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Planning, Development & Heritage Consultants

**Signature Victoria Mill Limited, c/o its
Administrators**

Victoria Mill – Ceiling Works

Heritage Statement

03 February 2023

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Professional Planning, Development & Heritage Advisors since 1992.

Members of the Royal Town Planning Institute (RTPI). Recognised by the Institute of Historic Building Conservation (IHBC) as a Historic Environment Service Provider (HESPR).

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1. Introduction

- 1.1 This Heritage Statement has been prepared by Paul Butler Associates on behalf of Signature Victoria Mill Limited, c/o its Administrators relating to proposed works at Victoria Mill, Lower Vickers St, Manchester, M40 7LH. Victoria Mill dates from 1869-73 and was constructed as a cotton spinning mill. The building is Grade II* listed but is not located within a Conservation Area.
- 1.2 The statement has been provided in support of an application for Listed Building Consent for works to ceilings within the ground floor and basement of the northern wing of the building. The ground floor is currently in office use whilst the basement is vacant.

Background

- 1.3 Planning Permission (Ref: 119321) and Listed Building Consent (Ref: 119357) for the conversion of the upper floors of the northern part of the building from office to residential apartments was approved on 6 June 2018, with these consents having been partially implemented. The works ceased due to the developer falling into administration. Paul Butler Associates have been involved in the project since 2020 as part of a new project team which has been tasked by the administrator with completing the development, enabling its occupation. The project team identified a number of discrepancies with regards to the approved residential scheme which have meant that had it been built out as approved, it would not have been safe, or in accordance with other requirements such as secure by design. A suite of variation applications along with fresh applications for Planning Permission and Listed Building Consent relating to the upper floor conversion works were submitted in July 2021 and approved in March 2022. Upper floor works are subsequently nearing completion.
- 1.4 A further issue which had not been considered by the previous project team was the necessity for fire protection between the ground floor office use and the upper floor residential use. It again therefore falls to the current project team to resolve this issue, which will comprise the painting of historic columns and beams in intumescent paint. Listed Building Consent will therefore be required for these works and associated works.

This Statement

- 1.5 A Heritage Statement (dated October 2016) was issued by Archaeological Research Services Ltd in support of the original applications for the conversion of the upper floors of the building but did also consider the ground and basement floors. No significant changes have been made to these spaces since this Statement was undertaken. The Statement included a policy review, an assessment of significance, and an assessment of the impact on the significance resulting from the development. The Statement was undertaken in accordance with national and local policy, which has not significantly changed in the intervening period.
- 1.6 The purpose of this statement is therefore to consider any impact upon the heritage significance of those parts of the Listed Building which may be affected by the works proposed as part of this Listed Building Consent application, and subsequently the overall impact on the significance of the Listed Building.
- 1.7 This statement includes:
- A description of the application site and surrounding area;
 - An overview of the proposed works;
 - A review of the heritage significance of the application site; and,
 - An appraisal of the application proposals against this significance.
- 1.8 The proposed scheme is supported by a series of drawings prepared by Allison Pike Architects and has been developed further to consultation with Manchester City Council's (MCC) planning and conservation officers during pre-application discussions between September 2022 and November 2022.

2. The Application Site and Surrounding Area

Application Site

- 2.1 The application site incorporates the northern part of Victoria Mill which is located within the Manchester suburb of Miles Platting. The works which comprise part of the subject applications relate only to internal works to the ground floor and basement of the northern wing of the former Mill.



Figure 2.1: Aerial view of the Victoria Mill site

- 2.2 Victoria Mill is Grade II* listed. It is a substantial former cotton spinning mill comprising six storeys set above a basement and is constructed from red brick with yellow brick dressing, and a modern bitumen flat roof. The building actually comprises two large former mills, connected by a central engine house, thereby following a U-plan. There is a small enclosed courtyard to the rear, with a large car park to the front.
- 2.3 The building currently accommodates a mix of uses with residential use occupying the southern wing of the building, whilst the northern wing has in recent times been entirely in office use. The office use of the upper floors of the northern wing ceased several years ago,

albeit the ground floor (which forms part of the application site) is currently partly occupied by the NHS and the Manchester Primary Care Trust (PCT).

2.4 With regards to the ground floor offices, this is split into four units; Units 1 – 3 and the NHS Doctors Surgery. All four offices have modern fit-outs with suspended ceilings and columns boxed in and include toilets / kitchens and meeting / clinical examination rooms etc. In most cases, internal partitions only extend to suspended ceiling level (rather than the soffit). Unit 1 is currently vacant but is in temporary use as a contractor site office / meeting room. In addition to the NHS Doctor's Surgery, the NHS utilise Unit 2 as office accommodation, with Unit 3 occupied by the Manchester Primary Care Trust. Historic brick arches survive to much (but not all) of the ground floor ceilings.

2.5 The basement level is vacant and although there has been some subdivision with modern breezeblock walls, the space has not been made habitable. The historic columns, beams, and brick jack arches are all therefore visible.

