to relate to the orthogonal street pattern and urban grain of the surrounding area. Plots A will have one canted side which will provide a subtle memory of the taper of the former building on the site. It is proposed that Edmund Street will be extended through the site to Pall Mall as a pedestrian route. Part of the former Lumber Street will be re-instated and a new N-S route will be created between: Plots A and B and; Plots C and D. The buildings will be laid out wholly on those plots, again in a plan form which relates to the surrounding streets and buildings, which tend to occupy whole city-blocks, at back of all four pavements. In this way, the layout in the Masterplan: responds positively to the existing urban grain of the surrounding area; integrates the proposed development into its urban context and; will enable the proposed development to contribute positively to the historic urban landscape.

The proposed layout of plots will represent a **major change** in respect of the previous and current layout and appearance of the site and its role as a setting for the surrounding heritage assets (which are of Medium, High and Very High Significance) but it will be a beneficial change and will result in **Moderate/ Large/ Very Large** Beneficial Impact on their setting, respectively.

8.3.2.3 *Building Heights and Form*

i) Introduction

The height and form of the proposed buildings in the Masterplan are crucial issues in affecting the impact of the proposals, as their height and form are the main factors which will affect: a) the prominence of the development in the wider historic urban landscape and; b) the relationship of the proposed buildings with the existing historic buildings and townscape in the immediate vicinity.

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However, tall buildings are not necessarily harmful to the setting of historic buildings or historic area, as acknowledged by the WHS SPD:

Tall buildings are recognised by the City Council as symbols of regeneration and can contribute positively to urban landscape.

Indeed, some historic buildings can be categorised as tall buildings. In Liverpool: the Royal Liver Building was the tallest office building in the country (when built) and; the Anglican Cathedral is a tall building which dominates the ridge to the E of the city. Both are buildings of the highest heritage significance and are tall buildings. Furthermore, much of the technology for the evolution of tall buildings was developed or used at an early stage in Liverpool: cast-iron framed office buildings (Oriental Chambers - 1864); steel-framed buildings (Royal Insurance Building - 1903); concrete-framed buildings (Royal Liver Building 1911) and paternoster lifts (Oriental Chambers). The tradition of tall buildings is thus an element of Liverpool's Outstanding Universal Value and it would be perverse to object in principle to further tall buildings in Liverpool. The key issues in determining the acceptability of new tall buildings in heritage terms are their location, relative height, form, materials and their design.

The previous building on the site was a large single storey building which is believed to have been approximately 15m high (equivalent of approximately a 4 storey building) but there are no buildings on the site at present (apart from the electricity sub-station).

The Masterplan includes a detailed proposal for an office block on Plot A which will: have a basement, ground floor and seven upper floors - max 40m above the level of Bixteth Street (Bixteth St = 18m AOD, building height = 58m AOD). The top floor will be recessed by approximately 9 m from the elevations and so, effectively from street-level, the building will appear as a 8 storey building.

The Masterplan also includes proposals for:

- Plot B: a hotel with a height parameter of up to Max 69.9m AOD;
- Plot C: an office building with a height parameter of up to Max 72.3 AOD;
- Plot D: an office building with a height parameter of up to Max 64.3m AOD and;
- Plot E: a bar/restaurant pavilion with a height parameter of up to Max 25m

Detailed designs for the proposed buildings on Plots B-E have not been finalised but some indicative drawings are provided in the Design and Access Statement and a Design Code is submitted as part of the application to ensure that they are complementary to the building on Plot A and each other.

A set of 14 Verified Views of the proposals within the historic urban landscape has been prepared, from viewpoints, agreed in advance with officers of Liverpool City Council, to assist in the HIA and TVIA. The Viewpoints are shown on Plans 13-15 and the Verified Views shown on Plates (40-53). Two low resolution images of each view (as existing and with the proposed buildings shown) are provided in this statement and high resolution versions are provided in a separate document.

The Verified Views include the relevant important views which were identified in the WHS SPD (see Appendices 3 and 4) and some specific local views which may be (or may not be) affected by the proposal. The verified views are assessed below, particularly in respect of their impact on the skyline, townscape of the World Heritage site, the adjacent Castle Street Conservation Area and individual historic buildings.

ii) The Impact of Building Heights on Immediate Streetscenes around the Site

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The proposed buildings of 9-14 storeys will be substantial buildings and will be seen in the context of the WHS, the CA and listed buildings but there is an existing variety of heights of buildings in the immediate vicinity and indeed in the wider area of Liverpool City Centre, including some which are substantially higher. A survey of building heights in the WHS SPD (Plan 12) illustrates the distribution of buildings and their varied heights around the application site in 2009.

A recent survey (Plan 13) of building heights has confirmed that the buildings along Tithebarn Street, which are all in the WHS and CA, include:

- Churchill House (now The Tempest) - 7/8 storeys
- Sun Alliance House - 15 storeys
- Silk House Court - 15 storeys

The survey also found that the buildings along this part of Bixteth Street and the immediate vicinity, which are all in or adjacent to the WHS and CA, include:

- The new part of Exchange Station - 7 storeys
- Berry's Building - 6 storeys (including a recent penthouse level addition)
- Lombard Chambers - 6 storeys (including a recent penthouse level)
- The Cotton Exchange - 7 storeys
- Orleans House - 7 storeys
- Cross Building - 7 storey
- 4 St Paul's Square - 8 storeys
- The Plaza, 100 Old Hall Street - 16 storeys
- Lancaster House - 6 storeys

The proposed office blocks on Plot A and D will be slightly higher than the average height of existing historic buildings along this part of Bixteth Street but will be comparable to some buildings on Tithebarn Street and will be considerably lower than many existing buildings to the S on Tithebarn Street (in the CA and WHS) and others to the N around St Paul's Square.

The WHS SPD provides guidance on the height of new development in the WHS and Buffer Zone:

5.2.5 New developments should reflect local variations in building heights and ensure that they do not dominate areas by virtue of their height.

and

5.2.6 New buildings in the WHS should not generally exceed the height of the tallest building in the immediate vicinity of the street(s) that they address.

The proposed variation in height of the four main buildings on the application site thus: "reflects local variations in building heights and ensures that they do not dominate areas by virtue of their height" and; thus complies with the guidance at Para 5.2.5 of the WHS SPD.

The site lies between Silkhouse Court (16 storeys) and The Plaza (16 storeys) and all four proposed buildings are: lower than these two buildings; do not "exceed the height of the tallest

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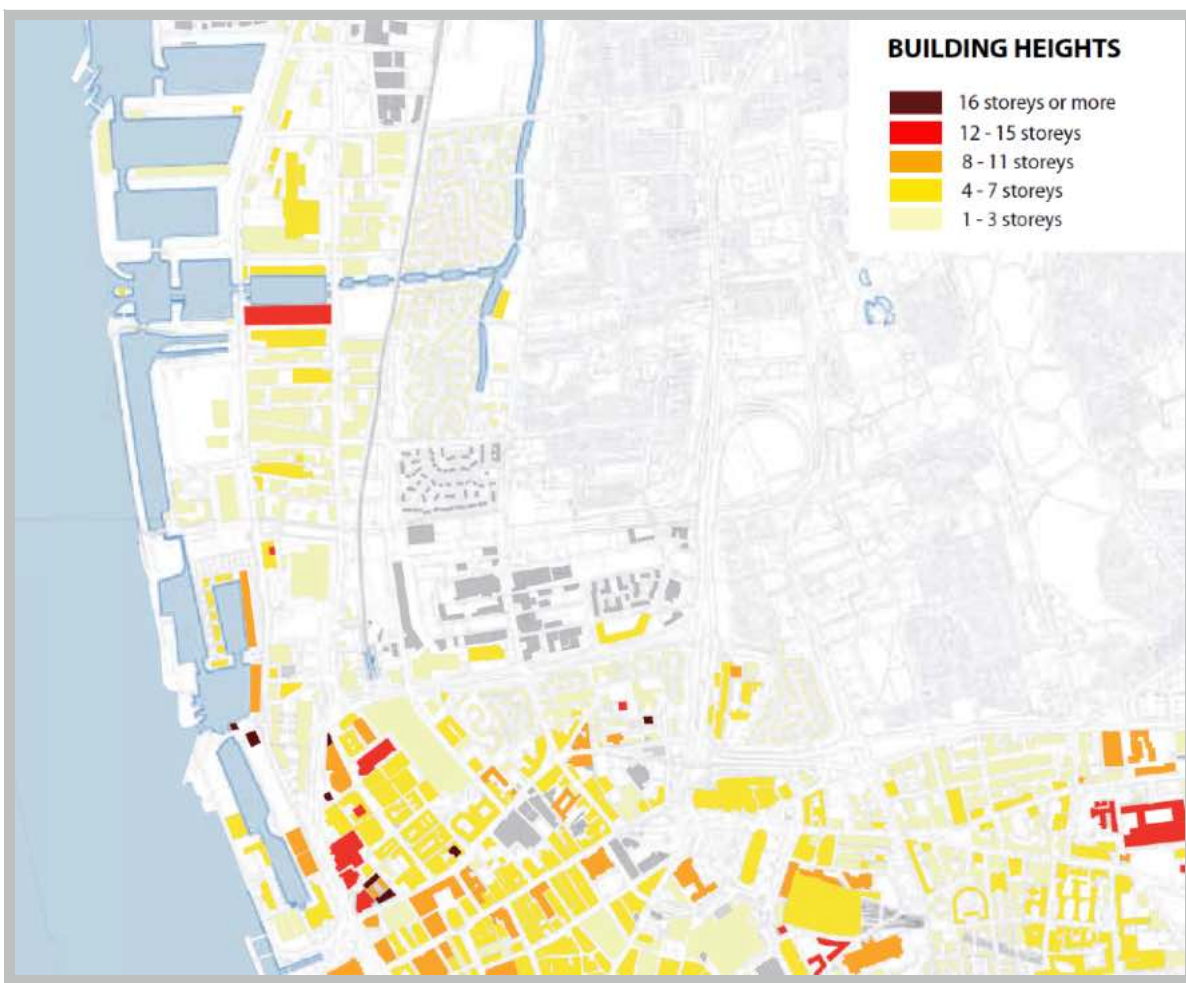
building in the immediate vicinity of the street(s) that they address” and; comply with the guidance at 5.2.6 of the WHS SPD.

Also within the general vicinity, the existing Beetham Tower on Brook Street rises to 40 storeys and the West Tower on Old Hall Street rises to 30 storeys. The proposed buildings will not be exceptional in height but will merely become part of the varied street scene and skyline and they will integrate into the variety of heights of buildings in the vicinity.

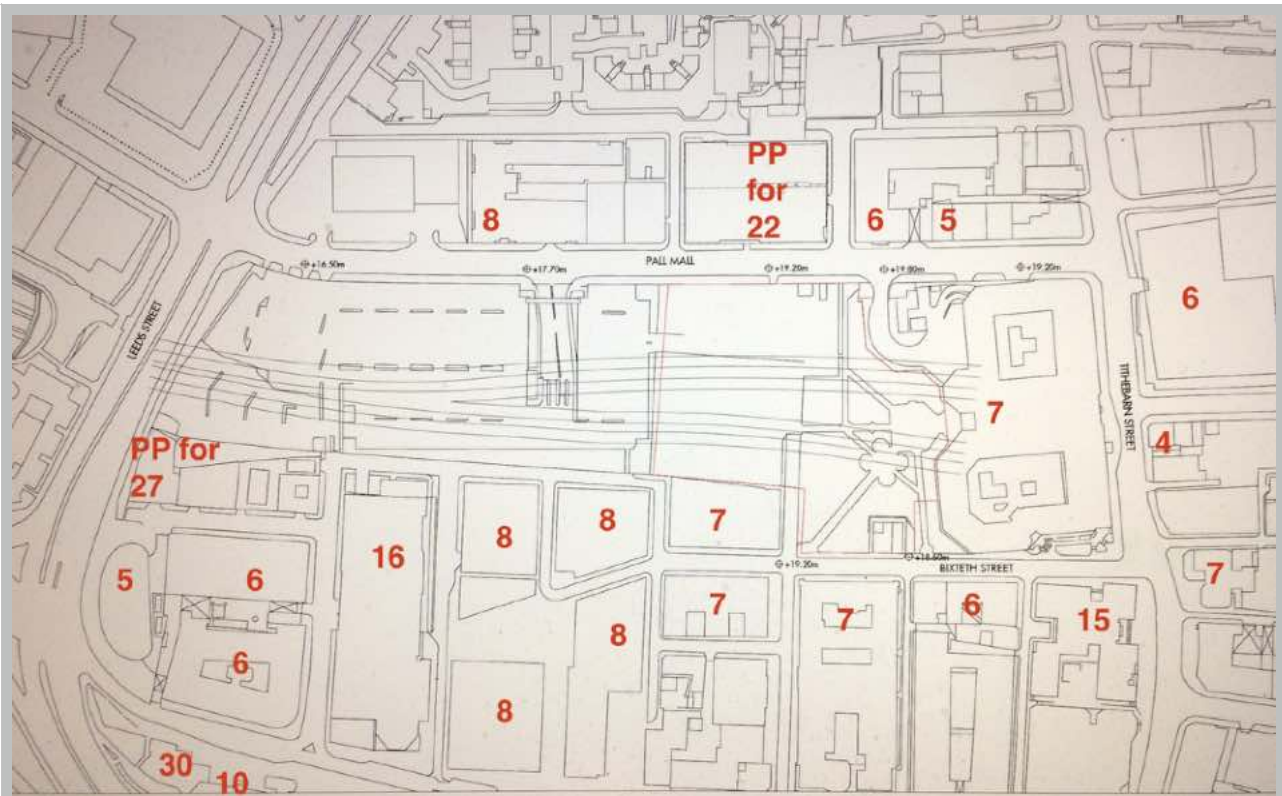
Furthermore, the proposed buildings should be assessed in the context of other proposals in the vicinity for which planning permission has recently been granted and which are likely to be under construction shortly:

- Planning permission (17F/0042) has been granted for a 27 storey building at 122 Old Hall Street.
- Planning permission (17F/0340) has been granted for 3 buildings of 27, 33 and 39 storeys at Lanyork Street, just on the N side of Leeds Street, now labelled as *Infinity*. The construction tower for the latter development has recently been erected and gives some indication on the ground of the location and height of that development.
- Planning permission (16F/2634) has been granted for a development of 22 storeys at 30-36 Pall Mall

In the context of these proposals, the proposed heights of 9, 11 and 14 storeys is relatively modest and will create a gradual stepping up from Tithebarn Street to those much taller buildings.



Plan 12. Building Heights (from the WHS SPD 2009)



Plan 12. Building heights of existing and approved buildings in the vicinity and along Bixteth Street and Pall Mall (May 2019)

iii) The Impact of Buildings' Heights and Form on the Wider Townscape, Skyline and the Historic Urban Landscape

As with the buildings in the immediate vicinity of the site, the buildings within the wider historic urban landscape of Liverpool city centre have a variety of building heights and their contribution to the overall wider townscape is strongly influenced by the topography of the area: a wide river, which enables long-distance views across it; a low ridge rising up to Castle Street and Old Hall Street from the E river bank, which increases the baseline of buildings along that ridge, and; a more substantial ridge rising up to Hope Street and Everton Brow in the E, which again increases the baseline of buildings along that ridge. This topography enables some panoramic views of the city skyline from the E and W. It is therefore important to assess the impact of the proposed building heights on these views.

The visual impact of the proposed height of the buildings on the setting of historic buildings, the street scene, skyline and townscape is clearly illustrated in the Verified Views 1-14 (Plates 40-53). For the distant views and some of the local views, the proposed buildings are shown simply as "wire-frame outlines" to illustrate whether they will be seen on the skyline and if so to what degree. For most of the local views, the details of the proposed building on Plot A are shown in order to give a clearer indication of its impact on the local townscape. The impact of the proposed development on each view is briefly assessed in text below and summarised in Table 3.

The Landscape Institute's *The Guidelines for Landscape & Visual Impact Assessment, 3rd Edition, 2013* provides a detailed and complex methodology for undertaking landscape and visual impact assessments, which is justified for assessing the impact of some major proposals. However, the current proposal does not justify the strict use of that full methodology, as it is for mid-rise buildings rather than high-rise buildings. Rather, this heritage statement assesses the townscape and visual impact of the proposal on each view, using the "Scale and Criteria for Magnitude of Effect" recommended by the Landscape Institute (see Table 2) and then balances the magnitude with the

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level of heritage significance, as within the methodology of ICOMOS's *Guidance on Heritage Impact Assessments* (2011).

Category	Criteria
Major adverse or beneficial visual effect	The proposals will cause a dominant or complete change or contrast to the view, resulting from the loss or addition of substantial features in the view and will substantially alter the appreciation of the view.
Moderate adverse or beneficial visual effect	The proposals will cause a clearly noticeable change or contrast to the view, which would have some affect on the composition, resulting from the loss or addition of features in the view and will noticeably alter the appreciation of the view.
Slight adverse or beneficial visual effect	The proposals will cause a perceptible change or contrast to the view, but which would not materially affect the composition or the appreciation of the view.
Negligible adverse or beneficial visual effect	The proposals will cause a barely perceptible change or contrast to the view, which would not affect the composition or the appreciation of the view.
No change	The proposals will cause no change to the view.
Neutral	There will be a change to the composition of the view, but the change will be in keeping with the existing elements of the view.

Table 2. Scale and Criteria for Magnitude of Effect from Landscape Institute guidance

View 1. Distant View from Magazine Promenade

This view was identified in the WHS SPD as a key Distant View 1 of the WHS.

The WHS SPD identified that the Main Heritage/Features in the view are:

Foreground: River; Tidal Margins (low tide)

Middleground: River wall; Stanley Dock Warehouses ;Victoria Clock Tower; Waterloo Warehouse; operational docks; dockside wind turbines

Background/Skyline: Everton Ridge; Kingsway Tunnel Ventilation shaft; Metropolitan Cathedral; St John's Beacon; The Plaza; the Pier Head Group; Albert Dock Warehouses; overall cityscape; St George's Church, Everton Water Tower

It can be seen from the Verified View (Plates 40) that the proposed buildings will be seen on the skyline in this view but they will: be in the background/skyline; will not be especially dominant; will not obscure the silhouette of any historic building or landmark building, other than the tower of St Luke's Church which is minute at that great distance) and; will simply merge into the wider townscape. Although St. Luke's has been identified as a Landmark Building (No.11) in the WHS SPD, its landmark qualities are far more important at a relatively local level, when viewed up Bold Street and along Renshaw Street than in this Distant View. It has not been specifically identified as a "Main Heritage/Feature" in the "Background/Skyline" in this view from Magazine Promenade. More importantly, since the Verified Views were taken (early 2019), the steel frame of a new

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apartment block has been erected at Waterloo Dock and it completely obstructs the view of St Luke's from Magazine Lane (Plate 54)!

The proposal will therefore cause a barely perceptible change which would not affect the composition or appreciation of the view or the townscape of the WHS.

Magnitude of change: Negligible Adverse

Significance of impact: Very Slight adverse

View 2. Distant View from Wallasey Town Hall

This view was identified in the WHS SPD as a key Distant View 2 of the WHS.

The WHS SPD identified that the Main Heritage/Features in the view are:

Foreground: *River, Tidal Margins (low tide)*

Middleground: *River wall, Waterloo*

Warehouse (full on), Stanley Dock Warehouses, Victoria Clock Tower, Pier Head Group, Kingsway Tunnel Ventilation shaft, operational docks, wind turbines

Background/Skyline: *Everton Ridge, Museum of Liverpool, St John's Beacon, overall cityscape, operational docks, Albert Dock*

Warehouses, Kings Arena, St Georges Church, Everton Water Tower

It can be seen from the Verified View (Plates 41) that most of the proposed buildings will not be seen on the skyline in this view as they will be hidden behind The Plaza and other buildings. Only the top LH (N) corner of one building will just protrude behind The Plaza. Effectively, this will cause no change to the skyline and townscape in this view.

The proposal will therefore cause no change and would not affect the composition or appreciation of the view or the townscape of the WHS.

Magnitude of change: No change

Significance of impact: Neutral

View 3. Distant View from Woodside Ferry Terminal

This view was identified in the WHS SPD as a key Distant View 3 of the WHS.

