

London Road Fire Station, Manchester. M1 2PH.

Heritage Statement. Part 2. Heritage Impact Assessment.



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London Road Fire Station. Heritage Statement. **Part.2** Heritage Impact Assessment.

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1. The Heritage Impact Assessment is Part 2 of the Heritage Statement.

2. This document directly references and should be read in the context of the Heritage Significance Appraisal Parts 1 and 2 of the heritage Statement *London Road Fire Station Heritage Statement: Part 1. Volume 2. Appendices.*

Executive summary.



EXECUTIVE SUMMARY. PART 2. HERITAGE IMPACT ASSESSMENT.

1. This document is the **Heritage Impact Assessment** (HIA) which forms Part 2 of the Heritage Statement commissioned by Allied London to evaluate the **revised proposals** for the conversion and reuse of the grade-II* listed, former, London Road Fire Station (LRFS) into a sustainable new use. The HIA should be reads in the context of Part 1 of the Heritage Statement which forms the Heritage Significance Appraisal.

2. The proposals essentially comprise the conversion of part of the building to a hotel, with other spaces adapted to become workspaces and are described as:

> *"Refurbishment, restoration, reconfiguration and extension of former London Road Fire Station site to create a mixed use development comprising of hotel (Use Class C1), workspace/office (Use Class B1, D1), commercial floorspace for shop and food and drink uses (Use Classes A1, A3 and A4), residential apartments (Use Class C3) and leisure uses (Class D2), together with access and highways works, servicing, rooftop plant, landscaping and associated works".*

The revised proposals amount to a reduction in **direct** and **indirect heritage impact** from the consented in the extant Planning and Listed Building Consents (MCC Planning references: 116099/FO/2017 & 116100/LO/2017).

3. The purpose of the **Heritage Statement** is to define the ***heritage significance*** of the building and its setting (**Part 1, Volumes 1 and 2**) and then evaluate the ***heritage Impact*** on the fabric, character and experience of the identified listed building and its context (**Part 2**). This impact assessment (**Part 2**) comprises an assessment of both the **direct heritage impact** *(i.e. change of use and physical impact)* and the **indirect heritage impact** *(i.e. visual change to the character and experience of its context and other heritage assets)*. However, it will be noted that the **revised proposals** would make no significant impact on the outward facing historic fabric, the conservation area or adjacent listed buildings. Therefore, this **Heritage Impact Assessment** (Part 2) is primarily focused on the **direct heritage impact** (in particular the physical change to the fabric and character of the building).

4. The structure of the document is consistent with the requirements of the NPPF 2019, paragraphs **189** and **193**, and Historic England's guidance on the form of *'Statements of Heritage Significance'* (Oct 2019). It utilises a tailored form of the ICOMOS heritage impact evaluation method, to ensure clarity and that the conclusions are evidence-based and consistent. Therefore, **Part 1**, the **Heritage Significance Appraisal**, considers the relative architectural and historic interest and the consequent sensitivity of the grade-II* listed former fire station, as the baseline to subsequently measure the impact of the proposed alteration and conversion works (**Part 2**) in this document.

5. London Road Fire Station (LRFS) was designed at the turn of the 20th century by architects Woodhouse, Willoughby and Langham, and is as an exemplar of its type. The architectural form of the LRFS has been described as *"Ebullient Edwardian Baroque, with turrets, domes, corner tourelles, and tall south-east tower with domed belfry*". It was notable for its state-of-the-art fire service facilities, as well as the variety of uses within the building complex.

6. The architectural form of the fire station complex has been widely-lauded as an exemplar of its type. The landmark building has been under-used and neglected for some 30 years resulting in extensive fabric deterioration. However, the Heritage Significance Appraisal (**Part 1** of the Heritage Statement) confirms that, despite the years of neglect, and the catalogue of alterations to the original (1906) fabric, the London Road Fire Station retains its fundamental architectural and historic interest and continues to merit its status as one of Manchester's (and the nation's) most outstanding heritage assets. The most significant parts of the fabric of the original building largely remain intact, notably characterised by the terracotta and faience elevations.

7. The detailed Heritage Significance Appraisal (Part 1, Volumes 1 & 2), enables the **direct** and **indirect heritage impact** of the revised proposals to be appropriately evaluated. The NPPF requires that, when considering the direct and indirect impact of a proposed development on the significance of identified designated heritage assets that great weight is given to their conservation. The design objective to avoid, or minimise, any unmitigated 'harm' which might diminish the special interest of the assets. The NPPF emphasises that significance derives not only from a heritage asset's physical presence, but also from its setting and contribution to the wider townscape (in this case the Whitworth Street Conservation Area). It is thus, important to consider the cumulative impact of the revised proposals on the grade-II* listed building and its context. The Heritage Impact Assessment (HIA) as **Part 2** of the Heritage Statement is presented in these terms.

8. The conclusions of the Heritage Impact Assessment (HIA) are set out in detail below and confirm that the Revised Proposals for the Grade II* London Road Fire Station will secure an appropriate and sustainable use for the building.

9. The **direct heritage impact** *(i.e. the physical works, alterations and change of use)* will include completion of the on-going, essential repairs to the significant fabric of the building which will enhance its special character, and thereby add to the overall quality and appreciation of both it and the character of the Whitworth Street Conservation Area. The proposed uses to be accommodated within the building complex would adapt to the existing plan-form and retain its significant volumes. The re-opening of the existing entrances into the building and courtyard will reconnect the building complex to its historic streetscape surroundings, while providing public access into the courtyard-activities will establish a strong sense of place and sustain an appropriate mix of uses which will secure its long-term conservation.

10. The refurbished former fire station will consequently remain as a positive contributor to the Whitworth Conservation Area and a focus of key views and vistas. The removal of extraneous clutter adjacent to the building and the on-going programme of repairs and restoration, as well as signage and lighting improvements would have a positive impact on the streetscape and character of the Conservation Area. The high-quality external decorative features will be retained and restored, and the outstanding architectural qualities of the external architectural form would be enhanced.

11. Therefore, despite some alteration to the fabric and character of the building, the overall impact of the revised proposals is considered to result in no instances of significant fabric loss or compromise, and would be appropriately balanced by the important heritage benefit of securing

a sustainable use for the grade-II* listed building. Therefore, the revised proposals would continue to meet the requirements of NPPF, **paragraphs 193** and **194** and Manchester Council's Core Strategy, specifically policies **CC 9** and **EN 3**.

12. The primary statutory requirement, as set out in the NPPF, is to preserve the significant fabric and character of the LRFS, while facilitating its future use, and has been given great weight in developing the revised proposal, with the direct and indirect heritage impacts appropriately mitigated. Therefore, as required by the NPPF paragraph 194, the public benefits of the development demonstrably outweigh any associated negative change to the overall significance of the building. In accordance with MCC's Core Strategy **Policy CC9** the new interventions within the building are revealed as being both 'necessary' to underpin the building's long term future and 'desirable' as they of high-quality in function and detail.

13. Therefore, in accordance with the NPPF and MCC's Core Strategy **Policy EN3** the revised proposals would demonstrably enhance the fabric, character and setting of the grade-II* listed London Road Fire Station, facilitating a sustainable long-term use which will make a positive contribution to the character of the Whitworth Conservation Area and bring wider pubic benefits. In these terms the proposed development meets the requirements of Planning policy and is considered to demonstrate best conservation practice.

1 INTRODUCTION

1.1 Purpose

i) This report describes and the **direct** and **indirect** heritage impact of the proposed alteration works set out in the drawings by project architects, Purcell. The document forms **Part 2** of the **Heritage Statement** and is the **Heritage Impact Assessment (HIA)** which has informed the design options and the development proposals for the London Road Fire Station.

ii) The **Heritage Statement** report as a whole is divided into two main parts comprising:

- ***Part 1 – Heritage Significance Appraisal.*** This comprises an evaluation of the importance of the site components to the character and appreciation of the building complex, as well as its sensitivity as a designated heritage asset. This is presented as a pair of stand-alone documents (Heritage Statement Part 1. Volumes 1 & 2) which include, the appendices to this report. The significance conclusions are tailored to the LRFS, so relative sensitivity comparisons are not made with the components of any other listed building.