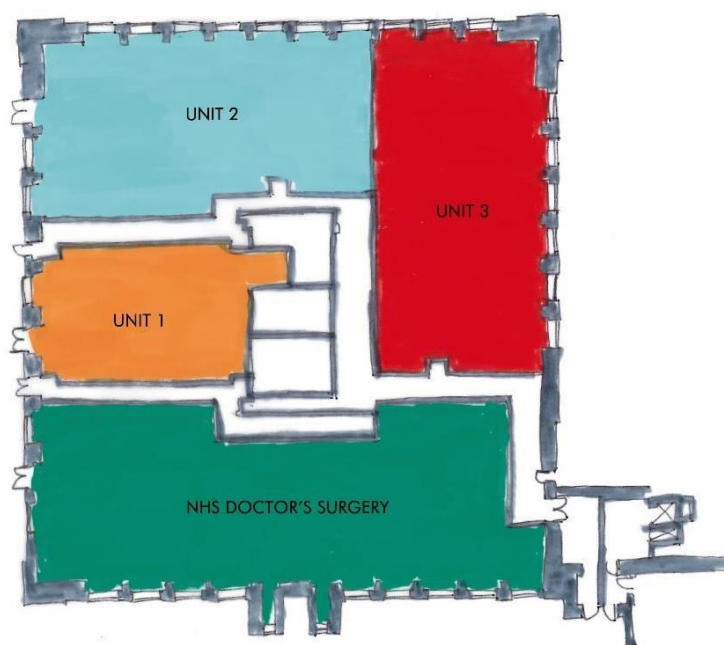


Figure 2.2: Ground Floor Office Plan

2.6 Each wing has its own separate primary access, positioned either side of a central spiral staircase turret, which also supports the large mill chimney. The ground floor offices can be accessed via the northern building elevations and via the central chimney core, whilst the basement can be accessed via an entrance to the west / main elevation.

Surrounding Area

- 2.7 The site lies within the suburb of Miles Platting, approximately 1 mile to the east of Manchester City Centre. There are a mix of residential and commercial uses within the immediate area, with the Rochdale Canal aligning the site's southern perimeter, and a public park with children's play facilities located to the immediate west. The site is not located within a Conservation Area and there are no other listed buildings or structures within immediate proximity to the site. Removed from the site is the Grade II Listed former Corpus Christie Basilica which is located approximately 300m to the north.
- 2.8 The site itself became developed during the industrial expansion of the mid-19th Century, and whilst the southern part of the complex had by 1845 been developed as housing, construction of the mill commenced in 1869, with the second western wing being completed in 1873. Although there have always been residential properties in close proximity to the Mill, for many years the site was abutted on its western side by a cotton mill, and on its eastern side, by a chemical works. These adjacent buildings and industrial operations longer exist, and aside from a modern light industrial complex to the north of the site, the Victoria Mill remains the only clear evidence of the area's historic industrial past.

3. The Proposed Scheme

- 3.1 The application proposals comprise minor necessary works to ensure the fire safety of the building. These works are effectively limited to the intumescent painting of existing historic columns and beams at ground and basement levels in order to secure 90 minute fire protection. The necessity for the works is set out within the submitted Fire Strategy Report prepared by BB7.
- 3.2 The works will necessitate the removal of all non-historic suspended ceilings, column boxes, and some partition walls within the ground floor office suites so that the historic features can be accessed and the works undertaken.
- 3.3 Once the suspended ceilings, column boxes and partitions have been removed and the painting works completed, it is then proposed to reinstate ceilings to some areas and where possible (subject to operator requirements) leave ceilings exposed, enabling the original brick jack arch ceilings to remain on view, where these remain in situ. The basement ceilings are already exposed and therefore no removal of suspended ceilings is necessary.
- 3.4 The proposed works are set out in detail within the submitted Schedule of Works and are illustrated on the submitted plans. The works can be summarised as follows:

Ground Floor Works

- Existing suspended ceilings, column boxes and partition walls within ground floor offices to be carefully removed.
- Redundant M&E equipment to be removed where possible.
- The repair of brick arch ceilings where necessary and these remaining exposed along with beams, columns, and column heads where possible.
- Replacement M&E equipment to be installed where required.
- Intumescent paint to be applied to columns and beams.

- Lay-in grid ceiling to be reinstated to some ground floor ceilings, in line with occupier requirements, and enabling the re-use of existing M&E systems.
- Partition walls to be reinstated to existing configuration, including walls being extended upwards to ceiling level where necessary (abutting with section of exposed historic brick ceiling, or to fire escape corridors).

Basement Works

- Intumescent paint to be applied to columns and beams.
- The repair of brick arch ceilings where necessary.
- Installation of partition walls to create alternative means of escape and for access to mechanical kit for upper floor apartments.

- 3.5 Whilst the reinstatement of suspended ceilings is therefore required to some areas, these have been minimised as far as possible, and will take place only where absolutely necessary due to operator and cost requirements. Where possible, historic columns and column heads will remain exposed, and a bulk head will be created set back from perimeter windows so that the full height of these windows and the historic spaces can be appreciated.
- 3.6 The use of a lay-in grid ceiling is proposed on the basis of the more limited physical impact that this will have on the historic ceilings. These are lightweight and can be attached to the mortar joints of the brick arches. These ceilings also allow ease of access for maintenance and alterations to M&E equipment, avoiding the need for the creation of multiple access hatches over time, as is visible within areas where there are currently plasterboard ceilings.
- 3.7 Furthermore, a lay-in grid ceiling rather than a plasterboard ceiling is proposed on the basis of the extent of ceiling that is to be reinstated. A plasterboard ceiling is more likely to appear as an historic / original ceiling rather than an inserted ceiling which is misleading in terms of the historic character of the building.
- 3.8 The reduced physical impact on historic fabric means that once the occupiers of the space changes at a future point, and a more sympathetic conservation design approach can be taken, the historic fabric which can then be fully exposed is retained in better condition.

Requirement for Reinstatement of Ceilings

- 3.9 Extensive discussions have been had with the NHS and Primary Care Trust (PCT) who occupy three of the four ground floor units. The NHS have had a presence at the building for around 30 years and are therefore well established within the local area both in terms of providing vital local services and as a source of employment, with 13 full time members of staff working within the NHS surgery and around 42 staff based within the offices.
- 3.10 The NHS spaces must achieve certain hygiene standards and in light of a limited budget must be economic to clean to these standards. The necessity for hygiene and sterile spaces has become all the more pertinent since the Covid 19 pandemic. Therefore, within the NHS spaces, the full reinstatement of ceilings is necessary. This is in line with an assessment undertaken in accordance with the submitted Department of Health Infection Control in Built Environment guidance which states:

'It is important that healthcare buildings are designed with appropriate consultation, and the design facilitates good infection prevention and control (IPC) practices and has the quality and design of finishes and fittings that enable thorough access, cleaning and maintenance to take place. Good standards of basic hygiene, cleaning and regular planned maintenance will assist in preventing healthcare-associated infection (HCAI); only if the built environment reflects these needs are schedules more likely to be successful not only in being undertaken on a proactive and reactive basis but also in reducing contamination and risks to patients.'