The WHS SPD identified that the Main Heritage/Features in the view are:

Foreground: *River*

Middleground: *River wall, Kings Arena, Albert Dock Warehouses (full on), Museum of Liverpool, Pier Head Group (oblique)*

Background/Skyline: *Hope Street Ridge, Anglican Cathedral, Metropolitan Cathedral, St John's Beacon, overall cityscape, Waterloo Warehouse, Stanley Dock Warehouses*

It can be seen from the Verified View (Plates 42) that the proposed Building A will be obstructed from view by the Atlantic Tower Hotel but that the other buildings will be seen on the skyline in this view but they will: be in the background/skyline; will not be especially dominant; will not obscure the silhouette of any historic building or landmark building; will be seen behind and to the L of the Liver Building but; will simply merge into the wider townscape.

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Although the proposal would cause a slight change over the current view, the change would be barely perceptible and importantly would not affect the composition or setting of historic buildings or appreciation of the view or the townscape of the WHS. In these respects, the proposal would have no impact in this view.

Magnitude of change: No change

Significance of impact: Neutral

View 4. Distant View from Everton Park

This view was identified in the WHS SPD as a key Distant View 5 of the WHS.

The WHS SPD identified that the Main Heritage/Features in the view are:

Foreground: *Everton Park*

Middleground: *St George's Church,*

Operational Docks, dockland wind turbines, Stanley Dock Warehouses, Waterloo Warehouse, overall cityscape, St John's Beacon,

Background/Skyline: *Irish Sea, Liverpool Bay wind turbines, River estuary, Wirral, Wallasey Town Hall, Anglican Cathedral, Metropolitan Cathedral, St John's Beacon*

It can be seen from the Verified View (Plates 43) that the proposed Building A will be obstructed from view by Buildings C and D but that, although these two buildings will just be seen on the skyline in this view but they will: be in the background/skyline; will not be especially dominant; will not obscure the silhouette of any historic building or landmark building; will be seen in front of but below the Unity Building and; will simply merge into the wider townscape.

Although the proposal would cause a slight change over the current view, the change would be barely perceptible and importantly would not affect the composition or setting of historic buildings or appreciation of the view or the townscape of the WHS. In these respects, the proposal would have no impact in this view.

Magnitude of change: No change

Significance of impact: Neutral

View 5. Distant View from Metropolitan Cathedral

This view was identified in the WHS SPD as a key Distant View 7 of the WHS.

The WHS SPD identified that the Main Heritage/Features in the view are:

Foreground: *Innovation Centre, Design School*

Middleground: *Corporation tenements, LJMU former architecture school, Community College,*

Background/Skyline: *St Johns Beacon, Unity, Towers of Liver Building, Tower of former YMCA, Park One West, Hilton Hotel and Bidston Hill*

It can be seen from the Verified View (Plates 44) that the proposed buildings will be obstructed from view by vegetation, topography, distance and intervening buildings. Although it may just be possible to have a glimpse of the buildings from some viewpoints on the piazza around the cathedral, they would: be in the background/skyline; will not be especially dominant; will not

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obscure the silhouette of any historic building or landmark building and; will simply merge into the wider townscape.

The proposal would cause no change over the current view and would not affect the composition or setting of historic buildings or appreciation of the view or the townscape of the WHS. In these respects, the proposal would have no impact in this view.

Magnitude of change: No change

Significance of impact: Neutral

View 6. Distant View from Anglican Cathedral

This view was identified in the WHS SPD as a key Distant View 6 of the WHS.

The WHS SPD identified that the Main Heritage/Features in the view are:

Foreground: *Oratory, Cathedral Gates, Dean Walters Building, S end of Rodney Street*

Middleground: *Rooftops, Dome of The Blackie, St Johns Beacon*

Background/Skyline: *Towers of Liver Building, Unity Building, India Building, Pier Head Tunnel*

Ventilation Tower, Park One West, Hilton Hotel

It can be seen from the Verified View (Plates 45) that the proposed buildings will be obstructed from view by vegetation, topography, distance and intervening buildings.

The proposal would cause no change over the current view and would not affect the composition or setting of historic buildings or appreciation of the view or the townscape of the WHS. In these respects, the proposal would have no impact in this view.

Magnitude of change: No change

Significance of impact: Neutral

View 7. General View from William Brown Street

This view was identified in the WHS SPD as a key General View/Panorama VII of the WHS.

The WHS SPD identified that the Main Heritage/Features in the view are:

Foreground: *Trees, boundary wall, statuary and landscaping of St Johns gardens*

Middleground: *Queensway Tunnel Entrance, Municipal Building Tower; East end of Dale St; S-facing elevations of cultural buildings on William Brown St; overall cityscape*

Skyline/Background: *Towers of Liver Building; South John Street Tunnel Ventilation Tower, Dome of Royal Insurance Building*

It can be seen from the Verified View (Plates 46) that the proposed Building A will be obstructed from view by intervening buildings and that, the top of proposed Building C will just be seen on the skyline in this view but it will: be in the background/skyline; will not be especially dominant; will not obscure the silhouette of any historic building or landmark building; will be seen in front of but below The Plaza and; will simply merge into the wider townscape.

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Although the proposal would cause a slight change over the current view, the change would be barely perceptible and importantly would not affect the composition or setting of historic buildings or appreciation of the view or the townscape of the WHS. In these respects, the proposal would have no impact in this view.

Magnitude of change: No change

Significance of impact: Neutral

View 8. N up Moorfields towards the site from Moorfields Station

This viewpoint has been selected for assessment as it is a major public transport node (Moorfields Station) and the view towards the application site is towards the principal elevation of Exchange Station, which, although not a listed building, is part of the historic urban landscape around the WHS. The former station building has special prominence as it is the focal point in the view, framed by The Lion Pub and the Family Courts building. The boundary of the WHS and the Castle Street CA runs up the middle of the street, with the building on the L (W) in the designated areas but the buildings on the R (E) and in the centre outside the designated areas.

It can be seen from the Verified View (Plates 47) that the proposed buildings will be obstructed from view by the former Exchange Station.

The proposal would cause no change over the current view and would not affect the composition or setting of historic buildings or appreciation of the view or the townscape of the WHS. In these respects, the proposal would have no impact in this view.

Magnitude of change: No change

Significance of impact: Neutral

View 9. - View N up Bixteth Street from Tithebarn Street junction

This viewpoint is just within the Castle Street Conservation Area and the WHS and the view is effectively along the boundary of those designations which run along Bixteth Street. The view is temporarily affected by scaffolding in Plates 48 but takes in the retained W end of Exchange Station and, without the scaffolding, very acute views of Bereys Buildings, Lombard Chambers, Cotton Exchange and Orleans House.

The view is dominated by: the mid-late 20th C Silkhouse Court and the late 20th C extensions to Exchange Station in the foreground and; the early 21st C St Pauls Square and The Plaza in the far distance, closing off the view at the end of Bixteth Street. The proposed Buildings B, C and D would be obstructed from view by the former Exchange Station and its extensions but the proposed Building A will be clearly seen, at an acute angle, as an element in the street's frontage.

The proposed Building A will be slightly higher than some of the buildings in the view but will be lower than other buildings in the view or comparable in height to them. The proposed building will: not be overly dominant and; will cause no harm to the setting of the listed buildings, conservation area or the WHS in this view. On the contrary, it will fill in a void in the urban fabric and; help to re-establish a more complete and active street scene on the fringe of the CA and WHS. It will therefore enhance the townscape in these respects.

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The proposal will cause perceptible change but it would: not harm any views of heritage assets; not meaningfully affect the appreciation of the heritage values in the view and; would help to re-establish a more complete street frontage.

Magnitude of change: Minor Beneficial

Significance of impact: Moderate/Large Beneficial

View 10. View S along Pall Mall from Leeds St

The viewpoint is outside the Castle Street CA but the view is towards the CA, although that part of the view which is in the CA is the late 20th C extension to Exchange Station. The viewpoint is on the outer boundary of the Buffer Zone of the WHS and within its broad historic urban landscape but no heritage assets within the WHS are visible. No listed buildings are within the view.

Plates 49 illustrate that the view is dominated by the modern car sales site and apartment block in the foreground. In the middle distance is the undesignated heritage asset of the retaining wall of the former Exchange Station railway tracks and sheds. In the far distance on the R, are the early 21st C mid-rise buildings around St Pauls Square and 16 storey building of The Plaza.

The proposed Blocks, B, C and D would become prominent structures within the centre of this view but would: not harm sight of any heritage assets; would integrate harmoniously with the other buildings within the view; fill in a void in the urban fabric and; help to re-establish a more complete street scene.

Magnitude of change: Minor Beneficial

Significance of impact: Moderate/Large Beneficial

View 11. View W from Cockspur Street

The viewpoint is outside the Castle Street CA but the view is towards it, although that part of the view which is in the CA is restricted to buildings of no heritage significance. The viewpoint is in the Buffer Zone of the WHS and within its broad historic urban landscape and the view is towards the historic commercial district but no heritage assets within the WHS are visible in the view. No listed buildings are within the view.

Plates 50 illustrate that the view is dominated in the foreground by the trees and hoarding around a redevelopment site on the L(S) and the late 20th C low-rise houses on the R (N). In the middle distance are the 1960s former Royal and Sun Alliance Building, the early 21st C mid-rise buildings around St Pauls Square and most prominently the Beetham Tower.

The proposed buildings would become prominent structures within the centre of this view and would obstruct the view of the Beetham Tower but would: not harm sight of any heritage assets; would integrate harmoniously with the other buildings within the view; fill in a void in the urban fabric and; help to re-establish a more complete street scene.

Magnitude of change: Minor Beneficial

Significance of impact: Moderate/Large Beneficial

View 12. NE along Ormond Street from Old Hall Street

The viewpoint and the heritage assets within the view are within the Castle St CA and the WHS. The Albany on the R (S) and the Cotton Exchange on the L (N) are Grade II* and Grade II listed

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buildings respectfully. This is one of several important local views within the historic commercial district which illustrate the tight urban grain of long-straight streets with mid-rise historic buildings at the back of the pavement (or just behind iron railings). The buildings themselves have high significance as buildings which embody the OUV of this character area of the WHS.

The Albany and the Cotton Exchange frame the view at the end of the narrow street, which would have been occupied by the sheds of Exchange Station until its demolition. Between the demolition and until recently, the site has been open and occupied by the temporary trees on the site but at present the focal point is over the cleared application site towards the early 21st C apartment block on the E side of Pall Mall, creating an unsatisfactory void in the townscape.

Plates 51 illustrate that a sliver of a view of the proposed Building A will be prominent in this view and that some of the other buildings will just be visible in this view. However, the proposed buildings would: not harm sight of any heritage assets; would appear to be in scale with the existing buildings; would integrate harmoniously with the existing historic buildings within the view; fill in a void in the urban fabric and; help to re-establish a more complete street scene.

Magnitude of change: Minor Beneficial

Significance of impact: Moderate/Large Beneficial

View 13. S along Bixteth Street from St Paul's Square

This viewpoint is immediately outside a corner of the Castle Street CA and the WHS and the view down Bixteth Street is along the boundary of these designations, with: Orleans House (Grade II* Listed Building) on the R (W) inside the designated areas; the early 21st apartments block on the L outside the designated areas and Churchill House a brutalist mid 20th C mid-rise office tower closing the view. The narrowness of the street, with mid-rise buildings tightly at the back of the pavement can be seen in Plates 52 but it does not obviously reveal the void in the view created by the openness of the application site. However, this is experienced kinetically as receptors move towards Tithebarn Street.

Plates 52 illustrate more clearly that the proposed Building A: would not harm sight of any heritage assets; would appear to be in scale with the existing buildings; would integrate harmoniously with the existing historic buildings within the view; fill in a void in the urban fabric and; help to re-establish a more complete street scene along Bixteth Street.

Magnitude of change: Minor Beneficial

Significance of impact: Moderate/Large Beneficial

View 14 E along Edmund Street

The viewpoint and the heritage assets within the view are within the Castle St CA and the WHS. The Cotton Exchange on the R (S) and Orleans House (seen acutely) on the L (N) are Grade II* listed buildings. Stanley House on the L is not a listed building but it is of some architectural and historic interest and it too embodies some of the OUV of the WHS. These three buildings all contribute to the character and appearance of the CA. This is another of several important local views within the historic commercial district which illustrate the tight urban grain of long-straight streets with mid-rise historic buildings at the back of the pavement (or just behind iron railings). The buildings themselves have high significance as buildings which embody the OUV of this character area of the WHS.

It can be seen in Plate 53 that the Cotton Exchange and Orleans House frame the view at the end of the narrow street, which would have been occupied by the sheds of Exchange Station until their demolition. Between the demolition and until recently, the site has been open and occupied by the temporary trees on the site but at present the focal points are and unsatisfactory combination of: a) the 7 storey apartment block on Bixteth Street on the L in the middle ground

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and; b) the early 21st C apartment block on the E side of Pall Mall, over the cleared application site on the R which is a void in the townscape.

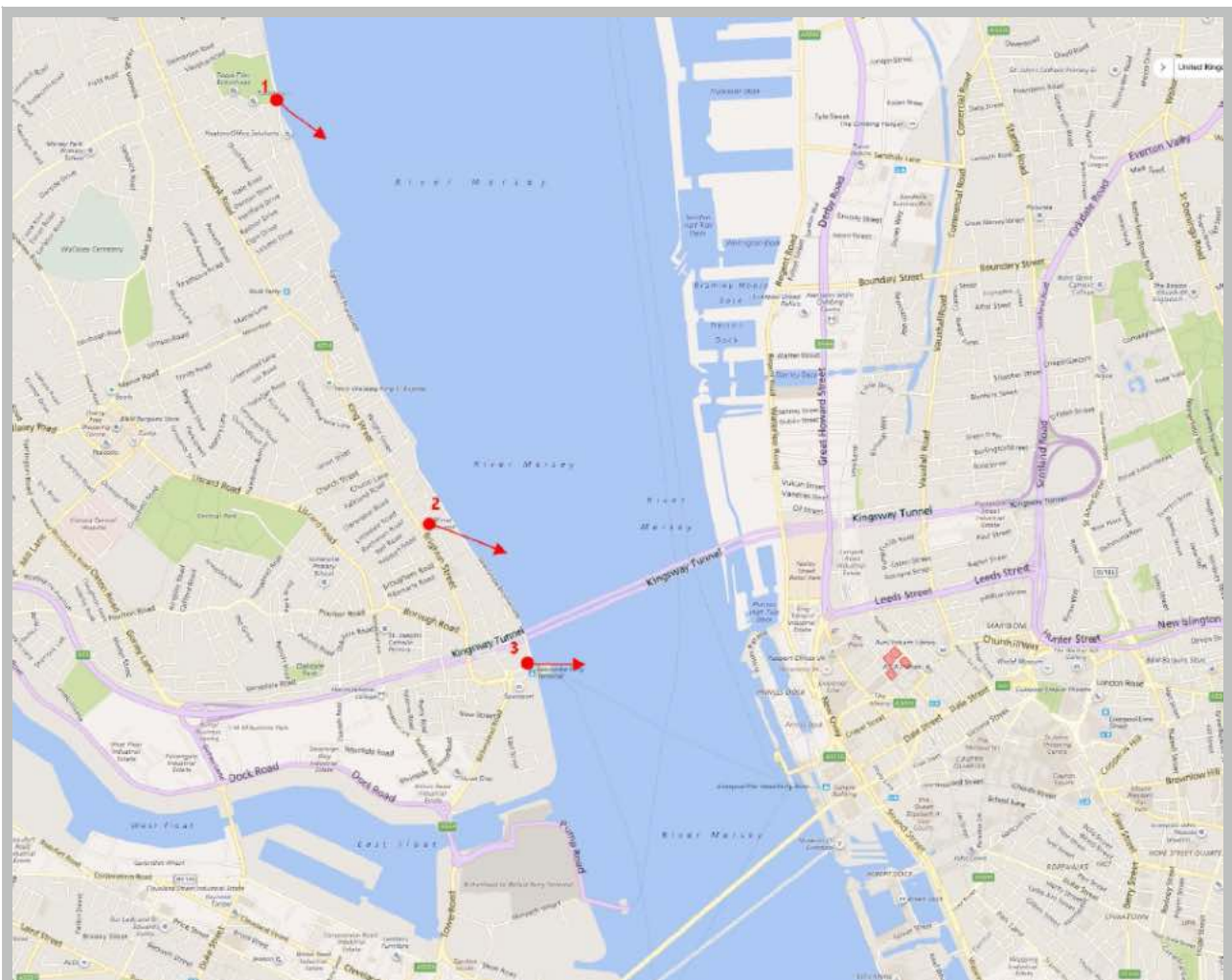
Plates 53 illustrate that the proposed Building A will be prominent in this view and will form a sense of enclosure in the same plane as that of the Cotton Exchange. The images also show that some of the other buildings will be visible in this view. However, the proposed buildings would: not harm sight of any heritage assets; would appear to be in scale with the existing buildings; would integrate harmoniously with the existing historic buildings within the view; fill in a void in the urban fabric and; help to re-establish a more complete and active street scene.

Magnitude of change: Minor Beneficial

Significance of impact: Moderate/Large Beneficial

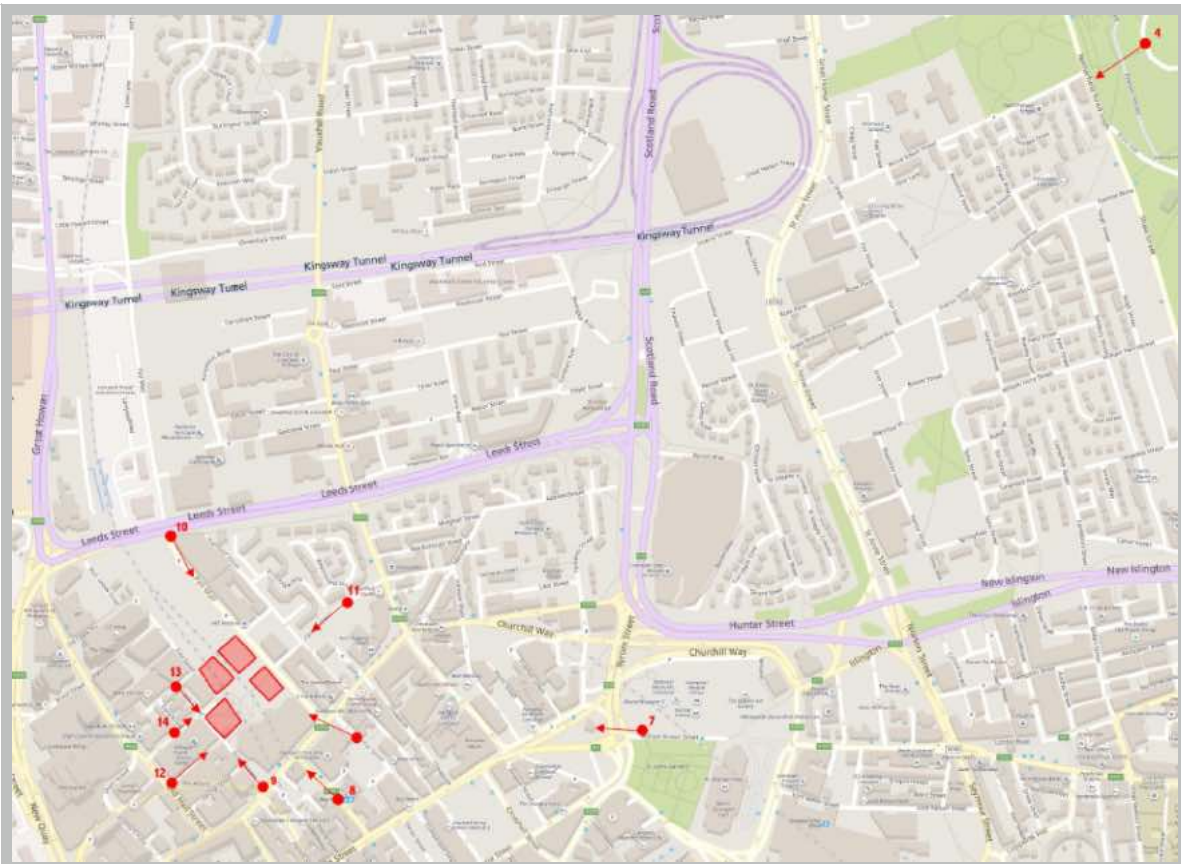
Summary of Impacts on Townscape

The assessment of the proposed heights of the four principal buildings on views and townscape above demonstrates that the only adverse impact will be the obstruction of the relatively unimportant view of the tower of St Luke's Church from Magazine Promenade in Distant Viewpoint 1, which has since been obstructed by another development at Waterloo Dock. It also demonstrates that the impact on some views will be neutral but will be Moderate/Large Beneficial on many others, as: the development will fill in a void in the urban fabric with a suitable form and mass and; it will help to re-establish a more complete and active street scene. Cumulatively, the proposed form and height of development will have a **Moderate/Slight Beneficial** Impact on the townscape

