

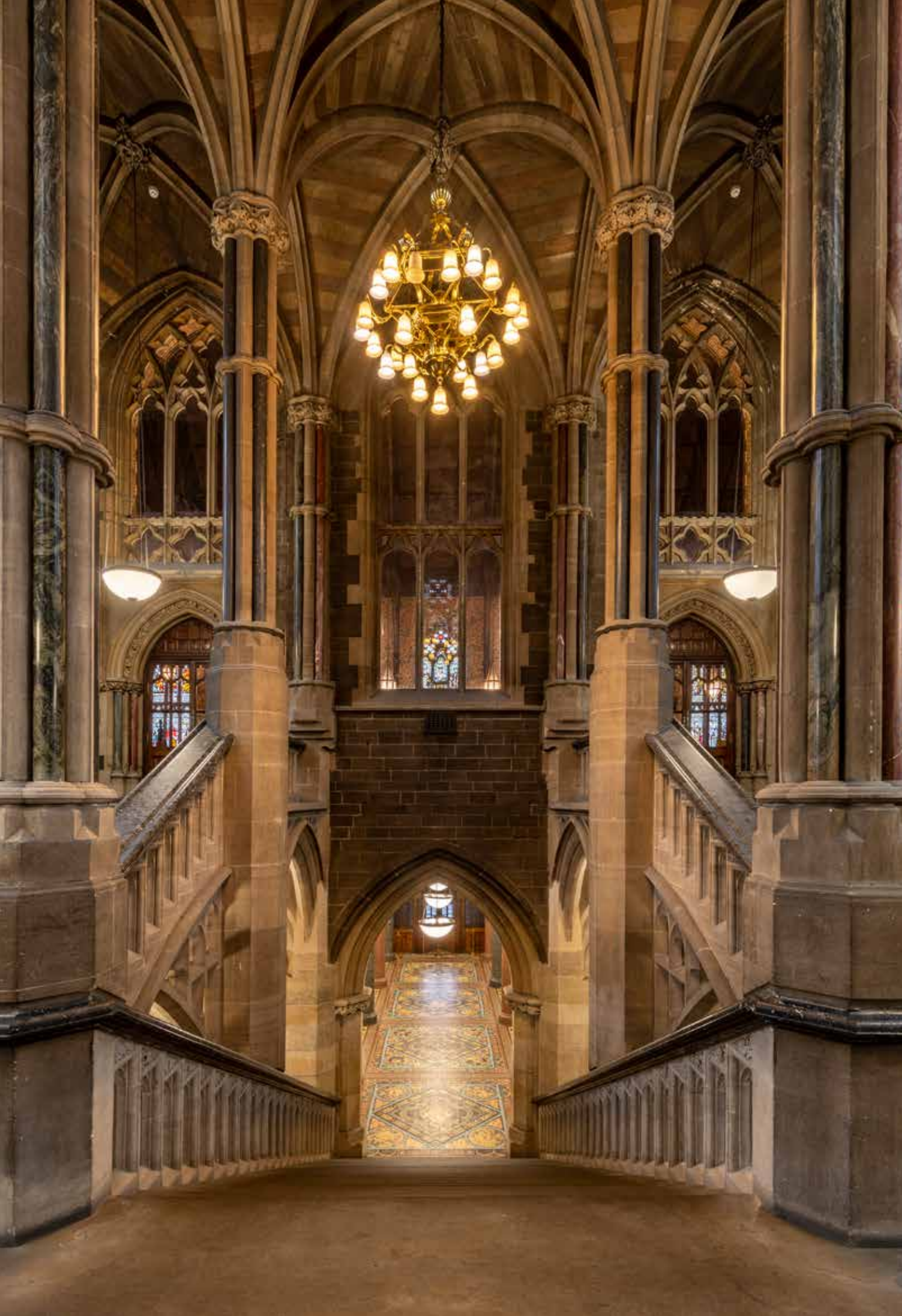
A photograph of Rochdale Town Hall, a large, ornate Gothic Revival building with a prominent clock tower on the left. The building features multiple levels of arched windows and a central spire. In the foreground, there is a roundabout with several cars. The sky is clear and blue.

