



2nd February 2023

London Road Fire Station, Manchester (Grade II* listed) - Listed Building Consent.

Heritage Statement regarding the proposed replacement of the external courtyard staircase.

1.0 Project background

- i. The Grade II* listed London Road Fire Station, Manchester (LRFS), is currently undergoing extensive repair, refurbishment and conversion to become a mixed-use development. The works that were first begun under consents gained in 2017, were superseded in 2020 due to revised proposals that gained consent under the extant Listed Building Consent 125714/LO/2019, dated 17th April 2020.
- ii. In undertaking extensive repairs to the historic fabric of LRFS, the applicant has utilised a conservation strategy that has strived to sensitively repair and retain as much historic fabric as possible. This has been exemplified in the project to date.
- iii. The external courtyard staircase has suffered from structural movement, partially historic, due to insufficient foundations and construction detailing, but also due to the extensive water ingress and decay of the building over the past 40 years.
- iv. In 2021 Allied London instructed Quadriga Ltd. as main contractor and under instruction from Curtins as the projects structural engineers, to commence a programme of in-situ repairs to the staircase.
- v. Upon commencing the repairs it became apparent that that extent of cracking and structural failure of primary columns and beams was more extensive than previously envisaged. The resultant structural survey concluded that a holistic programme of repair and replacement was required as in-situ repairs would not be sufficient to bring the staircase back into use on completion of the redevelopment.
- vi. A further contributing factor to the decision-making process has been the consideration that the staircase will form one of the primary fire escape routes from the Whitworth Street side of the building.
- vii. This Heritage Statement accompanies the listed building consent application for the replacement of failed structural components of the staircase, that will also require the complete dismantlement and re-build of the stair, with existing decorative elements being re-used in the re-construction.

2.0 Statutory Designations and Planning Policy Context

2.1 Statutory Designations

- i. LRFS was statutorily designated as Grade II* Listed on 3rd October 1974.
- ii. The building also forms a component of the Whitworth Street Conservation Area.

2.2 Planning Policy Context

- iii. The key planning policy documents are respectively, the Planning (Listed Building and Conservation Areas) Act 1990, the National Planning Policy Framework (NPPF, 2021) and the Manchester City Council (MCC) Core Strategy (2012).
- iv. The policies in the NPPF constitute the Government's view of what sustainable development means in practice. The definition requires development to give due weight to the appropriate conservation of heritage assets in order to be defined as sustainable development (paragraph 8). This is because one of the key dimensions of sustainability is protecting and enhancing the historic environment. It is thus necessary to demonstrate that the proposals for the site are demonstrably sustainable.
- v. Paragraph 189 advises that heritage assets are "an irreplaceable resource and should be conserved in a manner appropriate to their significance". The analysis of heritage significance in this document accords with the required NPPF approach, as it presents sufficient evidence to enable the Council, "to reach an informed decision".
- vi. The analysis of heritage significance in this Heritage Statement accords with the requirements of paragraphs 194 and 203 of the NPPF (2021) as it presents sufficient and proportionate evidence to enable the Council, "to reach an informed decision". The conclusions of this Heritage Statement are thus based on the "need to be proportionate to the significance of the heritage assets [potentially] affected, and the impact on the significance of those heritage assets".
- vii. In order to test the relative impact upon the built historic environment, the following Heritage Statement will assess the potential impact of the proposals on the fabric and character of the Grade II* listed London Road Fire Station.
- viii. Due to the nature of the proposals, there is no potential impact to the significance of the Whitworth Street Conservation Area.

2.3 Historic England Guidance

- ix. In 2015 Historic England released three Good Practice Advice notes supporting the implementation of national policy and the related guidance in the PPG. The advice notes do not constitute a statement of Government policy itself, nor do they seek to prescribe a single methodology or particular data sources. Good Practice Advice Note 2 (Managing Significance in Decision-Taking in the Historic Environment) and Good Practice Advice Note 3 (The Setting of Heritage Assets – as amended December 2017) were both utilised as part of this assessment in order to gain a full understanding of the relevant issues, alongside the NPPF and the PPG.
- x. The Heritage Statement accords with the requirements of the NPPF, and the guidance set out in Historic England's Advice Note 12, 'Statements of Heritage Significance : Analysing Significance in heritage Assets' (October 2019), providing relevant and proportionate information sufficient to inform decision-making by the Council.