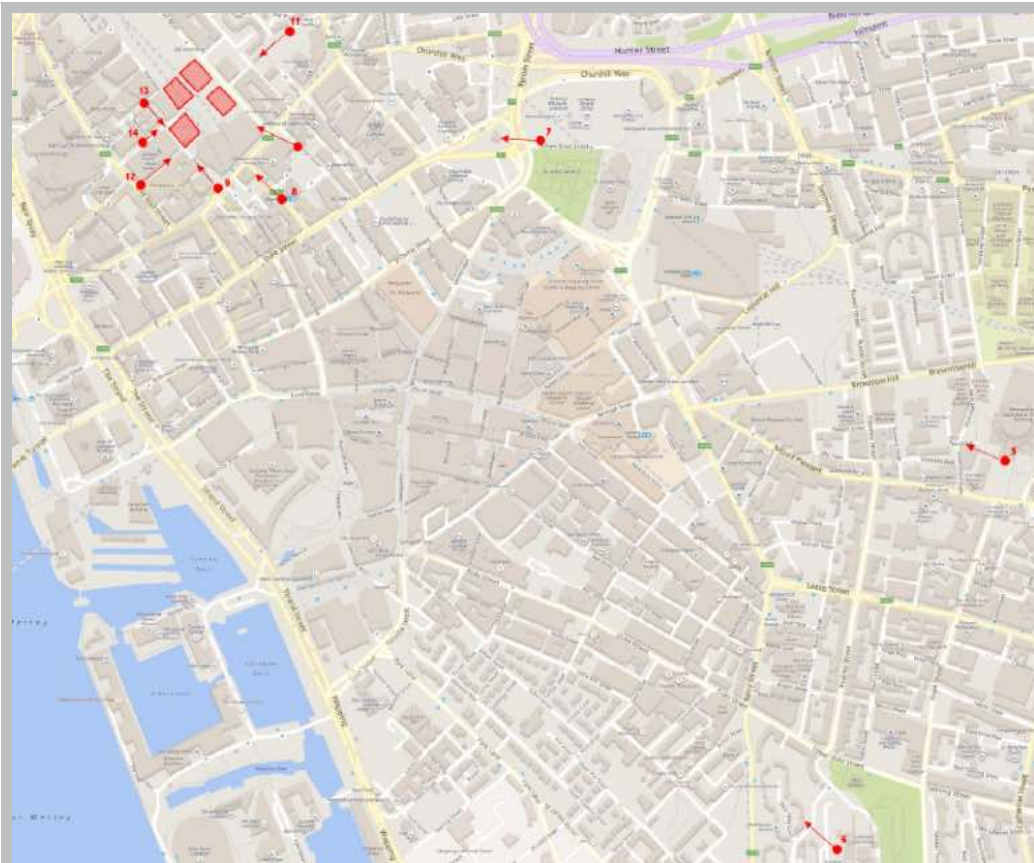


Plan 13. Viewpoints 1-3

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Plan 14. Viewpoints 4 and 7-14



Plan 15. Viewpoints 5-14



Plates 40. View 1. Distant View from Magazine Promenade

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Plates 41. View 2. Distant View from Wallasey Town Hall

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Plates 42. View 3 Distant View from Woodside Ferry Terminal



Plates 43. View 4. Distant View from Everton Park



Plates 44. View 5. Distant View from Metropolitan Cathedral



Plates 45. View 6. Distant View from Anglican Cathedral



Plates 46. View 7. General View from William Brown Street



Plates 47. View 8. NW along Moorfields from Station



Plates 48. View 9. View NW up Bixteth Street from junction with Tithebarn Street



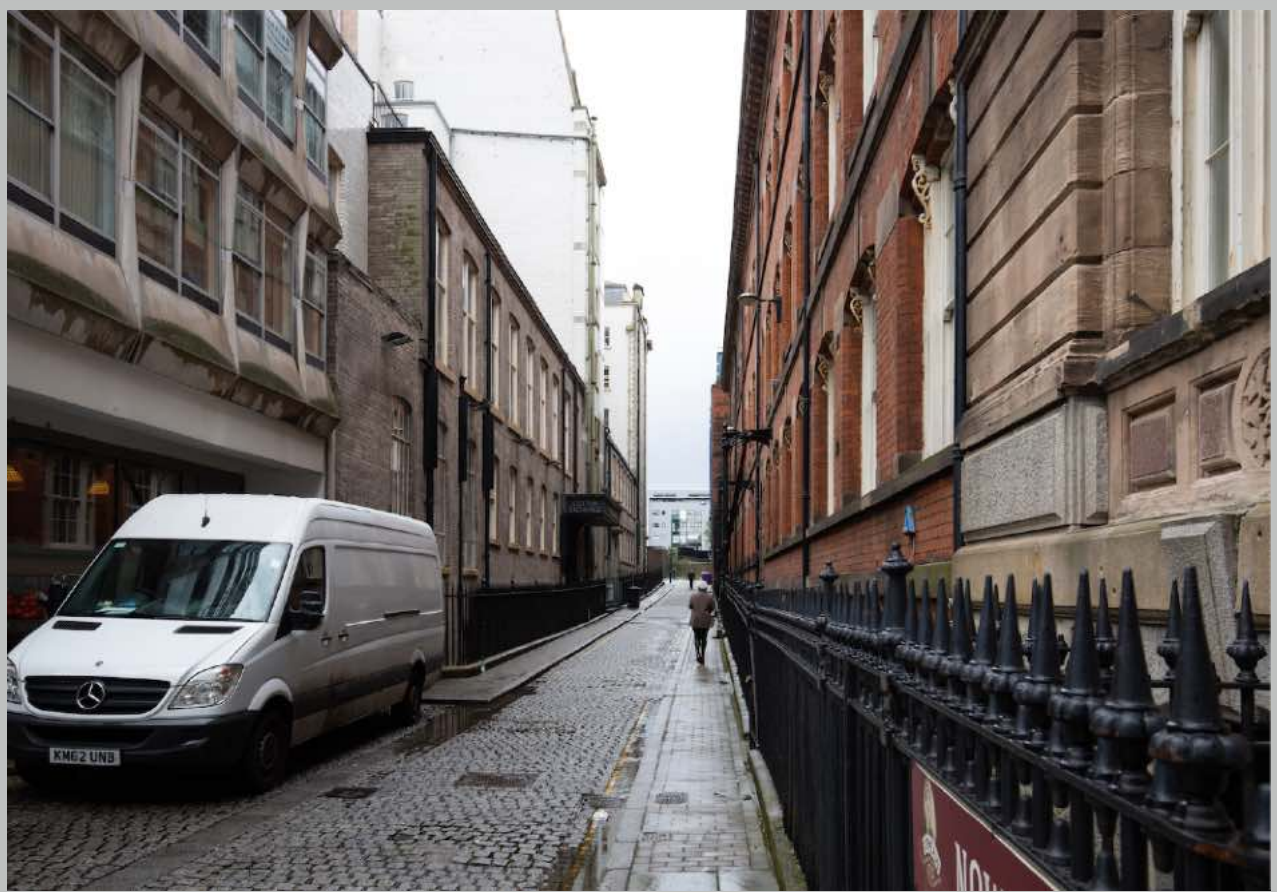
Plates 49. View 10. SE along Pall Mall from junction with Leeds St

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Table XX Summary of Magnitude of Impact, assessed from Verified Views



Plates 50. View 11 W along Cockspur Street



Plates 51. View 12 NE along Ormond Street from Old Hall Street



Plates 52. View 13 S along Bixteth Street from St Paul's Square



Plates 53. View 14 E along Edmund Street

Table 3. Summary of Impacts of proposed development on Key Views

View	Main Heritage/Townscape in the view	Magnitude of Impact	Significance of Impact
View 1. Distant View from Magazine Promenade	<p>Foreground: River; Tidal Margins (low tide)</p> <p>Middleground: River wall; Stanley Dock Warehouses ;Victoria Clock Tower; Waterloo Warehouse; operational docks; dockside wind turbines</p> <p>Background/Skyline: Everton Ridge; Kingsway Tunnel Ventilation shaft; Metropolitan Cathedral; St John's Beacon; The Plaza; the Pier Head Group; Albert Dock Warehouses; overall cityscape; St George's Church, Everton Water Tower</p>	Negligible Adverse (on tower of St Luke's)	Very Slight Adverse
View 2. Distant View from Wallasey Town Hall	<p>Foreground: River, Tidal Margins (low tide)</p> <p>Middleground: River wall, Waterloo Warehouse (full on), Stanley Dock Warehouses, Victoria Clock Tower, Pier Head Group, Kingsway Tunnel Ventilation shaft, operational docks, wind turbines</p> <p>Background/Skyline: Everton Ridge, Museum of Liverpool, St John's Beacon, overall cityscape, operational docks, Albert Dock Warehouses, Kings Arena, St Georges Church, Everton Water Tower</p>	No change	Neutral
View 3 Distant View from Woodside Ferry Terminal	<p>Foreground: River</p> <p>Middleground: River wall, Kings Arena, Albert Dock Warehouses (full on), Museum of Liverpool, Pier Head Group (oblique)</p> <p>Background/Skyline: Hope Street Ridge, Anglican Cathedral, Metropolitan Cathedral, St John's Beacon, overall cityscape, Waterloo Warehouse, Stanley Dock Warehouses</p>	No change	Neutral
View 4. Distant View from Everton Park	<p>Foreground: Everton Park</p> <p>Middleground: St George's Church, Operational Docks, dockland wind turbines, Stanley Dock Warehouses, Waterloo Warehouse, overall cityscape, St John's Beacon,</p> <p>Background/Skyline: Irish Sea, Liverpool Bay wind turbines, River estuary, Wirral, Wallasey Town Hall, Anglican Cathedral, Metropolitan Cathedral, St John's Beacon</p>	No change	Neutral

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View	Main Heritage/Townscape in the view	Magnitude of Impact	Significance of Impact
View 5. Distant View from Metropolitan Cathedral	Foreground: Innovation Centre, Design School Middleground: Corporation tenements, LJMU former architecture school, Community College, Background/Skyline: St Johns Beacon, Unity, Towers of Liver Building, Tower of former YMCA, Park One West, Hilton Hotel and Bidston Hill	No change	Neutral
View 6. Distant View from Anglican Cathedral	Foreground: Oratory, Cathedral Gates, Dean Walters Building, S end of Rodney Street Middleground: Rooftops, Dome of The Blackie, St Johns Beacon Background/Skyline: Towers of Liver Building, Unity Building, India Building, Pier Head Tunnel Ventilation Tower, Park One West, Hilton Hotel	No change	Neutral
View 7. General View from William Brown Street	Foreground: Trees, boundary wall, statuary and landscaping of St Johns gardens Middleground: Queensway Tunnel Entrance, Municipal Building Tower; East end of Dale St; S-facing elevations of cultural buildings on William Brown St; overall cityscape Skyline/Background: Towers of Liver Building; South John Street Tunnel Ventilation Tower, Dome of Royal Insurance Building	No change	Neutral
View 8. View N up Moorfields from Moorfields Station	Central bay of Exchange Station	No change	Neutral
View 9. - View N up Bixteth Street from Tithebarn Street junction	W end of Exchange Station and very acute view of Bereys Buildings, Lombard Chambers, Cotton Exchange and Orleans House	Minor Beneficial	Moderate/Large Beneficial
View 10. View S along Pall Mall from Leeds St	Retaining wall of former tracks and non-historic skyline	Minor Beneficial	Moderate/Large Beneficial
View 11. View W along Cockspur Street	1980s low-rise houses, and non-historic commercial buildings	Minor Beneficial	Moderate/Large Beneficial
View 12 NE along Ormond Street from Old Hall Street	The Albany, the Cotton Exchange and narrow view of the site	Minor Beneficial	Moderate/Large Beneficial
View 13 S along Bixteth Street from St Paul's Square	The Orleans House and non-historic mid-rise commentarial and residential buildings	Minor Beneficial	Moderate/Large Beneficial
View 14 E along Edmund Street	The Cotton Exchange and Stanley House	Minor Beneficial	Moderate/Large Beneficial

8.3.3 Impact of Masterplan on Setting of Listed Buildings

8.3.3.1 Historic England recommends that the impact of development proposals on the setting of heritage assets, such as listed buildings, should be undertaken through a staged approach:

Step 1: identify which heritage assets and their settings are affected;

Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);

Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;

Step 4: explore ways of maximising enhancement and avoiding or minimising harm;

Step 5: make and document the decision and monitor outcomes.

This staged approach is undertaken below.

8.3.3.2 Step 1 : identify which heritage assets and their settings are affected;

The listed buildings, the setting of which may be affected, have been identified in Section 4.1 of this statement. Those which are in the immediate vicinity and which are most likely to be affected are shown in Table 1 and Plan 3.

59-61 TITHEBARN STREET
67, Lion Tavern, MOORFIELDS
No 35 Windsor Building, GEORGE STREET
The Albany, OLD HALL STREET (east side)
No 33 Bereys' Buildings, GEORGE STREET
No 12 (Lombard Chambers), ORMOND STREET
Cotton Exchange - Building (formerly listed 14.3.75 under Edmund Street), OLD HALL STREET
Orleans House (formerly listed under Bixteth Street), EDMUND STREET

Those which are further afield, but the setting of which could potentially be affected in distant views are shown on Plan 2.

8.3.3.3 Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);

An initial assessment of contribution of the site to the setting of these listed buildings has been made at Para 4.2.4 and concluded that:

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...whilst the openness of the application site and its currently lowered ground level enables views over the site towards them and contributes to the setting of those buildings and their appreciation at mid-range, this is not a view which has been available historically...

On a more detailed assessment of the contribution of the site to the setting of these listed buildings, it is found that:

- 59-61 Tithebarn Street is separated from the application site by the building on the corner of Pall Mall and Tithebarn Street and so there is no inter-visibility between them
- The Lion Tavern is separated from the application site by the former Exchange Station Building itself and so there is no inter-visibility between them

The application site thus makes a very minimal contribution to the setting of these two listed buildings.

As previously stated, even when the railway sheds on the site were in situ, they had little visual synergy with the other listed buildings (which all have a frontage on to or near Bixteth Street) as the sheds had little design or functional similarity with them and in fact presented a barrier to views of them. Furthermore, the sheds on the site only had a very limited and indirect associative connection with the functions of the listed buildings, through the role of the station as a transport building which enabled people to visit and work in the various buildings. After the demolition of the sheds, the partial clearance of the site enabled some views over it towards the buildings and enabled their appreciation in some full-on views, notwithstanding that the site was still raised above the general street level and there was a tall retaining wall on Pall Mall. However, these views had not been available historically, were not designed views and were relatively temporary. Thus although the application site is in close proximity to these listed buildings it contributes very little to their setting, other than simply being in close proximity to them. The application site thus makes only minimal and recent contribution to the setting of those listed buildings which have a frontage on to or near Bixteth Street.

8.3.3.4 Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;

The principle of redeveloping the site will restore the historical “built-up” status of the site and the situation whereby the listed buildings were within a dense urban environment with a tight urban grain and so in this sense it will help to restore an aspect of their historical setting. The construction of four mid-rise buildings on the application site, compared to the contribution of the long and relatively low railway sheds, will have a different impact on the setting of the listed buildings but the impact will not necessarily be harmful. Similarly, the construction of four mid-rise buildings on the application site compared to the contribution of the open temporary park and car park on the site will have a different impact on the setting of the listed buildings but again the impact will not necessarily be harmful.

The proposed mid-rise buildings will be considerably taller than the railway sheds which provided the historic setting and will be slightly taller than the listed buildings. However, when viewed at close range along the narrow Bixteth Street, the additional height of the buildings will barely be perceived, as it will be the lower parts of the buildings which dominate the intermediate setting of the listed buildings. The Verified Views 9 and 13 along Bixteth Street illustrate that the proposed buildings will not appear unduly dominant in the street scene, will not detract from the setting of the listed buildings. On the contrary, they demonstrate that the proposed buildings on the site will sit harmoniously in the setting, will create active frontages, re-instate a tight urban grain and will bring a **Moderate Beneficial** change on their setting. The same positive change is demonstrated in Verified View 14 along Edmund Street, in which it can be seen that the proposed buildings will continue the plane and street pattern established by the Cotton Exchange and will not appear over-dominant or excessively high.

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Verified View 13 illustrates that the proposed development will bring a slightly different change on the view along Ormond Street, where the central focal point is framed by the side elevations of The Albany and The Cotton Exchange and where the proposed development will close that vacuous and “leaking” view. Again, the proposed development will not appear over-dominant or excessively high but will re-instate a tight urban grain and will bring a Moderate Beneficial change on their setting.

The other verified views from more distant viewpoints illustrate that the proposed heights and form of the development will not have any harmful impact on the skyline or silhouette of any of the more distant listed buildings shown on Plan 3 or indeed on any of the Landmark Buildings identified in the WHS SPD (other than the former view of the tower of St Luke’s from Magazine Lane which has now been obstructed by a new apartment block at Waterloo Dock [Plate 54]).

In conclusion, although the proposed form and height of the development on the application site will cause a “clearly noticeable change” in the views and setting of the listed buildings, they will be a Moderately Beneficial magnitude of change. The listed buildings include Grade II and Grade II* listed buildings which have Medium and High Heritage Significance respectively and so, in accordance with the ICOMOS balancing methodology, the proposed form and height of the development will have a **Moderate/Large Beneficial** significance of impact.



Plate 54. View from Magazine Lane (10.6.19) showing sight of St Luke’s obstructed by new steel-framed apartment block

8.3.3.5 Step 4: explore ways of maximising enhancement and avoiding or minimising harm;

As the proposed height and form of the development will cause no harm to the setting of these listed buildings, there is no necessity to avoid or minimise harm. The proposed enhancement of the

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setting has already been fully considered and maximised through the design process which has involved giving full weight to the setting of the heritage assets and the adjustment of the design following consultation with Liverpool City Council, Historic England and Places Matter.

8.3.3.6 Step 5: make and document the decision and monitor outcomes.

It is the role of Liverpool City Council to make and document the decision and monitor the outcome.

8.3.4 Impact of Masterplan on Setting of Castle Street Conservation Area

8.3.4.1 Step 1 : identify which heritage assets and their settings are affected;

The application site is adjacent to the Castle Street CA.

8.3.4.2 Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);

The Castle Street Conservation Area is comprised of the listed buildings referred to above plus many more listed and unlisted buildings over a wide part of the city centre and it has different character areas within it. The draft CA Appraisal (2004) and WHS SPD have summarised its character and appearance and OUV and extracts are provided at Section 4.1 above. These summaries include strong references to:

- the “hierarchy of streets;
- buildings which are “...Fronting onto narrow streets and lanes they create canyon like effects”;
- “Buildings throughout the area front directly onto the pavement and where this is not the case this usually detracts from historic character. a dense concentration of historic buildings that reflect the medieval origins of the city and its growth and development of over the course of the 18th, 19th and 20th centuries.”

Although the application site is adjacent to the CA, it was not included within it (apart from a small corner) and was presumably excluded because it did not have similar characteristics, either when the railway sheds were in situ or after they had been demolished. It could therefore be assumed that the application site made a neutral or negative contribution to the setting of the CA due to the presence of the sheds or the subsequent temporary openness of the site. Even so, as with its contribution to the setting of the listed buildings, the recent openness of the application site enabled views of it and appreciation of the adjacent part of the CA.

8.3.4.3 Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;

By contrast to the recent and current contribution of the site to the setting of the CA, the proposed masterplan for the development incorporates some of the key characteristics of the CA, will better integrate the site with the CA and will therefore enhance its setting:

- the historic hierarchy of streets and lanes will be reinforced by the proposed orthogonal layout
- the proposed buildings will reinforce the canyon-like effects
- the buildings will front directly on to the pavement

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Also, it can be seen in View 14 (Plates 3) that the regular articulation of Building A will replicate the strong horizontal and vertical articulation of the existing buildings in this part of the CA, notably The Cotton Exchange.

