



Paul Butler Associates
Planning, Development & Heritage Consultants

Cassel and Fletcher

No.1 Drake Street

Heritage Statement

08 May 2025

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1. Introduction

- 1.1 This Heritage Statement has been prepared by Paul Butler Associates on behalf of Cassel & Fletcher. The statement has been provided in support of an application for planning permission and listed building consent for a residential development at 1 Drake Street, Rochdale, OL16 1RE. The application proposes the change of use of vacant upper floor levels to 10no. residential apartments, together with insertion of window openings and rooflights. The application building is Grade II listed and is located within the Rochdale Town Centre Conservation Area.
- 1.2 This statement has been prepared to provide an assessment of significance of the affected heritage assets, and also to provide an assessment of potential impact of the proposed development upon that significance.

Approach and Methodology

- 1.3 This Heritage Statement has been prepared to comply with the tests and requirements of the National Planning Policy Framework (NPPF: 2024), specifically paragraphs 200 and 201, under which a description of the significance of a site, including any contribution made by its setting, must be provided to support any planning applications to assess the effect on significance of any proposed changes. There is also a requirement to make an informed assessment of heritage significance as part of a staged approach to decision-making.
- 1.4 The assessment follows the staged approach to decision-making set out within *Historic England Advice Note 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)*:
- Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits
 - Understand the significance of the asset(s)
 - Understand the impact of the proposal on that significance

- Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF
- Look for opportunities to better reveal or enhance significance

1.5 The report also draws on other best practice guidance documents such as, *Conservation Principles (2008)* and *Historic Environment Good Practice Advice in Planning Note 3 - The Setting of Heritage Assets (2017)*.

1.6 Research has been primarily desk-based, consulting historic mapping and written secondary sources. A visual and photographic survey of the site, its surroundings and nearby heritage assets was undertaken on 10th December 2024.

2. The Application Site and its Surroundings

Site location

- 2.1 The application site sits to the south east of the junction of Smith Street and Drake Street in Rochdale Town Centre.



Figure 2.1: Application site boundary identified in red.

Designations

- 2.2 1 Drake Street was Grade II listed on 12th February 1985 (list entry 1367054). The listing has the following description:

ROCHDALE, DRAKE STREET (north-east side), No 1 Wellington Hotel

(Formerly listed as No 1, DRAKE STREET, previously listed as Dukes Restaurant and Nightclub, DRAKE STREET)

II SUMMARY: former town house, now (2019) hotel and pub. Built between 1764 and 1795 as a town house for Thomas Smith

HISTORY: it was built between about 1764, when the vicar gained powers to grant building leases, and 1795, as a town house for Thomas Smith (1743-1806), a wealthy woollen merchant who built fulling mills behind it. It was later a school, then from 1818 the Wellington Hotel. Between 1825 and 1839 the police commissioners met here. In 1844, the building was still owned by the Smith family and the hotel was run by Elizabeth Richardson.

DETAILS: brick, appearing to be of various dates, the front appearing to have been re-faced, stone dressings and slate roof. Five bays, double-pile with three storeys and an additional wider bay to the right with a former bar entrance. Stone plinth, continuous ground and first-floor cornices and a modillion eaves cornice; steeply pitched roof. Pedimented Ionic doorcase as well as the entrance in bay six which has four Ionic pilasters and entablature. Window openings with moulded architraves, the ground floor having pulvinated friezes the first and second having sill blocks. Ground and first floors have Victorian sashes, otherwise glazing is C20. The original glazing pattern and some original brickwork is seen in the gable.

- 2.3 It is within the Rochdale Town Centre Conservation Area, in the Regency Drake Street character area.

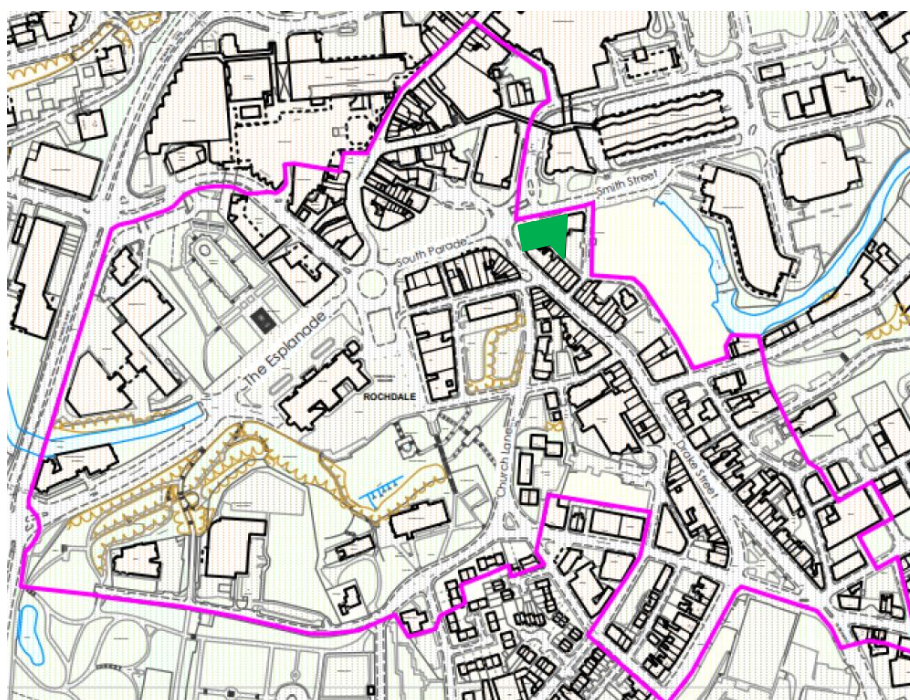


Figure 2.2: Map of conservation area boundary (pink), application site (green).

