

Heritage Statement

Whitworth Road (Dunelm and Carpetright) Car Park, Whitworth
Road, Rochdale, OL12 0TY

April 2023



adapt heritage

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I. Introduction

I.1 This Heritage Statement has been prepared by Adapt Heritage on behalf of ERP (Accrington) Ltd c/o Glenbrook Investments Ltd in connection with a full planning application for the construction of a drive-through coffee unit with parking, landscaping, and associated infrastructure (the 'Proposed Development') at Whitworth Road (Dunelm and Carpetright) Car Park, Whitworth Road, Rochdale, OL12 0TY (the 'Application Site').

I.2 There are no designated or formally recognised non-designated heritage assets within the Application Site. It is however proximate to Duke Street Mill which has been formally identified by Rochdale Borough Council ('the Council') as a 'non-designated heritage asset' under the terms of the National Planning Policy Framework ('NPPF') (2021).

I.3 The focus of this report is on **Built Heritage** only and does not cover archaeology.

I.4 The NPPF provides the Government's national planning policy on the conservation of the historic environment. In respect of information requirements for applications, Paragraph 194 states the following:

*"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."*¹

I.5 The report is structured as follows:

- Section 2 identifies the relevant heritage assets with potential to be affected by the Proposed Development.
- Section 3 provides an overview of the history and development of the Application Site and the surrounding area.
- Section 4 proportionately assesses the significance and setting of heritage assets and the contribution made by the Application Site.
- Section 5 provides an assessment of the impact of the Proposed Development in light of national policy set out in the NPPF and local planning policy (set out in detail at **Appendix I**).
- Section 6 sets out the summary and conclusions.

I.6 The assessment has been undertaken on the basis of published information, proportionate archival research and on-site visual survey. It has been produced in accordance with Historic England guidance set out in the following:

- Advice Note 2: Managing Significance in Decision Taking in the Historic Environment (2015)
- Advice Note 3: The Setting of Heritage Assets (2017)
- Advice Note 7: Local Heritage Listing (2021)
- Advice Note 12: Statements of Heritage Significance (2019).

¹

DLUHC (2021) National Planning Policy Framework (NPPF) – Annex 2: Glossary



2. The Heritage Assets

2.1 The NPPF (2021) defines a heritage asset as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.”

2.2 Site visits were undertaken in August 2022 and February 2023 to identify heritage assets with potential to be affected.

Designated Heritage Assets

2.3 Designated heritage assets are those which possess a level of heritage interest that justifies designation under relevant legislation and are then subject to particular procedures in planning decisions that involve them.

Listed Buildings

2.4 A review of the National Heritage List for England (NHLE) in April 2023 confirms that there are some listed buildings within the wider vicinity of the Application Site:

Name	Grade	Designation Date	List Entry No
Ukrainian Catholic Church of St Mary	II	12 February 1985	1346258
1 & 3 Whitehall Street	II	12 February 1985	1084259
Hope Chapel	II*	12 February 1985	1057694

2.5 Based on the significance of these listed buildings and intervening development together with on-site visual survey, they are not considered

to be affected by the Proposed Development. These assets are therefore not considered further in this report.

Conservation Areas

2.6 The Townhead Conservation Area is located to the south of the Application Site. Based on the significance of the conservation area and intervening development together with on-site visual survey, it is not considered to be affected by the Proposed Development. The conservation area is therefore not considered further in this report.

Non-Designated Heritage Assets

2.7 The NPPF identifies that heritage assets include both designated heritage assets and assets identified by the local planning authority (including local listing). Historic England's guidance on 'Managing Significance in Decision Taking in the Historic Environment' (2015) states that:

“Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application.”

Rochdale Non-Designated Heritage Assets

2.8 Rochdale Borough Council maintains a list of non-designated heritage assets within the area which was last updated on Thursday 19 January 2023. These assets have been identified based upon the following criteria set by the Council:

- Architectural significance - sites that demonstrate local architectural style and character or are associated with a local architect, designer or engineer of importance.
- Historical significance - sites associated with a local historical event, that have importance as a community asset, are associated with local



famous or notable people or appear on the First Edition of the Ordnance Survey Map.

- Positive contribution - such as a landmark or as part of a key view.
- Designed landscape - asset is a component of a designed landscape.

2.9 As of March 2023, there is one formally recognised non-designated heritage asset proximate to the Application Site which has the potential to be affected:

Street Name	Name and Address of Asset	Type of Asset
<i>Duke Street</i>	<i>Duke Street Mill, Duke Street, OL1 2 0LW</i>	<i>Mill</i>

2.10 The above non-designated heritage asset is assessed further within this report.



3. The Application Site and the Surrounding Area

Location and Context

- 3.1 The Application Site (Figure 3.1) is located to the north of Rochdale town centre off Whitworth Road. It is bound by Queen Street to the north, Whitehall Street to the west and Duke Street to the east. To the south is a further car park and large commercial retail units.