The proposed form and height of the development on the application site will cause a clearly noticeable change in the views and setting of the Castle Street Conservation Area, but this will be a **Moderately Beneficial** magnitude of change. The CA has High Heritage Significance and so, in accordance with the ICOMOS methodology, the proposed form and height of the development will have a **Moderate/Large Beneficial** significance of impact on its setting.

8.3.4.4 Step 4: explore ways of maximising enhancement and avoiding or minimising harm;

As the proposed height and form of the development will cause no harm to the setting of the Castle Street CA, there is no necessity to avoid or minimise harm. The proposed enhancement of the setting has already been fully considered and maximised through the design process which has involved giving full weight to the setting of the heritage assets and the adjustment of the design following consultation with Liverpool City Council, Historic England and Places Matter.

8.3.4.5 Step 5: make and document the decision and monitor outcomes.

It is the role of Liverpool City Council to make and document the decision and monitor the outcome.

8.3.5 Impact of Masterplan on Setting of Liverpool World Heritage Site

8.3.5.1 Introduction

The application site is outside the boundary of the *Liverpool - Maritime Mercantile City World Heritage Site* but is immediately adjacent to it and within its buffer zone. The proposed development will be visible from the World Heritage Site and has the potential to affect its setting.

8.3.5.2 Buffer Zones

The Operational Guidelines for the Implementation of the World Heritage Convention (2017) provides an explanation of the role of Buffer Zones:

104. For the purposes of effective protection of the nominated property, a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property. This should include the immediate setting of the nominated property, important views and other areas or attributes that are functionally important as a support to the property and its protection.

8.3.5.3 Impact on Character Area 4 "Castle Street/Dale Street/Old Hall Street Commercial Area" of the WHS

The Liverpool WHS is divided into six areas of distinctive townscape character and the application site is adjacent to Character Area 4 "Castle Street/Dale Street/Old Hall Street Commercial Area" of the WHS which is summarised in the Statement of Outstanding Universal Value as: "...the mercantile area, with its shipping offices, produce exchanges, marine insurance offices, banks, inland warehouses and merchants houses". It is this character area the setting of which will be most affected by the proposed development.

The visual characteristics of this area are effectively the same as those of the Castle Street Conservation Area (as the boundaries are almost identical) and the listed buildings referred to above. The visual change that the proposed development will bring to the setting of the WHS's townscape will thus be similar to the visual change that the development will bring to the setting of

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the CA's townscape. It was assessed that the proposed development will bring a **Moderately Beneficial** magnitude of change but as the WHS has a Very High Heritage Significance, in accordance with the ICOMOS methodology, the proposed form and height of the development will have a **Large/Very Large Beneficial** significance of impact on its visual setting.

8.5.4.4 Impact on Intangible Heritage of the WHS

In addition to the historic buildings and structures which are obvious tangible heritage assets of the WHS and which carry the attributes of its Outstanding Universal Value, the WHS embodies many other attributes which are part of its intangible heritage. These traditions and elements of intangible heritage are referred to obliquely in the formal Statement of OUV (Appendix 6) but Liverpool City Council has attempted to capture these intangible attributes and stated in its *WHS Management Plan 2017-24*:

A Statement of Attributes for the Liverpool Maritime Mercantile City was established in 2011, comprising five key themes:

- I. The spirit of **innovation** illustrated by the pioneering dock technology, architecture, engineering, transport, port management and labour systems created and developed in Liverpool*
- II. The buildings and monuments, stories and records that evidence Liverpool's central role in the development of the British Empire and **global trade***
- III. The buildings and monuments, stories and records that evidence Liverpool's central role in global **migration***
- IV. The docks, warehouses, commercial buildings, cultural buildings and dwelling houses and their relationships to each other that illustrate Liverpool's development as a **port city** of global importance*
- V. The tradition of **cultural exchange** exemplified by Liverpool's roles in the development of popular music and as a patron of the visual arts*

None of these intangible attributes of the WHS will be affected in any way by the proposed development.

Magnitude of change for these attributes - **No Change**

Significance of Impact- **Neutral**.

8.3.6 Impact of the Masterplan's proposals for the Park on the Setting of Heritage Assets

Introduction

8.3.6.1 The site had no green open space from the beginning of the 19th C, when it was developed for housing, warehousing and then the station, until the 1980s, when the station's sheds were demolished and the private park on the S side of the site was laid out and so the park had no heritage significance. However, it did have amenity and visual value, even though it had limited facilities and features and was looking a little dated. There were limited areas for seating. The park made minimal contribution to the setting of the surrounding heritage assets. The Masterplan proposes to reinstate a substantial area of landscaped open space between Plots A and B, between the rear entrance to Exchange Station and the Plot D. The intention is that it will have a much improved appearance and improved facilities in relation to the previous park. It is also proposed to create structural planters in the wide route between Blocks C and D as an enclosed Winter Garden. It is also proposed to plant trees around the N and E boundaries and along the extended Bixteth Street.

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The previous park was privately owned but was publicly accessible and it is proposed that this arrangement will be re-instated with the proposed park. The new park will effectively be part of an enhanced public realm.

8.3.6.2 A comparable situation in Liverpool worth noting in this respect is Chevasse Park, between The Strand and Paradise Street. Chavasse Park had been created as a grassed open area between the Albert Dock and the city centre, following WWII bomb-damage of the site and partial redevelopment. It was highly valued by the public as a green open space, despite its minimal facilities and landscaping. Some concerns were raised by the public when its redevelopment was proposed as part of Liverpool 1. However, a commitment was given by the developers and the City Council to re-instating a publicly accessible park as part of the development and with much enhanced landscaping and facilities. That commitment was honoured by the developer and the City Council, with the result that the new Chavasse Park is even more highly valued and more intensively used. The intention is that the proposed new park facilities at the Pall Mall site will be similarly better valued and used when completed.

8.3.6.3 The proposed layout of the park will represent a **minor beneficial** change in respect of the current layout and appearance of the site and its role as a setting for the surrounding heritage assets (which are of Medium, High and Very High Significance) but it will be a beneficial change and will result in **Slight/Moderate/ Large** Beneficial Impact on their setting, respectively.

Surface Landscaping

The quality of the surface landscaping of the site was very poor on the N part of the site, where it was simply a rough aggregate surface and a limited and worn palette of grass and brick paviers. These surfaces contributed negatively to the setting of the surrounding heritage assets.

The proposed surface landscaping of the park will represent a **minor beneficial** change in respect of the current surfaces and appearance of the site and its role as a setting for the surrounding heritage assets (which are of Medium, High and Very High Significance) but it will be a beneficial change and will result in **Slight/Moderate/ Large** Beneficial Impact on their setting, respectively.

Trees

Until recently, there were several trees across the site which were planted in the 1980s, which were semi-mature and had a strong presence on the site. Although the trees had many environmental benefits and helped to soften and filter the setting of the surrounding heritage assets, they were not heritage assets in themselves and there is no historic precedent for trees on this site. Notwithstanding, the Masterplan recognises the wider environmental benefits and visual contribution of trees on the site and provides for planting of more new trees than existing trees.

It is also proposed that, in addition to the trees within the park and along the entrance route from Ormond Street, additional trees will be planted along Lumber Street, the N boundary, Edmund Street and along Pall Mall. The net effect of the new trees will contribute to creating a softer visual appearance for the site and enhance the setting of the surrounding heritage assets.

The initial loss of existing trees on the site will represent negligible harmful change to the setting of the heritage assets but, in the longer term when the replacement trees have grown and become established, the net effect will be a neutral change on the setting of the heritage assets (which are of Medium, High and Very High Significance) and will result in **Neutral** Impacts on their setting, respectively.

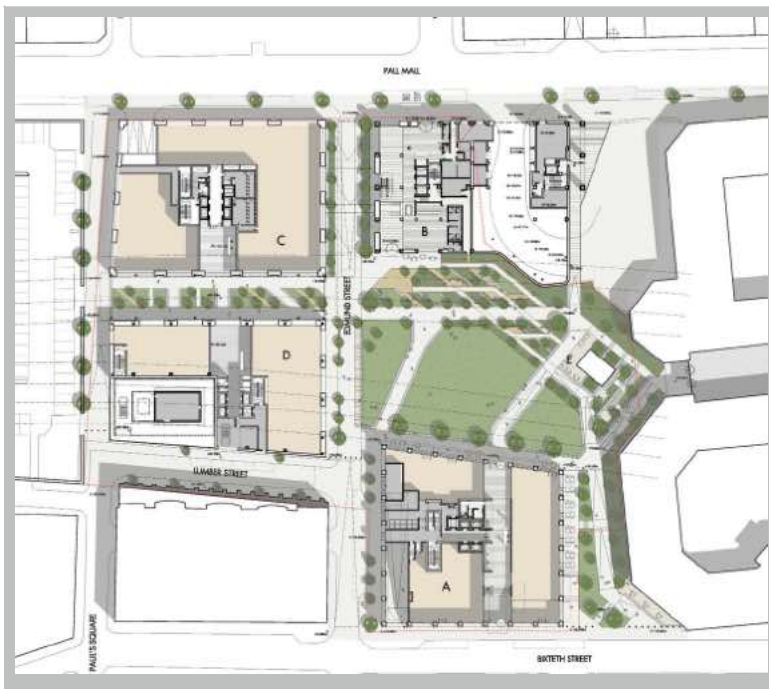
g) Pedestrian Permeability

Historically, there has been limited pedestrian permeability through the site as it was occupied by the station, its railway tracks and platforms. The only E-W route was the subway underneath

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between the two ends of Prussia Street, between Pall Mall and St Paul's Square. From the 1980's the site enjoyed reasonable pedestrian permeability, especially E-W along routes between Pall Mall and Bixteth Street, Edmund Street and Ormond Street, although the subway had been closed for many years. This pedestrian permeability helped the site to be integrated into its surroundings from a practical aspect but was not central to its heritage significance. The Masterplan proposes that the existing routes through the site will be retained and that permeability through the site will be considerably improved by; creating the additional E-W route along the N boundary of the site (along the extended Prussia Street); creating enhanced N-S routes and; especially by constructing the new pedestrian bridge over the service yard of Exchange Station to better link the E end of Tithebarn Street with the site and the commercial centre.

The overall impact of this enhanced pedestrian permeability will bring about a **Minor Beneficial** change to permeability and its contribution to the setting of the surrounding heritage assets (which are of Medium, High and Very High Significance) and will result in **Slight/Moderate/Large** Impacts on their setting, respectively.

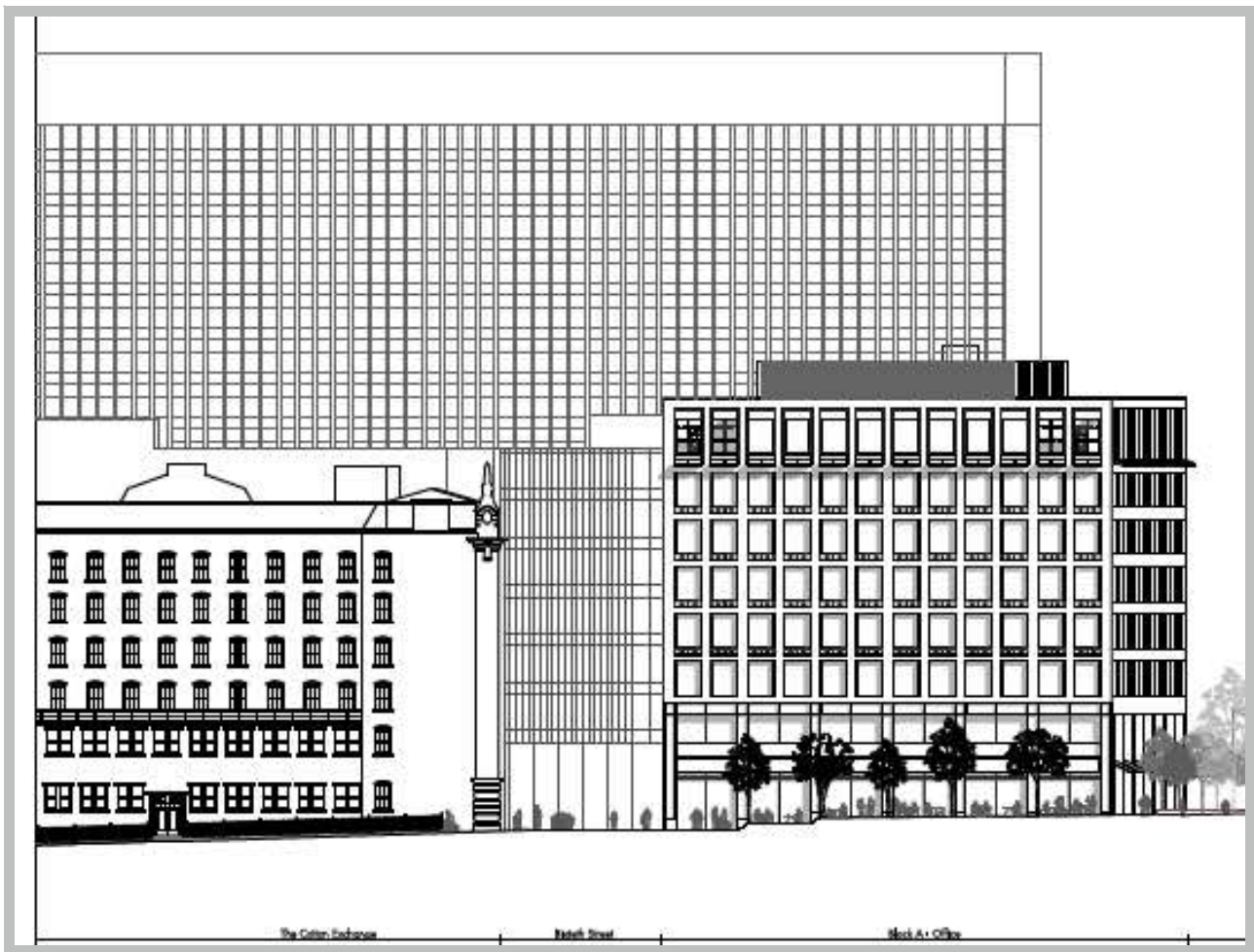


Plan 16a. Masterplan with basic landscaping elements

8.4 The Impact of the Detailed Proposals for the Office Block on Plot A on the Setting of Heritage Assets

8.4.1 Form and Mass

The impact of the form and mass of the proposed buildings on Plot A, B, C and D on the setting of the heritage assets has been assessed at length above. The specific impact of the proposed building on Plot A in relation to The Cotton Exchange (and The Plaza) is also shown in Plan 17. It re-affirms that, although the proposed building will be slightly higher than The Cotton Exchange, it will be considerably lower than The Plaza and will integrate suitably into the streetscene. Whilst the relative heights of the buildings in Plan 17 is accurate, an image which provides an illustration of the impact of the proposal on the view up Bixteth Street for receptors at ground level is provided in Plate 55. This is even more convincing in illustrating that the form and mass (and design) of the proposed building will integrate harmoniously into the street scene.



Plan 17. Proposed building on Plot A in relation to The Cotton Exchange and The Plaza



Plate 55. Visualisation of view up Bixteth Street

Design

The detailed design of the proposed office block on Plot A has been strongly influenced by an understanding of the surrounding historic commercial buildings and has evolved, partly to reflect the comments of the Places Matter Panel and Historic England.

The proposed plan form is almost orthogonal and will appear to be so for most receptors, but actually has a slight taper, as did the shed of Exchange Station and the block occupied by The Albany. The elevations of the proposed building on Plot A are regularly articulated both horizontally and vertically to create a grid of solid and void, in a very similar way as the historic elevations in The Cotton Exchange and Orleans House. These grids and the solid; void ratio will be emphasised by the recessed windows and the metal linings of their reveals. All upper floor windows are simple undivided panes but the deep shadows will create a 3-dimensional impression on each elevation.

The elevations also embody the classical tripartite vertical features of a building which replicate a classical column: a strong plinth (in the form of a double metal cladding around the structural columns at Ground and First Floors); a main body (in the form of five almost identical storeys) and; a cap or capital (with a band of expressed and projecting lighter-coloured cornice). This classical vertical arrangement gives the proposed building a suitable dignity and a timeless quality and has been strongly influenced by some of the historic commercial buildings in the commercial centre, such as India Building.

Importantly, the building will be at the back of the pavement on Bixteth Street and thereby continue the prevailing historic grain of the street, and will have a central arcade, again similar to that on India Building.

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The ground floor consists of a series of double height angular metal-clad columns and lintels which strongly echoes the columns and entablatures found on many of the historic commercial buildings in the area but also introduce an industrial aesthetic. The upper floor windows have metal spandrels, which again respond positively to the cast iron panels on The Cotton Exchange and Orleans House.

It is proposed that the principal facing material will be a red/brown brick to blend in with the common use of bricks within the area, but the proposed large windows will create a large void: solid ratio and increase to visual lightness of the building.

The proposed building will thus be a clearly contemporary building which expresses the zeitgeist or “spirit of the day” but it has been informed by its historic setting, incorporates many traditional principles and will integrate harmoniously into it. This is fully in accordance with UNESCO’s *Vienna Memorandum on World Heritage and Contemporary Architecture* which states:

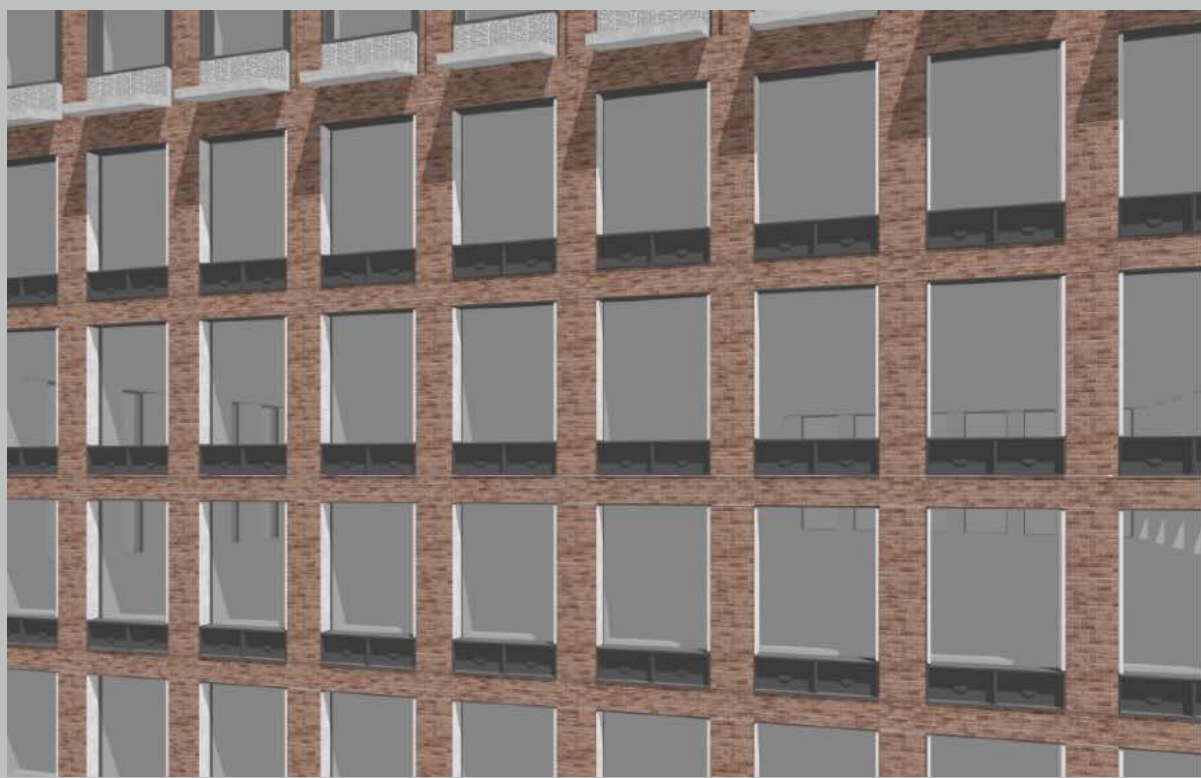
*21. Taking into account the basic definition, urban planning, contemporary architecture and preservation of the historic urban landscape should **avoid all forms of pseudo-historical design**, as they constitute a denial of both the historical and the contemporary alike. One historical view should not supplant others, as history must remain readable, while continuity of culture through quality interventions is the ultimate goal.*

Accordingly, the proposed detailed design will have a positive impact on the setting of the nearby listed buildings, the Castle Street CA and Character Area 4 of the WHS

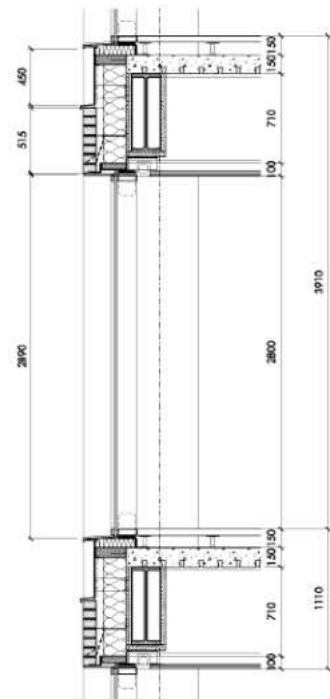
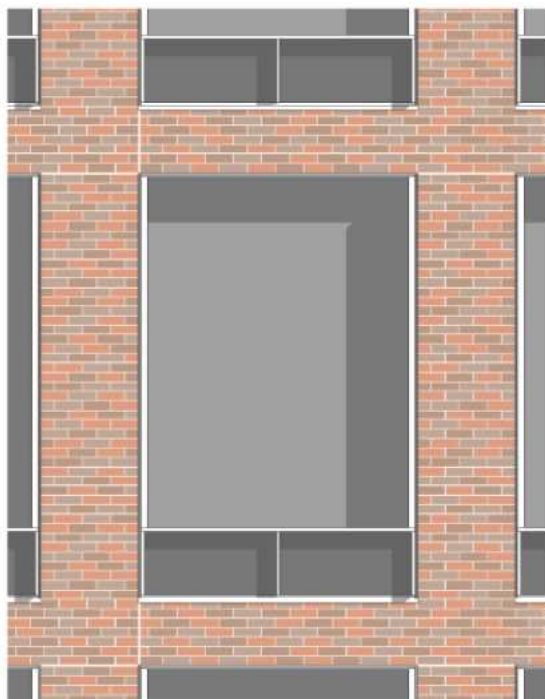
The overall impact of the detailed design of Block A will bring about a **Minor Beneficial** change to the current appearance of the site and the setting of the surrounding heritage assets (which are of Medium, High and Very High Significance) and will result in **Slight/Moderate/Large** Beneficial Impacts on their setting, respectively.