- ***Part 2 - Heritage Impact Assessmen (HIA).*** This document evaluates the impact of Allied London's revised proposals to adapt the complex for multi-purpose uses. The document considers the proposed changes to the individual building components and evaluates the cumulative direct and indirect heritage on the significance of the complex, its setting and identified heritage assets. It concludes with an assessment of how the proposed development accords with the NPPF and local planning policy.

iii) Therefore, the purpose of this document, ***Part 2 - Heritage Impact Assessment*** is to assess the effects of the revised proposals on the cultural heritage values of the grade-II* listed building. The effects are considered as direct and indirect changes resulting from the development which may be either *adverse, beneficial* or *neutral* in terms of the architectural and historic interest of the building and its context.

iv) It is, therefore, necessary to catalogue and consider the proposed changes on its fabric and spatial characteristics. It is also important to identify the degree of a specific change (or impact) on a specific component, as this combination is what defines the overall significance of the particular impact.

1.2 Defining direct and indirect heritage impacts.

i) The definition of the potential heritage impacts is set out in **Table 1** below which presents a nine-point scale of 'direct' and 'indirect' effects. This is a tailored version of that recommended by ICOMOS in its 2011 Guidance on Heritage Impact Assessments for Cultural World Heritage properties. It is used here as a widely recognised, objective and defendable system for assessing change. The methodology also accords with the October 2019 Historic England guidance on the structure of 'Heritage Statements'.

ii) The cumulative heritage are considered as **direct** and **indirect** to help disaggregate the type and degree of change. They be: cumulative, temporary and permanent, reversible or irreversible, visual, physical, social and cultural, even economic. Each needs to be considered for its relevance to the HIA. The following defines the distinction:

- **Direct Heritage Impacts** are those that area as a primary consequence of the proposed development or change of use. They will comprise ***physical changes*** to fabric, or a change in the character or appreciation of the architectural or historic interest of the grade-II* London Road Fire Station. The degree of impact will thus depend on the relative importance of the effected component.

- **Indirect Heritage Impacts** occur as a secondary consequence of the development and comprise changes which could affect the appreciation or experience of the architectural or historic interest of the grade-II* London Road Fire Station or other identified designated heritage assets (including the Whitworth Street Conservation Area). Indirect heritage impacts are often (but not always) considered as ***visual changes*** which change the character of an identified heritage asset.

iii) This assessment of **direct** and **indirect Heritage Impact** is intended to inform the consideration of the revised proposal for the London Road Fire Station, as described in the Planning submission drawings prepared by project architects, Purcell. The aim is to demonstrate the cumulative heritage impact of the proposed multi-purpose redevelopment. In accordance with the NPPF the following Heritage Impact Assessment (HIA) considers the direct (or physical) and indirect (or visual) heritage impact which would result from the proposals. It evaluates the potential heritage impact of the revised development proposals on the grade-II* listed former fire station and its context as described above.

iv) The conclusions of the heritage impact assessment (HIA) are intended to identify the cumulative impact of the proposed development on the significant components of the historic environment. The key purpose is to consider whether the revised development proposals would deliver a sustainable development which avoids any unmitigated 'harm' to the London Road Fire Station and any other identified designated heritage assets.

v) The evaluation of impact is measured against the relative significance of the components of the fire station complex, as described in the Heritage Significance Appraisal, Part 1, Volumes 1 & 2, to which direct cross-reference should be made.

vi) The NPPF also makes it clear that significance derives not only from a heritage asset's inherent and tangible architectural and historic interest, but also from the less tangible contribution and sensitivity of its 'setting'. However, given that the revised proposed works are almost entirely internal or enclosed by the building's volume, the issue of the indirect impact on the character and appearance of the conservation area is lesser importance than the impact on the integrity of the building's fabric. This is especially true given the national significance of the building and its status as a heritage asset of **high heritage significance.**

vii) The question as to whether proposed direct heritage impact resulting from the physical works and change in use could cause definable or unmitigated, permanent harm to the heritage significance of the building is a Planning judgment having regard to the circumstances of the case. However, it is essential to note that **Change in itself does not equate to harm**, and may be positive. This is particularly true in the case of the grade-II* former London Road Fire Station where the existing site and its context have been previously compromised, and adaptions are both desirable and necessary to secure a sustainable new use.

1.3 Measuring change by defining direct and indirect heritage impacts.

i) Measuring the heritage impacts resulting from the proposed development is essentially an **evaluation of change** to the: fabric, character, or appearance of the identified heritage assets, balanced against their relative significance. The **Heritage Impact Assessment** (HIA) considers the proposed changes or alterations to the fabric, character and setting of the site components in terms of an adverse, neutral or beneficial impact *(see **Table 1** below for term definitions).*

ii) The defined direct and indirect heritage impacts on the site's significance are informed by the predicted long-term consequences of the proposals. It is the assessment of the cumulative impact of the development that indicates the over-all heritage impact. The direct and indirect impacts are outlined below in **Table 1**. These definitions are also used to express the resultant ***effect and degree of heritage impact*** (both direct and indirect on the significance of the former fire station and its context.

iii) The definitions are used throughout this Heritage Impact Assessment to ensure objectivity, consistency and clarity. They are derived from the **ICOMOS** (2011) guidance on *'Heritage Impact Assessments'* (Section 5-8, page 9) and uses its recommended nine-point scale, with 'neutral' at its centre.

iv) The Heritage Impact Assessment directly references the fabric and spatial components described in the Heritage Significance Appraisal (Part 1, Volume 1 & 2).

Table 1. Criteria for defining the effect and degree of direct and indirect heritage impact resulting from the redevelopment of London Road Fire Station, Manchester.

Magnitude	**Direct heritage impacts.** ***(physical alteration, change of use or experience of the principal building).***	**Indirect heritage Impacts** ***(change to the site's setting or visual impact on the wider historic environment).***
Major adverse Impact. *Substantial harm of this nature, which fundamentally affects the significance of defined heritage assets, should normally be avoided.*	Development resulting in demolition of a significant historic fabric component, or fundamental compromise of the setting of the designated heritage asset.	Substantially harmful change to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. Where the development severely erodes the heritage values of the identified heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
Moderate Adverse Impact. *Such **less-than-substantial harm** will need to be demonstrably mitigated, and*	Development resulting in extensive harmful alterations (but not total demolition) of the designated heritage asset or its setting.	Less than substantial harm to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. Where the development erodes to a clearly discernible extent the heritage values of the heritage

justified by clear public benefits.		assets in the view, or the view as a whole, or the ability to appreciate those values.
Minor Adverse Impact. *The negative impact will need to be balanced by appropriate mitigation.*	Development resulting in alterations to a designated heritage asset which result in minor compromise of its fabric or erosion of its character.	Minor compromise to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. Where the development erodes to a minor extent the heritage values of the assets in the view, or the view as a whole, or the ability to appreciate those values.
Negligible adverse impact. *This does not mean that there will be no physical or visual change. Rather that the resultant effect would* ***not diminish*** *the value of the heritage assets' significant physical fabric, their settings or significance to any appreciable degree.*	Development resulting in negligible direct impact on a designated heritage asset which results in the removal of a minor, original fabric component, but avoids diminishing its character and its special architectural or historic interest.	Negligible perceptible change to the character of a designated heritage asset, or the experience and understanding of its special interest. The degree of change would alter, but not diminish, the intrinsic values of the identified heritage assets, or the experience and appreciation of the buildings or the designated area to any appreciable degree.
Neutral Impact. *This does not necessarily mean that there will be no physical or visual change, rather that the resultant difference will be* ***imperceptible*** *or* ***appropriately balanced.***	Development which comprises a neutral physical impact resulting in no apparent change, or achieved by removing a component of no heritage value which detracts from the special interest of the building fabric.	Negligible perceptible change to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. A neutral impact occurs when the development does not affect the values of the heritage assets in the view, the townscape as a whole, or the ability to appreciate its significance.
Negligible beneficial impact. *The resultant difference will be imperceptible but have a positive impact on the understanding or appreciation of the heritage asset.*	Development resulting in a negligible beneficial direct impact on a designated heritage asset which results in the removal of a minor non-original fabric component which is detracts from the character and its special architectural or historic interest.	Negligible perceptible change to the character of a designated heritage asset, or the experience and understanding of its special interest. The degree of change would imperceptibly enhance the intrinsic values of the identified heritage assets, or the experience and appreciation of the buildings or the designated area.