Donald Insall Associates
Chartered Architects and Historic Building Consultants

Rochdale Town Hall

Heritage, Design and Access Statement for Rochdale Development Agency

November 2022



Contact information

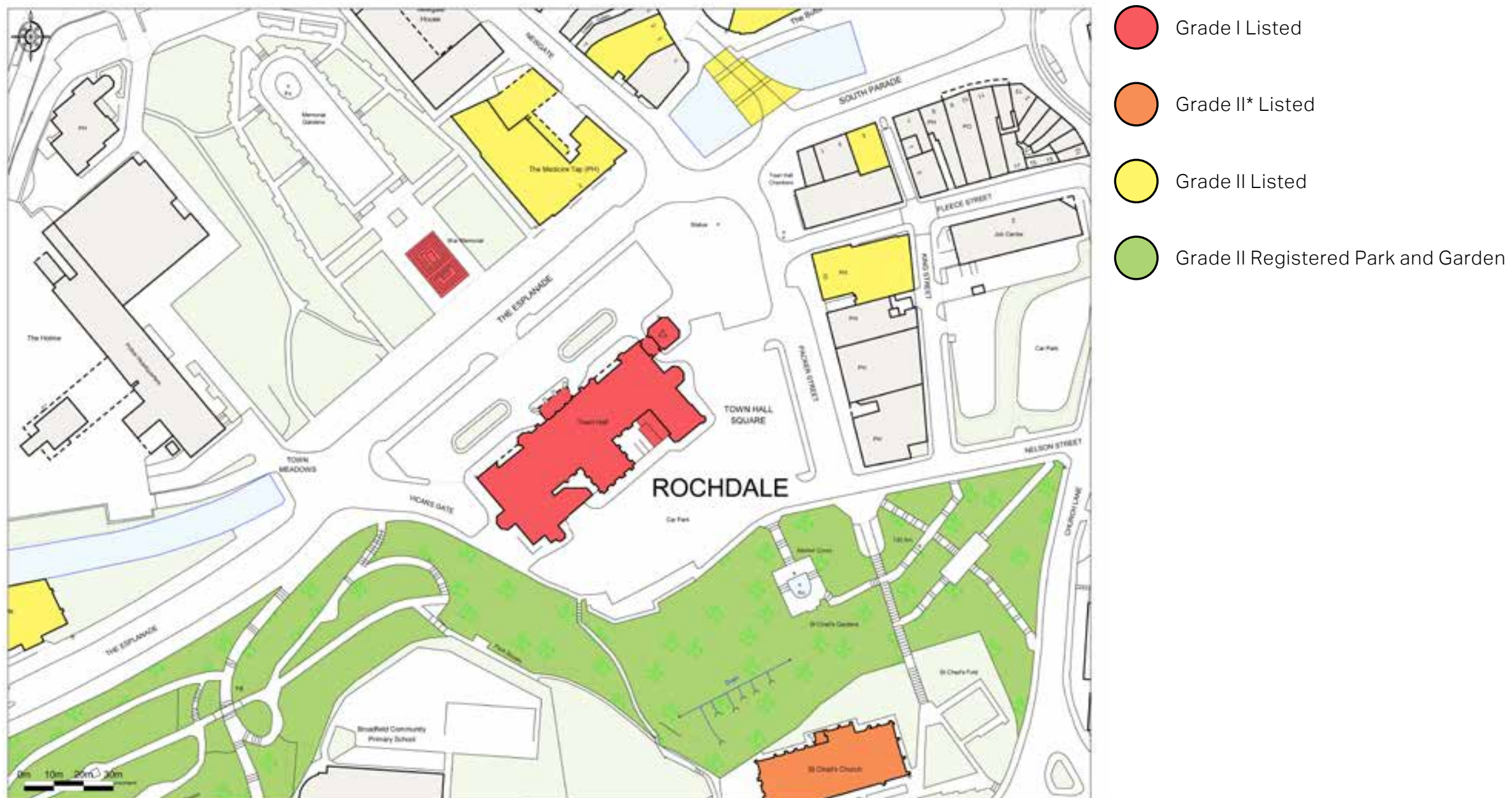
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1.1. Listed Buildings, Parks and Gardens



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1.0 Summary of Heritage, Design and Access Statement

1.1 Introduction

Donald Insall Associates were appointed in February 2019 to continue providing lead consultant and conservation architect services for Rochdale Borough Council (RBC) at Rochdale Town Hall following the successful outcome of the Heritage Fund stage 1 bid. This report has been drafted to accompany an application to provide new roof coverings to roof R2d.

This report has been drafted as a continuation of the Conservation Management Plan, 2020 (CMP), which informed the development of the main proposals for the building – as well as these specific proposals - the key principles of which are summarised in the Conservation Philosophy – (see Section 7 of the CMP). It seeks to demonstrate how the proposals comply with the relevant legislation, planning policy and guidance and to provide a justification of the scheme on this basis. It is underpinned by the comprehensive illustrated historic background, detailed building analysis and room-by-room gazetteer contained within the CMP and should be read in conjunction with that document – the relevant summaries of which are provided in Section 2; a summary of the Assessment of Significance is also provided at Section 3 of this report to provide context to the analysis and justification of the proposals contained in Section 4.

1.2 The Building, its Legal Status and Policy Context

Rochdale Town Hall is a Grade I listed building located in the Rochdale Town Centre Conservation Area (designated in 1980 and extended in 2011) in the Metropolitan Borough of Rochdale. It is in the setting of a number of nationally significant designated heritage assets. Directly opposite the Town Hall lies the Cenotaph (Grade I) and the old Post Office (Grade II); to the rear, St Chads Church (Grade II*) sits at the top of the hill with Broadfield Park and Slopes (Grade II Registered Park and Garden) extending between. The Rochdale Bridge (Grade II) forms part of the NLHF funded 'Revealing the Roch' scheme. The site also lies within the Historic England designated 'Heritage Action Zone' – a 5 year programme of heritage-led regeneration. Alterations to a listed building generally require listed building consent; development in conservation areas or within the setting of a listed building or conservation area requires local authorities to assess the implications of proposals on built heritage.

The statutory list description of the listed building is included in Appendix I and a summary of guidance on the conservation area provided by the local planning authority is in Appendix II, along with extracts from the relevant legislation and planning policy documents.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to have 'special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses' and, in respect of conservation areas, that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the Site comprises the Rochdale Core Strategy for the Local Plan (2016).

