

Heritage Statement

in connection with

Proposed Warehouse Unit, Crawford Street, Rochdale

OL16 5RS

Prepared by

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November 2023

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1 INTRODUCTION

Purpose and Methodology

- 1.1 This heritage statement has been prepared to assess the potential heritage impacts of a proposed warehouse unit on the north side Crawford Street and west/south of Dodgson Street, Rochdale. The proposal site is not in the vicinity of any designated heritage assets, however pre-application advice from Rochdale Borough Council states that they consider Crossfield Mill, a 19th century mill complex to the south of the proposals site, as a non-designated heritage asset.
- 1.2 The approach taken adheres to the principle of managing change intelligently, which lies at the heart of national planning policy for conservation of the historic built environment. The methodology employed involves the following sequential steps:
- Establish the nature of the proposed change(s), including the overall aim of the change and any emergent design proposals
 - Identify any designated and/or non-designated heritage assets potentially affected by proposals for change
 - Evaluate the heritage values and significances of the heritage assets, placing particular focus on values and significances that might be affected by the proposed change(s)
 - Produce a statement of significance which is to be used to guide the design of changes in a manner that places conservation of significance as a priority
 - Analyse the potential impact of the finalised design upon the significance(s) of the heritage asset(s)
- 1.3 The statement has been prepared in accordance with the general guidelines set out in the Historic England publications 'Informed Conservation'ⁱ and 'Conservation Principles, Policies and Guidance'ⁱⁱ and responds to heritage policies outlined in Chapter 16 of the National Planning Policy Framework (DCLG 2023). Historic England guidance in preparing heritage statements, entitled 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' (Historic England Advice Note 12, 2019) has also been used. The legal context is set by the Planning (Listed Buildings and Conservation Areas) Act of 1990. Further guidance has been obtained from relevant Historic England Advice Notes (HEAN) and Good Practice Advice Notes (GPA).

The Author

- 1.4 Chris O'Flaherty, the author, is a Chartered Building Surveyor and professional member of the Royal Institution of Chartered Surveyors (MRICS). With a background in the recording, analysis and conservation of historic buildings, the author holds a Master's Degree in Building Heritage and Conservation and specialises in heritage planning matters.

Methods of Research and Investigation

- 1.5 Visual inspection of the site was carried out in November to assess its physical nature. Background research has also been conducted to ascertain all relevant contextual matters appertaining to the proposals. In accordance with the NPPF, background research has been proportionate to the nature of the building/site, the proposed change(s) and the likely impact of the change(s).
- 1.6 In terms the site's potential for buried archaeology, the proposals site appears to be in the position of a former addition to the barn therefore there may be some potential for below ground archaeology. This potential has not been assessed beyond scrutiny of historic mapping.

2 GENERAL DESCRIPTION

Location

2.1 The proposal site is situated on the north side of Crawford Street in the angle of the junction with Dodgson Street. A location plan is given below in figure 1.