- 3.11 In addition, the guidance also identifies the need for spaces to have 'appropriate finishes which permit efficient cleaning methods, equipment and safe chemicals to be used'. (Paragraph 2.13). Section 3 ('Designing a healthcare facility: issues to consider') of the document sets out design principles which include:
- Use finishes that are impervious, smooth and seamless, as far as practicable.
 - It is always best practice to maintain a visibly clean environment that is free from dust and soilage, and acceptable to patients, their visitors and staff.

- Good design can make cleaning immeasurably easier, for example by using finishes that are easy to clean.
- It is important that ancillary areas are of an acceptable standard to support effective infection prevention. (Para 3.65)
- The design and finish of ancillary areas should facilitate good cleaning. (Para 3.66)
- In relation to day room/patient waiting areas there is often conflict between the aesthetics of these areas and the prevention of contamination of the environment or furnishings and ease of cleaning / disinfection. (Para 3.91)
- In relation to interior finishes/fixtures and fittings the quality of finishes in all clinical areas should be readily cleaned and resilient. It is important that the healthcare environment is aesthetically pleasing but takes into account the clinical nature of the intended purpose suited to its function. (Para 3.108)
- Smooth cleanable impervious surfaces are recommended in clinical areas. Design should ensure that surfaces are easily accessed, will not be physically affected by detergents and disinfectants, and will dry quickly. Wall surfaces should be maintained so that they are free from fissures and crevices (Para 3.119)
- Suspended ceilings may be installed in general clinical areas and other areas in the healthcare facility (Para 3.121)
- Light fittings that are easy to clean and unlikely to accumulate dust should be chosen for clinical areas. For example, flush ceiling fittings are acceptable, but not open up-lights. (Para 3.123)
- The location and design of luminaires should permit easy changing of lamps and frequent cleaning. They should be designed so that there are no ledges or ridges and they allow ease of access for cleaning. (Para 3.124)
- Floors or walls penetrated by pipes, ducts and conduits should be sealed to stop entry of pests. (Para 3.130)

3.12 Health Building Note 00-10 Part B: Walls and Ceilings which has also been submitted in support of the application is also of relevance. This notes:

- The control and prevention of healthcare-associated infection (HCAI) is a priority issue in terms of not only the safety and well-being of patients and staff, but also the resources consumed by potentially avoidable infections. It is important that the design of the building facilitates good infection prevention and control practices, and has the quality and design of finishes and fittings that enable thorough access, cleaning, disinfection and maintenance to take place. (Para 1.17)
- Materials and finishes are to be selected to minimise maintenance and be compatible with their intended function and lifespan/duration of use. (Para 1.25)
- Partitions are required to enclose spaces and, at the same time, facilitate activities to be carried out whilst protecting adjacent spaces from those activities to defined environmental conditions and defined life-cycle replacement periods. (Para 2.1)
- Finishes are applied to partitions not only for functional reasons but also to enhance the healthcare environment. (Para 2.2)
- Smooth, hard, seamless and impervious surfaces are required in clinical areas as they are easier to clean. (Para 2.9)
- Wall surfaces are to be free from fissures, open joints or crevices. (Para 2.10)
- Wall finishes are to be impermeable and easily wiped over if necessary and not be physically affected or degraded by detergents and disinfectants. (Para 2.16)
- Smooth surfaces on concealed suspension systems should be impervious and able to withstand hard cleaning regimes. (Para 3.7)
- Ceiling voids should be designed to allow primary and secondary services distribution, access and support of ceiling-mounted services. (Para 3.18)

- Access points should be designed to allow panels and tiles to be removed without damage or disfiguration and should be clearly identified. They should not change the overall design/appearance of the ceiling. (Para 3.21)

- 3.13 Other concerns raised by the NHS and PCT relating to the permanent loss of ceilings relate to the potential impact on working conditions in terms of access to natural light; the subsequent additional impact on electricity costs resulting from the need for more artificial lighting; and the additional heating costs due to the increased volume of space to heat. This is all within a context of extremely stretched budgets for these vital services.
- 3.14 Whilst the PCT's preference is for the full reinstatement of ceilings, it has been agreed with this occupier that ceilings can remain exposed within some areas. Unit 1 is currently vacant, and therefore there has been much greater flexibility here to reveal ceilings, with the reinstatement of ceilings only proposed where absolutely necessary to toilet, kitchen and meeting room areas. The meeting rooms will in effect be enclosed pods, with the historic ceilings above visible to the main part of the office space.
- 3.15 It is acknowledged by the applicant that the proposed scheme does not reflect conservation best practice in terms of the reinstatement rather than full exposure of historic ceilings. The subsequent harm is considered within Section 5 below.

Pre-Application Discussions / Design Development

- 3.16 Paul Butler Associates have provided advice to the team throughout this process, and have engaged with MCC planning and conservation officers. During this time, a total of four schemes have been designed and submitted to MCC and / or the office occupiers. The pre-application process is reviewed in further detail below:

Option A: Pre-App submitted to MCC on 11 August 2022

- 3.17 PBA originally engaged with MCC in August 2022, explaining the need for the fire safety works, the necessity for the removal of suspended ceilings, and the proposed full reinstatement of ceilings, which was the occupiers' preference.