The Core Strategy for the Local Plan has policies that deal with development affecting the historic environment, and these require that development conserves and enhances townscape character (P2,1e); conserve, enhance and promote key heritage assets (P2, 2a); use heritage assets positively and intelligently to strengthen identity, image and support visitor economy (P2, 2c); and prioritise the conservation of heritage assets at risk from decay (P2, 2d).

The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework 2021 will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). The key message of the NPPF is the concept of 'sustainable development' which for the historic environment means that heritage assets 'should be conserved in a manner appropriate to their significance'.

The NPPF recognises that, in some cases, the significance of a designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The NPPF therefore states that any harm or loss to a designated heritage asset 'should require clear and convincing justification' and that any 'less than substantial' harm caused to the significance of a designated heritage asset should be weighed against the benefits of the proposal including, where appropriate, securing its optimum viable use. A designated heritage asset is defined as a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.

2.0 Site Survey Descriptions

2.1 The Building Externally

The following site survey is derived from the CMP (2020).

2.1.1 The Exterior

The different functions of the building were expressed on the exterior, with separate roofs and blocks reflecting the separate functions, a principle used in Gothic Revival architecture. Crossland used a hierarchy in the richness of the architecture and decoration to express the status of the rooms within. The three different functions are loosely articulated along the long principal frontage, resulting in subtle departures from symmetry. The central position of the Hall, expressed by a steep roof topped with a tall central flèche, is flanked by lower cross wings to create a near symmetrical front elevation. A grand projecting porte-cochère identifies the main entrance, with a roof that can be used as a public speaking platform. The structure is decorated with gilded heraldic lions. The principal staircase is expressed on the south front by a substantial projecting stair tower, with secondary stair towers at east and west ends of the building. The Court's high status was reflected in its lavishly detailed exterior, compared to the more functional Library to the east. Window treatment varied in the level of decoration (and cost) between these two extremes, and is a clear indicator of the status of the interior rooms.

2.1.2 North West Elevation

The principal, north-west elevation survives almost as it was in 1887. It was designed by Crossland as the principal frontage of the Town Hall, facing the river and was given the most lavish decorative treatment [Plate 3.1]. It has an asymmetrical frontage dominated by the two-storey seven-bay volume of Great Hall, with eight-stage tower to the north east corner (Waterhouse, 1880s). The hall range is flanked by gabled three-storey 'cross wings', and to the west is a lower gabled two-three storey cross wing. A three-bay porte cochère expresses the entrance. The exterior of the former Council Chamber (room F15a) was decorated with rich carved decorative blind tracery details to its spandrels and crow-stepped gable, as well as its traceried windows at second and third floors. Adjacent, the turreted and finialed Magistrate's staircase features further decorative spandrels and traceried windows at second floor level.

Few external changes have been carried out, but they include the insertion of windows to the first floor of the Waterhouse tower; stepped roof access to the parapet over the former Council Chamber; the removal of the railings and gates to the main porte-cochère, and levels changes for access.



3.1 North West Elevation, Copyright Damien Griffiths

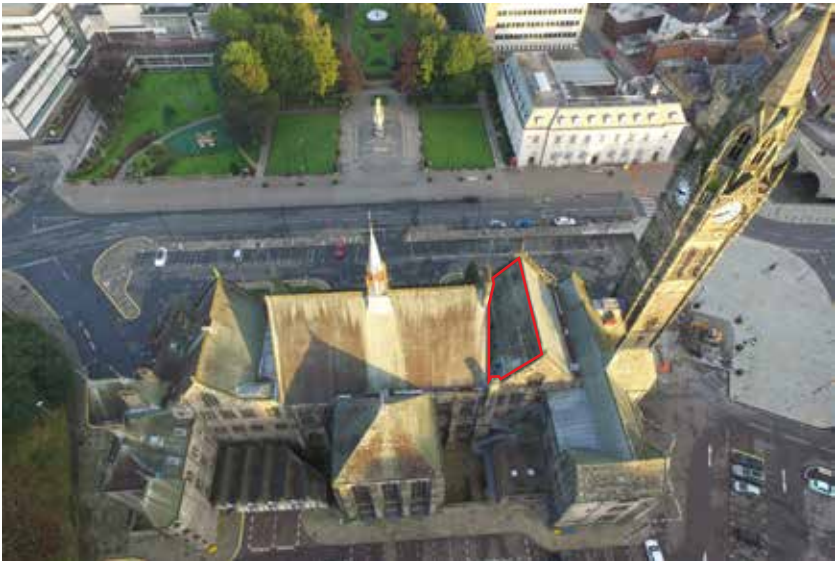
2.1.3 Roofscape

The roofscape is one of the building’s most noticeable features, with a variety of lively roof forms that relate to the different ranges and stair towers. These roofs are most richly detailed to the front where stone parapets are decorated with carved stone, whereas to the rear and side elevations they are plain with overhanging eaves and iron rainwater goods. Gables are finished with stone coped verges and parapets except for stair towers which have hipped roofs. Roofs are generally steep with a pitch of about 50°, and stair towers are even steeper. Iron finials, originally probably gilded, are used to punctuate the roofline and provide interest and decoration, although only a few finials remain. The roofs are largely covered with Westmorland-slates. There is a capped flue at the centre of the ridge of the Council Chamber roof.

