

Emailed to: Ryan.Killeen@Rochdale.Gov.UK

15/07/2025

Dear Ryan Killeen,

Site: Land at Parkfield House, Manchester Old Road, Middleton, M24 4DY

Ref: 23/00335/FUL

The Twentieth Century Society has been notified of the above planning application for “Residential development comprising of 20 dwellings (Use Class C3) and a 80 bed care home development (Use Class C2) including creation of new access, car parking, landscaping, open space and other associated works following demolition of Parkfield House”. The Society *strongly objects* to the proposed demolition of Parkfield House, which is a Non-Designated Heritage Asset included on Rochdale Borough Council’s Local List and is regarded as a positive contributor to the Manchester Old Road Conservation Area it is located within.

We *strongly objected* to the application in our letter of 22 May 2023. We retain this opposition to the application. Our assessment of the revised elements of the scheme can be found below.

Significance

Parkfield House was formerly council offices, built in 1965-66 to designs by Lyons, Israel and Ellis and replacing an earlier villa of the same name.

Lyons, Israel and Ellis were major post-war architects, established in 1934 by Edward Lyons and Lawrence Israel, the pair having won the competition to design the Wolverhampton Civic Halls (1937). The partnership was reestablished following the war in 1945 and the pair were joined in 1947 by Tom Ellis (becoming full partner in 1949). David Gray joined the three in 1957, becoming full partner in 1970 when Edward Lyons retired.

The practice is perhaps best known for their educational projects, which include the Grade II Oldbury Wells School in Bridgnorth, Shropshire (1958) and the Grade II Upholland School in Lancashire (1962). Listed examples of their work outside education includes the Grade II early Brutalist Royal National Theatre Studio (Old Vic Annexe) in Lambeth, London (1957-58) and the residential Grade II Wyndham Court in Southampton (1966-69).

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

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At Parkfield House, Israel and Ellis were the partners in charge and J. McCaine and A. St George were the assistants. J. Samuely and Partners were the structural consultants.

Parkfield House featured in the *Architectural Review* in an article titled 'Civic Group: Stage 1' (1 December 1966, pp.445-448). It is also recorded in *The Buildings of England, Lancashire: Manchester and the South East* (2004) (p.513).

It is a 4-storey block of council offices, designed to incorporate a rating hall and staff dining-rooms. Separate staff and public entrances were provided, and there was a high entrance hall (made possible by the fall of the site) combined with the rating hall.

As shown in the *Architectural Review*, it was the first part of a larger civic scheme and there were plans to build assembly halls and a council suite also on the site. The council offices block was planned to sit alongside the existing town hall, which was "to continue in use in the meantime" (*Architectural Review*, p.446) (the town hall was demolished in 1978). Both *The Buildings of England* and *Architectural Review* note that the site was laid out in response to the existing Garden of Remembrance adjacent. *The Buildings of England* reflects on its wider setting, stating that "...The relationship between Alkrington on its sweep of illusionary parkland, Parkfield House in the valley, and Sunny Brow on the opposite hillside is satisfactory."

Parkfield House was faced with pre-cast concrete panels which were bolted onto the building's in-situ concrete frame, with windows in between. The panels incline to meet the windows, creating a faceted appearance. Panels were cast against rough timber boards using white cement and Ballidon sand, resulting in richly textured finishes. The RIBA holds a series of photographs of the building nearing completion and clearly illustrates the high quality of the pre-cast concrete panels (the images are searchable under 'Council offices, Middleton, Greater Manchester').

Policy

The **National Planning Policy Framework (NPPF; 2024)** states at **Paragraph 202:**

202. *Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.*

At **Paragraph 212:**

212. *When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

And at **Paragraph 216:**

216. 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 Society's Assessment

No meaningful change (from our perspective) has been made to the application since our letter of 22 May 2023 was submitted, as complete demolition of Parkfield House is still proposed. As such, we still retain the comments that we made in that letter.