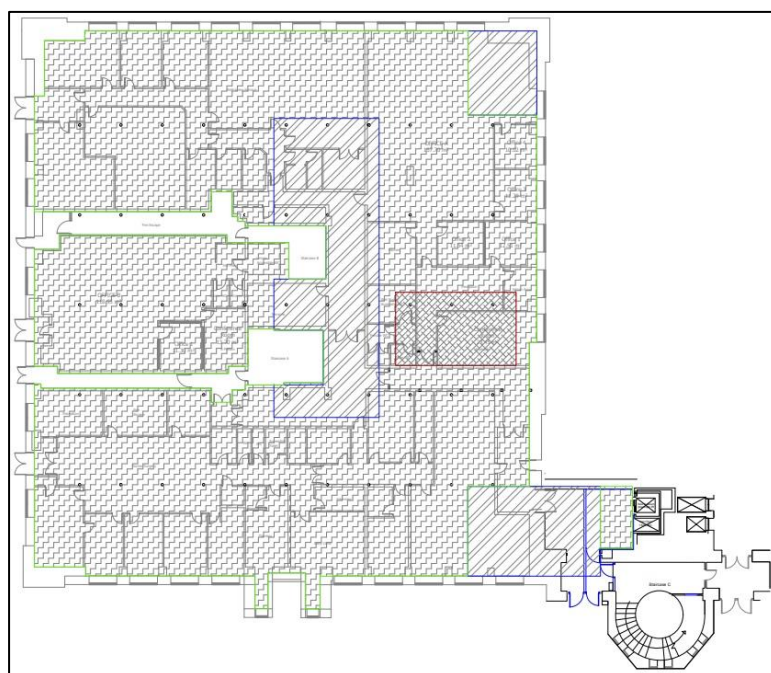


Image 3.1 – ‘Option A’ Illustrating area of suspended ceiling to be removed and then reinstated.

3.18 A response was received from MCC on 12 September 2022 which raised concerns with the proposals and suggested that:

- The aim should be to remove all suspended ceilings and expose the original ceiling, including brick vaulted arches and expose all columns and column heads.
- As much of the original historic fabric should be exposed as possible.
- Any necessary services should be suspended in a considered manner to avoid too much clutter and avoid excessive fixings into the fabric.

3.19 Further design work and consultation with the occupiers was subsequently undertaken.

Option B: Amended Pre-App Scheme submitted to MCC on 28 October 2022

3.20 An amended scheme was issued to MCC with a supporting justification which highlighted the issues faced by the design team and applicant including the absence of any consideration of fire safety issues relating to the conversion of the upper floors of the mill by the previous owners; and the requirements of the longstanding NHS occupier. Significant progress had however been made in terms of the permanent exposing of areas of brick

arch ceiling following the fire safety works. The 'significant betterment' as compared with the existing situation within the ground floor was also noted.

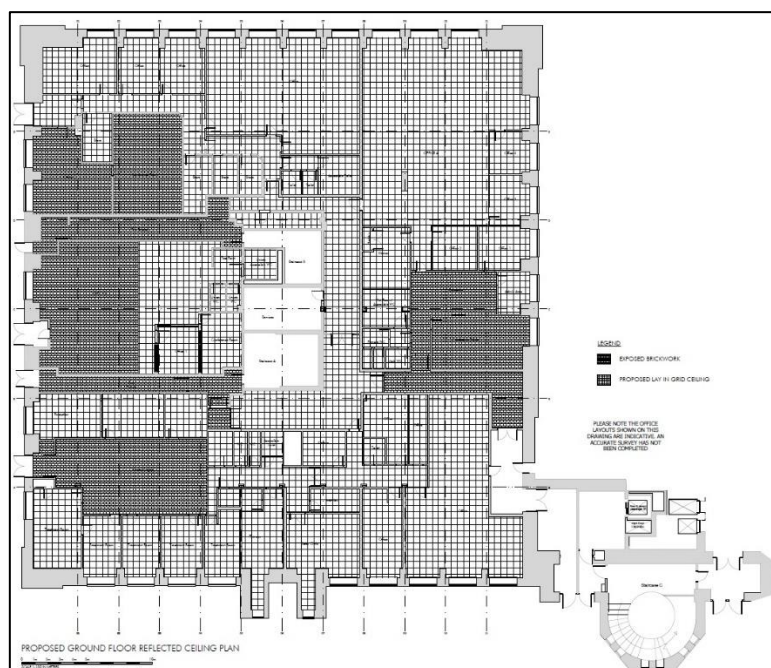


Image 3.2 – 'Option B' – Proposed Reflective Ceiling Plan.

3.21 A response to the amended scheme was received from MCC on 22 November 2022, which in summary stated the following:

- Whilst the scheme will remove some plasterboard ceilings to expose brickwork in a few locations, the majority will be reinstated with a suspended ceiling which would be a lay in grid and which would have a harmful appearance in that existing brickwork will be covered up.
- A lay in grid ceiling is not an accepted solution in a listed building where there are opportunities to reveal features of significance - in this case the brick arches and column heads.
- Whilst it is accepted that in some cases a more clinical environment is needed and these are accepted in very high-risk areas, the preference would be for plasterboard rather than lay in grid in these spaces, as this gives a cleaner and more unified appearance.

- In many of the other office spaces, there should be more of an attempt to reveal the brick arches and it is not considered that there would any reason why the Council would consider this any different from many of the other listed buildings that have been converted to offices, and where brickwork has been exposed. Exposed brick is compatible with many office environments and often a unique selling point as it creates a high quality and sought-after heritage aesthetic.