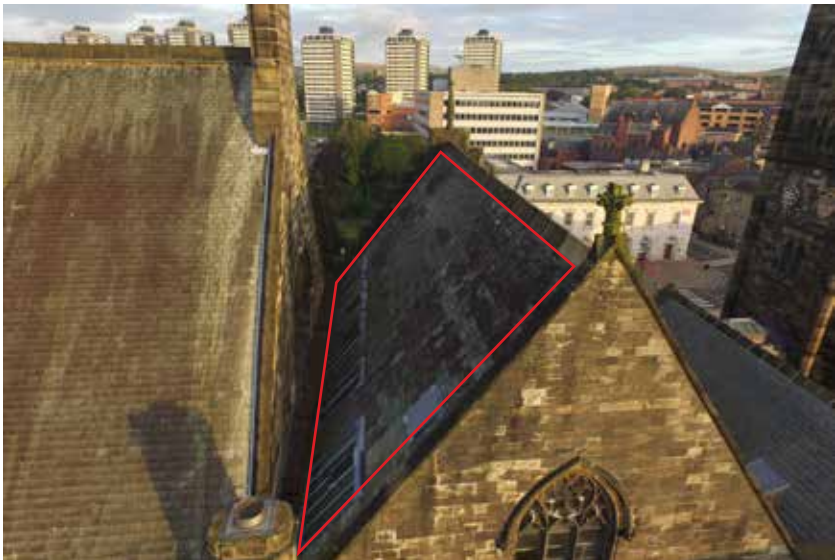
The subject area is the south west slope of the roof over the Bright Hall (S2), which is a steeply pitched and slated roof which is proposed for minor reconfiguration and recovering as part of the approved refurbishment works [Refs: 20/00616/LBC and 20/00615/FUL]. This section of roof is barely visible from any public views given its height, set back and location. The south west slope of the Bright Hall roof is visible in longer views from The Esplanade [see Plates 3.2-3.4].



3.2 Location of roof R2d



3.3 Location of roof R2d



3.4 Location of roof R2d

3.0 Assessment of Significance

3.1 Introduction

This assessment responds to the requirement of the National Planning Policy Framework to ‘recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance’. The NPPF defines significance as:

‘The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological (potential to yield evidence about the past), architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting’.

3.2 Summary of Significance

The following summary is derived from the CMP (2020).

3.2.1 Introduction

Rochdale Town Hall is a Grade I listed building of exceptional interest, its dramatic Gothic exterior and jewel-like interior are in harmony and together they exemplify not only the apex of High Victorian design and suggest the beginning of the Aesthetic movement, but also represent Rochdale’s specific position on trade and politics and the building is a symbol of civic pride and as such is of national significance.

The Town Hall was designed by William Crossland, a prominent Victorian architect, and is of the highest significance in terms of its historic value as one of the finest examples of a Victorian town hall nationally. As well as being an outstanding example of the Gothic Revival, it also includes early examples of Aesthetic Movement design, then a very new movement in art.

Its original form as designed is little altered with the exception of the later tower, itself a fine example of design by Waterhouse, and the north front and tower are of the highest architectural significance. This is derived through the aesthetic value of its exterior and for the particularly outstanding decorative design of the interior. Externally, Crossland utilised the form of the architecture and a hierarchy of decorative detail to express separate internal functions and create a unified interior and exterior scheme, with stone carvings and stained glass of the highest quality embellishing the building, with symbolic sculpture and motifs by the leading craftsmen of their trade.

Internally the surviving rooms with intact schemes are probably unmatched as examples of Victorian polychrome decorated interiors, with one of the most elaborate examples of pictorial and heraldic decoration of this era. The building has been in continuous public use for over 140 years and has a high evidential value founded in several major phases of alteration undertaken to reflect the changing aspirations and priorities of the Council; the layers of paint and other finishes in the decorative scheme hold evidence for the original appearance and composition of paint colours and are part of the building’s significance. Adaptations undertaken in the 1970s and 1990s are of low value and detract from the significance of the building.

A socially and culturally radical building, the Town Hall is regarded as a symbol of civic pride and identity in Rochdale. It has communal value for its presence in the town centre, as a focus of significant events and for the interior decoration illustrating the balance between radical politics, Victorian trade and a claim on tradition which Rochdale’s entrepreneurs and politicians sought - rooted in Rochdale’s heritage. The theme of interior decoration showing industrial processes and working people are extremely rare within Victorian fine art.

The Town Hall is the most significant building in the conservation area; lying on an island site it forms a major landmark on the Esplanade and dominates the town centre. It forms part of an attractive group of civic and community buildings that include St Chad’s Church and the Post Office set in a designed landscape that was developed in stages between the late 19th century and the mid-20th century and recently enhanced through the reopening of the River Roch. Views from the west along the Esplanade, from Park Slopes and from Memorial Gardens are of particular significance; whilst car parking, traffic and associated highway clutter detract from the Town Hall’s wider landscaped setting.

3.2.2 Significance: Setting

The Town Hall stands on an island site and forms the major landmark on the Esplanade and within the town centre. The site was cleared to allow for its construction and as a consequence the Town Hall does not have a strong relationship with the surrounding historic street pattern which was altered to accommodate it. Its immediate setting however was also remodelled to designs by Crossland to create a dignified civic setting for the building. To the north a new road edged with a new riverside parapet was laid out whilst to the south, Park Slopes was created with an informal park for recreation; both schemes were finished by 1870 in time for the opening of the Town Hall. The Town Hall Square and Memorial Gardens both formed later additions to its setting, the former altered by modern car parking. Views from the west along the Esplanade, from Park Slopes and from the Memorial Gardens are of particular significance. The existence of such an unusually generous space around the Town Hall is the result of separate phases of investment

by the Corporation over a period of over 70 years, to create a landscape setting for their Town Hall. Car parking, traffic and associated highway clutter added since the mid-20th century however detracts from the overall civic quality of its setting.