2.4 The Historic Environment Record was viewed online via the Heritage Gateway. Beyond the listed building which occupies the site, the following entries within 100m of the site are of note:

HER Number: 16713.1.0

Name: Butts Factory, The Butts (site of)

Grid Reference: SD 8976 1345

Protected Status: Conservation Area: Rochdale Town Centre

Full description:

Henry Kelsall is listed as a woollen manufacturer in Pigot's directory of 1822. The area is shown as partially developed on Murphy's 1831 map, and a small building with a chimney is depicted on the OS map of 1851. 'Butts Factory (Woollen)', is shown on the OS map of 1892, and two water mains and two tanks are marked within the site. The building is labelled 'Butts Mills (Woollen)' on the OS maps of 1910 and 1930 and 'Mills' on the OS maps of 1931 and 1938. On the 1959 OS map the westernmost of the mill buildings had been replaced by the Regal Cinema [HER 16741.1.0]. The remainder of the mill was demolished to make way for council offices, as shown on the OS map of 1978.

The site lies within the study area and any future development could have an impact on buried archaeological remains, which may require mitigation prior to development. Whilst much of the site is likely to have been destroyed during the construction of the cinema and the office block that occupy the site presently, some fragmentary elements of the mill may survive as buried remains beneath modern surfacing.

HER Number: 15499.1.0

Name: Bottom O'th Lane Mills (site of)

Grid Reference: SD 8983 1340

Protected Status: None recorded

Full description: Former site of Bottom O'th Lane Mills, an early 19th-century corn and seed mill. First shown on the Plan of Rochdale 1824. A waterway named the Goit was utilised as the power source. The mill had been demolished by 1930, when Electric House was built [see HER 15497.1.0]. The corn mill was constructed on an alignment different from that of Electric House: the northern elevation of the mill reflected the line of the southern bank of the river Roch, whilst the northern façade of Electric House followed the line of Smith Street.

HER Number: 15497.1.0

Name: Electric House, Smith Street (site of)

Grid Reference: SD 8983 1340

Protected Status: None recorded

Full description

Purpose-built electricity showroom and offices constructed in 1930, part of a multi-phase building complex dating back to the early C19 [see also HER 15498.1.0 & 15499.1.0]. Constructed of steel framing, with brick and stone infilling; part of the steel frame was exposed during an asbestos survey of the building. The plan of the building shows an unorthodox alignment with other buildings located along Smith Street. The building that stood prior to Electric House, a corn mill, was constructed on a different alignment. The northern elevation of the corn mill reflected the line of the southern bank of the river Roch, whilst the northern façade of Electric House followed the line of Smith Street. This northern façade, constructed of dressed sandstone blocks with symmetrically laid offset window openings and doorways, is arguably a fine example of a 1930s utility building. To the rear of the building the southern elevations are constructed of white-glazed engineering brick. In the interior of Electric House an important trace of the 1930s decor has survived, including the tiled walls in the male and female toilets of the first floor, and wood and glass panels. An entrance hall located within the NW corner of the Smith Street frontage led to a staircase and lift and to a series of display halls. During the latter part of the 20th century, the Rochdale Corporation was integrated into a larger company, Norweb, and became a district office. However, by 1972 the company had vacated Electric House. Rochdale Council purchased the building from Norweb in 1974 but the ground-floor showrooms were leased back to Norweb. (1)

Desk-based assessment and building recording were undertaken in advance of proposed demolition, and the site had been cleared by 2006. (1)(2)

The Site and its Setting

Exterior

- 2.5 1 Drake Street comprises an L-shaped three storey building fronting onto both Drake Street and Smith Street, with one and two storey elements infilling the L-shape at the rear. It is understood that the whole building is listed, however the Historic England listing describes only the western portion of the building fronting Drake Street. The application floorspace relates to the upper floors of the element of the building fronting Drake Street, and the first floor of the infill development to its rear. The element of the building fronting Drake Street retains a good degree of architectural integrity; it is constructed of red / orange brick with a slate roof, and features including a classical stone surround with a pediment to the main entrance, moulded stone window surrounds, projecting stone string courses, and a modillion eaves cornice. Windows are one over one sliding sash, frames are timber with horns and possibly a reproduction of a Victorian style window frame. The listing notes that the brick frontages may have been refaced, this is corroborated by the stretcher bond to the front elevation, while the return of the gable to Smith Street is in Flemish bond. The gable elevation

also indicates previous alterations where there are variances in brickwork, inserted windows and visible gauged brick arches with keystones where former openings have been bricked up. The roof is steeply pitched with a slate covering and bargeboards to either side of a central chimney stack that projects from the gable. The chimney stack has eight glazed bishop chimney pots. This portion of the building fronting Drake Street is currently vacant, it was most recently in use as 'Bombay Brew' restaurant on the ground floor. The upper floors were most recently in use as 'The Nile' nightclub, but have been vacant for several years.