3.22 Further design work and consultation with the occupiers was subsequently undertaken.

Option C: Amended Scheme presented to occupiers in December 2022

3.23 In light of MCC's further feedback, a scheme was developed which sought to accommodate MCC's request as far as possible whilst also seeking to meet occupier requirements as far as possible. Further areas of ceiling were exposed, as well as column heads where possible within some of the spaces where ceilings needed to be reinstated. To the perimeter of the majority of the floor, the suspended ceilings (where reinstated) would be set back from the windows allowing full internal views of those windows and enabling an appreciation of the historic proportions of the space. Option C was presented to the office occupiers in December 2022.

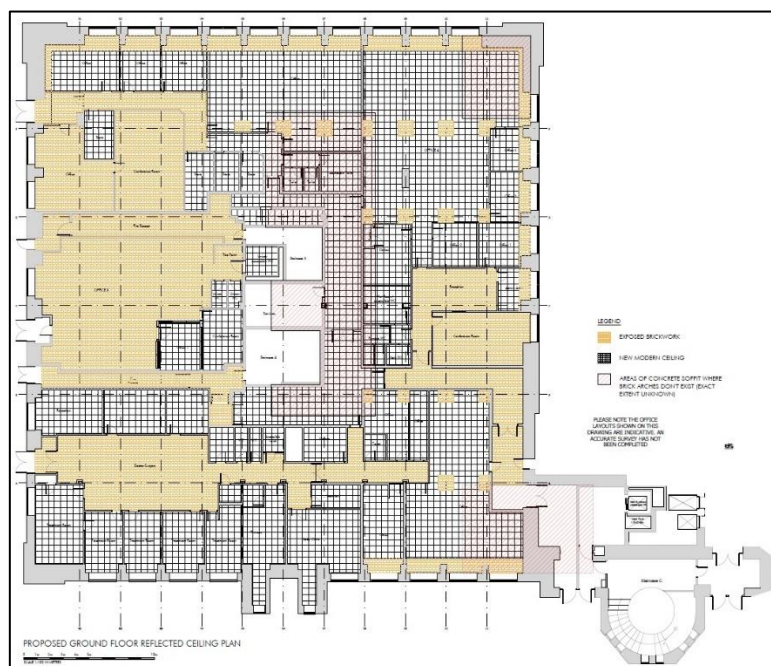


Image 3.3 – 'Option C' – Proposed Reflective Ceiling Plan.

3.24 Option C was unfortunately rejected by the NHS occupier on the basis that the entirety of the NHS Doctors Surgery (including reception and circulation areas) would need to adhere to the same hygiene specification as treatment rooms. Correspondence from the NHS confirms that the exposing of ceilings within the Doctor's Surgery would result in its continued occupancy of the unit as untenable. Further discussions with the NHS office space in unit 2 and the PCT's office space in Unit 3 were however more positive.

Option D: Final Proposed Scheme

3.25 Whilst discussions with the NHS had confirmed that all suspended ceilings would need to be reinstated following the fire safety works, further discussions with the PCT confirmed that some spaces where its preference was for the reinstatement of ceilings, could in fact remain exposed. The architect also developed a solution whereby meeting rooms within units 1 and 3 could effectively free-stand within the office space (Image 3.4, shaded in blue), meaning that the historic ceilings above would remain visible, and the physical impact would be reduced in these locations.

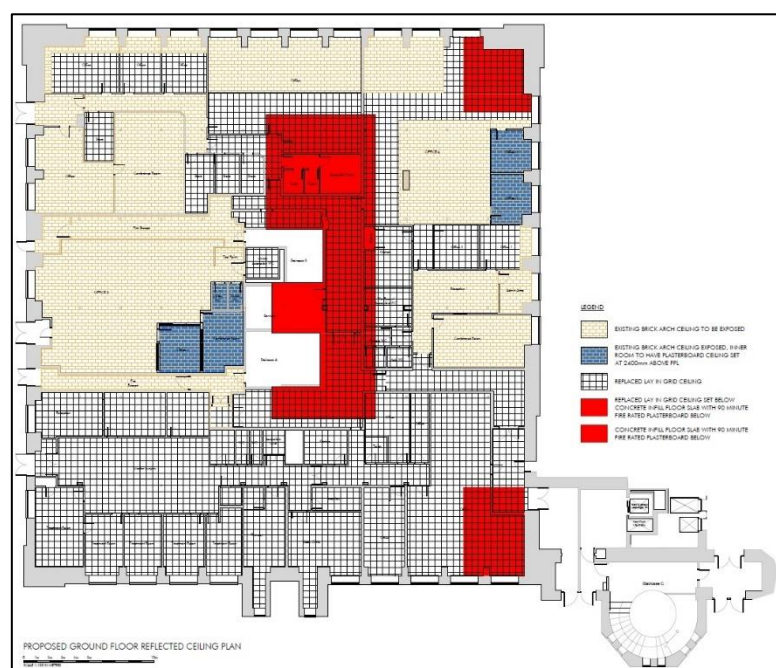


Image 3.4 – 'Option D' – Proposed Reflective Ceiling Plan – Submitted Scheme.

- 3.26 Therefore whilst the ceilings to the NHS Surgery would need to be reinstated, this would be partly offset by the additional areas within units 1, 2, and 3 which could now remain exposed, along with the exposed sections above the meeting rooms in units 1 and 3.
- 3.27 Further investigations had also revealed that the historic brick arched ceilings had been lost (Image 3.4, shaded in red) to additional areas than had previously been envisaged. These had been replaced by a concrete soffit of no historic significance.

Summary

- 3.28 The submitted scheme has been provisionally costed, can be delivered, and is acceptable to the existing occupiers. It is accepted that whilst the proposed scheme will result in a significant conservation betterment to the ground floor as compared to the current situation, it does not reflect the best practice approach advocated by MCC planning and conservation officers in its responses to Options A and B. The implementation of a scheme representing best practice (in revealing all historic ceilings, beams and columns) would not meet existing occupier requirements, which would mean that a vital NHS facility would be lost, and the PCT's continued occupancy of the building would be put into doubt. Evidence of this will be submitted on a confidential basis to officers.
- 3.29 Further detail, and justification for the proposed works is provided within the Design & Access Statement prepared by Allison Pike Architects and the Schedule of Works prepared by Medlock.