Figure 3.1: Satellite View of the Application Site and Surrounding Area © Google Maps (2023)

- 3.2 The Application Site itself consists of a large car park which is surrounded to three sides by mature planting and trees (Figures 3.2).



Figure 3.2: The Application Site from the South (2022)



Figure 3.3: The Application Site from Whitworth Road (2022)

Overview of Historic Development

- 3.3 The Application Site is illustrated on the 1851 Ordnance Survey (Figure 3.4) which confirms that it was developed with a dense arrangement of buildings, broadly consisting of two blocks separated by Duke Street. The exact use of the buildings on the site are not identifiable by the survey but they are likely to have been a mix of residential and industrial buildings.

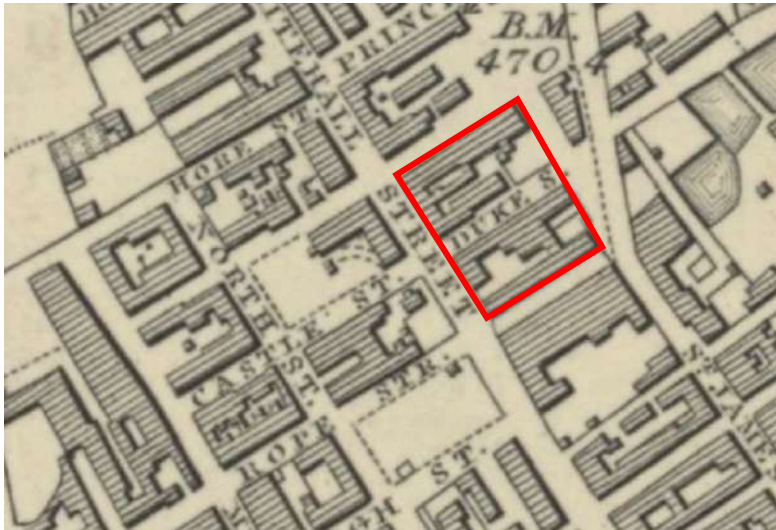


Figure 3.4: Ordnance Survey of Rochdale surveyed in 1844-1848 and published in 1851 © National Library of Scotland

- 3.4 The Ordnance Survey of 1893 (Figure 3.5) provides a clearer understanding of the former uses of the Application Site. It confirms that the southern section consisted of the 'Phoenix Foundry' which also extended across to the neighbouring southern plot, outside the site. Archival research confirms that the foundry was built by Alexander Petrie

and Co who manufactured stationary steam engines. The company was established on 'Whitehall Street' and built a foundry and engineering works on or adjacent to the site in 1816.² Petrie and Co are noted as the 'first makers of steam engines in Rochdale'.³

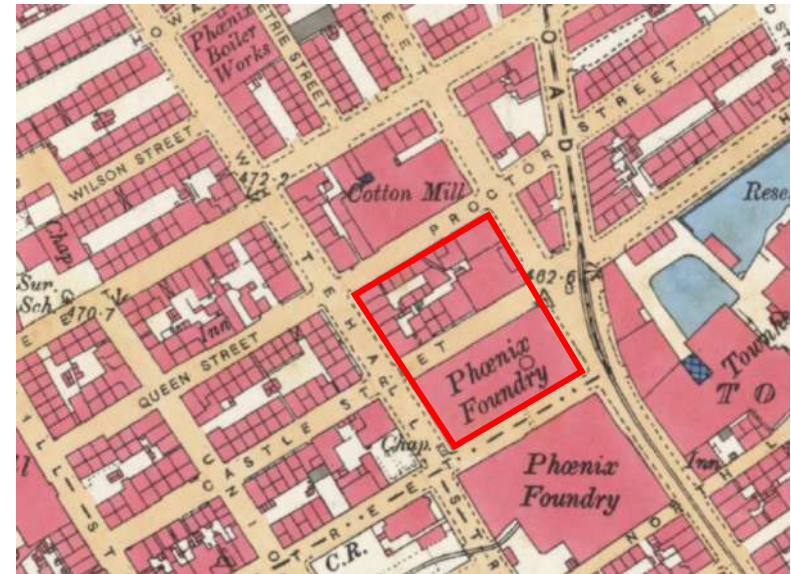


Figure 3.5: Ordnance Survey of Rochdale surveyed in 1890-1891 and published in 1893 © National Library of Scotland

- 3.5 The north section of the Application Site appears to contain residential dwellings and other industrial buildings from reviewing the plan form of the buildings. In the surrounding area, a Cotton Mill was established to the north of the Application Site. This was originally known as Bankside Mill and is the present Duke Street Mill.