Minor Beneficial Impact.	Development resulting in alterations to a built heritage asset which deliver a minor beneficial physical impact or enhancement of the site's special interest.	Minor enhancement to the fabric and character of a designated heritage asset, or the setting of the identified designated heritage assets. Where the development enhances to a minor extent the values of the heritage assets in the view, the view as a whole, or the ability to appreciate its significance.
Moderate Beneficial Impact.	Development resulting in alterations to a built heritage asset resulting in moderate beneficial physical impact, or an enhancement of the site's character.	Evident improvement of the fabric and character of a designated heritage asset (or the setting of the identified designated heritage assets) resulting in an enhancement of its cultural heritage values. Moderate enhancement to the setting of the built heritage asset. Where the development will enhance to a clearly discernible extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate its significance.
Major beneficial Impact.	Development resulting in restoration or alterations to a designated heritage asset which comprises substantial restoration of its fabric and historic character and an enhancement of its cultural heritage values.	Substantial improvement of the fabric and character of a designated heritage asset (or the setting of the identified designated heritage assets) resulting in a significant enhancement of its cultural heritage values. Substantial restoration or enhancement of the setting of the built heritage asset where the development will enhance to a fundamental extent the heritage values of the heritage assets in the view, the view as a whole, or the ability to appreciate its significance.

v) The NPPF requires that, when considering the impact of a proposed development on the significance of a designated heritage asset, **great weight** is given to its conservation in order to avoid any definable 'harm' which might diminish the significance of the asset (**paragraph 193**).

vi) The below assessment of the **direct** and **indirect heritage impact** is thus focused on the degree and nature of the proposed development's impact (both physical and visual). In this case the heritage impact is primarily on the appreciation and experience of the architectural and historic interest of the grade-II* former fire station complex and the setting of the adjacent listed buildings and the character and appearance of the conservation area.

vii) The HIA is made with direct reference should be made to the project architects' drawings, prepared by **Purcell,** dated 03/12/2019, numbered as follows:

- Accommodation Schedule. Drg. no.: 240242-PUR-FS-ZZ-DR-A-7001
- Proposed Basement Plan. Drg. no.: 240242-PUR-FS-BI-DR-A-2002
- PROPOSED Ground floor Plan. Drg. no.: 240242-PUR-FS-00-DR-A-2003
- PROPOSED First floor Plan. Drg. no.: 240242-PUR-FS-01-DR-A-2004
- PROPOSED Second floor Plan. Drg. no.: 240242-PUR-FS-02-DR-A-2005
- PROPOSED Third floor Plan. Drg. no.: 240242-PUR-FS-03-DR-A-2006

2. HERITAGE IMPACT ASSESSMENT OVERVIEW.

2.1 Proportionate changes to secure a sustainable new use.

i) The revised development proposals have been designed in accordance with the principles of Historic England's 2016 guidance on '*Making Changes to Heritage Assets'* and the requirements of the legislation and NPPF.

ii) The London Road Fire Station (LRFS) has been largely unoccupied since the mid-1980s when the Fire Service moved out and the building was subsequently used for bulk-storage. It became vulnerable to deterioration due to inadequate maintenance and suffered from water ingress, vandalism and theft of significant features, including fire-place surrounds. A comprehensive programme of external fabric repairs has recently been initiated, in accordance with the most recent Planning and Listed Building consents which were designed to secure an ambitious new use. The on-going works aim to arrest the building's decay and ensure that it is 'wind and weathertight' However, building remains in very poor condition as an accumulation of some 30 years of neglect.

iii) Allied London recognised the heritage significance of the LRFS, and its potential of the LRFS to be returned to a multi-purpose use, when it acquired the complex in 2015. To date works have focused on understanding and addressing the fundamental structural repairs, as the basis to facilitate the future new use. Planning Permission and Listed Building Consent was secured for an ambitious new use in 2017 and remain extant (MCC Planning references: 116099/FO/2017 & 116100/LO/2017). However, after a review of the cumulative impact of the consented scheme, revised proposals have been devised to secure a sustainable new use, maintaining the functional flexibility and vitality of the consented 2017 scheme, but with a much reduced direct heritage impact.

iv) The business case for the revised proposals are fundamentally similar to the 2017 consented development and include a mix of uses to underpin its viability. These including a boutique hotel, restaurants, leisure facilities, residential and workspaces.

v) The current revised proposals would thus retain the comprehensive restoration and refurbishment of the grade-II* listed building would have substantially less direct impact on its fabric and character that the consented scheme. Clearly both development approaches remain appropriate in principle, but the revised proposals are arguably more sensitive and thereby beneficial to securing the sustainable reuse of the LRFS as a major city landmark.

2.2 Policy context for the HIA.

i) The former London Road Fire Station (LRFS) is listed grade-II* and therefore of national significance as a designated heritage asset. It is also a positive contributor to the Whitworth Street Conservation Area. The **Heritage Significance Appraisal** is set out **Part 1, Volumes 1 & 2** of the **Heritage Statement** this includes a summary of relevant national and local planning policies which frame the Heritage Impact Assessment. The key planning policy documents for the LRFS are the National Planning Policy Framework (NPPF), the Planning (Listed Building and Conservation Areas Act) 1990, Manchester's Core Strategy and the Whitworth Street Conservation Area Guidance.

ii) The NPPF policies for conserving and enhancing our heritage assets confirm that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance and sets out the parameters for development that could impact on them. Therefore, development proposals should take into account the following essential principles:

- The desirability of sustaining and enhancing the significance of heritage assets.
- The social, cultural, economic and environmental benefits that conservation of the historic environment can bring.
- The positive contribution that new development can bring to local character and distinctiveness.
- The contribution made by the historic environment to the character of a place.
- Proposals should identify and assess the particular significance of the heritage assets affected, including their setting.

iii) The above have informed both the design-development of the revised proposals and the evaluation of the direct and indirect heritage impacts. It is understood that the key objective is to ideally avoid, but at least minimise, conflict between the heritage asset's conservation and any aspect of the proposal. This is because when considering the impact of a proposed development on the significance of a heritage asset, the NPPF requires that *"great weight"* is given to its conservation. The significance of a grade-II* listed building can be harmed (or lost) through alteration or development within its setting, and as such heritage assets are irreplaceable, any harm or loss should be exceptional and require clear and convincing justification. The revised proposals have been developed in this policy context.

iv) Thus, the revised development proposals aim to avoid any unmitigated harm to the significance of the LRFS as a designated heritage asset and secure demonstrable public benefits which will outweigh any adverse direct or indirect heritage impacts, and secure a sustainable new use.

2.3 General development-design approach.

i) The London Road Fire Station (LRFS) was designed to be a multi-purpose and flexibly planned building complex, comprising both outward-facing uses (such as the Bank and Coroner's Court) and more insular uses for the fire service and its enclosed community. The revised proposals seek to maintain this multi-purpose character and recapture the former vitality of the complex by reusing each part of the historic building within the revised proposals.

ii) The NPPF requires that the significance of the heritage asset must be put at the heart of the design proposals and any adverse impacts on it mitigated to ensure that the heritage benefits outweigh any harm caused. The revised proposals, therefore, seek to deliver the following basic outputs which are described in Part 1 of the heritage Statement.

- Repair the LRFS's significant historic fabric, to address its decay and prevent future deterioration.
- Secure the functional viability of the building.
- Create a vibrant destination within Manchester.
- Increase public access into and use of the building.
- Retain and express the historic character and architectural interest of the building as far a possible, recognising its significance (as defined in Part 1 of the Heritage Statement).
- Retain and reveal significant original spaces and volumes and the legibility of the courtyard based plan-form.
- Remove the building from the 'heritage at risk' register by delivering the fabric repairs and securing a viable new use.
- Enhance the experience of the building as a component of the Whitworth Street Conservation Area.
- Remove previous harmful piecemeal changes and alterations or additions which are identified as having an adverse impact on the building's character.
- Focus interventions within areas of lesser significance where feasible.

iii) The reuse of the LRFS inevitably necessitates some fabric changes to meet modern requirements of accessibility, health and safety, as well as such as enhanced environmental conditions and comfort for future occupants. Consequently, understanding the significance of the fabric has been the essential precursor to design decisions, to ensure that changes are appropriate and proportionate and do not irrevocably damages the building's special interest.

iv) The design-development approach thus reflects the fundamental Historic England guidance that: *"change is only harmful if (and to the extent that) significance is eroded"* (Conservation Principles. 2008). The challenge for the Design Team when considering the revised proposals has thus, been to continue to ensure that the impact of any changes are both understood and mitigated in order to protect the significance of the existing building and its setting

v) To facilitate the comprehensive understanding of the LRFS's fabric significance Allied London has initiated a series of detailed condition surveys and structural investigations which, together with the Heritage Statement, **Part 1, Heritage Significance Appraisal** (Volumes 1 & 2), have enable the revised proposals to be both deliverable and based on best conservation practice. These documents have been referred to through the design process, in order to avoid or minimise any adverse impacts of the design and to ensure that the heritage benefits of the revised proposals are demonstrably balanced by clear heritage and public benefits.