3.3.2 Significance: External Fabric

The exterior architecture of the Town Hall is of the highest significance as an example of a Town Hall designed in the Gothic Revival architectural style, with separate functions expressed in the form of the architecture and a hierarchy of decorative detail used to clearly express the most important areas and functions. Crossland used the country’s best stone carvers and stained glass artists to embellish the building with individually created, highest quality symbolic sculpture and motifs. The principal north façade and tower are of the highest significance whilst the rear elevation and south wings were deliberately treated more plainly, creating a clear contrast between these functional areas and the imposing public frontage - these are still of high significance. Minor late-20th century alterations to the south-east elevation have had a minor impact on the appearance of this façade; however overall the exterior is virtually unaltered and remains as designed by Crossland, with the later tower by Waterhouse.

The north-west elevation is of the highest significance for the richness of the stone detailing, including carved figures and animals to window hood moulds, window tracery, the crenellated parapet of the Hall and bands of carved detail linking the elevations. The access ladder at roof level detracts.

The form of the roof over the Bright Hall is of high significance as part of the overall lively and varied roofscape of the Town Hall. The study area is of medium significance in its own right as a simple pitched and slated roof and given its concealed location it plays a relatively limited role aesthetically. The original secondary roof fabric (batons and rafters) is of moderate significance.

3.3.3 Significance: Interior and Decorative Scheme

The interior as a whole is considered to be of high significance. The Gazetteer contained within the CMP sets out the relative significance of different spaces, also shown on the accompanying Significance Plans. The original internal structure and plan form is largely intact; the planning of the building was not particularly innovative at the time it was built, but reflected divisions between different historic functions of the Council at that time. Some aspects of circulation did not work well from the beginning, and changes were made incrementally to address this as municipal functions evolved within the Council.

Rooms were designed in a hierarchy so that at the lower end of the scale, functional offices and service rooms were plainly finished; these are of lower significance than the high status reception and civic rooms. The decorative design of the high status rooms in the interior is of the highest significance; Rochdale has one of the most elaborate programmes of pictorial and heraldic decoration of all Victorian town halls. The symbolism used in the decorative art, in wall painting, stained glass and on carved wood and stone architectural sculpture contributes to the importance of the whole interior.

The decorative scheme in intact high status rooms is of the **highest significance**; these include: The Exchange (G1a), the Former Council Chamber (Reception Room) (G1b), the Mayor's Parlour (G2a) and the Great Hall (F1). Of **high significance** are: the Borough Court (Council Chamber) (F15a) and the Magistrate's Retiring Room (Members' Room) (F14a). Of **medium significance** (certain key elements have been replaced and interior further compromised by insertion of dominant new elements): Refreshment Room (F2a) and the simple roof space above the Council Chamber (T15a).

4.0 Brief and Description of the Proposals

4.1 The Brief

The original LBC application for the project detailed the use of Westmorland slates to make up any shortfall in the existing roof slates to the Town Hall. A large store of Westmorland slates to make up this shortfall were available on site for use as required. Unfortunately, upon stripping of the existing roof slopes it was found that the upper slates were in worse condition than anticipated and many needed to be replaced. This meant that the basement stores were not enough in quantity to supplement the existing roof slates and alternative source of slates was required to be found to make up the shortfall.

A number of options have been considered which are summarised below **[Plate 4.2]**:

- Reclaimed Westmorland Slates

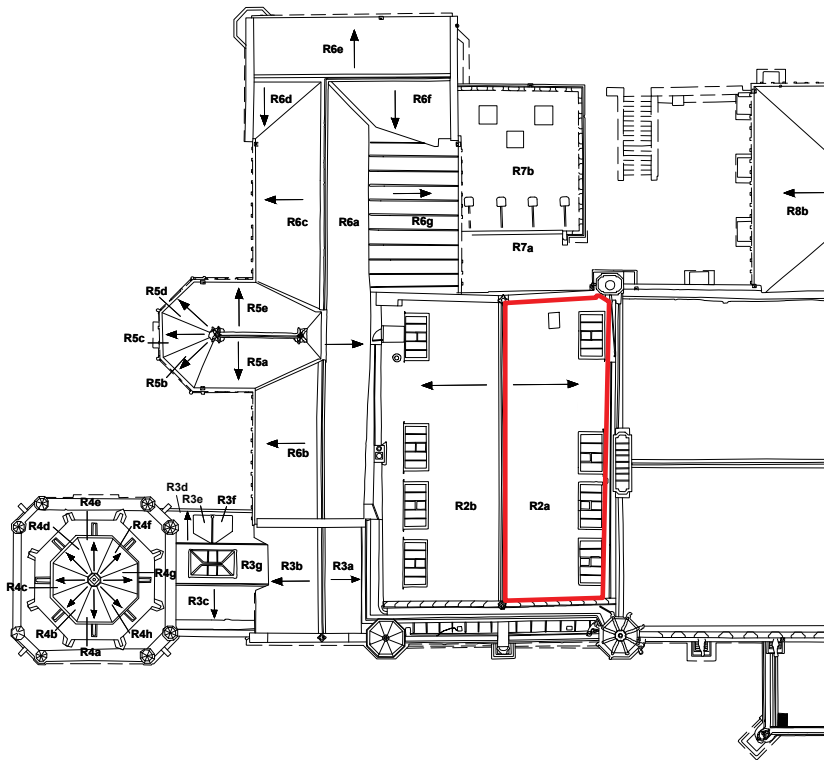
Reclaimed slates have been considered however available slates are coming towards the end of their useful lives and would need to be replaced in circa 10 years presenting an ongoing maintenance problem.