²

Rochdale Observer (24 November 1943) Steam Engines: Their Rochdale Makers

³

Rochdale Observer (24 November 1943) Steam Engines: Their Rochdale Makers



- 3.6 The Application Site is illustrated on the 1910 Ordnance Survey (Figure 3.6) which shows a similar arrangement to the previous survey. There does not appear to be any changes with the exception that some buildings on the northern section of the site are identified as 'warehouse' and the foundry is now referenced as 'Phoenix Machine Works'. Research indicates that Petrie and Co remained on-site during this time.⁴



Figure 3.6: Ordnance Survey of Rochdale surveyed in 1908 and published in 1910 © National Library of Scotland

- 3.7 An historic aerial photograph of Rochdale from c.1926 (Figure 3.7) shows the scale and arrangement of the buildings on the Application Site and the

surrounding area. It confirms that the machine works / foundry was partially damaged, potentially due to fire, with exposed roof and upper floors. The photograph illustrates that the surrounding area consisted of a densely developed arrangement of residential dwellings and large-scale industrial development.

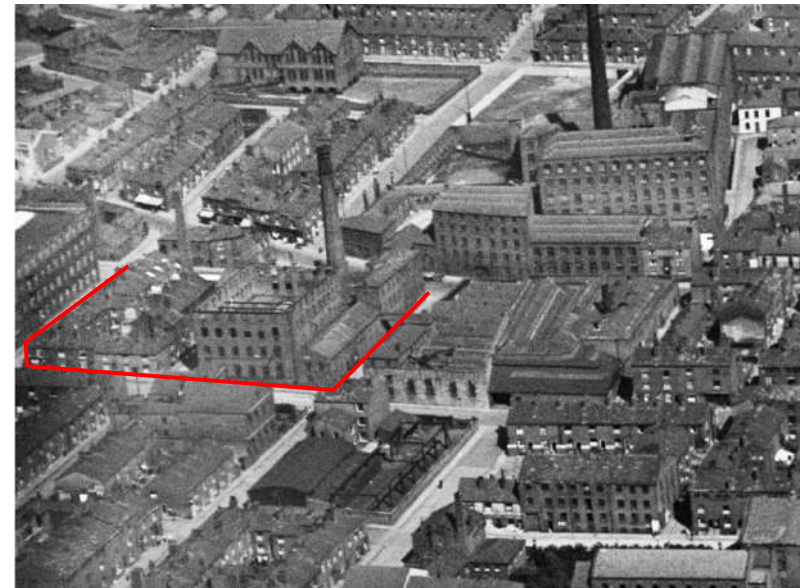


Figure 3.7: Historic aerial photograph of Rochdale including the Application Site c.1926 (Ref: EPW016788) © Historic England

- 3.8 There does not appear to be any changes to the Application Site by the 1930 Ordnance Survey (Figure 3.8). In the surrounding area, the Duke Street Mill to the north was extended to the north east.

⁴

Yorkshire Post and Leeds Intelligencer (07 October 1911) Workpeople Wanted





Figure 3.8: Ordnance Survey of Rochdale surveyed in 1928 and published in 1930 © National Library of Scotland

3.9 A further historic aerial photograph from 1949 (Figure 3.9) shows that aspects of the Application Site had been partially cleared and the previously damaged foundry building had been altered (removal of the upper floors and re-roofed). The surrounding area is also shown as being partially cleared by the mid 20th century.