4. Heritage Significance of Victoria Mill

- 4.1 The heritage planning policy of relevance to the proposed scheme, and which provides the context for its assessment, is set out within national and local planning policy guidance.
- 4.2 An assessment of the heritage significance of this Grade II* Listed Building is set out within Section 7 of the Heritage Statement by Archaeological Research Services (Ref: 2016/156). The assessment of significance is based on the four key aspects of significance as defined in Historic England's guidance document 'Conservation principles, policies and guidance for the sustainable management of the historic environment (Historic England 2008)'. The following is of note from this assessment:
- 4.3 The Listed Building has a 'degree of **evidential value**' resting in the nature of construction and style of the structure, due to the remnants of the building's engine house, and the crane hoist within the courtyard, along with two bearing shafts suggestive of industrial activity. The canal remaining in the same location adjacent to the Mill providing a 'visual aid' as to the transportation of raw materials and the finished product is also identified. The adverse impact upon the evidential value resulting from the substantial modification of the building's interior is noted – including with regards to false ceilings covering the jack arches and the rectangular lining obscuring cast iron columns, and all machinery has been removed or covered over during (the 1989) conversion. (paragraphs 7.2 – 7.4)
- 4.4 The site is identified as being of **historical value** in the sense that it guides a current understanding of how the cotton industry operated, but notes that this has been compromised due to the alterations to the surrounding land. The assessment states that 'many other mills would have been present in the surrounding area; however, these have been lost during time'. (paragraphs 7.5 – 7.6)
- 4.5 The assessment identifies Victoria Mill as being of **aesthetic value**. This is identified as being due to its Italianate architectural style which was popular in the late 19th century; and its imposing nature and scale which would result in people drawing sensory and intellectual stimulation from it. The loss of 19th century mills from Manchester is also noted, with Victoria Mill being 'the last remaining mill of the many mills that occupied sites along the Rochdale Canal until the mid-20th century'.

4.6 The site is identified as being of **communal value**, due to the large scale of the mill and its iconic chimney, meaning it can be seen from a substantial distance away. It is one of the few remaining mills along the Rochdale Canal and is considered a landmark in the north east of Manchester. The statement confirms that the site holds significant communal value as it contributes to a sense of place in this area, including for those who already live, work, and / or visit the building. (Paragraphs 7.9-7.10)

4.7 A 'Statement of Significance' is provided at paragraph 7.11 – 7.12 and notes:

'Victoria Mill is a Grade II Listed Building (ID: 388305). A Grade II* Listing defines the building as being of outstanding national importance and of 'more than special interest'. (paragraph 7.11)*

'Victoria Mill is significant, having been given a Grade II status in 1988, and thus is considered to be of 'more than special interest'. It is in good condition and provides an example of a late 19th century cotton mill built in the Italianate style. Although the interior machinery is no longer present, it still does retain good examples of jack-arches and cast iron pillars with octagonal capitals. Furthermore, this is one of the last of the 19th century mills still surviving on the Rochdale canal.' (paragraph 7.12)*

4.8 The 'Impact Assessment' within the Heritage Statement (Section 8) considered the impact of the proposed upper floor residential conversion scheme on the significance of the Listed Building. Paragraph 8.2 noted:

'Victoria Mill has already undergone changes when it was converted into offices and apartments in the late 20th century. Thus, the mill no longer retains any fixtures, on the interior, that indicate previous industrial use. The only visible historic fabrics on the floors are the jack-arches and the cast-iron columns with the octagonal capitals. The previous conversion, in the late 20th century, was reversible. False ceilings have simply covered the arches rather than altering them and the rectangular lining has simply shielded the cast-iron pillars from view instead of modifying them. Neither the jack-arches nor cast-iron pillars were removed or damaged during the alterations. If the proposed alterations to not damage or remove these items then the conversion will have moderate to minor impact on the fabric of the building.'

'In summary whilst it must be recognised that any new use will require some change to the historic fabric of the buildings, including the subdivision of space, if the jack arches and cast-iron pillars are not damaged or removed in the process, this proposal does not heavily impact upon the historic integrity of a heritage asset. The proposal represents a positive opportunity to provide a viable future for the building. Thus it could be concluded that the proposed development (Appendix II) would have negligible to minor impact on the mill, when this is balanced against public benefit the proposed development could be acceptable'. (Paragraph 8.6)

- 4.9 Section 5 considers the impact of the proposed works to the ground floor and basement ceilings and columns upon the significance of the Listed Building.

5. Impact of Scheme on Heritage Significance of Victoria Mill

- 5.1 This section is to be read alongside the photographs of the application site contained in Appendix 1. The submitted application broadly comprises the removal of suspended ceilings, column boxes and partitions, the painting of columns and beams, and the reinstatement of suspended ceilings and partitions to parts of the spaces. This section appraises the impact of the proposals upon the heritage significance of Victoria Mill.
- 5.2 It should be highlighted that from the outset of developing the proposed scheme, the design team have looked to retain and expose as many of the original features and as much of the original and historic fabric as possible, but have encountered challenges in terms of ensuring that existing occupiers can continue to operate from the ground floor.
- 5.3 As the proposals only relate to internal works to the ground floor and basement of the northern wing of the Mill, any impact is limited to those parts where works are proposed. Notwithstanding this, consideration has also been given to the impact of the works on the significance and setting of the broader Mill.
- 5.4 The sections below reflect the works proposed, as set out within the Design & Access Statement prepared by Allison Pike Architects and Schedule of Works prepared by Medlock.