- New riven Westmorland Slate

These currently have a 9-month lead time which is unfeasible for the project.

4.2 Description of the Proposals

It is proposed to replace the existing riven Westmorland slates with new Vermont Slates to **Roof R2d [Plate 4.1]**.



4.1 Roof plan showing the location of Roof R2d - see drawing RTH-DIA-XX-50-DR-A-0028-Phase2_Plan_Roof_Vermont Slates Location



4.2 Comparison of the Different Roof Slates. Clockwise From Top Left. 1) Reclaimed Westmorland 2) Riven Westmorland 3) Existing Slates 4) Vermont Slates

4.3 Commentary

The use of Vermont slates has been carefully considered. Their use has been contained to an all but hidden secondary roof (**R2d**) which is all but invisible from ground level [Plate 4.3]. A small triangle of the roof is visible from a specific angle on the north elevation [Plate 4.4].

The slope does not directly abut any other roof slope and so any marginal differences in appearance will not be apparent. It is noted that slates of a lesser quality have been used on this roof slope (Westmorland strongs rather than Westmorland bests).

The choice of slate has been considered in the context of the wider project budget. There are cost pressures to contend with on the project and the project team are facing tough decisions in order to keep the works within an affordable budget. The only way to facilitate the extra over cost associated with the riven Westmorland slates would be to cut out significant restoration works from the interior of the building.

The use of Vermont slates was discussed in a meeting with Historic England on the 15th of November 2022 who agreed in principle to their use on **Roof R2d**.

It was noted that the Vermont slates are a good product and the match between the Vermont Slate and the Westmorland slate was complimentary [Plate 4.6] as such the associated risk to wider preservation work through the use of riven Westmorland slates unnecessary. It has been confirmed from the roofing contractor that the Vermont slates are unfading.



4.3 Location of roof R2d on North-West Elevation



4.4 Location of roof R2d



4.5 Location of Roof R2d on South-East Elevation



4.6 Proposed Vermont Slate (L) adjacent to Existing Westmorland Slate (R)

5.0 Commentary on the Proposals

5.1 Impact on the Heritage Assets

The proposal relates to the roof which is of high significance overall and to a specific area which is considered to be of moderate significance. The use of Vermont slates on the roof would cause no harm overall whilst:

- Supporting the long-term conservation of the Grade I listed building
- Enabling the re-roofing to be undertaken within program and budget
- Protecting available budgets for other conservation projects including the Zodiac Room

The proposal would cause no harm to the significance of the listed building and would have no impact on the character or appearance of Rochdale Town Centre Conservation Area. Given its concealed location, the use of Vermont slates on roof R2d would cause no harm to the setting of nearby listed buildings which include the Old Post Office (grade II) and the Church of St Chad (II*).

5.2 Policy Justification of the Proposals

5.2.1 The Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990

The proposals are minor in nature and relate to the installation of Vermont slates to the internal slopes of **Roof R2d**. The proposals have been considered within the context of the wider project budget and it is considered that they would cause on **very minor** localized harm to the fabric of the building but not to the special interest of the listed building overall. The proposal would cause no harm or the character and appearance of the Rochdale Conservation Area.

Overall, it is considered that the proposed works would preserve the special architectural and historic interest of the listed building and character and appearance of the conservation area, in accordance with the statutory duties set out in Sections 16,66, and 72(l) of the Planning (Listed Building and Conservation Areas) Act 1990. The proposals would also accord with Policy P2 of the Core Strategy for the local Plan.

5.2.2 The National Planning Policy Framework

As Explained above, the extent of roof is small and almost completely concealed and would not cause harm to the significance of the listed building overall. Any perceived harm would be very much less than substantial and line with paragraph 202 of the NPPF would be outweighed by the following public benefits:

- Supporting the long-term conservation of the Grade I listed building
- Enabling the re-roofing to be undertaken within program and budget
- Protecting available budgets for other conservation projects including the Zodiac room

Overall and on balance it is considered that the proposal would comply with paragraphs 197, 199, 202, of the NPPF.

5.3 Conclusion

It is the conclusion of this report that the proposed scheme aligns with the policies within Rochdale’s Core Strategy, the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the tests for sustainable development outlined in the National Planning Policy Framework insofar as they relate to the historic environment.

Appendix I - Statutory List Description

ROCHDALE TOWN HALL

Grade: I

Date of most recent amendment: 12th February 1985

Town hall. 1866-1871, W.H Crossland; tower 1883 by A. Waterhouse. Ashlar, Westmorland slate roof.

The reception room, Lord Mayor's Parlour, the Small Exchange, members lounge and committee rooms are placed to either side of the entrance hall (or the Exchange). The grand staircase rises to the first floor Great Hall and small staircases terminate the essentially axial plan.