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3.0 Significance Appraisal

- i. Reference should be made to the SLHA Significance appraisal as submitted with planning and listed building consent applications (PP Ref: 125712/FO/2019 and LBC Ref: 125714/LO/2019) for the building's redevelopment and to understand the significance of the building and individual components. We have below summarized the significance of the staircase and its contribution to the buildings special interest.
- ii. As identified in the 2019 Heritage Statement, the staircase contributes to the following elements of the building and their significance:
 - a. The Courtyard Elevations – Considerable Significance
 - b. The Courtyard – High Significance
 - c. Metalwork – Considerable Significance
 - d. Stairs – Considerable Significance, the Heritage Statement outlined that:
 - i. *The vertical circulation within the LRFS complex is provided by main and service staircases for both public and private access. The staircases materially express the importance of hierarchy within the building.*
 - ii. *The abundance of space and highly-decorative finish of the main staircases is in contrast with the plain and utilitarian secondary staircases.*
 - iii. *The architectural form of the staircases vary in the quality of decoration and size, according to the prominence and function of the areas being served The most elaborate stairs are in the Coroner's court, followed by the stairs in the officer's flats and police maisonettes. The police station stairs and basement stairs tend to be finished in glazed brick, reflecting the highly utilitarian character of these. The hose tower features a narrow, spiral flight of stairs all the way up to the hose tower platform.*
 - iv. *The form adopted varies following the role of the staircase within the building. Open-well staircases are generally main means of circulation, while dog-legged or straight staircases are secondary accesses. With concrete steps at basement level, the staircases are generally in timber on the above floors. The only exception is provided by ST.4 and ST.6 (entirely in concrete) and ST.10 (entirely in wrought iron). Decorative or plain railings and finishes following the use of the area.*
 - v. **Architectural/Aesthetic** *The architectural and aesthetic significance of the staircase is an expression of the significance of the area served.*
 - vi. **Completeness.** *The early plan form is substantially unaltered. However, finishes and fixtures are altered or damaged throughout.*
 - vii. **Status in Hierarchy.** *The staircases are significant elements of the development of the LRFS complex. Each area of the building is articulated around a vertical circulation which reflects its appearance the form and function of the area served.*

viii. **Conclusion: considerable significance.** *The surviving staircases are relatively original but ancillary features which help express the status and function of the spaces they access. The stairs largely retain their original form and use but are diminished by deterioration, and as secondary features their overall interest and importance is eroded.*

- iii. The courtyard staircase is one of the primary staircases of the building with decoration and quality at the forefront of its design, as well as providing functional vertical access.
- iv. The Courtyard Staircase also contributes to the significance of the Whitworth Street flats and other elements of this side of the building due to its relationship and being the primary access route.
- v. Overall, the Courtyard Staircase is of **Considerable Significance.**

4.0 Proposals and Heritage Impact Assessment

- i. Upon assessing the condition and repair of the staircase, the project structural engineers, Curtins, alongside the project architects, Purcell, have obtained an accurate measured survey of the historic staircase, and developed comprehensive details for the proposed replacement and repair strategy submitted for consent.
- ii. A pre-application meeting with Caroline Parry and Paul Mason was held 16th December 2022, with feedback gained on the proposals, which have now been taken on board and integrated into the proposed package now submitted.
- iii. The following drawing and information packages provide full details of the proposed works to balconies:
 - a. Curtins Structural Engineers - 060270-CUR-00-XX-RP-S-00040-V02_Courtyard Metal Stair Condition Report
 - b. Purcell Drawing package for the existing and proposed courtyard staircase, including the proposed drawing 240242-PUR-00-XX-DR-A-9014
 - c. Purcell Architectural Statement
- iv. The above information has been reviewed to assess the heritage impact of the proposed reconstruction of the staircase.
- v. The purpose of this Heritage Statement is to outline the potential impacts that the proposals have on the building's special interest as a Grade II* listed building.
- vi. The project team have undertaken investigations and developed the design in the context of the agreed Conservation Strategy by Heritage Architecture Ltd (5th April 2017) and with the relevant guidance in Historic England's Practical Building Conservation series. The following Historic England guides have been referenced: "Concrete" (2015), "Metals" (2013) and "Conservation Basics" (2015).
- vii. The below itemised table provides a heritage impact assessment of the detailed proposals, with the methodology consistent with that in the 2019 Heritage Statement.

Table 1: Direct and indirect heritage Impact (refer also to Appendix I, Table 2).

Building element	Proposed intervention	Direct Heritage Impact / mitigation
Courtyard Staircase Structural Elements	Replacement of failed structural elements of the staircase including columns and beams. Replacement in steel over cast iron / steel.	The proposed replacement will erode the building's original historic fabric with the loss of original structural members of the building. The existing staircase has been scanned and the new replacement elements have been designed to match the original elements as closely as possible. The new design will also improve the structural performance of the stair and prevent further impact on the surrounding historic fabric, ultimately allowing a staircase to be

		retained in use in this location. Overall, the proposal has a minor adverse impact on historic fabric.
Courtyard Staircase Decorative Elements	Replacement of decorative elements to the staircase including stair treads, risers, balustrades and handrails.	The proposed loss of metalwork will erode the building's original historic fabric, in particular decorative elements that contribute to the architectural interest. The replacement of these elements in items to match the design of the original will allow an appreciation of the original design ethos of the staircase. Overall, this will have a minor adverse impact on historic fabric.
Courtyard Staircase	Replacement of the staircase with new.	The proposed replacement of the staircase and minor alteration of detailing will have a minor adverse impact the appreciation of the courtyard and courtyard elevations. Through detailing the new staircase as per the original, the impact will be minimised to enable the appreciation of the original staircase in this location and its form. This will result in a negligible impact on the building's plan form. Overall, the proposal will have a minor adverse impact on the building's special interest.

