

1 Introduction

1.1 The following Heritage Impact Assessment (HIA) has been prepared to support a retrospective application for Listed Building Consent in relation to no.1 The Rock, Bury, BL9 0JP.

1.2 No.1 The Rock dates from 1874 and is a four storey end of terrace building. It is Grade II listed and situated in the Bury Town Centre Conservation Area.

1.3 A fire broke out in the building on 23 November 2025 and caused extensive structural damage to the uppermost floor and roof structure. Following a post fire inspection, emergency works to stabilise and support the building were undertaken in line with the provisions of section 9(3) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1.4 A letter was sent to Bury Council on 8 December 2025 informing them of the works that were due to take place. This was accompanied by an engineer's report entitled '*Post Fire Preliminary Inspection Report*' prepared by Marston & Grundy Consulting Engineers and dated 5 December 2025. This confirmed the structural condition of the building and highlighted particular areas of concern. The report recommended that urgent works be undertaken to avoid the possibility of a sudden and uncontrolled collapse of elements of the building, and to ensure public safety. These included:

- Removal of the timber roof overhangs on the front and rear elevations.
- Taking down of the remainder of the roof structure to eaves level.
- Dismantling of the front and rear gables, as well as the transverse cross walls down to eaves level.
- Dismantling of the chimney stacks down to eaves level.
- Propping of the fractured window lintel on the rear elevation.

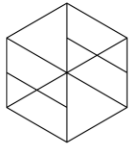
- Propping of the remainder of the 4th floor on the rear left section.
- Propping of damaged areas of the 3rd floor in the rear section.
- Removal of debris from the affected floors of the building.

1.5 In line with paragraphs 207 and 208 of the National Planning Policy Framework 2024 the purpose of this Heritage Impact Assessment is to define the significance of the listed building and the features which contribute to its special architectural and historic interest, as well as its contribution to the character and appearance of the Bury Town Centre Conservation Area. This assessment has been made in line with the heritage values set out in Historic England's 'Conservation Principles' (2008).

1.6 This Heritage Impact Assessment has been produced using desk based and online research. It has been informed by various specialist engineering reports and method statements, detailing the condition of the building, and the scope and progress of the works.

1.7 The HIA will discuss the works that have taken place to the building and will demonstrate that these were urgently necessary in the interests of safety or health, and for the preservation of the building. It will be shown that they were limited to the minimum measures necessary. The impact of the works upon the special architectural and historic interest of the listed building will be demonstrated, and then assessed in relation to the relevant statutory, national and local heritage policy framework.

1.8 This Heritage Impact Assessment has been prepared by Hannah Walker (BA (Hons) Oxon MSc IHBC) who has extensive experience in dealing with proposals that affect the historic environment. She has 15 years of local authority experience, including 10 years as a Principal Conservation & Design Officer at the London Borough of Camden. She also has a wide range of experience in the private sector, preparing heritage statements and appraising the



significance of historic buildings. She has trained as a historian, has a specialist qualification in historic building conservation and is a full member of the Institute of Historic Building Conservation (IHBC).

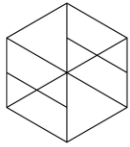
2 Site location and context

2.1 The Rock is a key east-west route through Bury town centre, forming part of its historic core. There are retail, restaurant and café uses at ground floor level, with associated commercial and residential uses on the upper floors. The western end of the street is pedestrianised.

2.2 The Rock is varied in the age and style of its buildings, with an individual and rather eclectic character. There are stone fronted buildings of the Victorian and Edwardian period, often classically inspired, along with those in red brick with stone dressings, such as the former bank on the corner of Union Street. Inter war additions at nos.15-17 have an Art Deco flavour, whilst those buildings from the mid 20th century are typical of the period, with simple horizontally aligned fenestration and flat roofs. The height and scale of the buildings also varies along The Rock, with buildings such as the single storey classical bank at no.40 and more generously scaled development such as nos.5-9, with its unusual, castellated parapet.

2.3 At the western end of The Rock is St Mary's Church. This replaced an earlier church on the site in the 1870s. It occupies a prominent position in the townscape, with frontages to Rock Street and The Wylde, and its tower and spire forming a key feature on Market Place. The churchyard and church gardens provide welcome greenery in the heart of the town centre.

2.4 Market Place sits at the western end of The Rock and is a key element at the historic core of the town. The space was enlarged and its eastern and western sides realigned towards the end of the 19th century, with new sandstone buildings erected. Vestiges of earlier and smaller development survive on The Wylde, such as the Two Tubs Public House.