2.4 The revised proposals.

i) The revised proposals essentially comprise the conversion of part of the building to a hotel, with other spaces adapted to become workspaces and are summarised as:

"Refurbishment, restoration, reconfiguration and extension of former London Road Fire Station site to create a mixed use development comprising of hotel (Use Class C1), workspace/office (Use Class B1, D1), commercial floorspace for shop and food and drink uses (Use Classes A1, A3 and A4), residential apartments (Use Class C3) and spa (Use Class D2), together with access and highways works, servicing, rooftop plant, landscaping and associated works".

ii) It will be evident that the revised proposals amount to a clear reduction in direct and indirect heritage impact from the extant Planning and Listed Building Consents (MCC Planning references: 116099/FO/2017 & 116100/LO/2017). The revised scheme continues to provide a series of leisure uses including: a hotel, restaurants, bars, as well as workspaces, plant rooms and residential units. The revised proposals no longer include the excavation of the courtyard as a new basement, service/activity area, as was included in the 2017 consented scheme, nor does it include the erection of a the consented single- storey pavilion within the courtyard.

iii) The streetscape setting of the building will be improved and the courtyard's non-original and compromised surface will be restored as a coherent 'carpet' of tiles, better expressing the original character of the space. The courtyard will become the focus for public access and rejuvenated as a space by the removal of extraneous clutter to enable a series of 'pop-up' uses to be held in the space.

iv) The on-going, extensive programme of essential repairs will enhance the building's fabric and protect it from further decay.

v) The distribution of activities across the site responds to the historic plan-form, which is expressed in the accommodation of the various uses. All of the most significant spaces within the building, such as the: former laundry, engine room, Gas Testing Room, gymnasium, and Coroner's Court are retained and all the existing entrances around the building are reinstated to accommodate the uses. Services are accommodated within the existing building fabric without significant compromise to the existing building.

vi) The courtyard is the heart of the fire station and will continue to provide access to the proposed Food and Beverage (F&B) facilities at ground-floor level.

vii) At the upper-levels the existing walkways are retained as the primary circulation routes to access the hotel and workspaces. However, structural analysis has shown that the walkways are failing and require significant repairs to ensure their long-term re-use. They will remain as open-access decks to the workspaces. The hotel use fronting London Road precludes this, due to the courtyard extension, but it will retain the walkways within the hotel, as an internal corridor.

viii) The major intervention, therefore, remains the extension at the east-end of the courtyard (rear of the London Road frontage) which is required to provide sufficient hotel rooms to support the operator requirements. This largely remains as consented in 2017, although its impact is also reduced in terms of the extent of roof-top access. The hotel extension provides an important area for necessary roof-top plant, enabling less intervention in the existing roof space. The revised proposal maintains the form of the previously consented extension, by allowing retention of the existing circulation route and façade

ix) The structural and other engineering solutions required to support the above proposals have been simplified and carefully designed to minimise any adverse interventions resulting from acoustic and ventilation requirements. The mechanical, electrical, structural, fire safety and acoustic designs are an integrated part of the scheme and co-ordinated within the revised proposals (as per the previously consented scheme) to minimise their impact on building fabric, room layouts and ceiling heights. They are detailed as part of this application

x) In summary, the concept of the revised proposals continue to demonstrate a sustainable, mixed-use scheme for the LRFS, although with considerably less intervention in the complex. The proposals continue the on-going repair programme, which is currently delivering the restoration of the building's envelope features such as its windows, doors, roofs and the terracotta facades. The changes proposed are those required to accommodate the new uses and respond to the character and original design flexibility of the building complex, primarily focusing on changes to internal areas of lesser significance. The new additions are designed to be read as high-quality interventions, which remain deferential to the character of the existing building.

xi) The details of the direct and indirect heritage impacts are considered below (Section 3), defined in terms of those set out in **Table 1** above. Reference should be made to the Purcell.

3. HERITAGE IMPACT ASSESSMENT.

3.1 General plan-from and structure (see also Pt.1, para.6.2). Major beneficial impact.

i) The general plan-form of the London Road Fire Station reflected several typical requirements in fire station design briefs, refined through the experience of Superintendent Parker and is considered to be of considerable significance as an altered but character-defining spatial component of the building.

ii) In accordance with the previous consent and in order to minimise the direct heritage impact the proposed new uses are designed to be accommodated within the historic plan-form wherever possible. The key spaces will retain their individual identities and the potential for independent operations while providing complementary services/uses and remaining distinctly a component of the former fire station complex.



Figure 1. Extract from Proposed Ground Floor Plan. Drg. No. 240242-PUR-FS-00-DR-A-2003 Purcell (03.12.19), showing the proposed accommodation arranged to address the general plan-form and structure.

iii) It will be noted for example that the proposed hotel use is largely confined to the London Road block, but retains the Coroner's Court as an independent performance/activity space (see also

below). The former Police station also is maintained as a self-contained unit at ground and basement levels to accommodate a Gym and health centre. Similarly, the former Fire Engine Room becomes an open-plan space capable of accommodating a restaurant (as per the previous consent). The former residential and social spaces on the upper-floors broadly remain compartmentalised and retain their plan form but area adapted to become workspaces, thereby limiting the extent of further adaptions for services.

iv) Consequently, the revised proposal would facilitate the comprehensive re-use of the spatial plan of the former fire station complex, as well as the existing perimeter entrances. The effect will be to rejuvenate each frontage as well as fully utilise the plan-form of the building and the significant volumes which it contains.

v) The revised proposals will avoid the loss of any structural walls. It will be noted that the internal plan was designed to be relatively flexible and has been adapted throughout the life of the building. Consequently, where there are functional or operational requirements to remove or add partition walls (notably in the provision of the hotel rooms and workspaces) the focus for the proposed change is on the interior spaces of lesser significance.

vi) The revised proposals retain the existing extent of the basement as the focus for services. The most significant spaces (the Coroner's Court and the former Gas-meter Testing Room) are maintained as relatively unaltered spaces.

vii) The significance of the plan-form and structure is discussed in the Heritage Significance Appraisal **Part 1, Volume 1, Section 6.2.** Overall the **direct heritage impact** of the development on the plan-form is considered to be **major beneficial,** as the development would result in the restoration of the use of redundant spaces for appropriate and complementary activities. The necessary alterations to the fabric will be modest and impact on fabric components of lower significance. It will be clear that there will no loss of significant architectural or historic fabric. Therefore, the physical impact of the alterations would be more that outweighed by the benefits of securing a viable new use.

viii) The **indirect heritage impact** resulting from the reuse of the plan-form will include the re-introduction of activities to the building complex which would be **moderately beneficial** as the rejuvenation of the building and its re-engagement with the four street-frontages would enhance the vitality of the streetscape within the conservation area. The development would thus enhance to a discernible extent the coherence and wider heritage values of a key component of the designated townscape and thus its character and cultural heritage values.

ix) The **cumulative heritage impact** of the revised proposals resulting from the development on the general plan-form and structure is thus considered to be to be **major beneficial**.