However, we have additional comments to add, particularly in response to **Design Report – Rev K** by Bower Mattin and Young, dated to 10/06/2025. This **Design Report** responds in part to the Society's letter of 22 May 2023. Our response to **Design Report – Rev K** can be found below:

The Twentieth Century Society considered that the building could be brought back into viable use but did not provide any details as to how this may be achieved other than noting that there were no serious structural issues which would prevent its adaption and reuse.

The society recognise that the original 1960's building has been subject to alterations to windows and has been extended. One of the tests of a balanced design is that the composition would be harmed by adding or taking away from the original building. These additions diluted the original design intentions.

As stated in our letter of 22 May 2023, 'while altered over the years... these [alterations] have had a limited impact... and overall [the building] retains its original 1960s character and strong architectural interest'. We retain this assessment of the building. It would not be unusual for a civic building from the 1960s to have had later alterations: we regard it as being in Parkfield House's favour that its character can withstand later minor alterations, such as window replacements.

The role of the Society is to comment on the harm that would be caused to the non-designated heritage asset that is Parkfield House by this application. It is not within our remit to redesign the proposals. It is within our remit to note that there is no reason why an existing heritage asset cannot be reused from a structural perspective.

It is pertinent to note that all of these buildings [other Lyons, Israel and Ellis buildings] are in the south of England where the climatic conditions are less likely to lead to premature staining and attract surface grime than in Middleton.

We disagree with the relevance of this statement to the application. Buildings with the same construction materiality and methodology have weathered well across a range of climatic conditions, including more challenging conditions than at the site in Middleton. In addition, the proposed replacement buildings will be subject to the same environmental conditions as the existing

building. All buildings require regular maintenance and cleaning. It is not to the detriment of Parkfield House that it requires maintenance sixty years after its construction.

The argument that total loss of the building would be of considerable significance is therefore a non sequitur given the absence of listing. It ignores the potential to replace the building with one which is equal or better than the original.

While Parkfield House is not listed, we have assessed the harm as being of considerable significance based on the *total loss* of the NDHA that is Parkfield House, the impact on the Manchester Old Road Conservation Area, and the impact on the Grade II listed Garden of Remembrance.

As stated in our previous letter, the proposed new building is not of the same architectural quality as the existing building, and does not hold its historic associations. We retain this assessment of the updated proposals. The high quality of the elevational design of the existing building, and its positive impact on the conservation area, is not reflected in the proposals for the replacement building. We do not find the new building to be 'equal or better' than the existing Parkfield House. We regard the proposals as having the potential to diminish the significance of the conservation area.

Like the original Parkfield House the 1965 replacement has served its purpose and is no longer sustainable given its current condition and poor levels of insulation and energy efficiency and an unsustainable building is replaced with highly insulated, adaptable new homes which make use of renewables and smart energy controls

The Society does not object to the adaption of the existing building to make it more efficient. We would support the considerate retrofit of the existing building to meet current environmental standards.

The retrofit and reuse of existing buildings is often less carbon-intensive than the demolition of existing buildings and new construction on the same site. The embodied carbon of the existing building is likely to be high, given its concrete construction. We would expect the retrofit of the existing building to be more sustainable as an approach than the proposed demolition and rebuild of the site. It is not clear if retrofit of the existing structure has been considered from an environmental perspective by the applicant.

With the evolution of society and the redundancy of former buildings there has never been any impediment to renewal on this site. The proposed redevelopment is consistent with the history of the site.

We disagree with this assessment of the site. Given that Manchester Old Road Conservation Area was recently (2011) extended to include this site, it is clear that this site has been designated to protect the NDHA that is Parkfield House from demolition and redevelopment. This can be seen at part **3.1** of the designation committee report.

The history, context and character of the area provide pointers for the new design and confirm that redevelopment makes a positive contribution to the Conservation Area... not only does it remove a dilapidated, vandalised eyesore, it reinstates useful buildings of similar mass and form, which are detailed to provide a visual dialogue with their surroundings.

In their committee report, the officers described “the white former Town Hall (1965) by Lyons Israel and Ellis has a striking urban character in an otherwise suburban setting.” In this the officers recognise that Parkfield House makes a divisive contribution to the Conservation Area. As a Brutalist building it acts as a counterpoint to the softer materials, detail and craftsmanship found in the Arts and Craft and Art Nouveau developments in the area. The reference to the Brutalist building as being strikingly different in its setting serves to validate that in any redevelopment a similar contrast in built form is acceptable in principle.