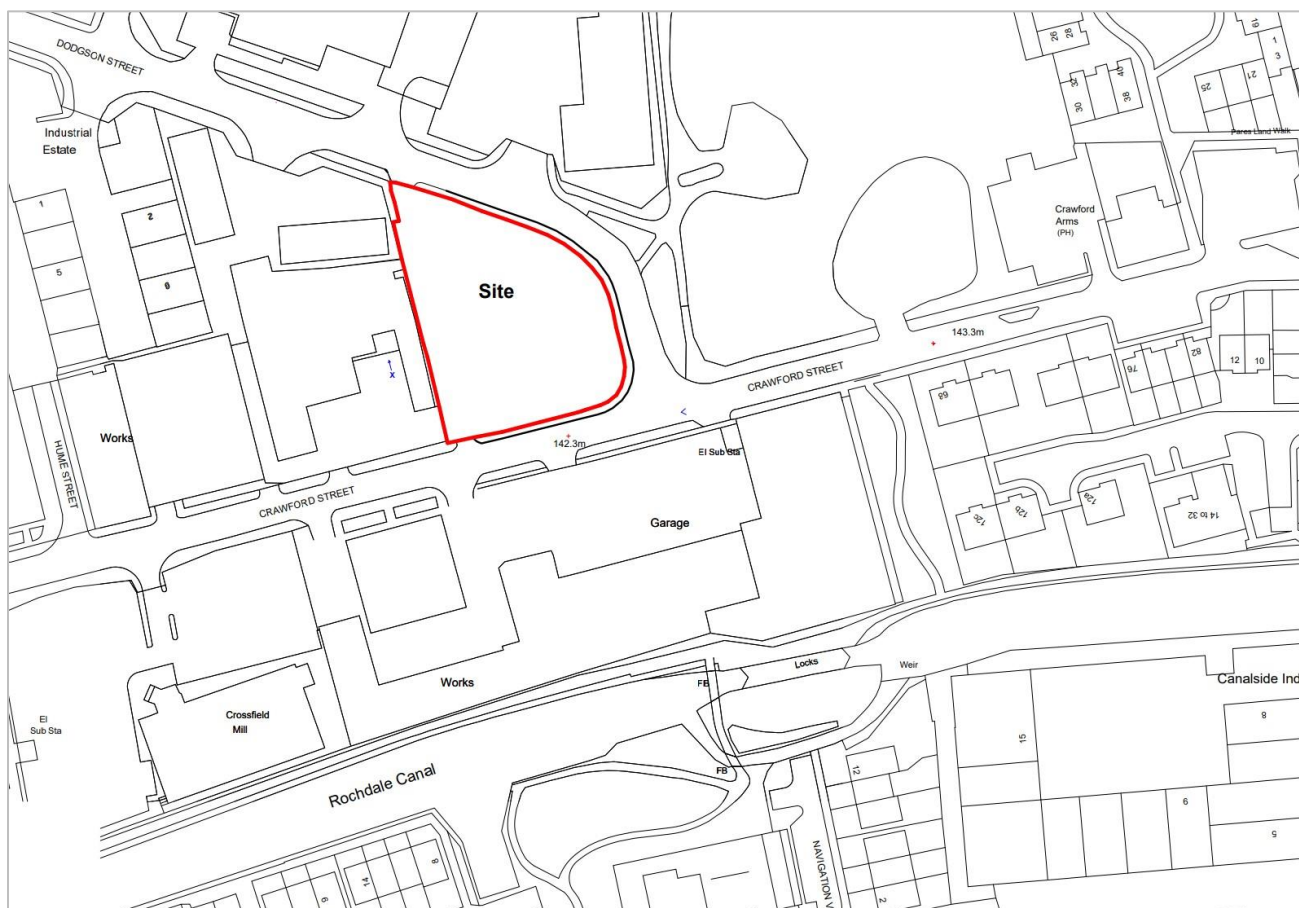


Figure 1) Site location

Outline Description & Historical Background

2.2 Until recent site clearance (early 2023) the proposal site housed low rise brick and metal clad units formerly used as an engineering works (figures 3-5). The site is bordered by grassed aprons to Crawford Street and Dodgson Street with some trees along Dodgson Street.

2.3 Historic mapping from the later C19th (figure 2) shows the site was formerly occupied by streets of terraced housing, some back to back. Opposite it, to the south, the map shows Crossfield Mill and Morning Side Mill (both cotton mills) on the northern side of the Rochdale Canal. Elements of these mill complexes, which originated in the later C19th, survive to this day, most notably a three storey warehouse with adjoined tower at Crossfield Mill (figure 6) and three storey warehousing of Morning Side Mill with some low rise northlight roof weaving

sheds. Additional C19th and C20th mill buildings that formerly skirted Crawford Street on the north side of the mills (figure 8) were demolished in the late C20th long after the textile mills had ceased operating. This cleared land was later partly developed, with Rochdale Suzuki garage (figure 5) now fronting Morning Side Mill and a large car park fronting Crossfield Mill (now used as offices).

- 2.4 The terraced housing that occupied the proposal site and originally housed mill workers was cleared in the 1960/70s to make way for new light industrial units, including the building that until recently occupied the proposal site. The area is depicted before these changes in aerial photography from the 1950s show in in figure 9.