3.2 The external elevations (see also Pt 1, para.6.3 (a-d). Moderate beneficial impact.

i) The external elevations are fundamental to the appreciation of London Road Fire Station, both as a highly-graded heritage asset and as a component of the Whitworth Street Conservation Area. The elevations define the building's character as is an*, "exuberant example of Edwardian Baroque"* and express the arranged around a trapezoidal plan which creates four external elevations.

ii) Overall there are no significant material changes proposed to the external elevations, other than the minor alterations outlined below. These should be considered in the context of the need for necessary adaption to accommodate the new use, the condition of the building's fabric and the on-going programme of repairs.

iii) The minor alterations accommodate the hotel entrance from the courtyard which involves removal of 2no. window and the central masonry section on the courtyard elevation (discussed below). The outward facing alterations comprise a new door into the currently blocked, former-vehicle service entrance on Whitworth Street, which will result in a minimal change and no loss of historic fabric or damage to the terracotta.

iv) The proposed alterations will simply reinstate the entrance and will thus have a **minor beneficial direct heritage impact**. alter the doors here will be some steps up to the floor level from the courtyard and an inner glazed lobby.



Figure 2. The location of the new hotel entrance on Whitworth Street. Minor beneficial direct heritage impact.

v) The minor alterations to the external elevations will also alter the use of the former Chief Fire Officer's garage facing on Minshull Street to accommodate the require electricity sub-station. This will necessitate installation of a replacement door (currently a sliding door). The original sliding-doors will be retained on site. So, the direct heritage impact will be **negligible adverse** as the change will avoid diminishing the character of the building.



Figure 3. The replacement door. Negligible adverse impact.

vi) The physical alterations to the Minshull Street elevation will include the adaption of the existing ground-floor window (which illuminates the former Chief Officer's garage) to create a new entrance for a bin store with a level threshold. The **direct heritage impact** will be **minor adverse**, as the new access will require cutting through the terracotta cills and elevation and thus a minor compromise of the elevation, although on the least prominent elevation.



Figure 4. The location of the new door opening on Minshull Street. Minor adverse impact.

vii) The minor changes to the elevations are balanced by an extensive programme of repairs is on-going which will restore the terracotta cladding and tiles as well as the cast-iron rainwater goods, windows and doors. These repairs works are described in the 'Condition Survey and Fabric & Repair' (April 2017) complied by OBI on behalf of Allied London Fire Station Limited. The on-going restoration works will include the repair and replacement of the paving lights. The on-going repair works will, therefore, have a **major beneficial direct heritage impact.**

viii) In addition, the new signage and lighting schemes are designed to enhance the architectural character of the building. Original lighting positions will be reinstated where evidence exists. Pavements adjacent to the building will be resurfaced and street clutter removed to improve the setting of the building. The streetscape views of the building have been protected by minimising changes to the exterior from the surrounding streets, including the high-level views from Piccadilly Station.

ix) The proposals will thus have an almost imperceptible impact on the expression of architecturally striking exterior, which will remain impressive due to its sheer scale, and the level of craftsmanship on the main street elevations.

x) The significance of the main external elevations are discussed in the Heritage Significance Appraisal Part 1, Volume 1, Section 6.3 a,b,c,& d. Overall the **direct heritage impact** of the development on the elevations is considered to be **negligible adverse**, as the development would result in some minor physical change to which will alter but not diminish the special interest of the architectural composition or the obscure the historic character of the streetscape elevations. The necessary alterations to the fabric will be minor and impact on the least prominent elevation (Minshull Street). Therefore, the physical impact of the alterations would be more that outweighed by the benefits of securing a viable new use.

xi) The **indirect heritage impact** resulting from the adapted entrances and the consequent re-introduction of activities to the building complex, would be **moderately beneficial** as they would facilitate the rejuvenation of the building and thus enhance the vitality of the streetscape within the Whitworth Street Conservation Area. The development would thus, enhance to a discernible extent the coherence and wider heritage values of a key component of the designated townscape and thus its character and cultural heritage values.



Figure 5. London Road elevation (Sept.2016) will remain the character-defining frontage for the LRFS and will be restored.

xii) The **cumulative heritage impact** of the revised proposals resulting from the minor alterations to the external elevations when balanced against the extensive repair and restoration programme is thus considered to be to be **moderately beneficial.** The proposed works will enhance to a clearly discernible extent the heritage values of the building and its contribution to the streetscape.

3.3 The Courtyard elevations (see also Pt.1 para.6.4). Negligible beneficial impact.

i) The courtyard elevations are of considerable significance despite being of utilitarian form, and repetitive with limited decorative than detailing in comparison to the exterior elevations. The key features are the main cast-iron stairs and the cantilevered concrete balconies with wrought-iron railings.

ii) The courtyard elevations are proposed to be changed as part of the revised development proposals, although the scope and extent of alterations will be reduced from those previously consented in 2017. The structural condition of the balconies (which partly results from the design-flaw of an inward sloping and draining deck) will be addressed as part of the over-all repair programme but may require some additional support.

iii) Where associated with the hotel some areas of the balconies are enclosed to maintain covered circulation to all hotel rooms. The enclosures are carefully detailed to minimise the visual impact on the elevations. There would be no impact on the exterior elevations.

iv) The revised proposals will maintain the scale, form and design of the previously consented courtyard extension which is necessary to provide sufficient accommodation associated with the hotel core and ensure a suitable size (allowing larger, non-standard sized rooms to be maintained within the existing building. This extension is located adjacent to the elevation to the London Road wing to maintain the long views to the Practice Tower across the courtyard and avoid any impact on the exterior elevations.

v) Some minor new openings are required to facilitate the use of the building and the connection to the courtyard. However, such interventions are minimised and where they are required they are located in areas of lower significance.

vi) The significance of the Courtyard elevations is discussed in the Heritage Significance Appraisal Part 1, Volume 1, Section 6.4.



Figure 6. Minor alteration to change a window to create a new, accessible opening.

vii) The **direct heritage impact** of the development on the Courtyard elevations is considered to be **minor adverse**, as the development would result in some minor, physical change which will alter the elevations to facilitate access. The alterations would not diminish the functional aesthetic of the elevations, or the character of the space. The necessary alterations to the fabric will be minor and impact the internal face below the balconies. To provide an enhanced connection to the space.

viii) Therefore, the minor physical impact of the alterations would be more than outweighed by the benefits of securing a viable new use.

ix) There would be **no indirect heritage impact** resulting from the minor alterations to the Courtyard elevations.

x) The **cumulative heritage impact** of the revised proposals resulting from the minor alterations to the Courtyard elevations, when balanced against the extensive repair and restoration programme is thus considered to be to be **negligible beneficial.** The proposed works will enhance the use of the building and the connections to the space and, therefore the heritage values of the building.

3.4 The Courtyard (see also Part.1, para 6.5). Minor beneficial impact.

i) The Courtyard is a high significance space, which was fundamental to the operational use of the complex. The pavement of the courtyard has been compromised by the loss of the original 'carpet' of tiles and is currently laid with a replacement textured, red-brick tile, with sections of concrete and asphalt.

ii) The revised proposals will result in the re-instatement of the use of the existing entrances into the enclosed space as well as the replacement of existing, non-original red-brick tiles with an appropriate 'carpet' of high-quality setts which better reflect the original pattern of the original courtyard's material.

iii) The hotel extension would project into the courtyard but is located to minimise its scale, mass and is carefully integrated into the rear of the London Road frontage. The scale, rhythm and materials of the extension are designed to be sympathetic and subordinate to the existing elevations.

iv) The courtyard space would remain open, to offer flexible uses as originally intended. The use would be facilitated by the erection of a light-weight glazed canopy around the edge to enable all weather use. The detailed design of the canopy would complement the delicacy of the balustrades to the balconies without any significant physical impact.

v) The **direct heritage impact** of the revised proposals on the structure and character of the Courtyard elevations is considered to be **minor beneficial**, as they would result in some minor, physical change which will alter the elevations but are reversible and would considerably enhance the use and accessibility of the space. The alterations would complement the functional aesthetic of the elevations and the character of the space. The necessary alterations to the fabric will be minor, reversible and impact on the internal face below the restored balconies. Therefore, the minor physical impact of the alterations would be more than outweighed by the benefits of securing a viable new use.

vi) There would be **no indirect heritage impact** resulting from the minor alterations to the Courtyard elevations.

vii) The **cumulative heritage impact** of the revised proposals impacting on the Courtyard, when balanced against the resurfacing and re-use is thus considered to be to be **minor beneficial,** as the works will deliver an enhancement of its function and special interest, facilitating the use of the building.