Intervention	Summary	Impact
Ground Floor Works		
1	Existing suspended ceilings, column boxes and partition walls within ground floor offices to be carefully removed.	Neutral These works are likely to affect historic and original building fabric including the brick arches and columns. Provided the works are undertaken sensitively then the impact upon the significance of the building should be neutral.
2	Redundant M&E equipment to be removed where possible.	Minor Positive This equipment has an adverse impact upon the building both visually and physically and where it is not operational, its removal is

Intervention	Summary	Impact
		regarded as having a minor positive impact upon the building's significance.
3	The repair of brick arch ceilings where necessary, and these remaining exposed along with beams, columns, and column heads where possible.	Minor Positive These works will repair original features within the building thus helping to secure its future. Where the brick ceilings (columns and beams) can remain exposed, there are additional visual benefits and the exposing of ceilings generally enables the historic character and function of the building to be better understood. The proposed scheme will result in an increase of exposed historic ceiling from the current 5% to 47%.
4	Replacement M&E equipment to be installed where required.	Minor Negative The installation of M&E equipment to the historic spaces is regarded as having a minor negative impact both physically and visually upon the significance of the building – albeit where this is to be positioned above reinstated suspended ceilings, there is no visual impact. In mitigation, the proposed M&E would be replacing existing systems, and provided that the equipment is designed and positioned to have as limited impact on the building as possible, then this impact is reduced.
5	Intumescent paint to be applied to columns and beams.	Neutral The columns and beams have been repainted in relatively recent times, and do not therefore display historic / original finishes. The painting of these to reflect the colours recently approved and applied to upper floor levels will result in a neutral impact upon the building's significance.
6	Lay-in grid ceiling to be reinstated to some	Major Negative

Intervention	Summary	Impact
	ground floor ceilings, in line with occupier requirements, and enabling the re-use of existing M&E systems.	The reinstatement of ceilings will have a major negative impact upon the ground floor where this is proposed, and where this would be to original brick arch ceilings. There would also be a minor negative physical impact upon the original ceilings. The impact has been assessed as being 'major negative' on the basis that the brick arch ceilings, columns and column heads have been identified as being of evidential value contributing to the historic significance of this Grade II* Listed Building. It is however noted that the ground floor historic ceilings are almost completely enclosed by suspended ceilings, and that extensive areas of historic ceiling will remain exposed. The alternative use of plasterboard rather than lay-in grid ceilings would be regarded as resulting in further adverse impact visually, and physically, to the building. The residual impact would be greater, meaning that in the future more sensitive conversion of the space and further repair of ceilings would be more challenging. In mitigation, ceiling hangers should attach only to mortar where they interface with original ceilings.
7	Partition walls to be reinstated to existing configuration, including walls being extended upwards to ceiling level where necessary (abutting with section of exposed historic brick	Neutral The impact is regarded as neutral as the partition walls will be reinstated to their existing configuration. Whilst some will be extended upwards resulting in some very minor physical impact, this is where necessary for fire safety reasons or where brick arch

Intervention	Summary	Impact
	ceiling, or to fire escape corridors).	ceilings are to be exposed, thereby mitigating that impact.
Basement Works		
8	Intumescent paint to be applied to columns and beams.	Neutral The columns and beams have been repainted in relatively recent times, and do not therefore display historic / original finishes. The painting of these to reflect the colours recently approved and applied to upper floor levels will result in a neutral impact upon the building's significance.
9	The repair of brick arch ceilings where necessary.	Minor Positive These works will repair original features within the building thus helping to secure its future.
10	Installation of partition walls to create alternative means of escape for access to mechanical kit for upper floor apartments.	Minor Negative The proposed works will have a very minor impact on this space by enclosing parts of it which historically have been open. This impact is regarded as very minor on the basis that extensive areas of the basement level will remain open, and that the higher significance elements (columns and beams) will not be physically affected. Furthermore, this space does not contribute significantly to the significance of this Listed Building, and the proposed works will be fully reversible. It is also understood that these works are unavoidable due to fire safety reasons.

Summary of Impact

- 5.5 The proposed amendments to the approved scheme and the proposed additional works which are the subject of the submitted applications will result in a number of impacts. The

majority of these impacts have been identified as being either minor positive, minor negative, or neutral.

5.6 The most significant adverse impact upon the Listed Building relates to the proposed reinstatement of suspended ceilings to extensive areas of the ground floor, due to the minor physical impact, but more significantly the visual impact in removing these original internal features of the building from view. Correspondence with the occupiers of these spaces has confirmed that for operational and hygiene reasons, the reinstatement of ceilings where this is proposed is absolutely necessary. The physical impact is partly mitigated by the use of a lay-in grid ceiling rather than a plasterboard ceiling which reduces the impact upon the brick arch ceilings where these remain in situ. It is also important to note the conservation benefit which will result from the proposals which include the permanent opening up of multiple columns and column heads and an increase in visibility of the historic brick arch ceiling from 5% of those ceilings which survive to 47%.

5.7 Along with all of the other proposed works, these works are necessary to ensure the scheme is in accordance with fire safety and building regulations standards. These works are ultimately necessary to enable the occupation of the upper floors of the building for residential use, and the continued operation of the ground floor as office uses. Whilst the proposed works will result in some harm to the Listed Building, this is regarded as less than substantial, and outweighed by the multiple public benefits of the scheme. The most significant public benefits associated with this application are:

- The continued operation of an established NHS Surgery which has functioned at the site for around 30 years.
- Safeguarding the jobs of 55 employees at the site associated with the NHS Surgery and the PCT offices.
- Enabling occupation of the upper floors of the building which have been converted for residential use and currently remain vacant.
- Enabling full occupation of this Grade II* Listed Building, securing its future so that it can continue to be an iconic historic feature within Miles Platting, linking the area in perpetuity to its industrial past.