The application site

2.5 No.1 The Rock was built in 1874 as Union Buildings. It occupies a prominent site on the corner of The Rock and the narrow lane to the west, North Back Rock. It is four storeys in height and designed in an exuberant and distinctive neo-Medieval style, in red brick with stone dressings and mock timber framing.

2.6 The building is situated adjacent to the churchyard of St Mary's Church and separated from it by a narrow, cobbled lane. It backs onto the verdant and well vegetated church gardens, to the north.

2.7 The upper floors of the building have hosted a variety of uses over time, including a private club, printers and dance school. The ground floor has always been occupied as a separate unit, originally as a bank and then insurance offices, until 2020, when it was converted to a mini-market.

2.8 Planning permission (68111) and Listed Building Consent (68112) were approved on 17 June 2022 for the change of use and conversion of the basement, the rear part of the ground floor and upper floors, from commercial use to seven self-contained flats. The work to implement this scheme have started but are not complete.

2.9 A fuller assessment of the significance of the site and its buildings can be found at section 4 of this Heritage Impact Assessment.

Heritage Designations

Statutorily Listed Buildings

2.10 No.1 The Rock was Grade II listed on 26 March 1975. The listing description reads as follows:

Dated 1874. Neo-medieval. Red brick with stone dressings and mock timbering with plastered infill (especially to top stages). Corner site. Irregular.

Four storeys. Gable front of three bays and 5-bay left-hand return front. Windows generally have straight heads on ground floor, obtusely pointed heads (and ornamental sill-grilles) on first floor, pointed heads and drip moulds on second floor and multiple mullioned lights on top floor (together with small 4-light roundels). Central window on first floor is rectangular oriel, as are two windows on second and third floors of return front, which has elaborate carving over bi-partite entry, incorporating dated coat of arms, surmounted by roundel on first floor under gabled canopy of pierced bargeboards on corbels. Circular corner chimney rising from foliate capital on shaft running towards ground. Steep tiled roof.

2.11 There are a small number of other statutorily listed buildings in the area surrounding the application site

- Parish Church of St Mary – Grade I
- Bury War Memorial – Grade II*
- Statue of Sir Robert Peel – Grade II

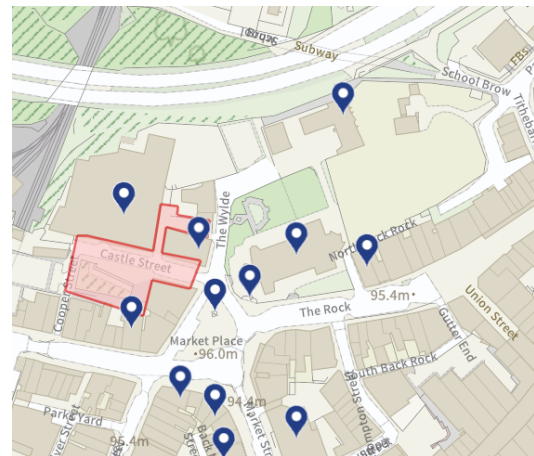
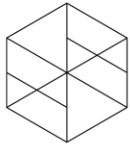


Figure 1: Historic England's map denoting statutorily listed buildings with blue markers. The application site is marked with a red dot.



The Bury Town Centre Conservation Area

2.12 The application site is located in the Bury Town Centre Conservation Area which was first designated in 1978 and then extended to the west in September 2005. The Bury Town Centre Conservation Area Appraisal was adopted in February 2007. The Summary of Special Interest at section 2.0 notes that:

The conservation area covers the historic core of central Bury, the heart of the medieval settlement, with densely built-up streets radiating to the east, south and west. The irregular grid of streets focuses on the junction of the Market Place, Bolton Street, Silver Street and The Rock. Although there are no mills within the conservation area, cotton mills were built in the area south of the Rock, and to north of the town centre. The architectural interest of the conservation area is principally in the fine grouping of Victorian and Edwardian civic and commercial buildings which remind visitors of the town's 19th century heyday.

The town's distinctive and unified character is partly derived from the use of local sandstone, and the fact that many of the town's most important buildings were constructed in a relatively narrow window of time between 1850 and the early 20th century. This contributes to the overall Victorian character of the principal streets, which are enlivened by later Edwardian additions which neither use local materials nor ape the existing building style. Bolton Street Station, the Art Picture House on Haymarket Street, and number 1 and numbers 15-21 The Rock are good examples. The prevailing scale is three to four storeys. The Bolton Street railway station is a reminder of the role of transportation in the 19th century development of the town; this line opened in 1846, one of two into the town.