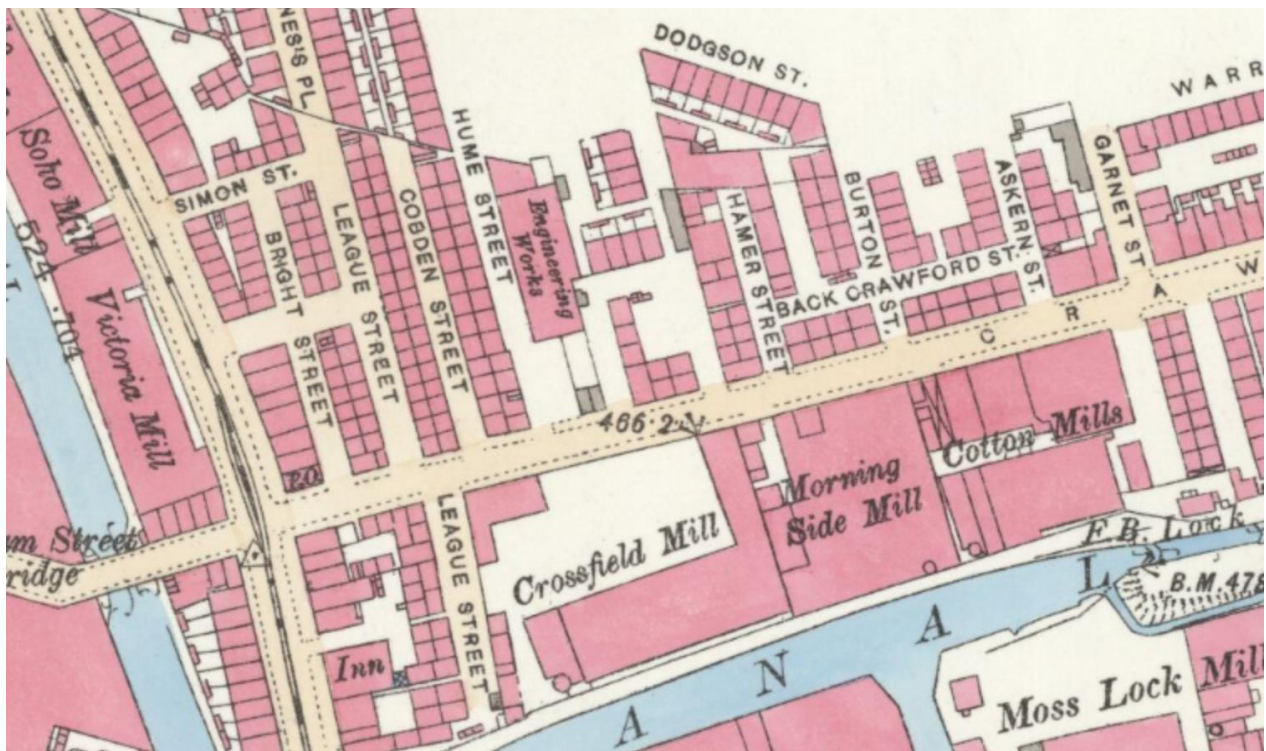


Figure 2) 1893 OS map showing Crossfield Mill with terraced houses on the proposals site (Hamer Street, Back Crawford Street)