Plan 18. Proposed treatment of lower part of elevations of Block A



Plan 19. Proposed treatment of middle part of elevations of Block A



Plan 20. Typical treatment of windows on Block A

8.5 Summary of Heritage Impacts

Table 4. Assessment of the Direct Impact of The Principle of Redeveloping the Site

Heritage Assets	Significance of Impact of Impact
No designated Heritage Assets on the site	Neutral
Historic Urban Landscape	(Potentially) Large/Very Large Beneficial Impact

Table 5. Impact of Masterplan

Heritage Assets	Design Principle/Proposal	Significance of Impact
Setting of surrounding historic urban landscape	Orthogonal layout of four principle plots	Moderate/ Large/ Very Large Beneficial Impact
Setting of surrounding historic urban landscape	Proposed building heights of 9, 11 and 14 storeys	Neutral/ Slight Adverse Impact
Setting of surrounding historic urban landscape	Re-creation of Park	Slight/Moderate/ Large Beneficial Impact
Setting of surrounding historic urban landscape	Trees: removal and replacement	Neutral (in long term)
Setting of surrounding historic urban landscape	Pedestrian Permeability	Slight/Moderate/Large Beneficial Impacts

Table 6. Impact of Detailed Design and Materials of Building on Plot A on Setting of Heritage Assets

Heritage Assets	Heritage Significance	Significance of Impact
Surrounding Listed Buildings	Medium/High	Slight/Moderate
Castle Street Conservation Area	High	Moderate
Character Area 4 of Liverpool WHS, Buffer Zone and Historic Urban Landscape	Very High	Large

8.5.1 Conclusions of HIA and TVIA

The summaries of the HIA and TVIA of the proposed development on the setting of the heritage assets and on the townscape are provided in Tables 3, 4, 5 and 6. The summaries show that the significance of impacts of the proposed development varies from Slight Adverse to Large Beneficial. The only Slight Adverse impact is the slight additional height of the proposed buildings over the height of the nearby listed buildings. However, the assessments have found that: this additional height will not be readily apparent at ground floor level; the level of harm will be very low; that there are already several buildings of comparable or greater height in the vicinity and; that more buildings of considerably greater height have recently been given planning permission.

By contrast, the HIA and TVIA have found that the beneficial impacts of the proposed development on the setting of the listed buildings, CA, Character Area 4 of the WHS and the Historic Urban Landscape will far outweigh any low level of harm. The principal heritage and townscape benefits of the proposed development will be: repairing and infilling the void in the urban fabric by re-establishing the dense urban grain of the area; capitalising on the historic street pattern of the area; responding to, respecting, and enhancing the highly sensitive and important historic context through the detailed design and materials.

8.6 How can these effects be avoided, reduced, rehabilitated (mitigated) or compensated?

8.6.1 The HIA and TVIA has concluded that the proposed development will cause no net harm.

8.6.2 The proposal has evolved and been improved following consultations and constructive advice from Liverpool City Council, the Places Matter Design Review Panel and Historic England. It is therefore considered that any minor adverse impacts have already been substantially avoided, reduced, rehabilitated (mitigated) and compensated. The beneficial impacts of the proposal will far outweigh any minor adverse impacts on the heritage assets and their settings and the adverse impacts do not need to be further avoided, reduced, rehabilitated (mitigated) or compensated to any great extent but can be achieved as necessary through timely implementation and archaeological recording (during site remediation).

Implementation

8.6.3 Great care will need to be taken in the on-going design and implementation process to ensure that: a) the detailed elements of the proposal (the site remediation and the building on Plot A and its immediate landscaping) are implemented in accordance with the approved drawings, specifications and methodology and that they use materials of appropriately high quality and; b) the outline proposals for the rest of the site are brought forward in a timely manner and of similarly suitable designs and materials and in accordance with the Design Codes.

Archaeology

8.6.4 The NPPF states at Para 199 that:

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.

The archaeological potential of the site is low and the site of most (un-designated) heritage assets are fully known due to the accurate OS maps of the site. This Heritage Statement and the *Archaeological Desk Based Assessment of a Plot of land at Pall Mall, Liverpool* (May 2017) have already provided much information about the history of the site. The potential for discovering and recording further valuable information about the site through further archaeological assessment is thus low. Notwithstanding, the *Archaeological Desk Based Assessment* included the recommendation that:

In the absence of detailed design proposals it is difficult to make proposals for mitigation. However, in general the archaeological potential of the site is low and it is unlikely that extensive deposits are present. It is likely that the most productive approach would be a series of targeted watching briefs, principally aimed at locating the line of the Civil War defences and of structures pre-dating the construction of Exchange Station.

These works should be conducted by a suitably qualified archaeological contractor to a written scheme of investigation agreed in advance with Liverpool City Council's Archaeological Advisor; Doug Moir, Archaeologist (Planning), Merseyside Environmental Advisory Service, 1st Floor, Merton House, Stanley Road, Bootle, Liverpool L20 3DL

8.7 Assessment of the Proposal against the Relevant Guidance in the WHS SPD

8.7.1 Development Opportunity

The SPD identifies the whole car park on Pall Mall (including the N part of the application site) as a development opportunity. It states:

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6.5.21 The significant development opportunities within the Buffer Zone around the Character Area 4 include:

Various sites along Pall Mall, mostly along the west side. The Pall Mall development area, is part of the continuing expansion of the existing Commercial District, and is crucial to achieving continued economic regeneration of the city centre, in accordance with the Commercial District SPD.

The Masterplan and the detailed proposals for the office block on Plot A will help to fulfil this “opportunity” which was identified in the SPD.

8.7.2 Design

The WHS SPD includes the guidance:

SPD 4.2: General Design Guidance

Applicants for development must demonstrate that they have understood the characteristics of the site and its environs and that the design proposals have responded to the OUV of the locality in terms of materials, layout, mass, relation to street, architectural detail and height.

The architectural quality of a proposal within the WHS and Buffer Zone must be of the highest quality of contemporary design but respect, respond to and enhance its highly sensitive and important historic context.

The Design and Access Statement and this Heritage Statement demonstrate that the applicants understand the characteristics of the site and that the design of the proposed development responds to the OUV of its surroundings and complies with this guidance.

8.7.3 Movement and Public Realm

The WHS SPD includes the guidance:

SPD 4.3: Movement and Public Realm

The public realm is a notable element of OUV, and paragraph 4.3.5 sets out a checklist of issues that applicants should address in their Design and Access Statements.

The Design and Access Statement and this Heritage Statement demonstrate that: the applicants have given much consideration to the public realm and movement through the site; have addressed the checklist of issues in the SPD and; comply with this guidance.

8.7.4 Views to, from and within the WHS

The SPD identifies the key views to, from and within the WHS, and includes the guidance:

SPD 4.4: Views to, from and within the WHS.

Views of the site are an important aspect of visual character and directly contribute to OUV.

Whilst the City Council accepts that all developments have some impact upon views, it also accepts that some development can have a positive impact on views by enclosing space and creating framed views. The City Council expects that developments should not

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have a significant adverse impact on the key views to, from and within the WHS, by wholly obstructing a key public view of a landmark building or overly dominating a panorama.

The Design and Access Statement, this Heritage Impact Assessment and Townscape Visual Assessment demonstrate that the applicants have fully considered the impact of the proposal on views to from and within the WHS and complies with this guidance.

The SPD also identifies: the main landmark buildings in and around the WHS; the key Defined Vistas; General Views with a focal point and; General Views/Panoramas. The plan showing these important visual assets is provided at Appendix 4 of this Statement. The analysis of the verified views of the proposal has concluded that the proposed development will have no meaningful impact on any of the views or landmark buildings (other than the sight of the tower of St Luke's Church from Magazines Promenade, which has subsequently been obstructed by a development at Waterloo Dock). The proposal therefore complies with this guidance.

8.7.5 Tall Buildings

The WHS SPD includes the guidance:

SPD 4.6: Tall Buildings

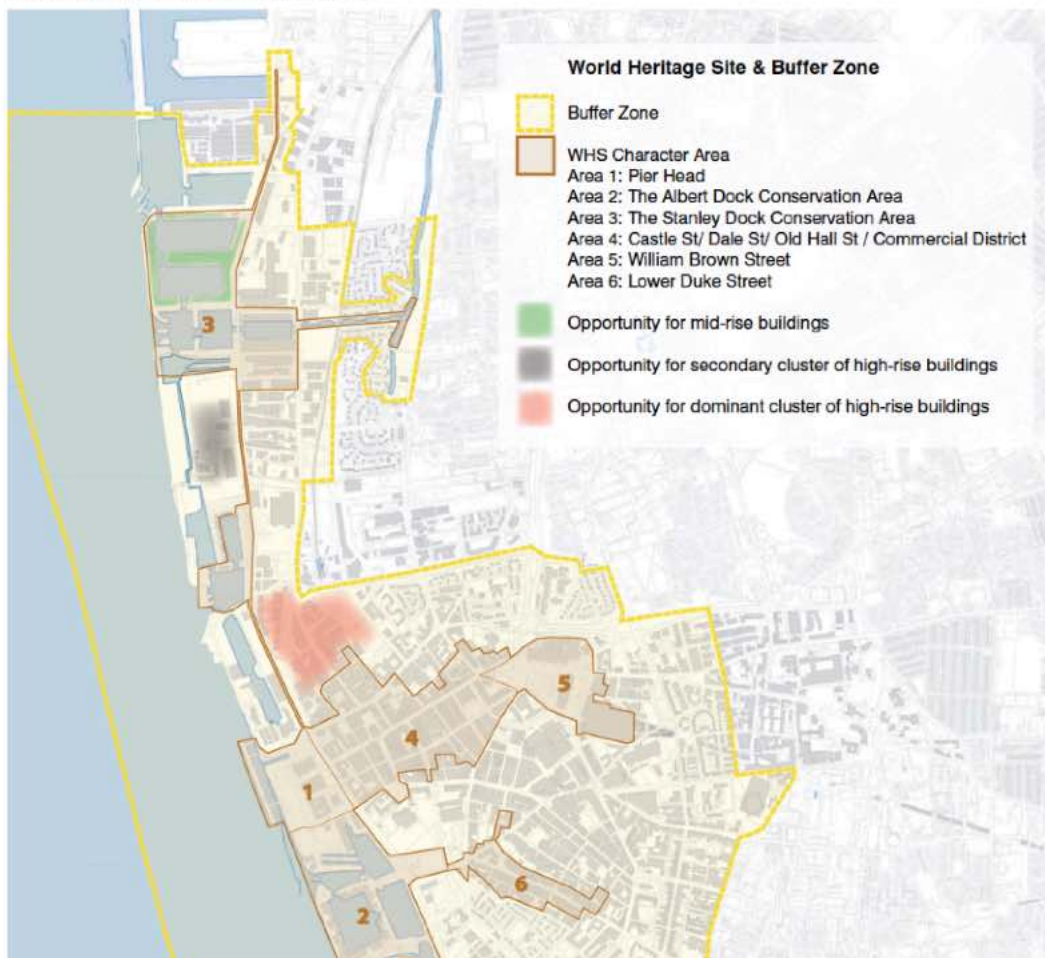
Tall buildings are recognised by the City Council as symbols of regeneration and can contribute positively to urban landscape. Opportunities are identified for tall building clusters within the Buffer Zone. Criteria for the location and design of tall buildings is established – including the existing urban structure, impacts on historic buildings and views and the need for the highest design quality.

The SPD identifies that the Commercial District, outside the WHS, provides the potential for accommodating tall buildings. It states:

4.6.16 The principal opportunity for high-rise buildings is in and around the existing cluster of tall buildings in the Commercial District (identified approximately on Figure 4.3), partly as this would strengthen the legibility of the city by signposting the location where most business exchange takes place. Tall buildings in this location firmly indicate that this area is the economic driver for the city and the city region. This cluster also provides a visual and activity focus for the commercial heart of the city and marks the northern edge of, and gateway to, the city centre core. It also emphasises the subtle, but important, change in topography, which rises up from the river. The proposed Tall Buildings Cluster at the Commercial District should be centred on the King Edward Street/Old Hall Street/Tithebarn Street/Pall Mall/Leeds Street area, but will not be rigidly limited to these streets.

Figure 4.3 of the SPD (Plan 21 of this Heritage Statement) identifies approximately the areas outside the WHS which provide "opportunities for Tall Buildings". Whilst the proposed buildings (at 9, 11 and 14 storeys) are more "Mid-rise" than "Tall Buildings", the site is in the approximate vicinity of the area that has been identified as an opportunity on that plan. Indeed, the SPD specifically states that the area relates to "...Tithebarn Street/Pall Mall...". The proposal therefore complies with this guidance.

Figure 4.3 Opportunities for Tall Buildings



Plan 21. Opportunities for Tall Buildings (Part of Figure 4.3 in WHS SPD)

8.7.6 Buildings Heights in the WHS

The WHS SPD includes the guidance:

SPD 5.2: Buildings Heights in the WHS

New buildings in the WHS should not generally exceed the height of the tallest building in the immediate vicinity of the street(s) that they address.

Although this guidance is directed specifically at the WHS, its principles are relevant for the immediate vicinity of the WHS, particularly where physical change has greater potential to alter the visual character of the WHS

Although the proposed buildings are outside the WHS, their close proximity in the Buffer Zone requires that this guidance should be given consideration. The SPD guidance accepts that there is no uniformity of building heights within the WHS and that a variation of height is an aspect of character. It refers to one of the conditions imposed at the time of inscription of the WHS that 'the height of any new construction in the WHS should not exceed that of structures in the immediate surroundings'. This Heritage Statement has demonstrated that the proposed buildings will be only marginally taller than "...the tallest building in the immediate vicinity of the street(s) that they address." (the opposite side of Bixteth Street) but that: a) there are taller buildings on Tithebarn

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Street; b) there are taller buildings further N along Bixteth Street and; c) planning permission has been granted for very much taller buildings further N and; d) the proposed buildings on the site will be seen as stepping up to the existing and approved taller buildings further N. In essence, the proposed development complies with this policy.

8.7.7 Conclusion on Impact of Proposed Development on the OUV of the WHS

a) The Outstanding Universal Value of Liverpool's WHS is summarised in the Liverpool WHS's Statement of OUV (Appendix 6). It clarifies how Liverpool meets UNESCO's generic criteria for OUV, as set out in the *Operational Guidelines for the Implementation of the World Heritage Convention*. Liverpool WHS's Statement of OUV states:

Criterion (ii): Liverpool was a major centre generating innovative technologies and methods in dock construction and port management in the 18th, 19th and early 20th centuries. It thus contributed to the building up of the international mercantile systems throughout the British Commonwealth.

Criterion (iii): the city and the port of Liverpool are an exceptional testimony to the development of maritime mercantile culture in the 18th, 19th and early 20th centuries, contributing to the building up of the British Empire. It was a centre for the slave trade, until its abolition in 1807, and for emigration from northern Europe to America.

Criterion (iv): Liverpool is an outstanding example of a world mercantile port city, which represents the early development of global trading and cultural connections throughout the British Empire.

Liverpool's attributes in meeting criteria (ii) and (iv) are essentially its historic importance and intangible values, but the attributes are embodied in many of the individual historic buildings and structures which contribute to the historic urban landscape. Liverpool's attributes in meeting criterion (iii) are more obviously tangible, as the criterion refers more specifically to "the city and the port as being testimony to maritime and mercantile culture". The historic townscape and skyline are thus crucial components of the city's OUV and must be protected from harm. UNESCO's decision to place Liverpool on the list of World Heritage "In Danger" in 2012, due to the perceived harmful impact of development at another site, is a demonstration of UNESCO's strong concerns about the potential harm of new development on the OUV of the WHS. However, UNESCO and ICOMOS not opposed in principle to new development in and around WHSs. Indeed:

a) UNESCO stated in its *Budapest Declaration* (2002)

3 *In view of the increasing challenges to our shared heritage, we will: ...*

c *seek to ensure **an appropriate and equitable balance between conservation, sustainability and development**, so that World Heritage properties can be protected through appropriate activities contributing to the social and economic development and the quality of life of our communities;*

This Heritage Statement makes the case that the proposed development will cause no meaningful harm to the WHS or its setting but will be such sustainable development which will contribute to the social and economic development and the quality of life of Liverpool's communities.

b) UNESCO's *VIENNA MEMORANDUM (2005) World Heritage and Contemporary Architecture – Managing the Historic Urban Landscape* includes a section on "Guidelines for Urban Development" which includes:

22. Ethic standards and a demand for high-quality design and execution, sensitive to the cultural-historic context, are prerequisites for the planning process. Architecture of quality

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in historic areas should give proper consideration to the given scales, particularly with reference to building volumes and heights. It is important for new development to minimize direct impacts on important historic elements, such as significant structures or archaeological deposits.

23. Spatial structures in and around historic cities are to be enhanced through urban design and art as they are key elements of the renaissance of historic cities: urban design and art express their specific historical, social and economic components and transmit them to forthcoming generations.

26. As a general principle, proportion and design must fit into the particular type of historic pattern and architecture, while removing the core of building stock worthy of protection ("façadism") does not constitute an appropriate mean of structural intervention. Special care should be taken to ensure that the development of contemporary architecture in World Heritage cities is complementary to values of the historic urban landscape and remains within limits in order not to compromise the historic nature of the city.

The HIA and TVIA above have found that the current proposal will have no direct impact on important historic elements and that the spatial structures (urban grain) will be enhanced. It has also demonstrated that the proposed form of development fits into the historic pattern and architecture of the surroundings. Furthermore, the proposed development does not constitute facadism. The proposed development expresses the zeitgeist or "spirit of the day" and is in compliance with the principles of the Vienna Memorandum.

c) A key issue for assessing the impact of the development is the impact on the setting of the WHS. ICOMOS's *Xi'an Declaration on the Conservation or the Setting of Heritage Structures, Sites and Areas* (2005) similarly does not advocate against change but states:

10. Change to the setting of heritage structures, sites and areas should be managed to retain cultural significance and distinctive character.

Managing change to the setting of heritage structures, sites and areas need not necessarily prevent or obstruct change.

The HIA above has assessed that the current proposal will retain the cultural significance and distinctive character of the WHS and will cause no meaningful harm to the setting of the WHS. It assessed that the proposal will have no meaningful adverse impact upon the historic townscape or skyline and will bring some beneficial change.