2.13 In relation to The Rock, the appraisal notes that:

As the main road to Bury from the east, The Rock was one of the earliest areas in the town to be settled and developed. No pre-Victorian buildings

survive, but, as a busy commercial street, the layers of Victorian, Edwardian, Art Deco and later architecture provide a varied and interesting streetscape. The scale is predominantly three or four storeys, with buildings hugging the street line and following the gentle curve eastwards from the Market Place.

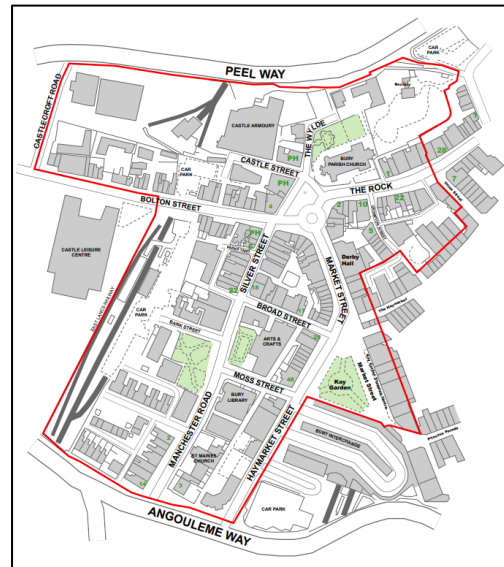
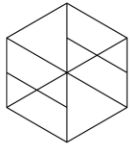


Figure 2: The Bury Town Conservation Area – the designation is drawn tightly around the historic core of the town centre, focused upon Market Place and the streets which radiate out from it.



3 Historic development of the site and area

3.1 Historically, Bury developed as a market town, focused upon Market Place and St Mary's Church, as well as the roads that radiated out from this space, including Silver Street and The Rock. During the late medieval period and into the 17th century the town fell upon hard times and many of its residents lived in poverty.

3.2 However, the town began to prosper during the 18th century due to the growth in the wool trade, and then in the manufacture and processing of cotton. Inventions in mechanisation by John Kay, a resident of the town, assisted in its rising fortunes. Furthermore, the position of the town on the banks of the River Irwell, and near the River Roach, with ready access to coal supplies, aided its expansion.

3.3 The town was also home to other industries, including iron foundries, paper making plants and coal mines, which contributed to its wealth. The arrival of the railway in 1846 further spurred on industrial growth for the town, with connections to various places in Lancashire and beyond.

3.4 By the early to mid-19th century the town's wealth had resulted in the construction of many of its handsome sandstone civic and commercial buildings, including Derby Hall on Market Street (Grade II listed) and the Athenaeum Club (demolished), as well as the buildings which now enclose Market Place, after its enlargement towards the end of the 19th century.

3.5 The detailed 1849 Ordnance Survey map shows the earlier version of St Mary's Church and its surrounding churchyard. Market Place retained its earlier more constrained layout, with a significant number of public houses fronting onto it and on the surrounding streets.

3.6 By 1891 St Mary's Church had been replaced, with a new, larger building. The tower and spire were rebuilt in the mid-19th century with the remainder of the building replaced in 1871-76

by E H Shallard. Market Place had also been enlarged, with new buildings lining its southern, eastern and western sides, including the Derby Hotel and the Town Hall.

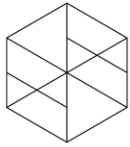


Figures 3 & 4: The 1849 Ordnance Survey map (top) and the 1891 Ordnance Survey map (bottom).

3.7 The built character of the town centre remained relatively consistent during the early to mid-20th century, with tram lines shown up until the mid-20th century and a plethora of banks and public houses crowded around Market Place. By the 1960s and 70s, older buildings had been incrementally replaced, for example Ribblesdale House in place of the Derby Hotel and larger commercial premises and industrial buildings had been lost, particularly in the areas to the south of The Rock.

The application site

3.8 The 1849 Ordnance Survey map shows



the site occupied at this time by The Red Lion Inn. To the rear of this appears to be a house with its entrance porch facing the churchyard. To the NE is Red Lion Yard.