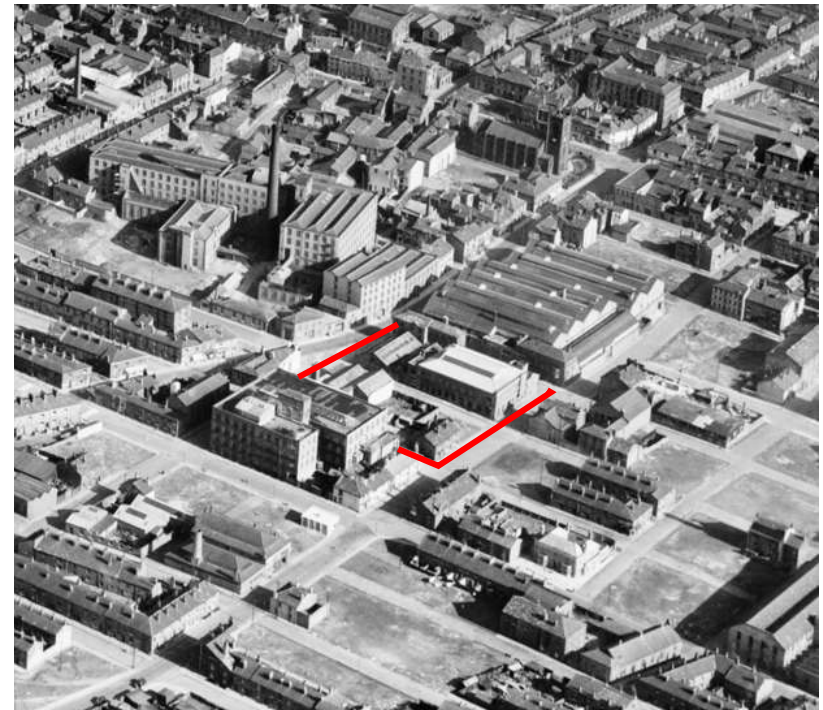


Figure 3.9: Historic aerial photograph of Rochdale including the Application Site c.1949 (Ref: EAW022016) © Historic England

3.10 In the mid to late 20th century, all of the buildings on the Application Site and the majority of those in the surrounding area were subject to post war clearance, enlargement of roads and wider redevelopment. The Application Site, alongside the wider Phoenix Foundry, were demolished and redeveloped as a car park with commercial retail units. This layout remains to the present day.



4. Assessment of Significance

Significance

- 4.1 The NPPF defines the significance of a heritage asset as:

"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."

Non-Designated Heritage Assets

- 4.2 Non-designated heritage assets (which can include 'locally listed buildings') are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets.

Setting

- 4.3 The NPPF defines the setting of a heritage asset as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

- 4.4 Historic England has published guidance in respect of the setting of heritage assets, providing detail on understanding setting and the associated assessment of the impact of any changes. It confirms that setting is not a heritage asset, nor a heritage designation, rather its importance lies in what it contributes to the significance of the relevant heritage asset itself.

- 4.5 Further guidance on the definition of setting and how it should be taken into account is set out in national Planning Practice Guidance. In assessing the contribution of setting to the significance of the following identified heritage assets the role of the Application Site has also been considered.

Assessment

- 4.6 As set out earlier, this assessment is proportionate to the significance of the relevant non-designated assets and the nature of the Proposed Development. It has been informed by published information, archival research and on-site visual survey.

- 4.7 The assessments have been produced in accordance with the criteria set. By Rochdale Borough Council and Historic England guidance set out in the following:

- Advice Note 2: Managing Significance in Decision Taking in the Historic Environment (2015)
- Advice Note 3: The Setting of Heritage Assets (2017)
- Advice Note 7: Local Heritage Listing (2021)
- Advice Note 12: Statements of Heritage Significance (2019).



Duke Street Mill (Non-Designated Heritage Asset)

- 4.8 The below assessment and subheadings for Duke Street Mill has been informed by the criteria set out by the Council. It is a proportionate assessment of the heritage significance of the non-designated heritage asset.

Architectural Significance

- 4.9 Duke Street Mill (originally known as Bankside Mill according to census records) dates from c.1860-70 and is principally built from red brick and partially faced in gritstone with ashlar dressings. It includes the main cotton mill, engine room and a central water tower. The building is four storeys with a flat roof concealed behind a slightly raised parapet.



Figure 4.1: View from Duke Street (2022)

- 4.10 The original principal elevation faces onto Duke Street (Figures 4.1 and 4.2) and consists of six bays, the outer bays of which protrude slightly and are

decorated with quoins. The ground floor contains arched window openings with ashlar dressings and keystones. The upper floors are demarcated by a dentilled cornice and have a consistent and ordered arrangement of windows. It includes a mix of crittel, timber sash, casement, and plastic windows. The central recessed bays include a continuous cill band at each floor level and the roofline is decorated with a projecting cornice.



Figure 4.2: View from Duke Street / Princess Street (2022)

- 4.11 To the side of the building is an early 20th century addition which was added between 1910-1930. It is of the same height but built from red pressed brick with stone cills and recessive brick lintels. The fourth floor is delineated by a continuous stone band.
- 4.12 The north elevation of the building (Figure 4.2) follows a similar design approach, forming part of the same addition from 1910-30. It connects to a



19th century brick section which appears to be a later addition (potentially late 19th century). It includes three storeys of red brick with stone lintels and continuous cill bands. A basement level is visible with blocked up openings and the fourth floor appears to have been added or rebuilt as part of the 20th century addition (with similar recessive brick lintels and red pressed brickwork).