We disagree with the assessment of the building as an ‘eyesore’, with the implication that the loss of Parkfield House would be a positive contribution to the Conservation Area, and that Parkfield House ‘makes a divisive contribution to the Conservation Area’. The decision to extend the designated conservation area to include Parkfield House is mentioned specifically at part **3.1** of the **Designation of Manchester Old Road Conservation Area** committee report (2011). The report states that ‘not extending the designated conservation area would mean that the wider proposed conservation area including the memorial gardens and former Town Hall would not be properly recognised as having special architectural and historic interest and would not be protected from demolition or harmful change’. As is evident here, the conservation area was extended to protect Parkfield House from demolition, as proposed in this application.

Part **5.7** of the designation report begins by stating that ‘the white former Town Hall... has a striking urban character in an otherwise suburban setting’, as quoted in **Design Report – Rev K**. While the applicants take this to mean that ‘Parkfield House makes a divisive contribution to the Conservation Area’, it is clear from the rest of Part **5.7** that this is not the case; the report states that ‘Middleton is fortunate to have such an example [of concrete Brutalism] and it is desirable to preserve its character through inclusion in the conservation area’. We disagree with the assessment of the applicants that Parkfield House makes a ‘divisive contribution’. It is acknowledged that brutalism is a divisive architectural style, but the designation report makes it clear that Parkfield House is a positive and well-regarded contributor to Manchester Old Road conservation area.

Similarly, we object to claims made in the **Addendum to the Heritage Statement** (May 2025). Parts **4.2**, **4.3** and **4.5** of the addendum state that Parkfield House ‘makes at most a low level contribution to the Conservation Area’, that the ‘proposals will also not affect the significance or the elements of the Conservation Area that contribute to the special historic interest of the area’, that Parkfield House is assessed as having ‘a very low value’, and that the ‘proposed works will have no impact on the historic significance, architectural quality or built form of the Conservation Area’. As stated both here and in our last letter, our assessment of the proposals is that there will be a negative impact on the Manchester Old Road Conservation Area resulting from the loss of Parkfield House.

We retain our objection to the application due to the negative impact that the loss of Parkfield House will have on the Manchester Old Road Conservation Area. While the existing building is currently subject to dereliction and vandalism, this would be easily reversed with a suitable retrofit and reuse programme. The applicant claims that Parkfield House makes a negative contribution to the conservation area in the **Conservation Area Character Study**, but the proposed replacement building specifically draws on the design of the existing building.

The **Designation of Manchester Old Road Conservation Area** committee report states that Parkfield House holds local interest, and is protected under UDP Policy **BE/11**: *the Council will permit development proposals that do not adversely affect buildings and features which are of local interest.* **BE/11** has been replaced in the **Rochdale Core Strategy** (2016) by Core Strategy Policy **P2**, which states at part **2(b)**: *we will protect the borough's heritage by... conserving, enhancing and utilising other non-statutory heritage assets of local interest... including promoting their sensitive restoration.*

As this amended application continues to run contrary to Policy **P2**, we urge the local planning authority to refuse this scheme. The Society would support a thoughtful retrofit programme to bring the existing building back into use.

As has been mentioned above, Parkfield House is a positive contributor to Manchester Old Road Conservation Area. In our assessment, and given the information provided in the **Designation of Manchester Old Road Conservation Area** committee report, the loss of Parkfield House will have a detrimental impact on the heritage significance of the Conservation Area. As the Conservation Area is a designated heritage asset, paragraph **212** of the NPPF applies.

As Parkfield House is a non-designated heritage asset, paragraph **216** of the NPPF applies. The effect of the application on the significance of Parkfield House will be complete loss of significance due to the proposed total demolition of the building.

We object to this application, based on the assessment of the proposals made in this letter and in our previous letter dated 22 May 2023.

Yours sincerely,

Gus Wray

A handwritten signature in black ink, appearing to be 'Gus Wray', with a long horizontal flourish extending to the right.

Caseworker

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Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.