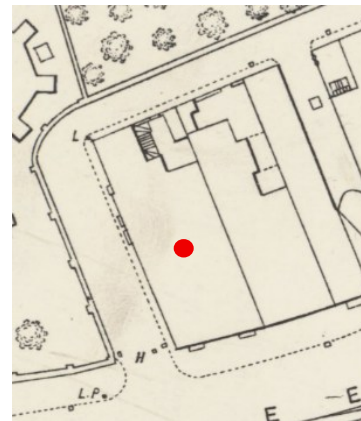
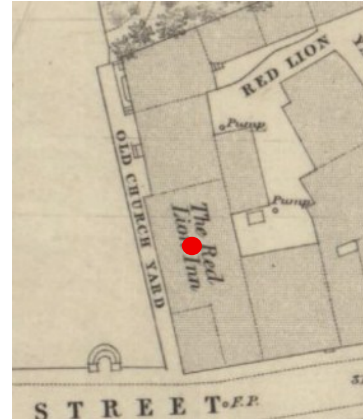
3.9 The current building was erected on the site in 1874 as Union Buildings (Figure 5). This replaced the old inn and the buildings to the north of it, filling most of the depth of the site, but with an alleyway wrapping around the site to the west and north. The building's date plaque refers to the 'Union Club Company Limited', which could have been a private dining/socialising establishment.

3.10 The 1891 Ordnance Survey map (Figure 6) shows the building with an L shaped plan, and a small courtyard and detached structure in the NE corner of the site.

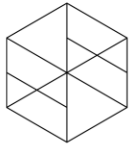
3.11 The 1910 Ordnance Survey map has the building annotated as a bank. The ground floor premises were occupied by the Lancashire and Yorkshire Bank, which amalgamated with the Bank of Liverpool and Martins to create Martins Bank Limited, who continued to occupy the site. Martins Bank merged with Barclays in 1968-69.

3.12 After the ground floor ceased to be a bank, it was used as an insurance office until 2020, after which point it became a mini-market. The upper floors have seen various uses over time, including occupation by the Clarence Club, and Fletcher & Speight printers in the early decades of the 20th century. The RAF Association club used the upper floors, followed by a dance school until the 1970s. Planning permission was granted in 2015 for a change of use of the upper floors from commercial use to residential.

3.13 The building has maintained its historic footprint through to the present day.



Figures 5-7: Extracts from the 1849, 1891 and 1971 Ordnance Survey maps showing the building at no.1 The Rock.



4 Significance of the site

4.1 The National Planning Policy Framework Annex 2 defines significance 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.”*

4.2 Historic England’s document ‘Conservation Principles – Policies and Guidance for the sustainable management of the historic environment’ (2008) identifies a series of values that can be attributed to a heritage asset and which help to appraise and define its significance. Paragraph 3.3 of the document outlines that:

“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:

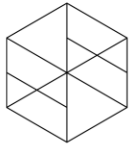
- *who values the place, and why they do so*
- *how those values relate to its fabric*
- *their relative importance*
- *whether associated objects contribute to them*
- *the contribution made by the setting and context of the place*
- *how the place compares with others sharing similar values.”*

4.3 No.1 The Rock was built in 1874 as Union Buildings. It is four storeys in height and occupies a prominent corner site, with key elevations to The Rock, and facing west towards North Back Rock and the churchyard of St Mary’s Church.

4.4 The building is neo-medieval in design with exuberant and eclectic detailing and use of materials. The lower portions of the building are red brick, with brighter red brick dressings, stone detailing and red and black contrasting brickwork courses. The elevations at 3rd floor level and to the street facing gable have mock half timbering with painted plaster infill panels.



Figures 8 & 9: The building in the late 19th century (top) and in the mid 20th century (bottom).



4.5 Due to its position in the townscape, both the front elevation to The Rock and the flank elevation to North Back Rock are of high architectural status. The front elevation is relatively narrow and three window bays wide. There is a projecting oriel window at 1st floor level with pointed and obtusely pointed heads to the windows either side. Stone hood moulds and decorative stonework add detail and embellishment. The façade is topped with a large gable, with overhanging eaves and decorative carved timber bargeboards.

4.6 The flank elevation is five window bays wide and arranged around the centrally positioned entrance leading to the upper floors. Here the door and an adjacent window are paired beneath a coat of arms and decorative stone roundel, with a projecting pitched roof with pierced timber bargeboards. There are pointed arched windows at 1st floor level, with shallow stone balconies and decorative cast iron railings. Above this are projecting oriel windows to the 2nd and 3rd floor, rising through the eaves line to terminate in a hipped roof.

4.7 The roofscape has steeply pitched slopes with gables to the north and south. There are circular chimneys to the SW corner and at the northern end of the North Back Rock elevation, and two brickwork slab chimneys to the main eastern slope. The roof is currently covered in plain red clay tiles, however historic photographs show a highly decorative zig zag pattern to the slopes, with a combination of dark and light courses. There were originally two large rooflights close to the ridge on both the eastern and western roof slopes, however these have been tiled over.