Figure 4.3: View from Whitehall Street / Princess Street (2022)

- 4.13 The side / rear (west) elevation (Figure 4.3) shows the original cotton mill with a stone façade to its north, together with the water tower, which both would have originally been visible at the lower stories. At some point in the late 19th century, the brick section to Princess Street was added which concealed this part of the building. The rear section of the mill is identified by its brick construction and includes seven bays with shallow arched brick lintels to the windows, continuous stone cill bands and quoins. The upper storey has been rebuilt in the 20th century. The engine room is also

partially visible to one side with a large former window opening (now bricked up).



Figure 4.4: View from Whitehall Street / Queen Street (2022)

- 4.14 The side (south) elevation is of stone with consistent window openings decorated with stone lintels with keystones and continuous cill bands at each floor. The windows include a mix of original and modern crittal and casements. A cast iron fire escape stair is located to one side. The engine room is evident to the side of the building although the main window opening has been infilled and altered.
- 4.15 Architecturally, Duke Street Mill is a good example of a cotton mill from the mid to late 19th century and employs quality materials and areas of architectural detailing. Its former use as a cotton mill remains legible with its engine room and water tower. The building is not however associated with a local architect, designer or engineer of importance as per the Council criterion.



Historical Significance

- 4.16 Duke Street Mill holds historical significance as a cotton mill from 1860/70 with additions from the late 19th and early 20th century which illustrate the continual use and adaptation of the building. Archival research has identified that there was a building on the site prior to the existing one but was demolished and replaced due to a severe fire in 1860.⁵
- 4.17 A textile company known as J.H. Cunliffe & Co are understood to have been established the building in 1878 and are confirmed in the 1891 records as 'fancys and fustians' and the building (Bankside Mills) is noted as containing 50 looms.⁶ The same company has remained in the building into the early 21st century. During the late 19th and early 20th century, Mr J.H. Cunliffe was one of the leaders of the Rochdale Conservatives.⁷
- 4.18 Archival research has revealed that an 'important invention in looms' took place at Duke Street Mills in 1897. The relevant article notes the following: *"An invention in looms has just been completed, the patentees being Messrs J Law and J.H. Cunliffe of Rochdale. The invention, which is in operation at Bankside Mills, Rochdale, will enable manufacturers to make, by power-loom, solid silk bordered fabrics known as "Sarries", "Dhoties", at much less cost than that entailed by this present hand-loom methods of manufacture. The loom should open up a wide field for the production of artistic fabrics not only in cotton, but also in the woollen, silk and linen trades, and is expected to prove of great utility in many branches of the textile trades of Lancashire and Yorkshire."*⁸
- 4.19 Overall, Duke Street Mill holds historical interest as a cotton mill from 1860/70 with later additions and which has local associations with a notable local company and individuals as well as a place for inventions.

⁵ Bristol Daily Post (26 November 1860) Serious Fire at Rochdale
⁶ Worrall, John (1891) Cotton Spinners & Manufacturers Directory

Positive Contribution

- 4.20 Duke Street Mill was originally enclosed by a dense arrangement of built development of varying heights and scales as illustrated at Section 3. It was not designed to be prominent within the wider area but has become more visible following post war clearance and redevelopment in the late 20th century. It therefore now has increased prominence within the immediate locale and has some landmark presence.

Designed Landscape

- 4.21 The building does not form part of a designed landscape. This criterion is therefore not applicable.

Contribution made by Setting

- 4.22 As set out earlier and at Section 3, Duke Street Mill originally sat within a tight urban grain and dense arrangement of streets and buildings, all of varying heights and scale. This original context has largely been eroded through later demolition, clearance, and redevelopment. As found today, Duke Street Mill is bound to the north by Princess Street, Whitehall Street to the west, Queen Street to the south and Duke Street to the east. It is enclosed to the west by modern residential dwellings and modern and altered industrial units to the north and east. To the south is a large car park (forming part of the site) beyond which are modern commercial units. The building now sits isolated within a predominantly modern context.
- 4.23 The building is primarily and directly experienced from Duke Street at its junction with Queen Street (Figure 4.1) where its architectural detailing and former use as a cotton mill is appreciable. The later phasing and engine room are also legible in this view and contribute towards the local significance of the building.

⁷ Rochdale Observer (06 October 1917) Obituaries
⁸ Cotton Factory Times (03 September 1897) Important Invention in Looms





Figure 4.5: View from Whitworth Road (2022)

- 4.24 From Whitworth Road (Figures 4.5 and 4.6), the principal elevation of Duke Street Mill is experienced amongst existing road infrastructure and buildings. The side elevation along Queens Street is largely screened and filtered by mature trees (Figure 4.5) which limits its appreciation. There are glimpsed views of the building at certain points along the road which allow for its scale and materiality to be experienced (Figure 4.6).