3.5 The Towers (see also Pt.1 para. 6.6). Major beneficial impact.

i) The highly-prominent Practice Tower (facing Minshull Street) and the Hose Tower (on Fairfield Street) are of great aesthetic and functional importance to the former fire station and thus of high significance. They make a character-defining contribution to the architectural character of the building.

ii) The proposal will secure the fabric of the towers and secure their future as components of the restored complex.

iii) The direct and indirect heritage impact on the towers will thus be major beneficial.

iv) Consequently, the **cumulative heritage impact** of the revised proposals will deliver both a restoration of the fabric and an enhancement of its aesthetic interest, expressing the successful re-use of the building and will thus have a **major beneficial heritage impact**.

3.6 Carving and Sculpture (see also Pt.1 para 6.7). Major beneficial impact.

i) A particularly notable design component of high significance is the London Road Fire Station's sculptural work by local artist, John Jarvis Millson.

ii) The carving and sculpture is all to be retained and enhanced by appropriate repair (where required) and cleaning. A detailed survey was undertaken in 2017 which defines the schedule of repairs to prevent deterioration and address areas of soiling that disfigure the sculptures.



Figure 7. One of the external sculptural features to be restored.

v) The direct and indirect heritage impact on the external facing terracotta sculptures and detailing will thus be major beneficial.

vi) Consequently, the **cumulative heritage impact** of the revised proposals will both restore these important fabric components and enhance the building's aesthetic interest and will thus have a **major beneficial heritage impact**.

3.7 Metalwork (see also Pt. 1 para. 6.8). Major beneficial impact.

i) The exterior metalwork in the London Road Fire Station is of considerable significance and consists of the cast-iron decorative balcony railings, canopies and exterior stairs with railings. The cast-iron metal work will be overhauled and repaired as the balconies are secured and brought back into use. Investigation have confirmed the extent of damage and the potential for restoration of the metal which will be carefully conserved in accordance with the previously approved conservation strategy for the building.

ii) Research suggests that the original metal work was a green colour. The colour is not considered to be of particular significance and, therefore, after colour studies it is proposed to redecorate the metal work in black paint.

iii) The direct heritage impact on the metal-work will thus be major beneficial. There will be a negligible indirect heritage impact as the majority of the metalwork is located within the courtyard, although the restored external rainwater woods will contribute to the enhancement of the streetscape.

iv) Consequently, the **cumulative heritage impact** of the revised proposals will both restore these important fabric components and enhance the building's aesthetic interest and will thus have a **major beneficial heritage impact**.

3.8 The Roof (see also Pt.1 para 6.9). Major beneficial impact.

i) The roof of the LRFS is highly prominent in the streetscape and is afforded key views from the surrounding buildings including Piccadilly Station. The vertical features on the roof, such as the tall chimney stacks, dormers, and corner turrets make a substantial contribution to the character of the building and the conservation area and are considered to be individually of high significance. The original roof-scape of the building remains largely unaltered. A new dormer provides access from the roof extension into the London Road roof space - this is not visible from the street or the courtyard.

ii) The revised proposals will facilitate a comprehensive programme of repairs to the roof while avoiding any new additions (such as the previously approved roof-top terrace, reducing the required plant enclosure. Service penetrations through the roofs are minimised.

iii) The direct heritage impact on the roofscape will thus be major beneficial. There will be a negligible indirect heritage impact as the external facing slopes will be simply repaired.

iv) Consequently, the **cumulative heritage impact** of the revised proposals will restore the function and aesthetic interest of the roof structure and thus have a **major beneficial heritage impact**.

3.9 The interior & multi-functional use (see Pt.1 para 6.10). Major beneficial impact

i) The London Road Fire Station was designed to be multi-functional and was originally divided into private, semi-private and public areas which remains a fundamental component of its character. The revised proposals will retain and reinforce this key characteristic by facilitating a rage of complementary uses which will revitalise the complex. The proposed uses have been designed to adapt to the constraints of the spaces and will serve to maintain the building's diverse character and value to the wider community.

ii) The direct heritage impact will thus be major beneficial as the building is comprehensively brought back into use, while any unmitigated change to the spatial characteristics. The indirect heritage impact will also be beneficial as variety of uses will animate each elevation of the island-site, as well as the exterior elevation and entrances.

iii) Consequently, the **cumulative heritage impact** of the revised proposals will restore the function and aesthetic interest of the building and street-elevations and thus have a **major beneficial heritage impact**.

3.10 The Fire Engine house (see Pt. 1 para. 6.11). Major beneficial impact.

i) The Engine House stretches for 7 bays along most of Fairfield Street and was the functional heart of the fire station and makes a major contribution to the streetscape.

ii) The revised proposals will bring this key space back into use and will restore the architectural details and materiality of the original space, to create a self-contained commercial unit. The commercial unit will be accessed from both the existing entrances on Fairfield Street, and the courtyard. The volume, of high significance, remains intact. However, the revised proposals will have a significantly reduced physical impact on the fabric of the space as the previously consented connection to the basement is no longer required and the intention is to avoid any sub-division of the space to maintain the expression its volume. .

iii) Existing ventilation and light will be maintained. high level window openings on the courtyard elevation. These will connect to the ducting used to ventilate the Engine House.

iv) The direct heritage impact on the engine rooms will thus be major beneficial as the building is comprehensively brought back into use, while avoiding significant or unmitigated change to the spatial characteristics. The indirect heritage impact will also be beneficial as the new use enhance the Fairfield Road Frontage as a key elevation in the conservation area.

v) Consequently, the **cumulative heritage impact** of the revised proposals will restore the function and aesthetic interest of the former engine rooms and thus have a **major beneficial heritage impact**.

3.11 The Coroner's Court (see Pt.1 para 6.12). Major beneficial impact

i) The Coroner's Court continued in use until 1998 and the double-height space remains relatively unaltered with no direct access into the courtyard. The furniture (benches and desks) are fixtures which have been altered to a modest degree and are potentially moveable

ii) The revised proposals will retain the potential to utilise the double-height space as a flexible performance as detailed in the previously subitted and consented "Coroner's Court Design Parameters Strategy. July 2017) which supported the previous Planning and Listed Building Consent approvals.

iii) The former Coroner's court will thus remain as a standalone venue, accessed from the existing entrance on London Road and a new entrance from the courtyard to the gallery formed by dropping the cill to an existing window (as previously consented). The new access is essential to facilitate the use of the partially below-ground space and its connection to the courtyard while minimising the intervention in the historic fabric.

iv) The spatial layout of the former court remains largely intact, and will be accessed from London Road via existing street entrances. Level access to the basement will be provided by a new lift within the existing stairwell. The Coroners Court, gallery, and ancillary spaces will largely be retained in their original state and unique style. In accordance with the July 2017 strategy, the furniture and high-quality joinery within the Coroner's Court will be retained in situ. The interior decoration (walls, ceiling and floors) will also be repaired in situ.

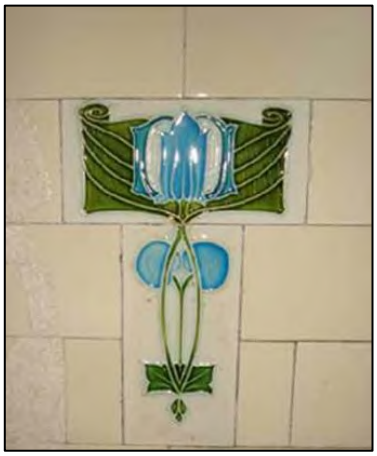


Figure 8. Tile detail in Coroner's Court to be conserved.

vi) The **direct heritage impact** on the Coroner's Court will retain the minor- adverse impact of the alteration of the courtyard window to become a level entrance but overall will be major beneficial as the revised proposals for the LRFS complex will facilitate the substantial restoration of this key space. The impact on the significant fabric is modest and remains as previously consented with no change to the spatial characteristics. The **indirect heritage impact** will also be beneficial as the reuse will enhance the streetscape along the main frontage and thus help animate both the building and the streetscape elevation and entrances.

vii) Consequently, the **cumulative heritage impact** of the revised proposals will restore the function and aesthetic interest of the Coroner's Court and thus have a **major beneficial heritage impact**.