4.8 Where they survive, the windows are painted timber casements, with some areas of stained glass, for example, to some of the circular windows and to the toplights on the 3rd floor flank elevation windows.

4.9 At ground floor level there is a shopfront facing The Rock. An 1895 image of the building appears to show a low stallriser and recessed

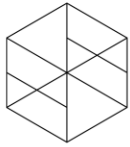
entrance into the ground floor. However, during the 20th century this has been replaced, with a new frontage, presumably to suit the longstanding use of the ground floor as a bank.

4.10 This frontage was clad in granite, with the entrance door closest to the corner of the building, with a fanlight above. Adjacent to this the granite formed a deep stallriser with three windows above. The flank elevation had two windows with corbelled brickwork cills, also lighting the ground floor unit. However, the shopfront has been heavily altered, with a modern fascia and solid metal roller shutter. The original windows and door in the shopfront have been replaced with poor quality timber versions, and the original granite surface is concealed behind modern finishes. To the flank elevation, the original windows have been replaced, with solid panels installed above the transom line.

4.11 The building has significant townscape value due to its prominent corner location and position adjacent to St Mary's Churchyard, in the heart of the historic town centre. The setback position of the church allows for longer range views towards the building from the west, although the building is screened to a degree by mature tree cover in the churchyard. The high significance front and flank facades make a strong positive contribution to the historic streetscene along The Rock, notable for their distinctive and eclectic architectural style and combination of materials.

Interior

4.12 The interior of the building has sustained a high degree of alteration over time and there are few surviving features of architectural or historic interest. These include a small number of fire surrounds, some areas of lath and plaster to partitions and some deep skirting boards with varying profiles. At 3rd floor level there is an exposed dumb waiter mechanism with a wheel, shaft and pulley. Prior to the fire, the roof trusses, with decorative brackets, were visible within the 4th floor space.



4.13 The main surviving feature within the building is its cantilevered stone staircase which rises in the centre of the plan, from an entrance hall accessed from the doors in the flank elevation. The staircase has a sinuous curved timber handrail, and open string with turned balusters.

4.14 The ground floor retail unit has historically been separated from the remainder of the building and is in use as a mini market, with modern fixtures and fittings.

Values and significance

4.15 Historic England's document 'Conservation Principles – Policies and Guidance for the sustainable management of the historic environment' (2008) identifies a series of values that can be attributed to a heritage asset and which help to appraise and define its significance. These have been examined in turn below.

Evidential and Historical Value

This value is derived from the potential of a place to yield evidence about past human activity (para 35) and is generally closely associated with archaeological sites and remains, with age being a strong indicator of evidential value.

Paragraph 39 of the Conservation Principles document outlines that *"Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative."*

The site has historical and evidential value for its contribution to the development and evolution of Bury town centre over time. It reflects the industrial prosperity of the town during the 18th and 19th centuries when many civic, commercial and entertainment buildings were constructed. It forms part of the large number of bank buildings that proliferated on and around Market Place during the 19th and 20th centuries.

Aesthetic value

Aesthetic value is defined as *"...the ways in which people draw sensory and intellectual stimulation from a place."*

The building is of high architectural and aesthetic value, with a distinctive neo-medieval design. Its facades have a high degree of detail and articulation, with the use of contrasting materials, projecting elements and stone relief panels and mouldings to add visual interest.

The facades remain largely unchanged over the upper floors, besides for some alterations to the windows and the replacement of the decorative zig zag roof tiles with plain versions.

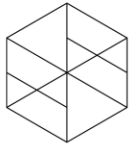
At ground floor level the shopfront and signage to the retail unit are incongruous and brash, and conceal historic fabric, detracting from the architectural character of the listed building.

The building makes a strong positive contribution to the townscape and the wider historic core, as well as the character and appearance of the Bury Town Centre Conservation Area. It has townscape value due to its prominent corner position and proximity to the adjacent St Mary's Church.

Internally the building retains little fabric of historic or architectural value, except for the main staircase and a small range of surviving features. The fire has had an inevitable impact upon fabric at 3rd and 4th floor levels, as well as to the roofscape, with extensive loss in some areas and smoke and water damage elsewhere.

Communal value

This value is derived from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience of memory. In this case, any communal value would be 'social', defined at paragraph 56 as *".....places that people perceive as a source of identity, distinctiveness, social interaction and coherence."*



The site has formed part of the local scene since it was first built in 1874 and has featured in the day-to-day lives of those who live, work and pass through the area for around 150 years. As a club, bank and dance school at various points over the years, the building has been publicly accessible, and many members of the local community will have had some personal experience of its internal spaces.