To the south west of the hall on the upper floor is the Council Chamber (formerly Court room) and retiring room. Gothic revival in an elaborate form with Continental antecedents. Facade of fourteen bays is asymmetrical but balanced with linking bay and tower added to left. Outer bays have triangular gables and are of three storeys, although they differ in treatment. The next two on left and three on right have an arcade across the ground floor, then tiers of plate glass windows, mostly mullioned with cusped heads, and end above a corbelled balcony in a stepped gable richly panelled with blind tracery. The central seven bays (containing the Hall) are flanked to left by a slim octagonal stair turret with stone spirelet and to right by an octagonal stair tower with tall two-light pointed windows and a steep pyramidal slate roof with cresting. The central three bays have a heavily buttressed porte-cochere supporting heraldic beasts and acting as a balcony to the Hall which is lit by tall three-light windows with geometrical tracery. Battlements behind which rises an immense slate roof with central wooden fleche.

The tower, a version of that at Manchester Town Hall rises sheer from the plinth through three stages to the broader clock stage where gables surmount each face flanked by pinnacles. Above this a short octagonal lantern carries a stone spire. The whole facade is richly carved with naturalistic foliage in the style of Southwell Minster. The main feature of each return wall is a tall semi-octagonal stair tower with lead windows and pyramidal slate roofs.

The rear is comparatively plain, but the centre is occupied by the great stair hall of three bays with weathered buttresses and very tall three-light windows, roofed separately. The entrance hall is 5x3 bays with quadripartite red and white stone vaulting, fine carved capitals of Southwell Minster type carved by Thomas Earp, polished granite columns and Minton floor tiles; it forms an undercroft to the hall and was intended as an Exchange. The reception room has three pierced diaphragm arches, two Tudor arched fireplaces with castellated mantles and heraldic panels, and wall paintings depicting the various machines used in textiles. The Lord Mayor's Parlour has a similar fireplace, chamfered beams carried on corbels representing

the sections of an orchestra, William Morris stained glass depicting the seasons and months of the year, and wall paintings.

The members lounge has a vaulted ceiling carried on granite corner columns. The Small Exchange has the industries of Rochdale represented in the stained glass and ceiling paintings. The vaulted stair hall has one flight which returns in two with clustered columns rising between the flights. The heavy marble handrail rests on a stone arcade, the upper landings are supported on flying ribs and the stained glass represents the towns with which Rochdale traded. The Great Hall has a painted timber roof with angelic hammer beams: Henry Holiday's wall painting of 1870 depicts King John signing the Magna Carta, the stained glass is by Bayne of Heaton But and Bayne and includes two rose windows to the gables. A large organ is housed in three pointed arches. The Council Chamber and Court Room are elaborately decorated with carved timber fittings. Most rooms have original painted wall pattern designs by Best of Rochdale and oak linenfold panelling of varying designs.

The design was selected by competition in 1864 and is an important early departure from High Victorian heaviness.

The Builder 7:4:66, 7:10:71, and 12.2.76. B.o.E.

Listing NGR: SD8958413253

Appendix II - Planning Law, Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

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

Similarly, section 66 of the above Act states that:

In considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Similarly, section 72(l) of the above Act states that:
[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Local Policy

Rochdale Core Strategy

The Core Strategy for the Rochdale Borough Local Plan was adopted on 19 October 2016 and sets out the strategies for the borough through to 2028. The following policy relates to the borough's heritage:

P2 - Protecting and enhancing character, landscape and heritage

1. We will protect and enhance the borough's character, the distinctiveness of its town centres, housing areas and countryside, and the qualities of its landscapes, utilising the considerable potential of these assets in development and regeneration schemes. We will do this by:

- a) Requiring new development to integrate successfully with the key natural features of the borough, e.g. river valleys and the Pennine landscape;

- b) Requiring new development to take opportunities to protect and open up important views of hills and valleys which are part of the borough's unique character;
- c) Restoring the River Roch and other water bodies to their place as key and attractive features of the borough, including opening up waterways where they have been covered, and enhancing their setting, heritage assets and biodiversity potential;
- d) Protecting, enhancing and utilising outstanding cultural landscapes, such as the Cheesden Valley area and around Littleborough and Hollingworth Lake; and
- e) Conserving and enhancing townscape character.

2. We will protect the borough's heritage by:

- a) Conserving, enhancing and promoting key heritage assets, both statutory and nonstatutory, including consideration of their wider settings. Key heritage assets of the borough include:
 - i. Four outstanding conservation areas: Central Rochdale, Middleton and Littleborough town centres and Rock Nook / Summit;
 - ii. Other designated assets such as listed buildings, conservation areas, registered parks and scheduled ancient monuments;
 - iii. The heritage of the Co-operative movement, the Rochdale Pioneers and the Labour movement;
 - iv. The Edgar Wood and J. H. Sellers cultural heritage;
 - v. The heritage of the seventeenth and eighteenth century vernacular tradition; and
 - vi. The engineering heritage, including mills, canals and railways.
- b) Conserving, enhancing and utilising other non-statutory heritage assets of local interest, be they buildings, parks, gardens or archaeological sites, including promoting their sensitive restoration;
- c) Using heritage assets positively and intelligently to strengthen identity and image and support the visitor economy, particularly in development and regeneration schemes; and
- d) Prioritising the conservation of heritage assets at risk from decay, giving special attention to designated heritage assets in this regard.