- viii. The above tabular assessment of the variations to the consented scheme provide a concise and clear schedule of the alterations and potential direct impact to the building's special interest.
- ix. Overall, the assessment confirms that that the proposed replacement will have a **minor adverse impact** on the building's special interest.
- x. The proposals are required as stipulated by the project's structural engineer, and to ensure that a staircase in this location can continue to be safely utilised on completion of the building's redevelopment.

5.0 Conclusion

- i. Heritage Architecture Ltd. have referenced the previous consents and heritage statement to ensure a consistent approach is taken to the assessment of significance and impact during the building's redevelopment.
- ii. The structural failure and heavy deterioration of the staircase's condition has informed the proposals to replace the stair's structural and decorative elements, as well as the requirement to meet modern building regulations and design standards in the wider building conversion.
- iii. The courtyard staircase is a component with considerable significance to the London Road Fire Station as a Grade II* listed building.
- iv. The heritage impact assessment concluded that the proposed replacement of the staircase will have a **minor adverse impact** on the building's special interest.
- v. The proposed design of the replacement staircase reflects that of the original staircase which mitigates the level of impact, as does the justification for replacing it based on health and safety. Ultimately, the proposals retain a staircase in use in the original location and allow an appreciation of the original courtyard space, reducing the potential for impact on other elements of the building such as the plan form and courtyard.

Yours sincerely,



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For and on behalf of Heritage Architecture Ltd

Appendix I: Assessing the Magnitude of Change or Impact

The magnitude of change or impact is assessed based upon a detailed understanding of how and to what extent the proposed development might impact the heritage asset.

The contribution of the setting to the value of the heritage asset is an integral component which also contributes to the overall value or significance of the asset. Which in turn, allows for the magnitude of direct and / or indirect heritage impact to be determined.

Table 2: Criteria for defining the effect and degree of direct and indirect heritage impact		
Definition of magnitude and nature of heritage impact.	Direct heritage impacts (physical alteration or change to the site's character)	Indirect heritage impact (visual change to the experience or setting of the site and its context).
Major adverse Impact. <i>Substantial harm of this nature, which results in total loss of significance or fundamentally affects the significance of defined heritage assets, should normally be avoided.</i>	Development resulting in demolition of a significant historic fabric component which results in total loss of significance, or fundamental compromises the setting of a 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 interest of the identified heritage assets in the view, or the ability to appreciate those values and thus results in total loss of significance.
Moderate Adverse Impact. <i>Less-than-substantial harm will need to be demonstrably mitigated and justified by clear public benefits.</i>	Development resulting in extensive harmful alterations (but not total demolition) of a 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 interest of the heritage assets in the view, or the ability to appreciate those values.
Minor Adverse Impact. <i>The negative impact on the setting or overall character will need to be clearly balanced by appropriate mitigation.</i>	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 interest of the assets in the view, or the ability to appreciate those values.
Negligible adverse impact. <i>This does not mean that there will be no physical or visual change, rather that</i>	Development resulting in negligible direct impact on a designated heritage asset which results in the removal of a	Negligible perceptible change to the character of a designated heritage asset, or the experience and understanding of its special interest.

<i>the resultant difference would not diminish the value of the heritage assets' significant physical fabric, their settings or significance to any appreciable degree.</i>	minor, original fabric component, but avoids diminishing its character and its special architectural or historic 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. <i>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.</i>	Development which comprises an imperceptible 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.	Imperceptible 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, or the ability to appreciate its significance.
Negligible beneficial impact. <i>The resultant difference will be imperceptible but have a positive impact on the understanding or appreciation of the heritage asset.</i>	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. <i>The proposed change would result in a demonstrable improvement to the overall character or setting of a heritage asset.</i>	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, or the ability to appreciate its significance.
Moderate Beneficial Impact. <i>The proposed change would result in a considerable improvement to the overall character and appreciation of a heritage asset with clear beneficial enhancement of its heritage interest.</i>	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 interest. Moderate enhancement to the setting of the built heritage asset. Where the development will enhance to a clearly discernible extent the heritage interest of the heritage assets in the view, or the ability to appreciate its significance.

Major beneficial Impact. <i>The proposed change would result in substantial improvement to the overall character and appreciation of a heritage asset, revealing and/or enhancing important characteristics of its heritage interest.</i>	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 interest.	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 interest. Substantial restoration or enhancement of the setting of the built heritage asset where the development will enhance to a fundamental extent the heritage interest of the heritage assets in the view, or the ability to appreciate its significance.
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