5 Assessment of the proposals

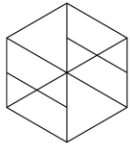
5.1 This section will set out the urgent works which have taken place to the building and will consider their impact upon the special architectural and historic interest of the listed building. The works will then be considered in relation to the relevant heritage policy framework.

Background information

5.2 A fire started in the rear 3rd floor section of the building on 23 November 2025 and spread to the 4th floor accommodation and then to the roof structure of the building. A drone inspection of the building following the fire was undertaken on 25 November 2025 and a site visit was undertaken by MJC Structural Engineers on 25th November 2025 (R1) and Marston & Grundy Consulting Engineers on 2 December 2025 (R2).

5.3 These inspections confirmed that the upper parts of the building had suffered extensive damage, which can be summarised as follows:

1. Destruction of roof timbers. Some larger sections such as the purlins survived in situ but were heavily charred and considered to be structurally unsound.
2. Structural stability of the roof overhangs, barge and soffit boards was compromised by the damage to the roof structure due to their structural connections. Front timber framed section had been displaced outwards, and its structural integrity was of significant concern.
3. The front gable wall was leaning inwards slightly.
4. Internal cross walls were in very poor condition and in danger of collapse without warning, particularly if wind speeds increased.
5. Rear left chimneystack was damaged and others were in poor condition. Stability of the chimneystacks relied upon restraint from the roof at their base, which had been compromised by damage to the structural integrity of the roof.



6. Rear right section at 4th floor level had collapsed and was considered unsafe.

7. Localised damage to the rear part of the 3rd floor where floorboards had been burnt away and supporting joists were heavily charred.

8. Fractured lintel above 3rd floor rear windows which was susceptible to collapse without warning.

5.4 Given the severity of the damage to the upper parts and roof structure of the building, the Marston & Grundy Consulting Engineers Engineer's Report (R2) concluded that *"Once the remaining roof structure has been removed the stability of the front and rear gable walls, and internal transverse purlin support walls cannot be guaranteed which represents a significant risk to life should they collapse"* and that *"As the internal transverse walls at roof level are in poor condition there is no other option but to take these down to approximately eaves level."* In addition, given concerns regarding the structural stability of the chimneystacks, the report concluded that *"Finally, due to the restraint to the chimney stacks being compromised, and due to their poor condition, we are also of the opinion that these should be dismantled down to eaves level."*

5.5 The possibility of temporary support was considered for the front and rear gables, however the professional view of Marston & Grundy Consulting Engineers was that *"As the structural stability of these gables cannot be guaranteed, even in the short term, and given the consequence of collapse would be catastrophic, we are of the opinion that the gables should also be dismantled down to approximately eaves level as well."*

5.6 The conclusion was that a scheme of urgent works should be undertaken in order to ensure that the building was safe from collapse and potential harm to the public. These works would also ensure that damaged sections of the building could be dismantled carefully and safely, without the risk of consequent damage to other

parts of the building which could occur in the event of a sudden and uncontrolled collapse.

5.7 Following the fire, a Dangerous Building Notice (DS/25/0047) was issued by Bury Council's Building Control department under Section 78 of the Building Act 1984.

5.8 A Method Statement was prepared by Acero, dated 31 December 2025 (R3). This document clearly set out the basis upon which work would be undertaken and the principles governing this, including public safety as the overriding priority, minimum intervention, retention of historic fabric wherever structurally feasible, preference for temporary stabilisation over demolition, the reversibility of works where practicable and comprehensive recording of affected historic fabric.

The works

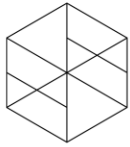
5.9 Listed Building Consent is required for the works that have been undertaken to the building. However, there is a statutory defence for emergency works under Section 9(3) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This allows them to be carried out without prior consent where they are urgently necessary in the interests of safety or health, or for the preservation of the building. Section 9(3) notes the following as a statutory defence:

(a) *that works to the building were urgently necessary in the interests of safety or health or for the preservation of the building;*

(b) *that it was not practicable to secure safety or health or, as the case may be, the preservation of the building by works of repair or works for affording temporary support or shelter;*

(c) *that the works carried out were limited to the minimum measures immediately necessary; and*

(d) *that notice in writing justifying in detail the carrying out of the works was given to the local planning authority as soon as reasonably practicable.*



5.10 The following works have been undertaken to the building, for which retrospective Listed Building Consent is now sought.