Figure 4.6: View from Whitworth Road (2022)

- 4.25 The building is experienced from various points to the north including Petrie Street, Howard Street, Duke Street and Whitworth Road where the topography of the land rises. Both the mill and its tower remain prominent in views from these areas, allowing for an understanding of its original use and function as a cotton mill. There are more intimate and direct views from Princess Street (Figure 4.7) where the function and differing components and additions of the mill are appreciated and contribute towards the local significance of the building.



Figure 4.7: View from Princess Street / Duke Street (2022)

- 4.26 From the south, Duke Street Mill is visible along Whitworth Road close to its junction with St Mary's Gate (Figure 4.8) due to the lack of built form and later redevelopment. The scale and local prominence of the building and its projecting water tower are experienced from this point. The lower



stages of the side elevation are largely concealed and filtered by mature trees which draws the eye upwards to the upper stages and tower.



Figure 4.8: View from Princess Street / Duke Street (2022)

- 4.27 Due to intervening development and the topography of the land, there are limited other areas from which to experience and appreciate the non-designated heritage asset.

Contribution made by the Application Site

- 4.28 Whilst located adjacent, there are no known functional or historic connections with the Duke Street Mill and the Application Site. The vacant and undeveloped nature of the site deviates from the original character of the area. It does allow for filtered views of the building from the south (Figure 4.9) but these are limited and are confined to the upper stages of

the building due to the extent of mature trees. The local significance of the building as a cotton mill is also not readily appreciable from these views.



Figure 4.9: View from across the Application Site (2022)

- 4.29 With reference to Paragraph 206 of the NPPF, although the Application Site is part of the setting and physical surroundings of the Duke Street Mill, it is not an aspect of setting that contributes to its significance.



5. Impact Assessment

Summary of National Planning Policy

- 5.1 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, putting them into viable uses consistent with their conservation, as well as the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.2 'Conservation' is defined by the NPPF as *'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.'*
- 5.3 In relation to non-designated heritage assets, Paragraph 203 of the NPPF requires states that 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.
- 5.4 Paragraph 206 requires local planning authorities to look for opportunities for new development within the setting of heritage assets to better reveal their significance. With respect to setting, the NPPF notes that proposals that preserve those elements of setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 5.5 Further details of the heritage national and local planning policy and guidance for consideration of the Proposed Development is set out in in **Appendix I.**

The Proposed Development

- 5.6 The Proposed Development involves a full planning application for the construction of a drive-through coffee unit with parking, landscaping, and associated infrastructure. Further information on the design and appearance of the Proposed Development is set out within the accompanying Design and Access Statement prepared by RGP Architects.

Impact Assessment

- 5.7 This impact assessment employs current national advice provided by Historic England as an appropriate framework for analysis, including Advice Note 2: Managing Significance in Decision Taking in the Historic Environment (2015), which sets out the importance of good design and response to local distinctiveness for new development in the historic environment. This advice provides a checklist of factors that may influence what will make the scale, height, massing, alignment, materials, and use of new development successful in its context.

Duke Street Mill (Non-Designated Heritage Asset)

- 5.8 The Proposed Development involves the partial redevelopment of the Application Site with a new drive-through coffee unit. This is positioned to the north of the Application Site, and which is setback from Duke Street with all new access roads located on areas of existing hardstanding. As set out at Section 3, the Application Site was historically densely developed with buildings of varying scale ranging from two to six storeys. The introduction of built form on this part of the site is therefore acceptable in principle.
- 5.9 The scale and massing of the proposed building is predominantly single storey which responds to the low-lying buildings and structures within the surrounding area. The total height of the proposed building is 4m high with a feature tower that is slightly taller at 6m high.





Figure 5.1: Contextual Elevation © RGP Architects

- 5.10 As set out in the supporting architectural contextual elevation (Figure 5.1) and section (Figure 5.2), the proposed building remains subservient to the neighbouring mill building and sits well below the height of the existing tree cover. The projecting tower element of the new building also responds to the projecting water tower found on Duke Street Mill. Its height is marginal and will not detract from the mill as shown at Figures 5.1 and 5.2.