- 5.8 Extensive consultation has been undertaken with MCC and the occupiers of the ground floor space. Refusal of this application would result in the eventual loss of the NHS surgery and its office space in Unit 2, and potentially jeopardises the future of the PCT occupying unit 3, resulting in the closure of this essential NHS facility and the potential loss of employment. It is for this reason that the acknowledged harm resulting from the application proposals (which is less than substantial) is vastly outweighed by the public benefit of the scheme, in accordance with NPPF paragraph 202.
- 5.9 As is set out within Section 4, the Listed Building is identified as being of outstanding national importance and of more than special interest. Its historic interest is primarily within its external appearance, as a 19th century cotton mill built in a specific architectural style popular during the period. It is one of the last 19th Century Mills which survive on the Rochdale Canal and its relationship with the canal can still clearly be read and understood.
- 5.10 The building's evidential, historical, aesthetic, and communal value is summarised within section 4. The works set out within this application submission will not significantly impact upon these values. Whilst the application will result in a degree of harm, this is not regarded as materially impacting upon the significance identified above, and the proposals will not materially impact upon the building's setting.

6. Conclusion

- 6.1 This Heritage Statement has been prepared as an addendum to the Heritage Statement prepared by Archaeological Research Services (Ref: 2016/156) and approved as part of applications 119321 and 119357. This Statement considers the potential impact of necessary fire safety works to the ground floor and basement of the northern part of the Grade II* Listed Victoria Mill.
- 6.2 Approval of the submitted Listed Building Consent application is vital both to ensuring the continued operation of the NHS and PCT at the site, and enabling the occupation of the upper floors at the building for residential use. Together, this continued and future occupation will help to secure the long-term future of the building. Furthermore, in addition to these public benefits, the proposals do include some heritage benefits with the extensive opening up of historic ceilings, columns, and column heads across Units 1 to 3, allowing the historic function of the space to be better understood and appreciated.
- 6.3 The heritage significance of the building has informed the various design interventions, and impact upon sensitive parts of the building has been minimised as far as possible. The majority of amendments and proposed works will have a minor or neutral impact upon the significance of the Listed Building. Where works are proposed which will result in a degree of harm, this harm is regarded as less than substantial, and outweighed by the public benefits of the scheme.
- 6.4 This Heritage Statement has been prepared in accordance with national and local planning policy guidance. The design team look forward to working further with the Council in progressing the proposals through to determination.

Appendix 1: Photographs



Image 001: North (main) elevation



Image 002: East elevation



Image 003: North wing south elevation



Image 004: Courtyard elevations



Image 005: Fire Escape Corridor



Image 006: Fire Escape Corridor



Image 007: Above ground floor suspended ceiling

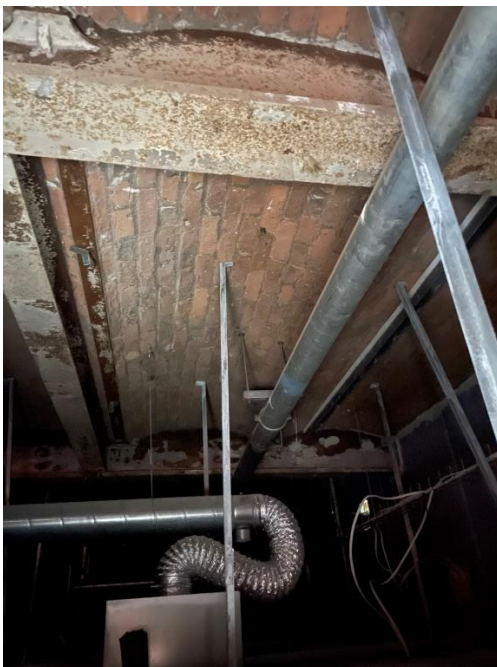


Image 008: Above ground floor suspended ceiling



Image 009: Above ground floor suspended ceiling



Image 010: Above ground floor suspended ceiling



Image 011: Above ground floor suspended ceiling



Image 012: Above ground floor suspended ceiling



Image 013: Above ground floor suspended ceiling



Image 014: Ground floor office typical interior

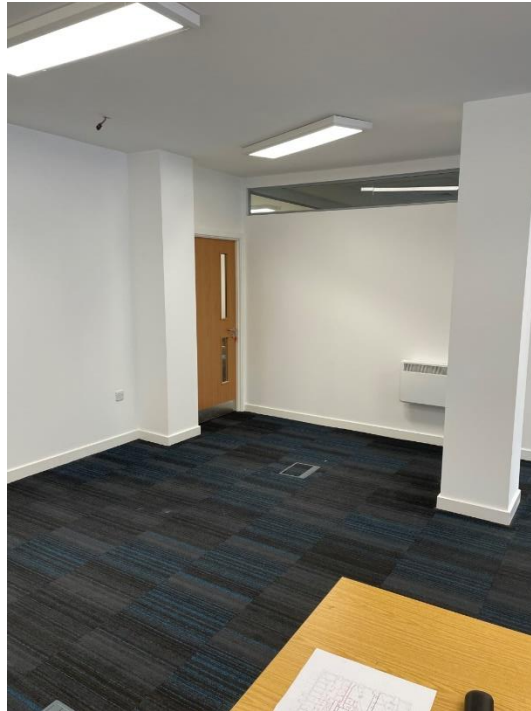


Image 015: Ground floor office typical interior



Image 016: Ground floor office typical interior



Image 017: Ground floor office typical interior



Image 018: Ground floor office typical interior



Image 019: Ground floor office typical interior



Image 020: Ground floor office kitchenette



Image 021: Ground floor office toilet



Image 022: Ground floor office typical interior



Image 023: Ground floor office typical interior



Image 024: Basement



Image 025: Basement