In summary, this Heritage Statement and TVIA concludes that the proposal is in compliance with all relevant guidance in the WHS SPD, the relevant guidance from UNESCO and ICOMOS and will cause no harm to the Outstanding Universal Value of Liverpool's WHS.

8.8 Assessment of the Proposal against the Relevant Policies in the UDP and the Emerging Local Plan

8.8.1 Policy GEN 3 *Heritage and Design in the Built Environment* of the UDP seeks to protect and enhance the built environment of the city. This Heritage Statement has found that the proposed development will protect and enhance to built environment of the city and complies with this policy.

8.8.2 Policy HD5 *Development affecting the Setting of a Listed Building* of the UDP seeks to preserve the setting and important views of listed buildings. This Heritage Statement has found that the proposed development will preserve the setting and views of all listed buildings in the vicinity and wider area and complies with this policy.

8.8.3 Policy HD12 *New Development Adjacent to Conservation Areas* of the UDP seeks to preserve the setting and important views of conservation areas. This Heritage Statement has found

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that the proposed development will preserve the setting and views of the Castle Street Conservation Area and complies with this policy.

8.8.4 Policy HD18 *General Design Requirements* of the UDP seeks to raise standards of urban design through establishing a range of criteria for new development to meet. This Heritage Statement has found that the proposed development meets all relevant criteria and complies with this policy.

8.8.5 Policy HD1 *Heritage Assets: Listed Buildings; Conservation Areas; Registered Parks and Gardens; Scheduled Ancient Monuments* of the emerging Liverpool Local Plan seeks to ensure that the significance of the city's heritage assets is conserved and not harmed. In particular it refers to

...the significance of those elements of its historic environment which contribute most to the City's distinctive identity and sense of place are not harmed. These include:

The architectural innovation and exuberance of the nineteenth and early Twentieth Century banks, exchanges and offices in the commercial centre;

This Heritage Statement has found that the proposed development will not cause any net harm to any heritage assets and will enhance the setting of the "...nineteenth and early Twentieth Century banks, exchanges and offices in the commercial centre" and complies with this policy.

8.8.6 Policy HD2 *Liverpool Maritime Mercantile City World Heritage Site* seeks to conserve and enhance the OUV of the WHS.

This Heritage Statement has found that the proposed development will not cause any net harm to the OUV of the WHS, will enhance the setting of Character Area 4 of the WHS and complies with this policy.

8.9 Assessment of the Proposal against the Relevant Policies in the NPPF (2019)

8.9.1 Section 16 *Conserving and enhancing the historic environment* of the NPPF (2019) sets out the government's planning policy framework for the historic environment. It states at S.184:

Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generation

However, it also states:

192. In determining applications, local planning authorities should take account of:...

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

200. 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.

This Heritage Statement has found that the proposed development will make a positive contribution to local character of the area and will enhance the significance of the area and complies with the policy framework.

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8.9.2 Sections 195-198 sets out the policy framework in respect of harm to heritage assets or their setting. In particular S.195 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.

This Heritage Statement has found that only a very low level of harm would be caused to the setting of the heritage assets, as the proposed buildings are slightly higher than the immediately adjacent listed buildings but that even so, the heritage and townscape benefits of the proposal outweigh that harm and that there is no net harm to the setting of the heritage assets and that the proposed development complies with the policy framework.

8.10 Assessment Against Para 138 of Historic England's *Conservation Principles*

8.10.1 Para 138 of Historic England's *Conservation Principles* states:

138. New work or alteration to a significant place should normally be acceptable if:

- a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;*
- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;*
- c. the proposals aspire to a quality of design and execution which may be valued now and in the future;*
- d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.*

8.10.2 This Heritage Statement makes the case that all of these criteria for acceptable new work affecting the historic environment have been met:

- a) this Heritage Statement, the Archaeological Assessment and the D&A Statement provide sufficient information to enable the impacts of the proposal to be fully understood
- b) the HIA and TVIA have demonstrated that the proposal will not materially harm the values of the listed buildings, Castle Street CA, Liverpool WHS or the Historic Urban Landscape
- c) this Heritage Statement and the D&A Statement make the case that the proposals aspire to a timeless quality of design and execution
- d) this Heritage Statement makes the case that the long-term consequences of the proposed development will be benign. In this instance, if Block A is built as proposed and the masterplan is fully implemented, alternative solutions for the site would not be possible in the foreseeable future but this part of the criteria relates more to works of intervention in historic buildings than to the comprehensive redevelopment of a cleared site.

9. Conclusion

9.1 This Heritage Statement makes the case that the current proposals for Block A and the masterplan for the site at Pall Mall will cause no meaningful harm to the heritage significance or setting of any listed building, conservation areas, the Liverpool WHS or the townscape.

9.2 The HIA and TVIA in this Heritage Statement conclude that:

- the only Slight Adverse impact is the slight additional height of the proposed buildings over the height of the nearby listed buildings. However, the assessments have found that: this additional height will not be readily apparent at ground floor level; the level of harm will be very low; that there are already several buildings of comparable or greater height in the vicinity and; that more buildings of considerably greater height have recently been given planning permission.
- the beneficial impacts of the proposed development on the setting of the listed buildings, CA, Character Area 4 of the WHS and the historic Urban Landscape will far outweigh any low level of harm. The principal heritage and townscape benefits of the proposed development will be: repairing and infilling the void in the urban fabric by re-establishing the dense urban grain of the area; capitalising on the historic street pattern of the area; responding to, respecting, and enhancing the highly sensitive and important historic context through the detailed design and materials.

9.3 Crucially, the proposed development would not harm the OUV, integrity or authenticity of the WHS or the ability to appreciate its significance.

9.4 The NPPF, in Section 16 on *Conserving and enhancing the historic environment*, provides advice to local authorities on decision-making in respect of proposals which will cause some level of harm but, as the current proposals will cause no net harm, most of that advice does not apply.

9.5 Rather, the advice at Para. 11 of the NPPF is more relevant. It states:

11. Plans and decisions should apply a presumption in favour of sustainable development...

*For **decision-taking** this means:*

c) approving development proposals that accord with an up-to-date development plan without delay;

9.6 The proposed development at Pall Mall does represent sustainable development and accords with the national and local policies and guidance, the development plan and the emerging Central Business District SRF and so this Heritage Statement makes the case that the proposals should be approved without delay.

This Heritage Statement was prepared by:

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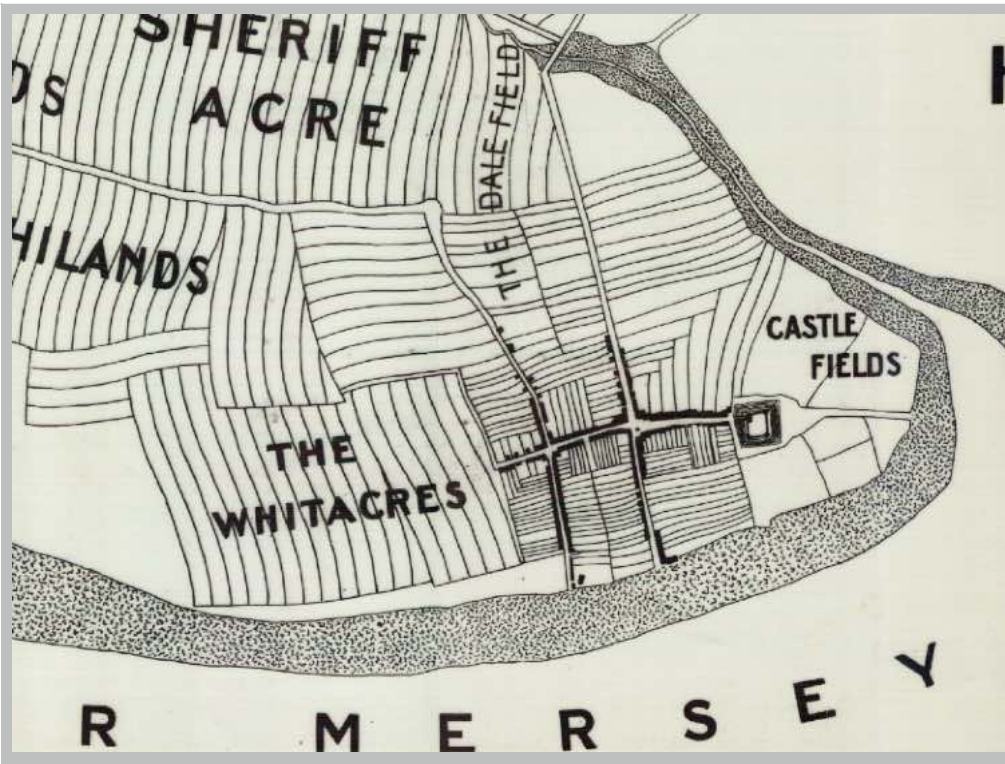
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Operational Guidelines for the Implementation of the WH Convention 2017 UNESCO

Street Names of Liverpool Steven Horton 2011 Countrywise

Appendices

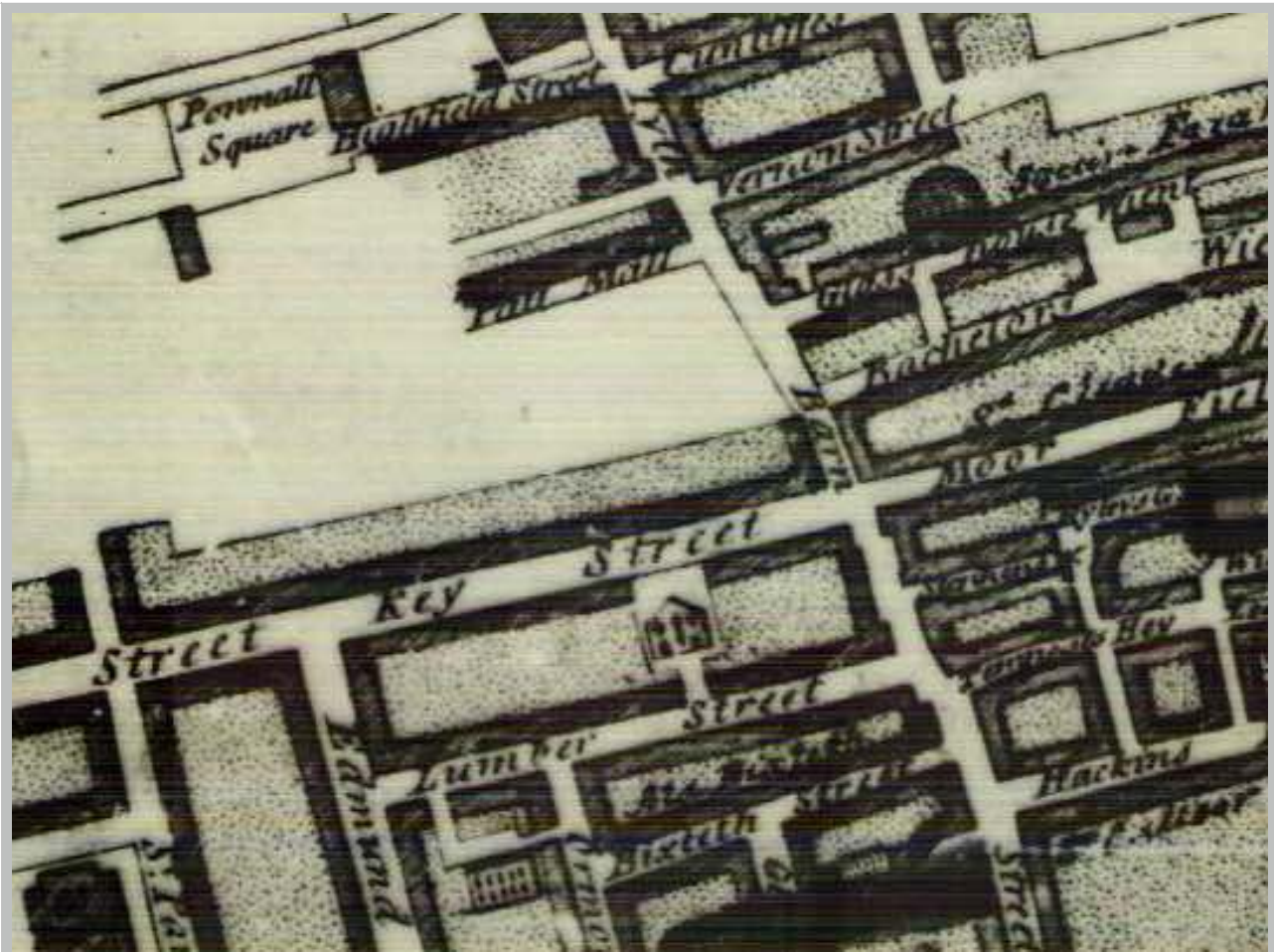
Appendix 1. Historic Maps



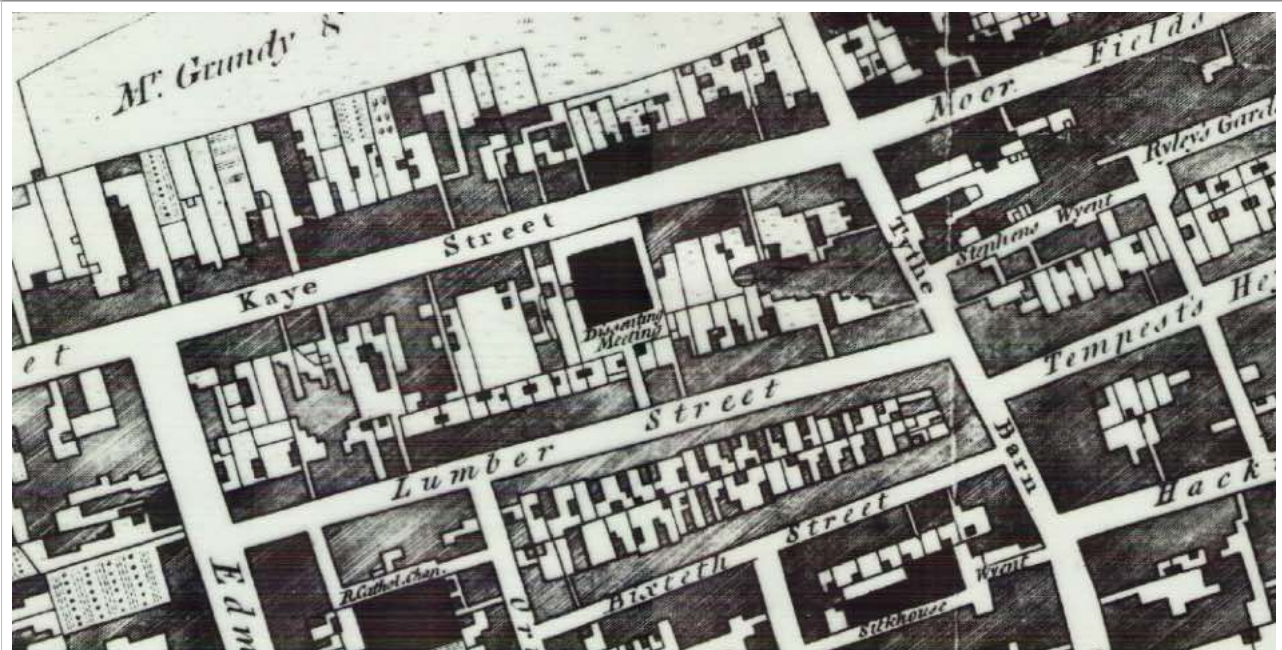
Map 1. Conjectural Map of Liverpool in 14th C with the 7 medieval streets