Figure 5.2: Section along Duke Street © RGP Architects

- 5.11 The views of the side of the mill building from the south (as illustrated at Figures 4.8 and 4.9) will remain appreciable and whilst the proposals will be visible, they are subservient and will not affect the ability to experience the local significance of Duke Street Mill in these views. The mill will continue to form a prominent feature on the skyline.
- 5.12 The setback nature of the Proposed Development from Duke Street together with its subservient scale and massing, ensures that the principal elevation of the mill will be unaffected. Furthermore, views of the proposals will be largely screened by existing mature trees and planting.
- 5.13 In relation to the wider views of the building gained from the west, north and east, the Proposed Development will not be visible due to its low scale and massing and the extent of intervening development. Those elements of setting which contribute towards the significance of the non-designated heritage asset will be unaffected by the Proposed Development.
- 5.14 In terms of materials, the Proposed Development includes a mix of ash white render panels, dark vertical timber cladding and aluminium framed windows units with fascias and trims. The use of timber cladding will ensure that the building blends in with the existing backdrop of mature trees in views from the south and the use of render panels responds to the nearby commercial retail units. The materials respond to the modern context of Duke Street Mill and will not detract or disrupt from an appreciation of the local significance of the non-designated heritage asset.
- 5.15 The existing perimeter soft landscaping found to the three sides of the Application Site are to be retained and strengthened as part of the proposals. This includes the introduction of planting zones with low-level ornamental planting and evergreen shrubs. The landscaping works will improve the immediate setting of the non-designated Duke Street Mill.



- 5.16 Overall, the Proposed Development will not affect the local architectural significance of Duke Street Mill. The historical interest of the building will be unaffected by the proposals. Furthermore, those elements of setting which contribute towards the significance of the non-designated heritage asset will be unaffected by the proposals. The Proposed Development will ensure the local significance of the buildings remains appreciable.

National Planning Policy

- 5.17 Having regard to the significance of the non-designated Duke Street Mill and the contribution made by setting to that significance (including the Application Site) and the weight attached to the conservation of the heritage asset, it is concluded that the Proposed Development will not harm its significance.
- 5.18 With respect to the core planning principle of the NPPF in relation to the historic environment, the Proposed Development would sustain, and thereby conserve, the significance of the non-designated Duke Street Mill. The Proposed Development therefore meets the objectives of paragraphs 197, 203 and 206 of the NPPF.

Local Planning Policy and Guidance

- 5.19 This Heritage Statement provides a proportionate assessment of the significance of the identified heritage assets. As set out above, the Proposed Development is considered to sustain the significance of the non-designated Duke Street Mill.
- 5.20 On this basis, the proposals are therefore considered to comply with the relevant policies of the Rochdale Borough Council Core Strategy (2016) and the saved policies in the Unitary Development Plan (2006).



6. Summary and Conclusions

- 6.1 This Heritage Statement has been prepared by Adapt Heritage on behalf of ERP (Accrington) Ltd c/o Glenbrook Investments Ltd in connection with a full planning application for the construction of a drive-through coffee unit with parking, landscaping, and associated infrastructure (the 'Proposed Development') at Whitworth Road (Dunelm and Carpetright) Car Park, Whitworth Road, Rochdale, OL12 0TY (the 'Application Site').
- 6.2 There are no designated or formally recognised non-designated heritage assets within the Application Site. It is however proximate to Duke Street Mill which has been formally identified by Rochdale Borough Council ('the Council') as a 'non-designated heritage asset' under the terms of the National Planning Policy Framework ('NPPF') (2021).
- 6.3 Overall, the Proposed Development will not affect the local architectural significance of Duke Street Mill. The historical interest of the building will be unaffected by the proposals. Furthermore, those elements of setting which contribute towards the significance of the non-designated heritage asset will be unaffected by the proposals. The Proposed Development will ensure the local significance of the buildings remains appreciable.
- 6.4 Having regard to the significance of the non-designated Duke Street Mill and the contribution made by setting to that significance (including the Application Site) and the weight attached to the conservation of the heritage asset, it is concluded that the Proposed Development will not harm its significance.
- 6.5 With respect to the core planning principle of the NPPF in relation to the historic environment, the Proposed Development would sustain, and

thereby conserve, the significance of the non-designated Duke Street Mill. The Proposed Development therefore meets the objectives of paragraphs 197, 203 and 206 of the NPPF.

- 6.6 Overall, the proposals are considered to comply with the relevant policies of the Rochdale Borough Council Core Strategy (2016) and the saved policies in the Unitary Development Plan (2006).



Appendix I: Heritage Planning Policy and Guidance



Heritage Planning Policy and Guidance

Below is an overview of the relevant heritage legislation, national and local planning policy and supplementary planning documents and guidance relevant to the Application Site and the Proposed Development.

National Planning Policy

The NPPF was originally published in March 2012 and was last updated in July 2021. The NPPF requires that great weight is given to the conservation of heritage assets. Conservation is defined by the NPPF as *“the process of maintaining and managing change to heritage assets in ways that sustain and where appropriate, enhance their significance.”*⁹

Paragraph 197 of the NPPF elaborates that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, putting them into viable uses consistent with their conservation, as well as the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 requires when considering the impact of a Proposed Development on the significance of a designated heritage asset, that great weight should be given to the asset's conservation and the more important the asset, the greater that weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss requires clear and convincing justification.