Rochdale Town Centre Conservation Area

The *Rochdale Town Centre Conservation Area Appraisal* was published in November 2011. The character of the area surrounding the Town Hall is described as follows:

Rochdale Town Hall, Square and Esplanade

South of the river, the Town Hall Square and The Esplanade (1864-71) was an artistic creation of the highest order with set-piece buildings in an expansive layout planned according to romantic and picturesque principles. Rochdale Town Hall and the clock tower rise sublimely from a very large plaza connected to Manchester Road by a ceremonial way, The Esplanade. The scheme is completed by romantic gardens created on the valley slopes (registered park grade II). The simplicity and the visionary scale of the scene contrast with the adjacent Old Town. Excessive parking dramatically lowers the quality of the scene and the functionality of the plaza.

Town Hall Square

Town Hall Square is part of the Crossland master plan. Originally, Town Hall Square was a beautifully urbane and uncluttered space. It joined all four parts of Victorian Rochdale together, the north, via Yorkshire Street, the east, via The Butts, the south, via Church Steps, and the west via The Esplanade - altogether a very symbolic piece of town planning. The focus of the square 45 was the statue of John Bright, created by the famous sculptor Hamo Thornycroft, which could be seen from all four directions. Commercial buildings were planned and built on the eastern side of the Square. Crossland and Crowther's enlargement of St Chad's Church enclosed the Square from the south. Crossland also doubled the width of Rochdale Bridge, transforming it into a wide platform so people could sweep down Yorkshire Street over the river and into the Square unhindered by any obstruction. Access from the south was via the ancient Church Steps which gave excellent views across the Square.

The buildings along Packer Street form an impressive frontage, the impact of which has been obstructed by a row of mainly purple ash trees, which although attractive in their own right cut these important buildings off from the square and are damaging their stonework.

The Esplanade

The name, "*Esplanade*" means a stretch of pavement used as a promenade and was proposed by a Cllr. Taylor as an alternative to the ubiquitous "*Corporation Street*". It was laid out in 1871 and formed a seamless extension of the "*wrap-around*" Town Hall Square. Trinity United Presbyterian Church marked the western extent, a Gothic focal point similar to St. Chad's Church. The Gothic theme was continued by the Old Grammar

School, (since replaced by Broadfield Hotel) which sat atop Park Slopes overlooking The Esplanade. Behind this Sparrow Hill was alignment with Trinity Church as its focal point.

The Esplanade is the picturesque equivalent of a long symmetrical vista to a classical town hall and square. However, unlike classical design, nothing is perfectly straight, symmetrical or "on axis" and everything appears informal and accidental. For example, from the west, the gently curving Esplanade never quite frames the Town Hall.

Over the decades, the junction of The Esplanade with Manchester Road has been the principal gateway to Rochdale Town Hall and centre. After the unfortunate destruction of Trinity Church and The Angel, the gateway has been strengthened by two "Spires" that take their cue from the five picturesque fleches on the roofs of Touchstones. The Spires were created in 1997 by Jeremy Waygood and with the creation of Touchstones have helped to redress the earlier losses. They are thoroughly positive developments that have helped to recreate the gateway effect, though their general setting is compromised by the road junction that takes up most of the available space.

The fast-flowing River Roch was another element to the design that imparted a sense of wild-ness so beloved by the Romantics. The character of the river varied: at the Butts it was wider and slower and had been crossed by a bridge and ford for centuries but adjacent The Esplanade it was narrow and faster running. The land levels adjacent the Roch were raised thereby alluding to the cliff-like edges and foot bridges found in fantasy illustrations of the picturesque. A footbridge and cutting was also created for Bird Cage Walk where it runs through Park Slopes.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (July 2021). This sets out the Government’s planning policies for England and how these are expected to be applied. With regard to ‘Conserving and enhancing the historic environment’, the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset’s significance provided. Paragraph 7 of the Framework states that the purpose of the planning system is to ‘contribute to the achievement of sustainable development’ and that, at a very high level, ‘the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs’. At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

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

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of the NPPF identifies the following criteria in relation to this:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness*

With regard to applications seeking to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), paragraph 198 states that:

- ...local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.*

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 199 the framework states the following:

- ...great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

The Framework goes on to state at paragraph 200 that:

- Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
 - a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Where a proposed development will lead to ‘substantial harm’ to or total loss of significance of a designated heritage asset paragraph 201 of the NPPF states that:

- ...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
 - a) the nature of the heritage asset prevents all reasonable uses of the site; and*

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
d) the harm or loss is outweighed by the benefit of bringing the site back into use

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following;

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

In terms of non-designated heritage assets, the NPPF states:

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and world heritage sites and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 206 states that:

... Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas and world heritage sites it states, in paragraph 207, that:

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Concerning enabling development, it states, in paragraph 208, that local authorities should:

assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) 2021 and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is “significance”?

‘Significance’ in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- **archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms ‘special architectural or historic interest’ of a listed building and the ‘national importance’ of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset’s significance.

Paragraph 7: Why is ‘significance’ important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure. In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset. If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 199-203 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 199-203) apply. Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings’ significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 200).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Other Relevant Policy Documents

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

Historic England: Conservation Principles and Assessment (2008)