Figure 3) The site viewed from Crawford Street prior to site clearance



Figure 4) The site viewed from Dodgson Street



Figure 5) Buildings on the south side of Crawford Street, opposite the site



Figure 6) Crossfield Mill buildings



Figure 7) Northlight roof weaving sheds south of the site

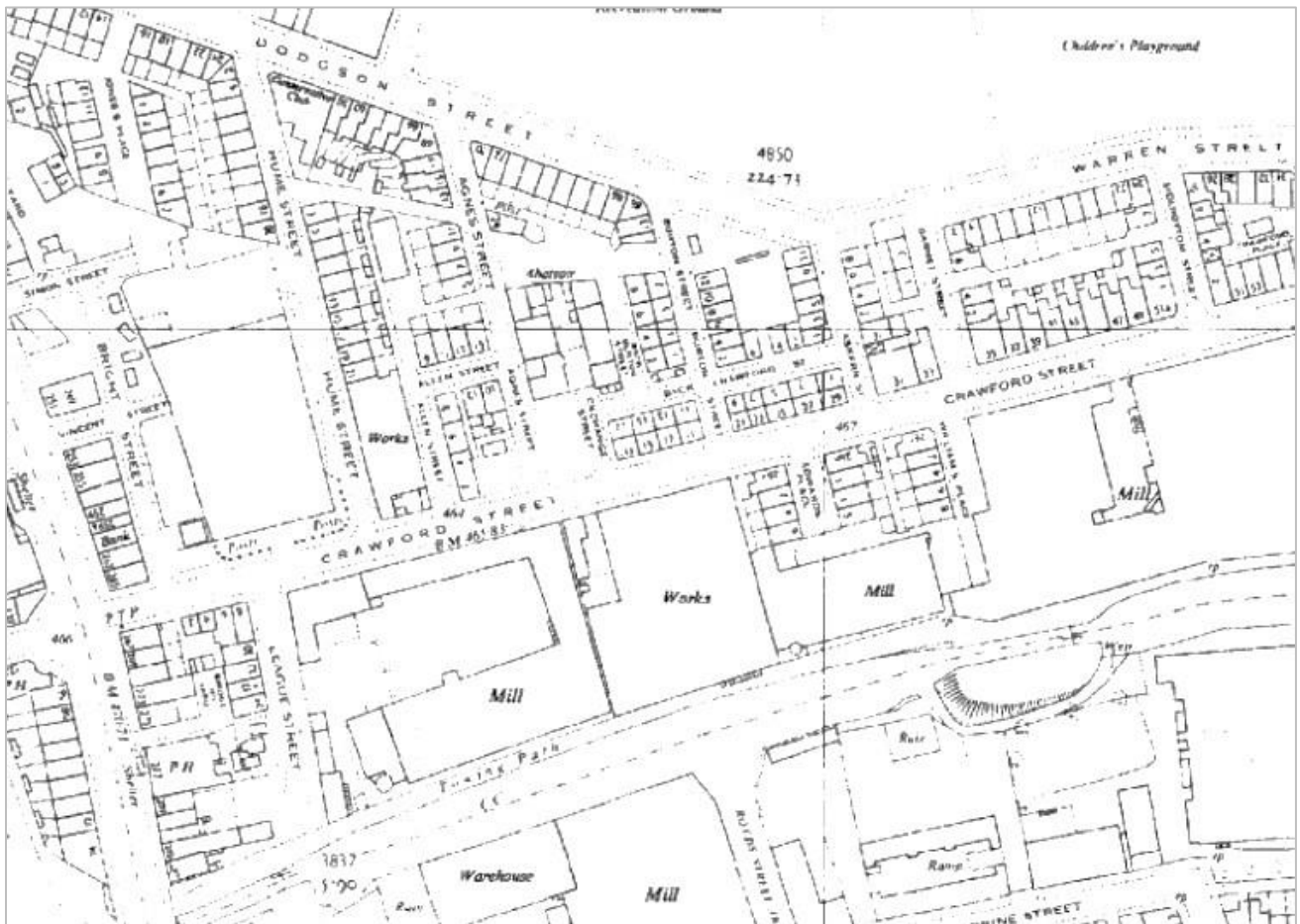


Figure 8) 1950s OS map showing the enlarged Crossfield Mill



Figure 9) Aerial view (1953) showing Crossfield and adjacent mills and terraced housing on the proposal site to the north

Heritage Asset Designations

- 2.5 There are no designated heritage assets in the immediate vicinity of the site, however Rochdale Borough Council has stated that it considers the remains as Crossfield Mill (and possibly elements of the adjacent Morning Side Mill) as a non-designated heritage asset, as defined by the NPPF.

3 HERITAGE APPRAISAL

Introduction

- 3.1 The following appraisal adheres to guidance published by Historic England (2008 and 2019)^{iii, iv} and relates specifically to the requirement contained in paragraph 194 of the National Planning Policy Framework (2023), given in extract below:
- 3.2 *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."*
- 3.3 The appraisal begins by identifying and assessing any heritage values/interests that might be affected by the proposals, before evaluating these and composing a 'Statement of Significance'. The essential purpose of the Statement is to set priorities for conservation of significance and enable an objective assessment on the likely impact of the proposals, with specific interest in the avoidance of harm.

Heritage Interests

- 3.4 The heritage interests explored below are distilled under the following headings: archaeological interest; historic interest; architectural and artistic interest. The exploration focusses specifically on those interests deemed of possible relevance to the proposals site, and it is not an exhaustive assessment of the inherent heritage interests of the relevant heritage assets. The phrase 'heritage interests' is interchangeable with the phrase 'heritage values', which was used in Historic England guidance from 2008^v.

Archaeological Interest

- 3.5 Historic England (2019) suggests that *"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."*
- 3.6 The proposal site previously housed light industrial units of the later C20th and prior to that C19th terraced housing. There may be some archaeological evidence of these previous developments, the interest of which is likely to be low.

Historical Interest

- 3.7 Historic England (2019) suggests this to be - *"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"*.
- 3.8 The proposal site retains no appreciable historic interest. The C19th mill workers houses that were cleared from the site in the 1960/70s did hold historic interest due to their depiction of the C19th industrial society, but now, only the remains of the nearby mills and canal provide evidence of this industrial past.
- 3.9 The historic interest of Crossfield Mill and Morning Side Mills to the south of the site derives from their illustration of the past, however this evidence is diminished by the loss of some infrastructure and conversion of the buildings. Otherwise, the neighbouring canal establishes the significant historic setting of the mills.