3.12 The Bank (see Pt. 1 para. 6.13). Major beneficial impact.

i) This commercial space is of considerable significance and is accessed off London Road. It has been vacant since the late-1980s and makes an important contribution to the sreetscape. .

ii) The revised proposals maintain the approach to its reuse as previously consented in 2017. At ground floor the bank becomes a stand-alone, outward facing commercial unit (Coffer Shop) accessed via the original entrance and a new service door out to the courtyard. Internally the original volume will be reinstated by the removal of the modern partitions. There are no significant internal features other than the tiled floor. A new opening will be made at basement level between the former bank vaults unit and the adjacent stair lobby to allow an internal connection between the two spaces.

iii) The existing timber stair to the former bank vault which are no longer needed to connect to the basement area will be removed to allow better use of the space and to open up the access route out to the courtyard. A new door connecting to the courtyard will be introduced by adjusting a pair of existing high level windows. Level access will be provided from this new entrance door.

iv) The **direct heritage impact** on the former bank will retain the negligible-adverse impact resulting from the alteration to the courtyard window to become a service access level entrance but overall will be major beneficial as the almost imperceptible alterations resulting from the revised proposals will facilitate the reuse of this prominent space. The impact on the significant fabric is modest and remains as previously consented, with no change to the spatial characteristics.

v) The **indirect heritage impact** will be beneficial as the reuse will enhance the streetscape at this junction and thus help animate both the building and the conservation area's streetscape.

vi) Consequently, the cumulative heritage impact of the revised proposals will restore the functional use of the redundant commercial office/bank space and thus have a **major beneficial heritage impact** on this space

3.13 The Laundry (see Pt.1 para 6.14). Major beneficial impact.

i) This third-floor space retains some historic fabric and its original double-height volume and is a high significance space. This is an airy room, flooded with light from its roof-lights and windows on both the exterior and courtyard side of the room. The exposed queen post timber trusses are painted white, further adding to the lightness of this space

ii) The former laundry will become a single, open-plan workspace, utilising the existing space and restoring the fabric details. The original volume would be retained along with the original cast iron drying racks. The roof light will be overhauled and restored.

iii) The **direct heritage impact** would be major beneficial as the space is retained and restored for a new use, without loss of any significant fabric or features. There would be no change to the spatial characteristics.

iv) The **indirect heritage impact** will also be beneficial as the reuse of the space will contribute to the restoration of the fenestration and the roofscape and thus help restore the Whitworth Street streetscape.

v) Consequently, the cumulative heritage impact of the revised proposals will restore the functional use of the redundant space and thus have a **major beneficial heritage impact.**

3.14 Stairs. Considerable significance. Minor adverse impact.

i) The vertical circulation and hierarchy of the spaces within the LRFS complex is expressed by main and service staircases for both public and private access. The revised proposals maintain the historic plan-form and as a result the existing significant staircases would be retained and restored in situ, continuing to facilitate the building's circulation.

ii) However, as previously consented in 2017, the staircase to the First and 3rd Officer's quarters (ST3 -see Part.1 Significance Plans) will be removed between ground to 3rd-floor. The flight from the ground floor to the basement is retained. The stair to the Second Officer's House, ST5 will also be removed between ground to 3rd floors. The flight from the ground floor to the basement is retained.

iii) The **direct heritage impact** would be minor adverse as the identified stairs are removed to facilitate the creation of the workspaces across the separate floors. There would be no significant change to the spatial characteristics of the floors, other than the vertical connections.

iv) The **indirect heritage impact** will be negligible as the alteration are internalised.

v) Consequently, the **cumulative heritage impact** of the revised proposals on the staircase will thus have **a minor adverse heritage impact** on this component of the site.

3.15 Gas Meter Testing Station (see Pt.1 para. 6.17). Negligible adverse impact.

i) The double height space which was the former Gas Meter Testing Station occupies the space between the courtyard access passage and Whitworth Street and is of considerable significance. The revised proposals will retain the consented use as a discrete commercial unit with a new perimeter mezzanine. Access will be from the existing adjacent entrance on London Road, with a stair lift internally to provide level access and into the courtyard.

ii) The proposed perimeter mezzanine will be constructed, and an opening formed in the ground floor to link to the basement below where a stair and lift provide access to the associated back of house areas for the new publicly accessible facility.

iii) The **direct heritage impact** would be negligible adverse as the previously consented stair lift and mezzanine would have a minor impact on the fabric of the utilitarian, workshop space. There would be no significant change to the spatial characteristics of the floors, other than the vertical connections.

iv) The **indirect heritage impact** will be negligible beneficial as the alterations would contribute in a minor way to the animation of the London Road frontage.

v) Consequently, the **cumulative heritage impact** of the revised proposals on this double height space will have a **negligible adverse impact**, outweighed by the benefits of bringing the space back into use. is brought back into use.

3.16 Workshops (see Pt.1 para. 6.18). Minor beneficial impact.

i) The workshops form part of the Whitworth Street frontage and comprise a collection of highly utilitarian rooms which were used as repair and vehicle maintenance workshops for the fire service and earlier (and briefly) as a Blacksmith's shop. The much-altered workshops are original spatial components of the site, but retain few surviving features which help express their original purpose, other than the exterior doors.

ii) The revised proposals would utilise the ground-floor spaces as a bar and dining room, with minimal internal alteration other than fitout of kitchen facilities. The existing entrances would be retained with appropriately restored doors.

vi) The **direct heritage impact** would be negligible beneficial as the space would be subject tpo minimal alteration other than enhancement of the accessibility. There would be no significant change to the spatial characteristics of the spaces of the surviving workshop fabric. The **indirect heritage impact** will be minor beneficial as the alterations would positively contribute to the animation of the Whitworth Street frontage.

vii) Consequently, the **cumulative heritage impact** of the revised proposals on these utilitarian spaces would have a **minor beneficial impact**, enabling the reuse of the space as a component of the LRFS.

3.17 Gymnasium (see also Pt.1. para 6.19). Minor beneficial impact.

i) The Gymnasium is a double-height room on the second floor, on the corner of Whitworth Street with London Road. The revised proposals will retain the volume of the altered spaces (which lost its original mezzanine some time before listing). The space would be simply restored and utilised as a workspace/social hub.

ii) The **direct heritage impact** would be minor beneficial as the space would be subject to extensive fabric restoration which would avoid any significant alteration. There would be no significant change to the spatial characteristics of the space. The **indirect heritage impact** will be negligible beneficial as the restored second-floor space would positively contribute to the fenestration of the Whitworth Street frontage.

iii) Consequently, the **cumulative heritage impact** of the revised proposals on the space would have a **minor beneficial impact**, enabling the reuse of the space as a component of the LRFS.

3.18 Billiard Room (see also Pt.1 pars 6.20). Minor beneficial impact.

i) The former Billiard Room was essentially an additional Mess Room created from an adapted residential unit, and located on the First Floor and Second Floor and comprise much-altered spaces within the Fairfield Street block.

ii) The revised proposals incorporate these mess rooms into the proposed workspaces with a minimal alteration to enhance the accessibility. There would be no substantial loss of historic fabric, while the fenestration and fabric of the exterior elevations would be repaired/restored.

iii) The **direct heritage impact** would be minor beneficial as the much-altered space would be subject to extensive fabric restoration works while avoiding any significant alteration. There would be no significant change to the spatial characteristics of the space. The **indirect heritage impact** will be negligible beneficial as the restored second-floor space would positively contribute to the fenestration of the Fairfield Street frontage.

iv) Consequently, the **cumulative heritage impact** of the revised proposals on these former Mess areas would have a **minor beneficial impact**, enabling the reuse of the space as a component of the LRFS.

3.19 The Ambulance House (see also Pt.1 para.6.21). Minor beneficial impact.

i) The Ambulance Station is accessed from Minshull Street and was designed to accommodate horse-drawn appliances. It was closed in 1948 and the area converted into workshops, for the use of the Fire Service. The revised proposals would bring the space back into use, incorporated into the expanded commercial fitness studios. The revised use will avoid any significant alteration to its spatial character and offers the potential for the restoration of the surviving fabric.

ii) The **direct heritage impact** would be minor beneficial as the utilitarian space would remain relatively unaltered and would be subject to extensive fabric restoration works. There would be no significant change to the spatial characteristics of the space. The **indirect heritage impact** will be negligible beneficial , although the streetscape on Minshull Street would be reactivated and therefore the proposal would make a positive contribution to this elevation.

v) Consequently, the **cumulative heritage impact** of the revised proposals on the former ambulance station as would have a **minor beneficial impact**, enabling the reuse of the space as a component of the LRFS.