Map 2. Chadwick 1725

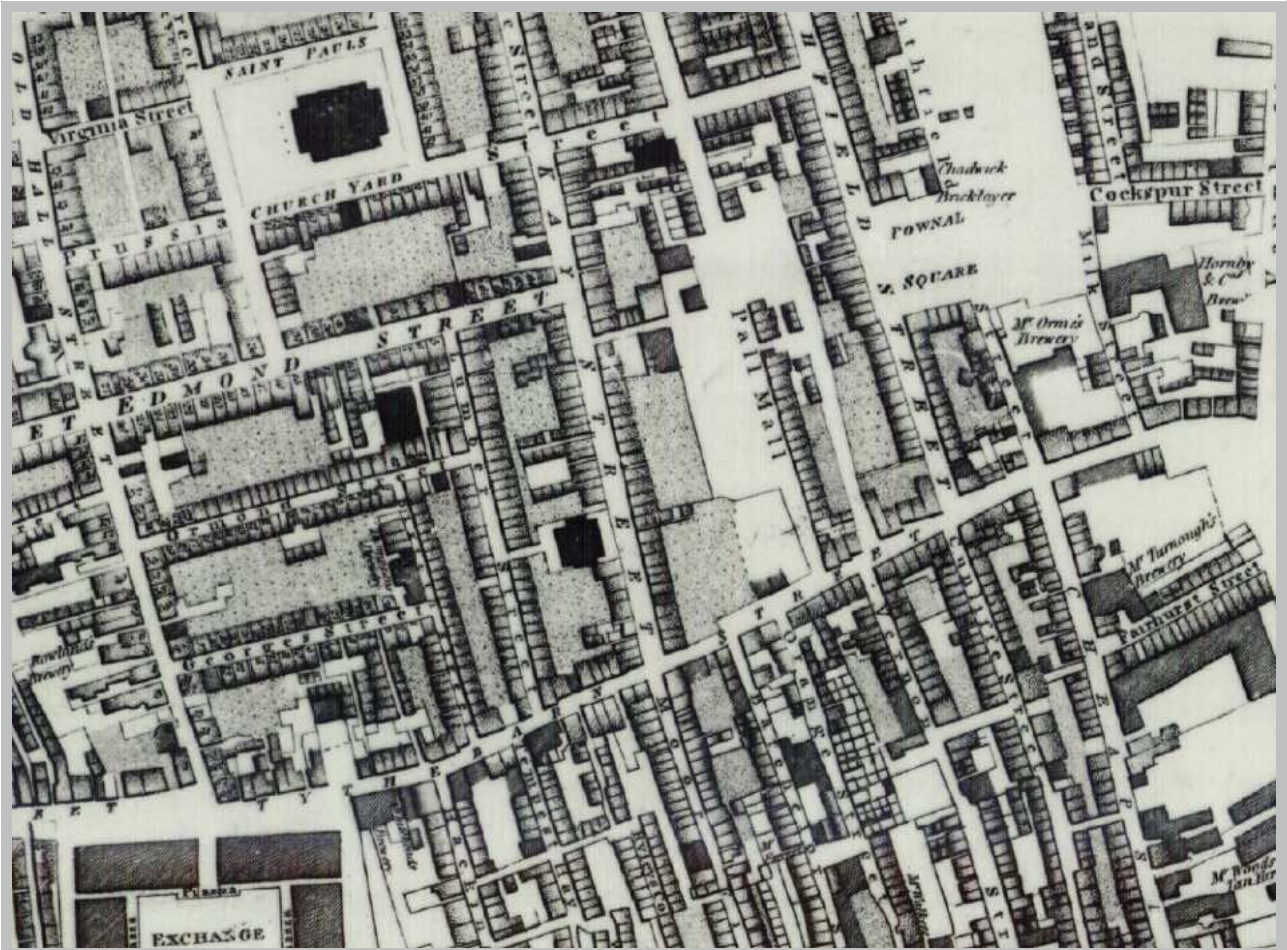


Map 3. Eyes 1768



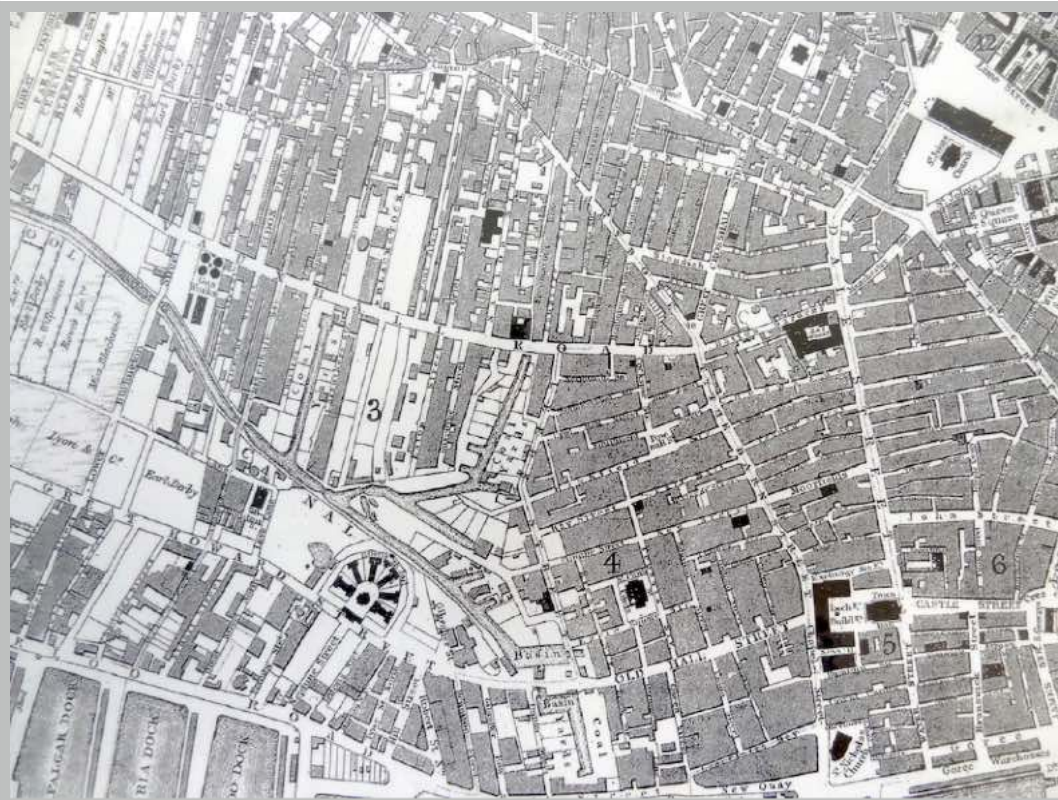
Map 4. Perry 1769

Heritage Statement: Pall Mall, Liverpool



Map 5. Horwood 1803

Heritage Statement: Pall Mall, Liverpool

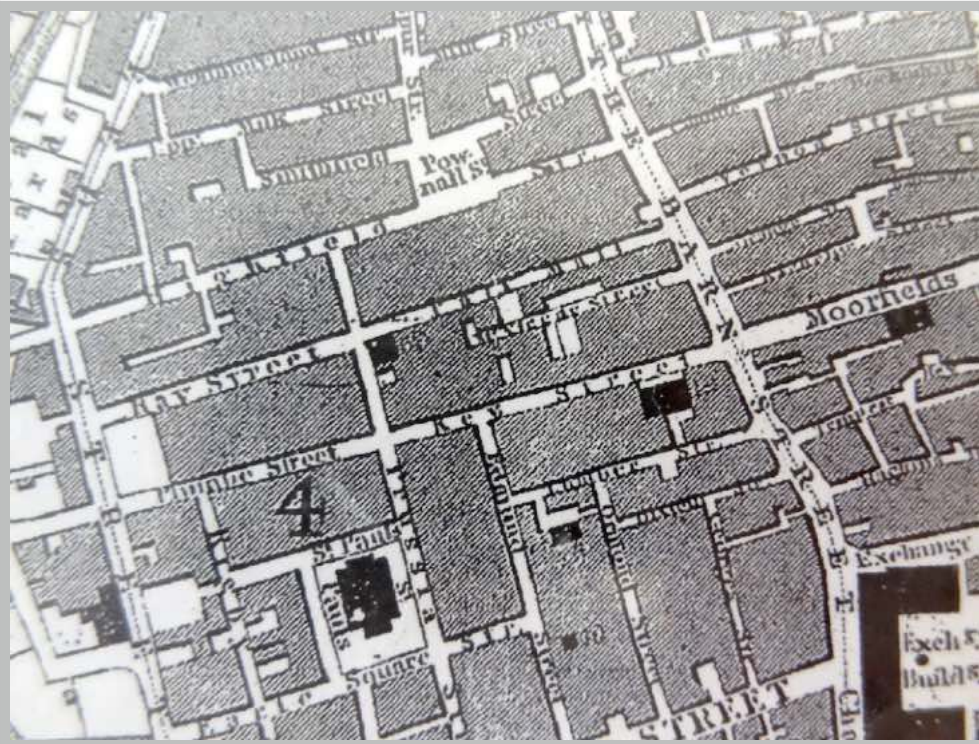


Map 6. 1824 Swire



Map 6a. Gage's Plan of the Town and Port of Liverpool

Heritage Statement: Pall Mall, Liverpool

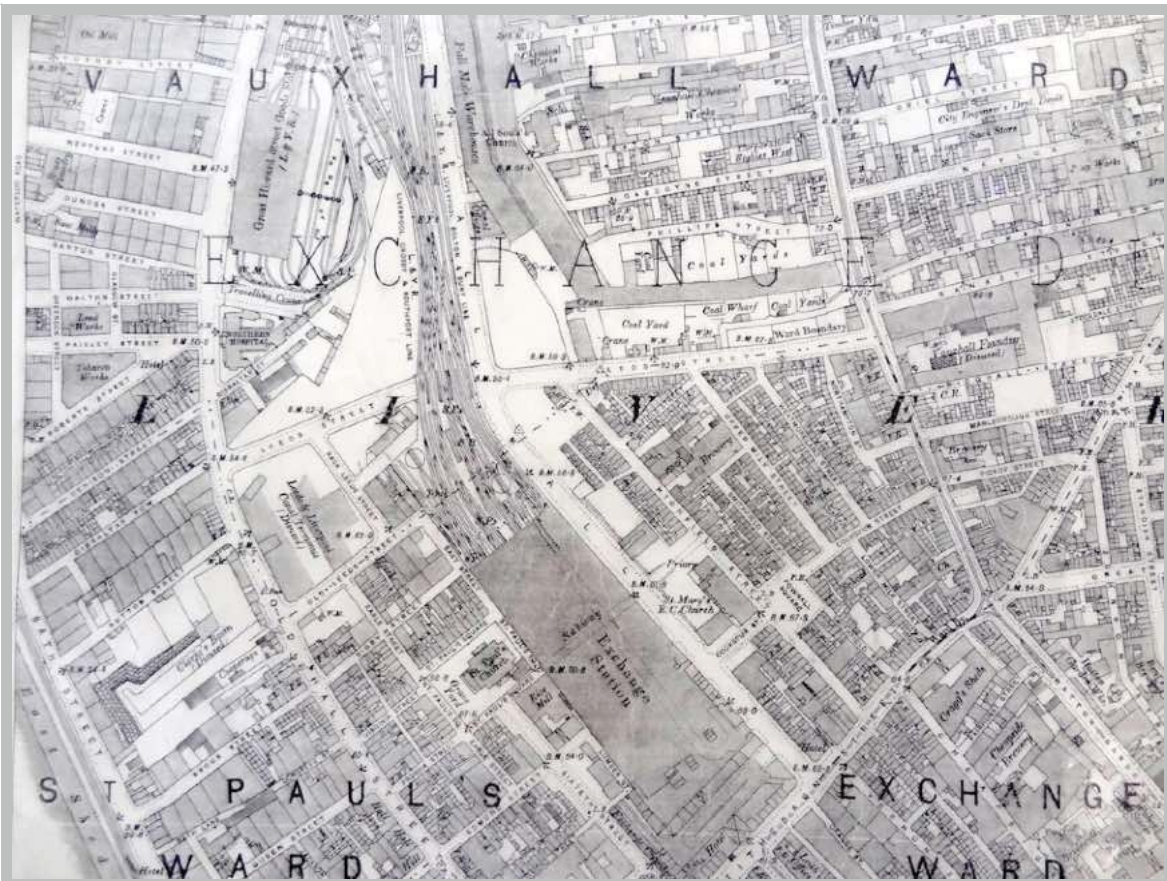


Map 7. 1841 Bennison

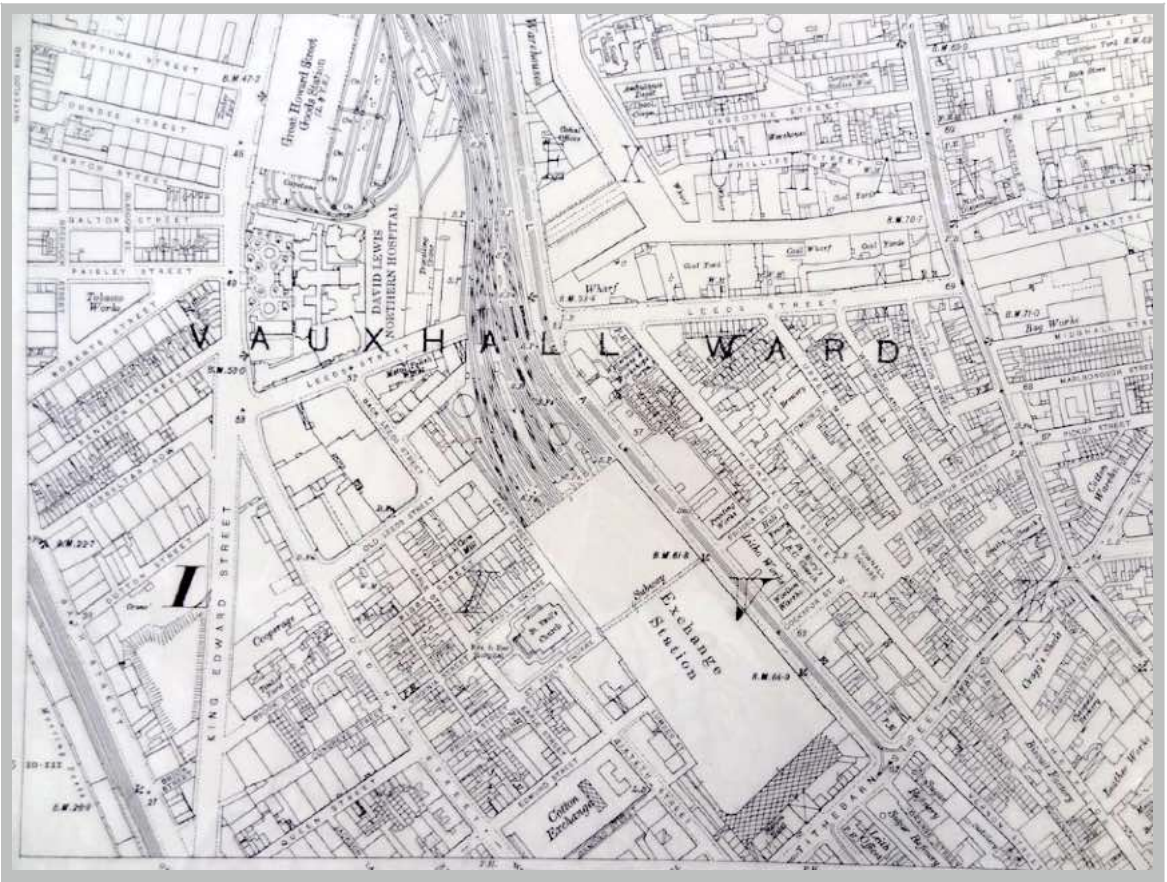


Map 8. 1848 OS (Rev 1864)

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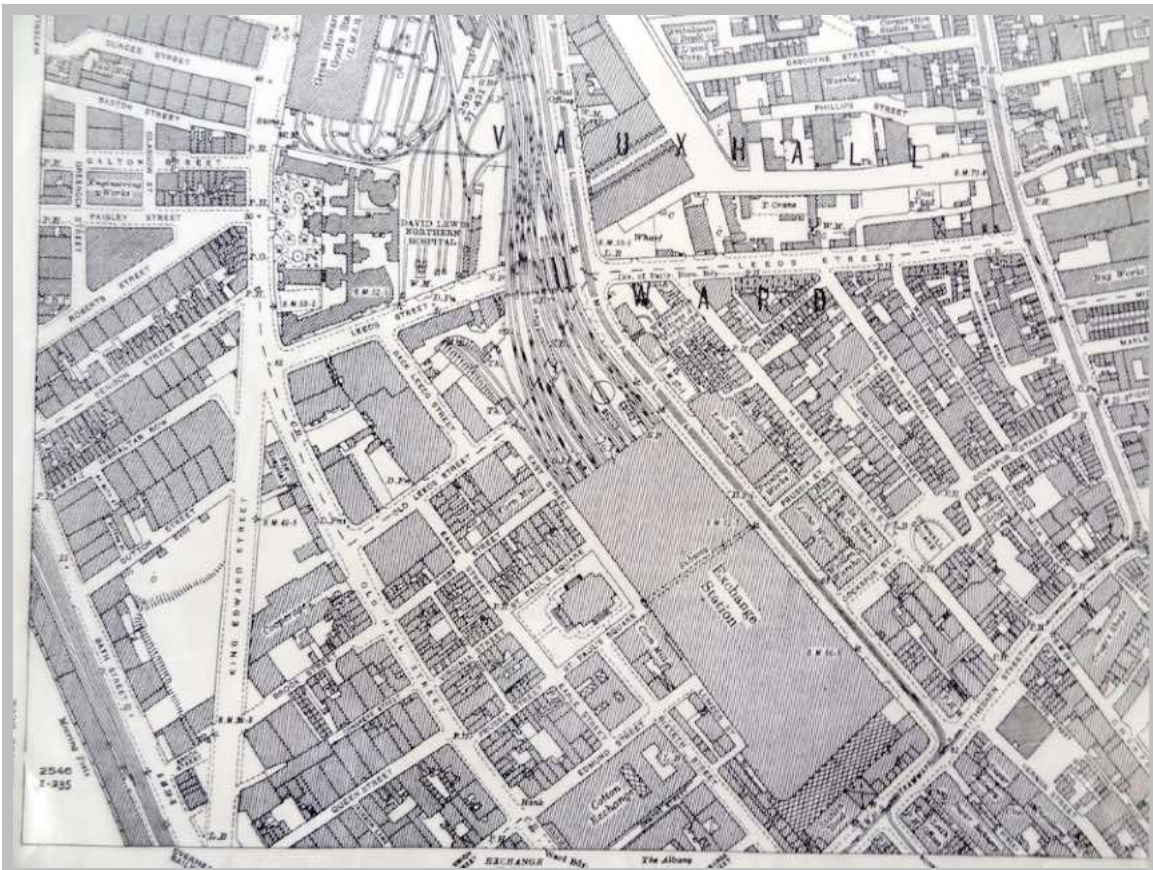


Map 9.1893 OS

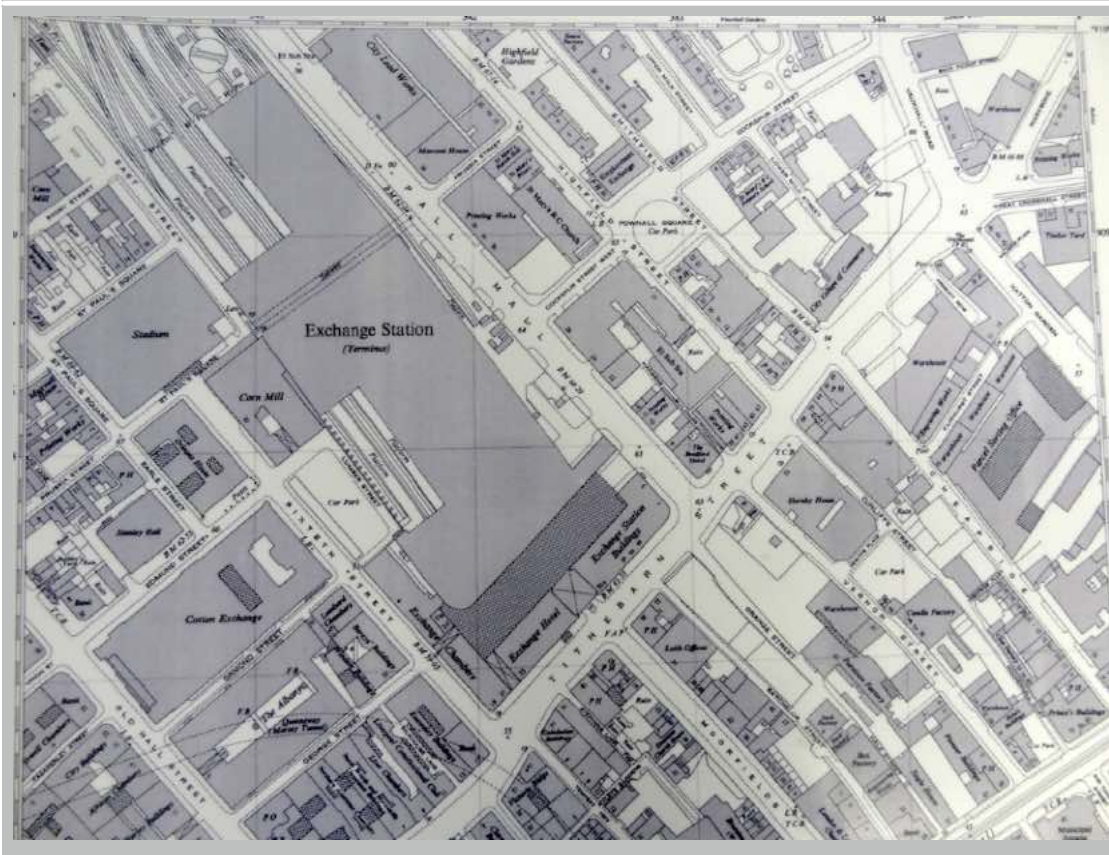


Map 10. 1908 OS

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Map 11. 1927 OS



Map 12. 1953 OS

Appendix 2. Listing Descriptions

59-61 TITHEBARN STREET

II

Printing and bookbinding factory and warehouse. Circa 1870 (for the Union Paper and Printing Company Ltd). Brick, possible partly iron- framed; roof material not visible. 4 storeys with attic and basement. Integrated building with workshops, office showrooms and warehousing. Regular 4 window range with full height taking- in opening to right, the latter with round- headed arch under gable, with recessed double planked doors at each level. Glazed basement. Ground floor under moulded stone cornice over name board fascia, with principal entrance to left flanked by debased Corinthian rusticated pilasters; double half glazed doors under rectangular overlights. Windows to all floors in entrance bay with brick surrounds and shouldered arches. All other windows with iron columns dividing lights, with varied capitals and lintel treatment. Attic is a half storey similarly treated. Real with almost continuous glazing to all floors. Interior not inspected but understood to contain cast iron columns to all floors. A good example of a Victorian integrated printing factory.

67, Lion Tavern, MOORFIELDS

II

Public house. Mid C19 with ground floor front remodelled and interior refitted c1905. MATERIALS: timber and glass pub front. Stucco to upper storeys. Slate roof. PLAN: Public bar in angle of street corner and surrounded by L-shaped corridor which leads into news room and drinking lobby. EXTERIOR: 3 storeys. 3-bays to each street front. Ground floor has panelled wood pilasters supporting paired consoles with cornice above. Windows have etched glass panels. First and second floors have rusticated quoins, second floor sill course and bracketed frieze, cornice and plain parapet. Windows with raised architraves with ears, segmental head over first floor windows. Second floor sash windows with glazing bars. INTERIOR: Public bar with panelled bar counter with consoles. Glazed bar back with etched glass, shelves and pedimented opening for access. Right-hand end of counter carries superstructure with pot-shelf. Tiled dado with art nouveau detailing repeated on bar side of corridor. Above timber and etched glass screen with sashes. Mosaic floor to corridor. Leading off the corridor is a news room (so-designated in its window glass) and drinking lobby with glazed dome over. Between news room and lobby is match boarded projection containing dumb waiter. Contemporary fireplaces in news room and lobby. Important example of lavishly refurbished turn-of-the-century public house which retains its plan and fittings almost entirely intact.

No 35 Windsor Building, GEORGE STREET

GV II Offices and warehouse. Circa 1856. Ashlar faced brick. Four principal floors (with basement); regular 4-window range, all the floors differently detailed and forming a good mid-C19 Liverpool 'palazzo' facade. Front: around floor and basement, and doorway to right, with pilasters and entablature and vermiculated plinth. Basement windows with decorative grille and casements; sashes in deep reveals to ground floor, and all floors above. Panelled door with plain overlight. First floor rusticated with depressed window arches and keyblocks. Raised and moulded architraves to 2nd and 3rd floors with depressed and flat window arches respectively. Moulded sill bands. Deeply overhanging console eaves cornice. The building stands forward of the adjacent Bereys' Buildings (ref 48/864) and groups with both this and the former Exchange Building (ref 48/845) ie The Albany.