Paragraph 201 states that where a Proposed Development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm and or loss is necessary to achieve substantial benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 202 requires that 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 securing its optimum viable use.

Paragraph 203 states that 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.

Paragraph 206 requires that Local planning authorities should look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance. 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.

Local Planning Policy

Rochdale Borough Council Local Plan: Core Strategy (2016)

The Core Strategy for Rochdale borough was adopted on 19 October 2016. It's the lead document in the Council's Local Plan.

In relation to protecting and enhancing character, landscape and heritage, Policy P2 of the Core Strategy states that:

"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:

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

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;

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;

Protecting, enhancing and utilising outstanding cultural landscapes, such as the Cheesden Valley area and around Littleborough and Hollingworth Lake; and Conserving and enhancing townscape character.

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

Conserving, enhancing and promoting key heritage assets, both statutory and non- statutory, 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.*

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;

Using heritage assets positively and intelligently to strengthen identity and image and support the visitor economy, particularly in development and regeneration schemes; and



Prioritising the conservation of heritage assets at risk from decay, giving special attention to designated heritage assets in this regard."

Rochdale Borough Council Local Plan: Unitary Development Plan (2006)

The Rochdale Borough Unitary Development Plan was adopted in June 2006 and forms the policy period between 1999 and 2016.

In relation to the design criteria for new development, Policy BE/2 states that:

"Development proposals will be required to demonstrate good design by:

- a) Ensuring that they are compatible with or improve their surroundings by virtue of their scale, density, height, massing, layout, materials, architectural style and detail and means of enclosure;*
- b) Creating visual interest in areas or buildings lacking character;*
- c) Taking opportunities to retain, enhance or create views, landmarks and other townscape features which make a material contribution to the character of the area and reveal such features to public view;*
- d) Retaining and enhancing the architectural or historic qualities and features of buildings of character;*
- e) Appropriate treatment of open spaces between and around buildings, including the provision of landscaping as an integral part of the development layout;*
- f) Retaining key natural features, including trees, as part of the landscaping of the site;*

g) Providing for safe and convenient access and circulation;

h) Minimising opportunities for crime against people or property;

i) Making adequate provision for natural light within and between buildings;

j) Minimising the potential environmental impact of and on the development, including noise, air and water pollution."

Policy G/BE/9 sets out the policy for the conservation of built heritage. It states the following:

"Priority will be given to the practical conservation and enhancement of those features of the built environment which are the most valuable, in particular: conservation areas; listed buildings and their settings; scheduled ancient monuments; parks and gardens of special historic interest; and archaeological remains. such buildings, areas and features of architectural and historic merit will be protected from adverse development or demolition and positive measures will be taken or supported, wherever possible, to facilitate their continued upkeep and beneficial use. particular emphasis will be placed on securing new uses for existing buildings to ensure their future, and on promoting conservation activities which provide a stimulus for the regeneration of town centres, older urban and rural areas, including historic and cultural landscapes."

In relation to the protection of locally important buildings and features of architectural and historic interest, Policy BE/11 states that:

"The Council will permit development proposals that do not adversely affect buildings and features which are of local interest and which contribute to the character of an area and/or are important in townscape terms."



Guidance

National Planning Policy Guidance, 2019

Whilst not planning policy the Planning Practice Guidance provides a clear indication of the Government's approach to the application of national policy contained in the NPPF. Where there is conflict between the guidance in the PPG and earlier documents the PPG will take precedence.

Historic England Advice Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)

This note is not a statement of Government policy but supports the implementation of national government policy. It provides advice on assessing the significance of heritage assets and the impact of proposals on that significance.

Historic England Advice Note 3: The Setting of Heritage Assets (2017)

Historic England has revised its guidance relating to setting and views of heritage assets. The guidance advocates a staged approach to assessment involving identification of the affected assets and setting, an assessment of the degree to which setting and views contribute to the significance of the assets, an assessment of the effects of the proposed development, exploration of ways to maximise enhancement and avoid or minimise harm and the monitoring of outcomes.

The revised guidance clarifies that there is a distinction between views that contribute to heritage significance and views that might be valued for reasons of landscape character or visual amenity. It states that the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.

The guidance makes it clear that setting is not a heritage asset, nor a heritage designation, rather its importance lies in what it contributes to the significance of the relevant heritage asset itself. The guidance sets out the need for a systematic and staged approach to assessing the impact of development proposals in the setting of a heritage asset. It confirms that such assessment should be based on an understanding of the significance of the heritage assets affected and then the contribution of setting to that significance.

Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)

The guidance covers the NPPF requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets. Understanding the significance of heritage assets, in advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions. The advice note explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).





adapt heritage