Architectural and Artistic Interest

- 3.10 Historic England (2019) suggests that: *"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 skills, like sculpture."*
- 3.11 The site holds no architectural interest. The neighbouring remains of Crossfield Mill and Morning Side Mill hold a degree of architectural interest on account of their industrial scale and fragmentary evidence of their original function. The functional and aesthetic interest of the mills is further enhanced by the neighbouring canal, which establishes the significant visual (and functional) setting of the buildings.

Statement of Significance

- 3.12 Having assessed the heritage interests associated with the site, it is now possible to take a more informed approach to the assessment of site significance. This will consider prioritising conservation, in light of the proposals for change. In this context, a statement of significance is given below.
- 3.13 An appraisal of heritage interests has been conducted to explore the inherent heritage interests of the proposal site and to determine any contribution the site makes to the

heritage interests and significances of nearby C19th textile mills (Crossfield Mill and Morning Side Mill), which are considered as non-designated heritage assets by Rochdale Borough Council.

- 3.14 The findings of this appraisal are that the proposal site, which until the 1970's was occupied by C19th terraced housing, after which it was redeveloped for light industrial use (recently demolished), has no appreciable architectural or historic interest and lacks any heritage significance. Furthermore, it does not contribute to the inherent heritage significances of the nearby mills, which retain a degree of architectural and historic interest owing to evidence of their scale, character and industrial past. The mills are also complimented by the neighbouring canal, which establishes the significant setting of the buildings.
- 3.15 On balance, there would appear no objective heritage-based reason to consider the proposal site as a sensitive position for development, mindful that much of the locale has previously been cleared (of C19th housing) and redeveloped (for light industry), changes which, with the notable exception of the canal, stripped the mills of their historic spatial context.

4 ANALYSIS OF THE PROPOSALS

General Principles

- 4.1 General guidance on assessing proposed changes to heritage assets is given in chapter 16 of the National Planning Policy Framework (2023). The NPPF establishes the premise that conserving significance should be a guiding principle when designing proposals for any development. In order to do this, it is first necessary to understand the heritage significance(s) of heritage assets before commencing with design.
- 4.2 Part 3 of this statement fulfils the need to understand significance and the findings of part 3 have informed the design of the proposals. There follows, here in section 4, an objective review of the finalised scheme, verifying to what extent conservation of significance has been achieved or whether any harm is likely to accrue.

Summary of the Proposals

- 4.3 The proposals involve the building of a new warehouse unit, shown below.