1. Removal of timber roof overhangs and bargeboards to front and rear elevations.
2. Dismantling of surviving roof structure down to eaves level, including clay tile covering.
3. Dismantling of front and rear gables, and transverse cross walls, down to eaves level.
4. Dismantling of chimneystacks down to eaves level.
5. Introduction of propping to fractured window lintel on rear elevation.
6. Introduction of propping to remainder of 4th floor in the rear left portion of the plan.
7. Introduction of propping to damaged areas of 3rd floor in rear part of plan.
8. Removal of debris from affected floors.

5.11 Marston & Grundy's report concluded at paragraph 5.4 that *"We would however point out that due to serious concerns over the structural stability, particularly of the gables, that the work should be carried out with some degree of urgency."* The report was also clear that the collapse of the front or rear gable walls, as well as the internal transverse support walls *"...represents a significant risk to life should they collapse."* The dismantling of these elements, along with the chimneystacks, was considered the best means of stabilising the building and lesser works of repair or temporary support would not have achieved this objective safely. Thus, it is clear that sections (a) and (b) of Section 9(3) have been complied with.

5.12 In accordance with section (c) the works that have been undertaken were the minimum necessary in order to ensure the safety of the general public, as well as allowing safe

access to the site for contractors to stabilise its structure and clear debris. The works have been restricted to areas of the building that were significantly damaged by the fire.

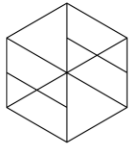
5.13 A Strategy for Re-Use of Salvaged Structural Elements (**R4**) has been prepared by Marston & Grundy Consulting Engineers in relation to salvaged roof tiles, masonry and timber elements. This outlines the conditions under which salvaged materials will be suitable and safe for reuse. Dismantling was undertaken carefully and salvaged elements were recorded, and are now stored safely off site, allowing for reconstruction and reinstatement in due course.

5.14 In accordance with section (d), notice was given to the Council in writing on 8 December 2025 (**R5**) with justification for the works. Following this, email updates on 30th December 2025, 5 January 2026 and 5 February 2026 were provided to Paul Holdaway of Bury Council detailing the scheduling and progress of works on site.

5.15 Three post-completion reports have been prepared by Marston & Grundy Consulting Engineers, dated 16 January 2026 (**R6**), 22 January 2026 (**R7**) and 30 January 2026 (**R8**). These provide details of the ongoing dismantling works, including commentary regarding the condition of historic material and fabric as it was revealed.

5.16 A report was compiled by Acero on 16 March 2026 (**R9**) providing detailed photographs, cross referenced to field reference and elevational drawings, showing work in progress on site. This has ensured that the Council remained fully informed as to the scale and scope of works undertaken on site, as well as providing a photographic record of the works.

5.17 The materials are cross referenced to the field report. I don't have images but I can try get over there when back from London on Friday and take photos. As an example, Chimney 1 labelled CH1, these are in crates labelled CH1.



Roof tiles from front west elevation are cabled RWF1, the crates labled the same.

5.17 Due to the limited access and size of the site, it has not been possible to store the salvaged material at the site. The stored materials are currently stored in secure compounds in the current locations:

Bricks tiles and crated materials are being stored at the yard of the demolition contractor.

Address: 72c moss lane, Macclesfield, SK11 7TT.

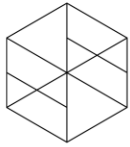
Smaller timber items

Address: Uint 6, Gourton cresent, Denton Manchester, M34 3RB.

5.18 The emergency stabilisation works are now complete on site, and a 'top hat' is being installed above the building to protect the exposed fabric from any further decay or weathering.



Figure 10 & 11: Salvaged bricks and other historic fabric have been catalogued and stored safely off site, awaiting reinstatement where possible.



The Planning (Listed Buildings and Conservation Areas) Act 1990

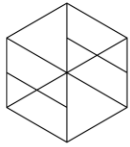
5.19 Although Listed Building Consent was not in place at the time the works were undertaken, it is clear that the provisions of section 9(3) of the 1990 Act have been complied with. All the necessary steps were undertaken to ensure that the works were restricted to the minimum necessary, and that they were urgently necessary for the preservation of public safety and the fabric of the listed building. The careful dismantling, salvage and storage of materials from the building have preserved its special interest as far as possible given the circumstances of the fire and its subsequent perilous structural condition. As such, the works also comply with section 16 of the 1990 Act.