The Albany, OLD HALL STREET (east side)

G.V. II* Former office and warehouse building. 1856. J.K. Colling. Brick with stone dressings. 3 storeys and basement, 11 bays. Rusticated granite basement. Rusticated ashlar ground floor. Segmental-headed windows, keystones and tripartite sash windows, cornice above. Central

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ground headed granite entrance with keystone, carved spandrels and frieze, and segmental pediment. 1st floor segmental-headed windows in round relieving arches with carved ornament on archivolt and tympana. 2nd floor sill band, stone architraves and keystones to windows. Carved frieze and heavy modillioned cornice, balustraded parapet. Sides are utilitarian with area railings and hoists. Inner courtyard especially noteworthy. Iron entrance gates in middle, leading to central corridor with coffered and enriched barrel vault on Composite capitals and red granite columns; secondary entrances to north and south corridors. Steps down to courtyard, long and narrow, 4 storeys, 15 windows on longer sides, with 2 iron bridges across the middle, and iron spiral stair. Good open-well iron staircases in wings.

No 33 Bereys' Buildings, LIVERPOOL GEORGE STREET

(Formerly listed as Berry's Buildings)

GV II Former offices and warehouse. Circa. 1870. Red brick with limestone dressings. Four storeys and basement. Regular elevations, 6 bays to George Street, 10 to Bixteth Street, the end and corner bays projecting slightly and treated a little more elaborately than the others; entrances to end bays. With the exception of these the windows run uninterruptedly: segmented window arches to all but top floor (which has flat arches) with stone hood moulds and shaped lintels. Iron mullions. Shaped parapet and modillion cornice. Corner bays have large printed arched windows through upper 2 storeys, with oculus and carved stonework set in the tympana. Stone plinth throughout, tooled lower courses, each bay divided by battered set-off buttresses. Decorative ironwork railings. Brick ridge stacks with stone moulded caps and contemporary posts.

Berry's Building groups with the adjacent Windsor Building (48/863) and Lombard Chambers (48/862).

No 12 (Lombard Chambers), ORMOND STREET

G.V. II

Office Building. 1860's. Brick with stone dressings. Italian Gothic style. 3 storeys, basement and attic, 5 bays to Bixteth Street and 3-bay return to Ormond Street. Bixteth St. facade: basement and ground floor banded with buff brick, applied pointed arcade has hood mould with stops in the form of twined animals, central arch higher than others. String course canted over central arch. Basement windows have shouldered lintels, ground floor windows have pointed arches. 1st floor pointed attached arcade with stone columns. Segmental-headed windows with brick herringbone tympana. 2nd floor sill band and 2-light windows under pointed relieving arches. Iron centre shafts, and round recesses in tympana. Attic has central gable with window of 5 pointed lights and iron shafts, balcony on brackets with iron railings. Lombard frieze and moulded coping. Flanking 4-light corbelled-out windows. Return facade utilitarian with central entrance with panel over, lettered "LOMBARD CHAMBERS". 2-light mullioned window above, all in decorated architrave with cornice.

Cotton Exchange - Building (formerly listed 14.3.75 under Edmund Street), OLD HALL STREET

G.V. II

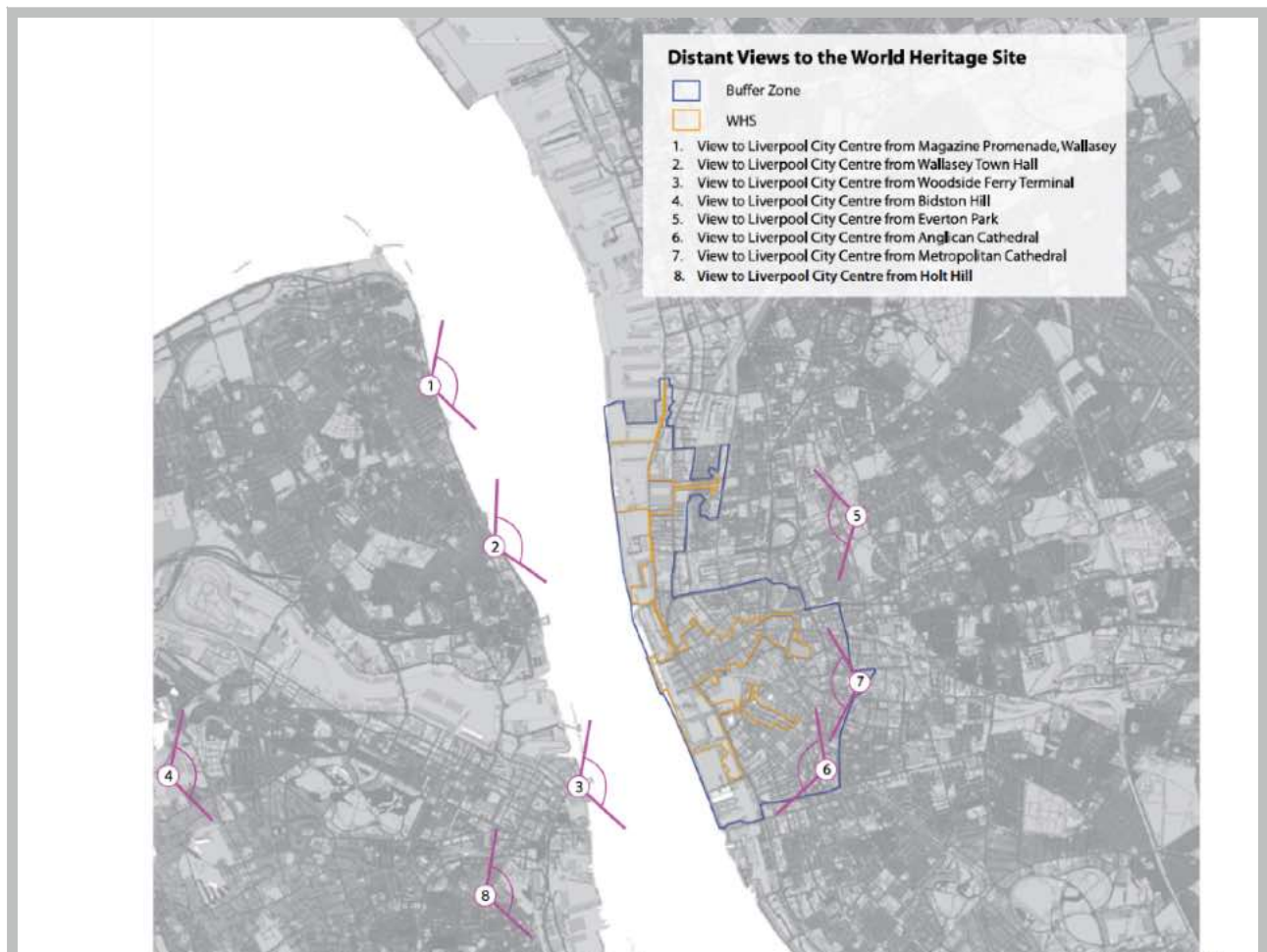
Office building. Old Hall Street facade demolished and has been rebuilt. 1906. Matear and Simon. 7 storeys, 21 bays. Ground floor of heavily rusticated stone; windows with keystones and sash windows with glazing bars, upper pilasters, reeded bands, wreaths and festoons, all very light and delicate. Centre brick bay of 3 sash windows on each floor, 10 iron and glass bays each side. Return side on Bixteth Street is 9 bays long, similar style, with iron window frames and iron lintels, but stone facing.

Orleans House (formerly listed under Bixteth Street), EDMUND STREET

14.3.75 G.V. II*

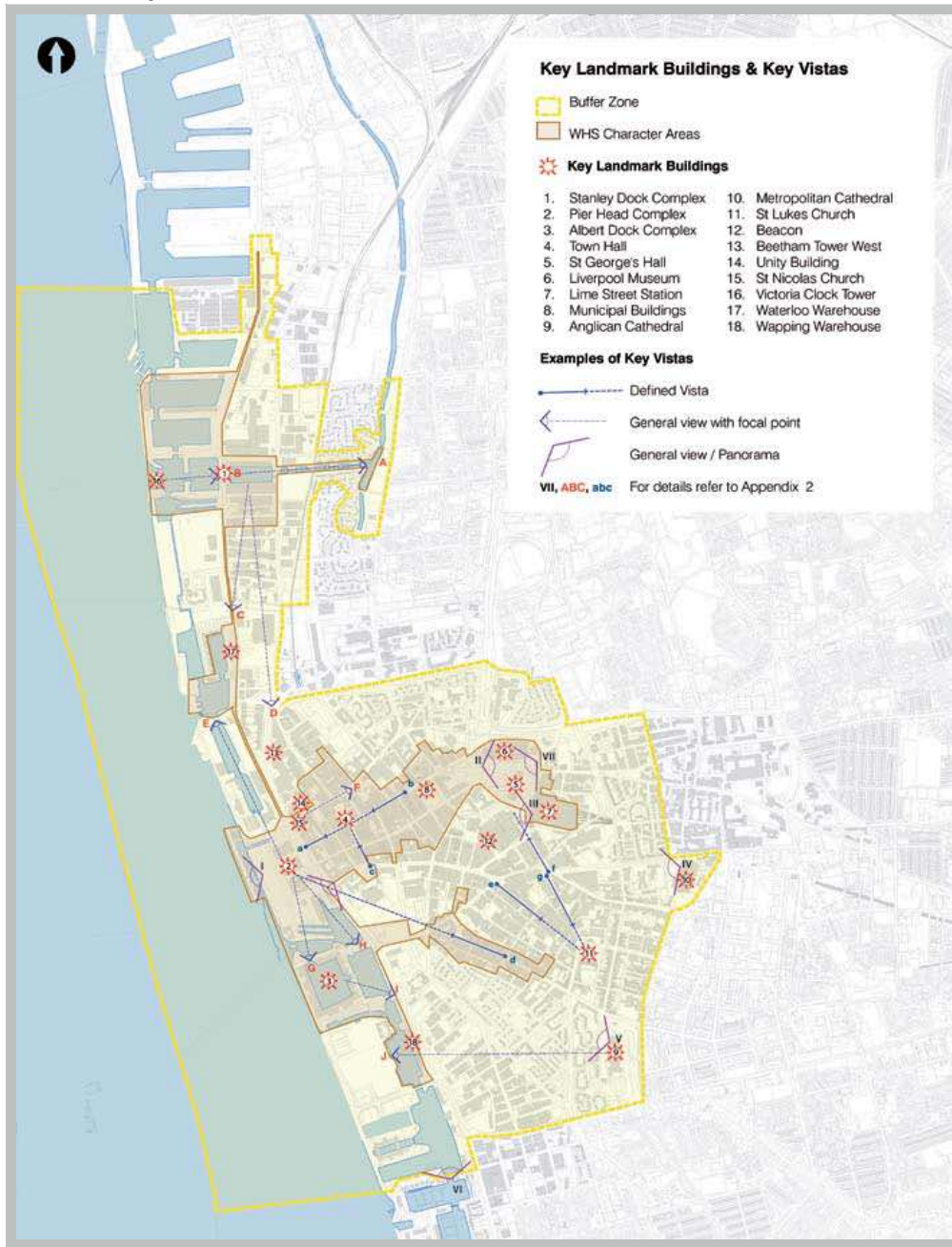
Office building. 1907 (on date stones). Matear and Simon. Buff brick with stone dressings, granite basement, cast iron framed windows to some elevations, slate roof. Rectangular plan with 2 light wells on Earle Street. Edmund Street facade of 5 storeys, basement and attic 5 window bays between blank end bays. All windows sashed without glazing bars, in pairs with cast iron mullions and lintels, those to ground floor with wedge lintels. Stone panels between floors. Deep cornice on trighiphs. Gambrel roof with flat topped dormers. End bays have stone date panels and end in truncated stacks Bixteth Street elevation of main interest; Basement and 3 blocks of 5 storeys with attics and 3 bays connected by blocks of 3 storeys and 2 bays. Cast iron facade with panelled pilasters, entablatures and decorated panels undertripartite windows. Attics as Edmund Street facade similarly treated. Important example of curtain walling

Appendix 3. Distant Views to the WHS (From the WHS SPD)



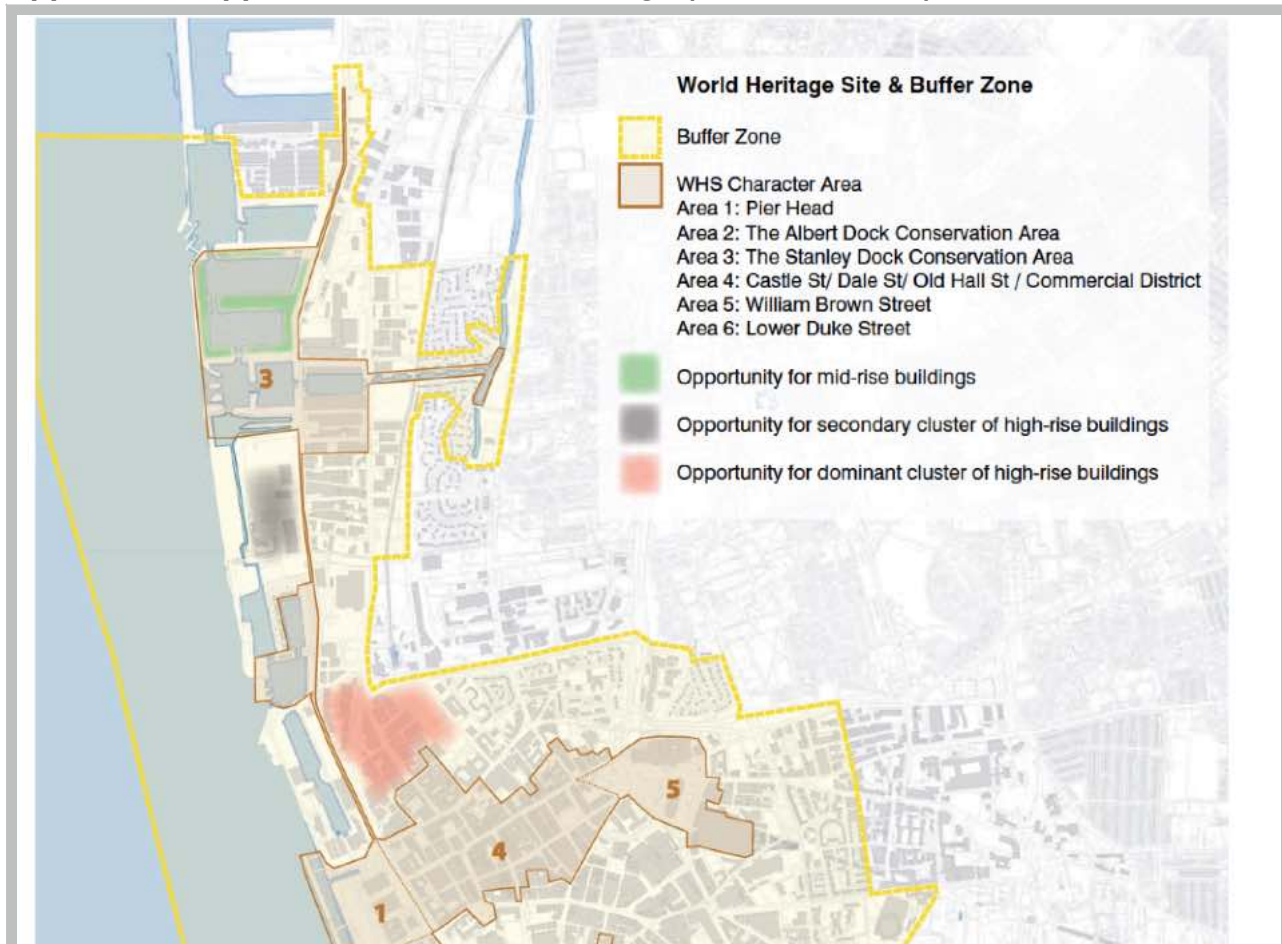
Plan 21. Distant Views to the WHS (From the WHS SPD)

Appendix 4. Key Landmark Buildings and Key Vistas in and around the WHS (from WHS SPD)



Plan 22. Key Landmark Buildings and Key Vistas in and around the WHS (from WHS SPD)

Appendix 5. Opportunities for Tall Buildings (from WHS SPD)



Plan 23. Opportunities for Tall Buildings (from WHS SPD)

Appendix 6. Statement of OUV for Liverpool WHS

Liverpool Maritime Mercantile City World Heritage Site Statement of Outstanding Universal Value

Brief Description

The Maritime Mercantile City of Liverpool became one of the centres of world trade in the 18th and 19th centuries. It had an important role in the growth of the British Empire and became the major port for the mass movement of people, especially enslaved Africans and European emigrants. Liverpool pioneered the development of modern dock technology, transport systems, port management, and building construction. A series of significant commercial, civic and public buildings lie within selected areas in the historic docklands and the centre of the city. These areas include: the Pier Head, with its three principal waterfront buildings – the Royal Liver Building, the Cunard Building and the Port of Liverpool Building; the Dock area with their warehouses, dock walls, docks and other facilities related to port activities from the 18th and 19th centuries; the mercantile area, with its shipping offices, produce exchanges, marine insurance offices, banks, inland warehouses and merchants houses; and the William Brown Street Cultural Quarter, including St George's Plateau, with its monumental cultural and civic buildings.

Statement of Significance

Liverpool – Maritime Mercantile City reflects the role of Liverpool as the supreme example of a commercial port at the time of Britain's greatest global influence. Liverpool grew into a major

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commercial port in the 18th century, when it was also crucial for the organisation of the trans-Atlantic slave trade. In the 19th century, Liverpool became a world mercantile centre for general cargo and mass European emigration to the New World. It had major significance on world trade being one of the principal ports of the British Commonwealth. Its innovative techniques and types of construction of dock facilities became an important reference worldwide. Liverpool also became instrumental in the development of industrial canals in the British Isles in the 18th century, as well as of railway transport in the 19th century. All through this period, and particularly in the 19th and early 20th centuries, Liverpool gave attention to the quality and innovation of its architecture and cultural activities. To this stand as testimony its outstanding public buildings, such as St George's Hall and its museums. Even in the 20th century, Liverpool has given a lasting contribution, which is remembered in the success of The Beatles.

Criteria for Inscription

Criterion (ii): Liverpool was a major centre generating innovative technologies and methods in dock construction and port management in the 18th, 19th and early 20th centuries. It thus contributed to the building up of the international mercantile systems throughout the British Commonwealth.

Criterion (iii): the city and the port of Liverpool are an exceptional testimony to the development of maritime mercantile culture in the 18th, 19th and early 20th centuries, contributing to the building up of the British Empire. It was a centre for the slave trade, until its abolition in 1807, and for emigration from northern Europe to America.

Criterion (iv): Liverpool is an outstanding example of a world mercantile port city, which represents the early development of global trading and cultural connections throughout the British Empire.

Assessment of the Conditions of Authenticity and Integrity, and of the Requirements for Protection and Management in Force

Integrity

The existing urban fabric of the World Heritage Site dates from the 18th to the 20th centuries, with an emphasis on the 19th and early 20th centuries. The city has suffered from the Second World War destruction as well as from the long economic decline after the war.

The historic evolution of the Liverpool street pattern is still readable representing the different periods. There have been some alterations after the war destruction in 1941.

Judging in the overall, though, the protected area has well retained its historic integrity. Not only are the buildings in good state but every effort has been made to preserve the minor detailing of architecture such as the original pulleys of the docks and various other cast iron features.

Authenticity

In the World Heritage property, the main historic buildings have retained their authenticity to a high degree. There are a small number of areas, especially in the buffer zone, where the damages from the war period still exist. There are also new constructions from the second half of the 20th century, of which not all are to high standard. The main docks survive as water-filled basins within the World Heritage property and the buffer zone. They are not any more operational, though one dock area is operated by Merseyside Maritime Museum, and another is used for ship repairs. The warehouses are being converted to new uses. Here attention is given to keep changes to the minimum.

Protection and Management

The World Heritage Site is within the boundary of Liverpool City Council. The property is protected through the planning system and through the designation of over 260 buildings. The whole property is protected by Conservation Areas.

The World Heritage Site is subject to different plans and policies, including the Liverpool Unitary Development Plan (2002), the Strategic Regeneration Framework (July 2001) and the Liverpool

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Maritime Mercantile City World Heritage Site SPD (2009). There are several detailed master plans for specified areas, and conservation plans for the individual buildings. A full Management Plan has been prepared for the World Heritage Site. Its implementation is overseen by a Liverpool World Heritage Site Steering Group, which includes most public bodies involved in the property.