Figure 10) 3D visualisation, viewed from Crawford Street to the east



Figure 11) The warehouse viewed from the east

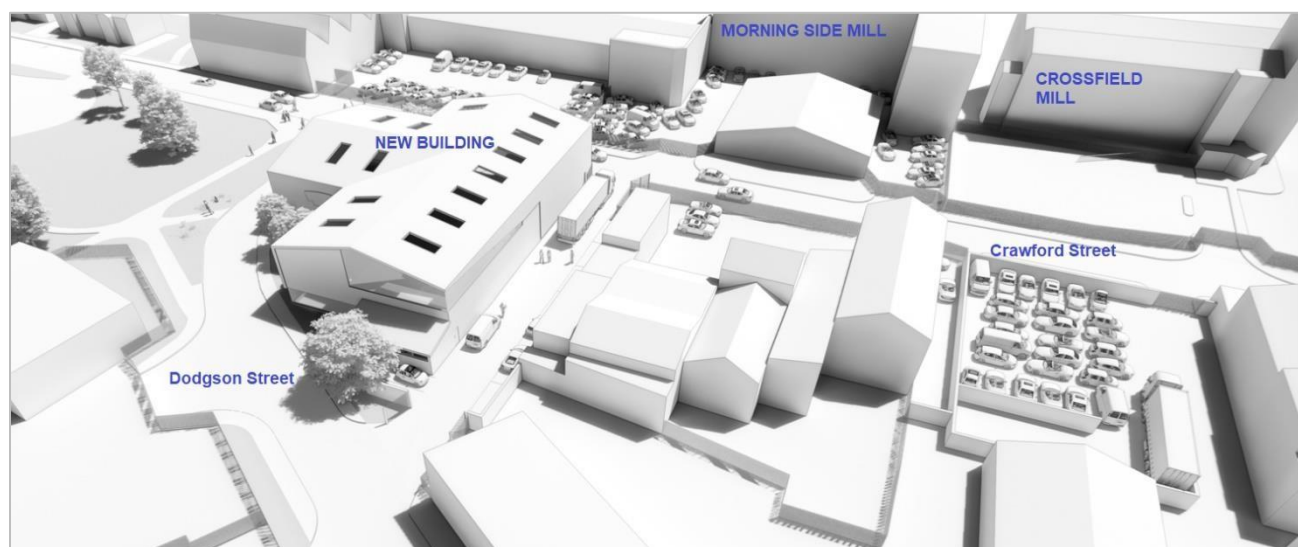


Figure 12) 3D model, aerial view, showing the new building in the context of the mills.

Analysis of the Proposals: National Planning Policy Framework

4.4 As discussed earlier, section 16 (Conserving and enhancing the historic environment) of the NPPF (2023) considers heritage planning and identifies the following key drivers in the decision making process:

- 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;

- c) the desirability of new development making a positive contribution to local character and distinctiveness.

4.5 The NPPF unifies the overall approach to planning, in order to ensure that deliberations over decisions relating to heritage assets are made in the full planning context. Securing sustainable development is the primary driver of the NPPF: in the heritage context this relies on maintaining active use (long term) in a manner that seeks to limit potential harm to significance.

NPPF Paragraph 199

4.6 Paragraph 199 of the NPPF states:

"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."

4.7 Parts 2 and 3 of this heritage statement acknowledge the need to explore and understand heritage significances in order to guide proposals for change and review likely impacts, all as outlined within the NPPF. However, there are no designated heritage assets associated with this case therefore paragraph 199 of the NPPF is not relevant.

NPPF Paragraph 203

4.8 Paragraph 203 of the NPPF states:

"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."

4.9 In this case the only issue of potential relevance is how the proposed development might impact upon the significance of non-designated heritage assets, namely the former mills to the south. This impact could only be indirect (i.e. the proposals do not physically affect the mills), and would relate to changes to the mills' settings.

4.10 As determined in section 3, the proposal site does not contribute to the significance of the mills as a feature of their setting, and the only relevant feature of the mills' setting that does make a positive contribution is the canal. Accordingly, development of the proposal site does not pose any appreciable risk of harm. This lack of risk is further emphasised by

the nature of the proposed development, which reflects the scale and character of neighbouring buildings and which will mark a notable visual improvement in the locale.

Analysis of the Proposals: Local Heritage Planning Policy

- 4.11 Local planning policy effectively follows, as it must legally do, the policy requirements of the NPPF, therefore separate consideration of local policy in the heritage planning context is not deemed necessary.

5 SUMMARY & CONCLUSION

- 5.1 This heritage statement has been prepared to assess the potential heritage impacts of a proposed warehouse unit on the north side Crawford Street and west/south of Dodgson Street, Rochdale. The proposal site is not in the vicinity of any designated heritage assets, however pre-application advice from Rochdale Borough Council states that they consider Crossfield Mill, a 19th century mill complex to the south of the proposals site, as a non-designated heritage asset.
- 5.2 The initial findings of the statement are that the proposals site holds no heritage interest or significance, nor does it contribute to any heritage interests or significances of nearby C19th former mill buildings. The site once housed terraced dwellings from the C19th (mill workers houses), but these were demolished many years ago.
- 5.3 The secondary findings of the statement are that the remains of Crossfield Mill and its neighbour Morning Side Mill do hold heritage interest and significance owing to their history of use, large industrial scale and character, and their canal side setting.
- 5.4 The final findings of the statement are that the proposed development of the site with a new warehouse unit, which will generally reflect the scale and character of neighbouring buildings, will cause no harm to heritage significance. As such the proposals are considered acceptable in the context of planning policy and law devoted to the conservation of the historic built environment.

ⁱ Clarke, K, *Informed Conservation*, Historic England 2003

ⁱⁱ Historic England, *Conservation Principles, Policies and Guidance: Sustainable Management of the Historic Environment*, 2008

ⁱⁱⁱ Historic England, *Conservation Principles, Policies and Guidance: Sustainable Management of the Historic Environment*,

2008 ^{iv} Historic England Advice Note 12 (2019) *Statements of Heritage Significance: Analysing Significance in Heritage Assets*

^v Historic England, *Conservation Principles, Policies and Guidance: Sustainable Management of the Historic Environment*, 2008