3.20 The Police Station (see also Pt.1 para.6.25). Minor beneficial impact.

i) The former Police Station is a discreet space which was accessed by two entrances from Whitworth Street and included cells and basement spaces. The revised proposal will retain the independent character of the Police station as a commercial health spa, utilising the existing spaces for the series of uses and incorporating the former ambulance station. The interventions proposed are relatively minor

ii) The proposals largely retain former plan form and will reinstate the street access points. The police cells will be retained as discrete volumes. The existing entrance from Whitworth Street is retained and used as the primary entrance into the unit. The decorative glazed tiles and joinery will be retained.

iii) The **direct heritage impact** would be minor beneficial as the diverse spaces would remain relatively unaltered and would be subject to extensive fabric restoration works. There would be no significant change to the spatial characteristics of the space, including the former cells. The **indirect heritage impact** will be negligible beneficial as the entrances onto Whitworth Street would be reactivated and therefore the proposal would make a positive contribution to this elevation.

vi) Consequently, the **cumulative heritage impact** of the revised proposals on the former Police station would have a **minor beneficial impact**, enabling the reuse of the discrete area as a distinct component of the LRFS.

3.20 The residential spaces (see also Pt. 6.22 a-h). Minor beneficial impact.

i) The residential spaces were located across the building on the first, second and third floors, arranged and designed hierarchically, according to the status of the occupants. These are the most altered spaces in terms of the retained interior fabric, having been adapted over the life of the building.

ii) The revised proposals largely maintain the form of the previously consented scheme with some relatively minor changes to the interior layouts as the spaces are adapted to accommodate more workspaces and fewer live-work units. The plan-form of the residential units is largely retained intact with minor modifications to accommodate new welfare facilities. The strategy for ventilation and services remains unaltered and has minimal impact on the fabric of the spaces or the over-all character of the building.

iii) The proposed workspaces would continue to be access from the balconies and the external fenestration and features would be restored. Overall, the proposal would have impact on much-altered spaces of lower significance.

iv) The **direct heritage impact** would be minor beneficial as the much-altered redundant spaces would be brought back into use, with some loss of low-significance fabric balanced by the extensive outward facing, fabric restoration works. There would be no significant change to the spatial characteristics of the former residential spaces which would remain access from the balconies.

v) The **indirect heritage impact** will be negligible beneficial , although the restoration of the spaces will contribute to the reactivation of all the elevations and, therefore, the proposal would make a positive contribution to the overall appearance of the building as a prominent streetscape component.

vii) Consequently, the **cumulative heritage impact** of the revised proposals on the former residential spaces would have a **minor beneficial impact**, enabling the reuse of the space as a component of the LRFS.

4 HERITAGE IMPACT CONCLUSIONS

4.1 Significance retained and positive heritage impact.

i) The NPPF (2019) and the associated Planning Practice Guide emphasise the need for a thorough understanding of the significance of Heritage Assets, to form the basis for the assessment of any development impact. The Heritage Impact Assessment (HIA) has provided this assessment as Part 2 of the Heritage Statement and overall demonstrates that the revised proposals will have a positive impact.

ii) It will be clear that revised proposals will secure a sustainable use for the grade-II* listed building which would facilitate its comprehensive repair and restoration. It would also enhance its special character, while adding to the overall regeneration and of the conservation area. The proposed uses within the building complement each other and minimise the impact on the historic fabric, adapting to the constraints of the existing plan form and thereby retaining the character of the significant spaces.

iii) It will be evident that the proposed development will have both a transformational direct and indirect impact on the fabric and character of this prominent building. However, it is demonstrated above that the comprehensive physical and visual impact would have a cumulatively **positive heritage impact** on the architectural or historic interest of this nationally important heritage asset.

iv) The visual impact on the adjacent designated heritage assets in the streetscape (including the conservation area) would also be appropriately balanced. The revised proposals would thus, avoid any compromise to the character of the conservation area, or the ability to appreciate or experience adjacent heritage values.

v) Intrinsic to the design-development has been the objective of maintaining those components which define the architectural integrity and fabric authenticity of the historic building. The revised proposals thus would deliver the following key conservation objectives as it would:

a) secures a collection of sustainable uses for the building complex;
b) preserve the external architectural expression of the building;
c) ensure the appropriate adaption of the interior spaces;
d) retain significant historic fixtures, fittings and equipment, where feasible;
e) express the historic decorative scheme.
f) maintain historic circulation patterns.
g) celebrate the distinctive plan-form and spatial pattern, and
h) maintain the positive contribution to the Conservation Area.

vi) The resultant revised proposal thus continues to express the individual characteristics of the former fire station complex, carefully integrating a bold new corner landmark. In these terms the **cumulative heritage impact** is considered to be **moderately beneficial.**

4.2 Appropriately informed development.

i) The NPPF requires that all planning proposals contribute to the achievement of "*sustainable development*" (**NPPF. Paragraph 8**), which in this case means the preservation of the fabric, character and appearance of the grade-II* listed building and the Whitworth Street Conservation Area. This requires a *clear and proportionate evaluation* of the significance and impact on the affected heritage assets as has been outlined in Parts 1 and 2 of the Heritage Statement.

ii) The design development was also informed by the evaluation of the relative value of the components of the grade-II* listed building, the conservation area and the wider character of this part of the city centre. The cumulative result of the proposed mixed-use development would be demonstrably beneficial, avoiding any unmitigated conflict with the conservation of the identified designated heritage assets. Thus, the proposal meets the requirements of **NPPF, paragraphs 192 and 193.**

4.3 Positively addresses the core planning policy principles.

i) The cumulative heritage impact of the proposed development has been assessed as **moderately beneficial**. Thus, in accordance with the definition of sustainable development in the NPPF (**paragraph 8**), the revised proposals would make a positive contribution to the preservation of the grade-II * listed building and offers the potential to enhance the appreciation and experience of this busy part of the city.

ii) The proposed development demonstrably avoids any unmitigated negative effects on the fabric of the building and retains its character-defining spatial qualities. The proposal would restore a major city landmark, enhancing the appreciation and understanding of this diverse part of the city centre. The development would thus, demonstrably deliver extensive **positive heritage benefits** enabling the enhanced appreciation and conservation the identified designated heritage assets.

iii) In the above terms, the proposed development positively addresses the core planning principles set out in **paragraph 8** of the NPPF 2019.

4.4 Balanced impact on the historic environment.

i) Despite the scale and sensitivity of the former London Road Fire Station, the cumulative impact of the proposed mixed-use development will be demonstrably positive. The direct impact of the complementary collection of uses will reflect its historic character, with the necessary additional accommodation carefully integrated into the courtyard without compromising the physical or visual characteristics of the building.

ii) Consequently, *'great weight'* has been given to bringing forward a revised, viable but deliverable new use which will secure the building's significant surviving fabric and preserve the appreciation of the nearby designated heritage assets. The development would, therefore, involve no unmitigated loss or alteration of any significant, character-defining fabric. The impact of the proposed development, therefore, appropriately balances the degree of change to the identified heritage assets and the character of the area. In the above terms, the proposed development would fully meet the requirements of the relevant Acts, the NPPF and Manchester City Council's local planning policy, as well as being consistent with good development design and conservation practice.

9. REFERENCES

The following documents have been referred to in the **Part 2** Heritage Impact Assessment and used to define the tailored assessment of the direct and indirect heritage impacts. . .

1) Historic England (2008). *Conservation Principles. Policies and Guidance.*

2) Historic England (2017). The setting of Heritage Assets. Good Practice Advice 3..

3) International Council on Monuments and Sites (*ICOMOS).2017 Guidance on Heritage Impact Assessments for Cultural World Heritage Properties.*

4) Greater Manchester Archaeological Unit (2009). Manchester Urban Historic Landscape Characterisation. Interim Report.

5) Historic England (2019). Managing Significance in Decision-Taking in the Historic Environment. Historic Environment Good Practice Advice in Planning: 2.

NB. This document should be read with the **Heritage Significance Appraisal** (**Part 1**, Volumes 1 and 2). in the accompanying SLHA Ltd document.



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