National Planning Policy Framework 2024 (NPPF)

5.20 This Heritage Appraisal has defined the significance of the listed building, and assessed the impact of the works, in line with paragraphs 207 and 208. The fire has caused inevitable damage to the building, with some fabric beyond repair or reuse and no longer fit for purpose. However, the careful dismantling of the upper parts of the building in controlled conditions has ensured that no consequent damage has been caused to other areas of the building from the sudden collapse of elements such as the large front and rear gables, or tall chimneys. An approach of minimum intervention has been taken, and sound fabric has been retained in situ. Overall, the significance of the listed building has been conserved, as far as possible given the circumstances of the fire. Great weight has been given to the conservation of the listed building in formulating the urgent works that were necessary to secure its fabric and structural integrity, in accordance with paragraph 212.

Bury Town Council Unitary Development Plan 1997

5.21 The works are considered to comply with **Policies EN1 – Built Environment, EN2 – Conservation and Listed Buildings** and **EN2/3 – Listed Buildings**. They have protected and preserved the fabric and special interest of the listed building as far as possible, given the devastating effects of the fire upon the structural integrity of the roofscape and the upper floors of the building.



6 Conclusion

6.1 This application seeks retrospective Listed Building Consent for works that were undertaken urgently following a serious fire at the building in November 2025.

6.2 These works proceeded without Listed Building Consent in place but rely upon the provisions of Section 9(3) of the Planning (Listed Buildings and Conservation Areas) Act 1990 for justification and as a statutory defence.

6.3 This HIA has demonstrated that the works were urgently necessary in the interest of health and safety, as well as for the preservation of the building and its surviving fabric.

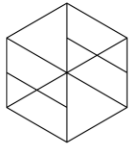
6.4 Given the extent of fire damage to the roof structure, and the effect that this had upon providing restraint to the front and rear gables, transverse walls and chimneystacks, the only safe and practicable option was to dismantle the roof and these brickwork elements down to eaves level. Temporary support would not have been sufficient as this would have needed to be removed at some point in order to remove fire damaged material, leaving these elements unsupported and in danger of catastrophic collapse.

6.5 The works have been restricted to the minimum measures immediately necessary, taking account of the degree of damage to the roof structure, the consequent impact upon masonry elements and the significant build-up of debris on the surviving lower floors of the building. Fabric, materials and features have been salvaged wherever possible and carefully and safely stored off site. This will enable the reuse and reinstatement of elements that are in a salvageable condition at a later date.

6.6 Notice was given to the Council on 8 December 2025 in writing, as required by paragraph (d) of Section 9(3). Email updates were provided to the Council during late December 2025 and January 2026, and three Post Fire Deconstruction reports were produced

in January 2026, ensuring that the Council were updated as to the scope and progress of works.

6.7 The works that have taken place preserve the special architectural and historic interest of the listed building as far as possible, given the circumstances of the fire and are thus in accordance with section 16 of the Act. They are also in accordance with the provisions of the National Planning Policy Framework 2024 and the adopted policies of the Bury Council Unitary Development Plan 1997.



Appendix A – Relevant historic environment policy

The Planning (Listed Buildings and Conservation Areas) Act 1990

A1 Section 16 requires that:

"In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

The National Planning Policy Framework 2024

A2 The revised National Planning Policy Framework 2024 (NPPF) sets out the Government's planning policies and how these are expected to be applied. There is a general presumption in favour of sustainable development within national planning policy guidance.

Paragraph 207

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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

Paragraph 208

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

Paragraph 212

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.

Bury Unitary Development Plan 1997

A3 The current Bury UDP was adopted by the Council on 29th August 1997. Relevant policy sections are cited below.

EN1 – Built Environment

The Council will seek to protect, preserve and enhance the character, appearance and amenity of the Borough's built environment.

EN2 – Conservation and Listed Buildings

The Council will seek to preserve the Borough's built heritage through the control of development, especially that affecting Conservation Areas, Listed Buildings and areas of local historical importance.

EN2/3 - Listed Buildings

The Council will actively safeguard the character and setting of Listed Buildings by not permitting works, alterations or changes of use which would have a detrimental effect on their historical or architectural character and features. Proposals for demolition will be opposed and will only be considered where it is demonstrated conclusively that the building(s) cannot be retained. In considering applications for Listed Building Consent, the Council will have regard to the following criteria: a) the impact of the proposal on the historic fabric of the building;

- *the relationship of any extension to the Listed Building in terms of its height, size, design, and roofscape;*
- *the need to protect the setting of the Listed Building;*
- *the impact of associated ancillary facilities and infrastructure works.*