2.6 The element of the building fronting Smith Street (not described within the listing) is a later phase of construction, and likely dates from the around the mid-20th Century. This is evident from the more contemporary appearance of the brickwork. Nonetheless, a traditional design approach has been adopted with the use of buff stone dressings and traditional glazing pattern to the uPVC windows. This element of the building is occupied by Rochdale Housing Solutions on the ground floor, and residential apartments on the upper floors.

2.7 Development infilling the 'L' shape comprises pitched roof buildings which form a perimeter block and square off the 'L' shape, which has been infilled at a later point with a flat roof element. A former glazed lantern appears to have been removed from the most southern building and infilled with a flat roof, indicated by small the projecting gables to either side of the flat element.



Figure 2.3: Rear elevation showing projecting gables where a roof lantern has likely been removed.

Interior

- 2.8 Internally, the upper floors of the application floorspace are in a significant state of disrepair and in need of significant investment to be brought back into a usable condition. Wall and ceiling finishes are considerably damaged or missing. At first floor of the element of the building fronting Drake Street, a number of the internal walls removed to facilitate previous uses of the building, and modern partitions have been inserted. Nibs of structural walls and chimney breasts appear to have been retained. Features of interest include lath and plaster to some walls and ceilings, which was evident from previous investigative opening up works undertaken to inform earlier development proposals for the building, as well as areas where this has fallen into disrepair. Timber beams are retained in places but have been reinforced by steel, while in other locations inserted RSJ's have been encased in timber with decorative wallpaper covering and later boxed in (indicating various refurbishments). A mock hewn effect ceiling joist has been applied to the ceiling, painted in the same dark blue colour as the beam encasement, suggesting these works formed part of the same refurbishment.

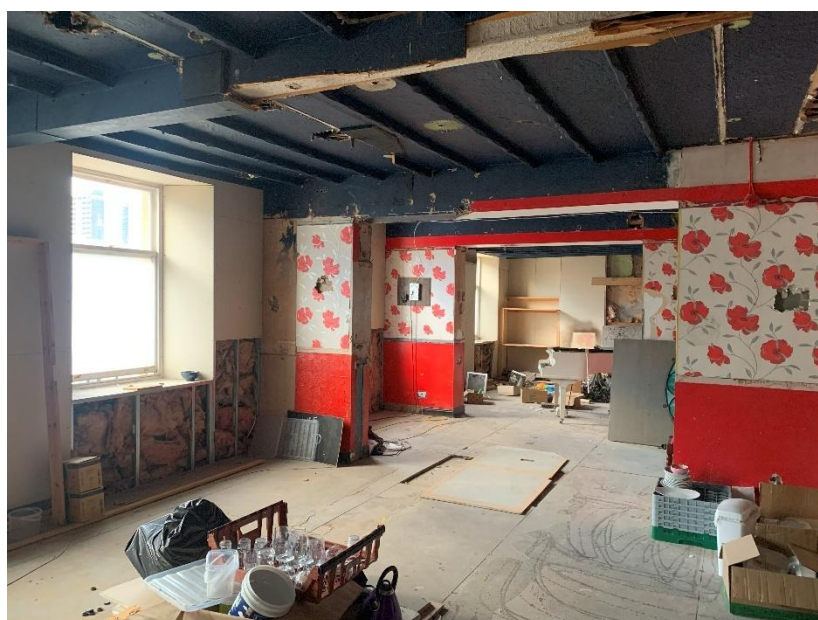


Figure 2.4: view of first floor showing removal of internal walls.



Figure 2.5: Timber beam reinforced by steel, and damaged lath and plaster ceilings.

2.9 The infilled extension can be accessed via a large opening in the rear wall, this area is largely void of any features and internal walls have been removed. From anecdotal evidence it is understood the building was previously used as a snooker hall when it functioned as a nightclub / bar. It is possible this space was the former snooker hall. Areas of plasterboard, modern roof timbers and ceiling joists, steel frame and brick walls are visible. Hipped roof timbers are visible with lath and plaster applied over, suggesting the roof was originally exposed. A modern ceiling has been installed below, with the plasterboard now removed.



Figure 2.6: Internal view of the two storey rear element.

- 2.10 At second floor level there are a greater number of internal walls although it is not clear what period this plan form dates from; walls are lath and plaster and partition walls have been inserted to subdivide spaces, in some places abutting bricked up windows. A hewn timber lintel above a window is probably original to the building's construction. In the attic space, the roof trusses have been modified, with sections of modern machine cut timbers visible. A roofing membrane has been installed above the rafters. Paint and remnants of lath and plaster to the underside of the roof timbers indicate that the attic space was previously occupied as habitable space. This is further reinforced by areas of plaster to the walls and the steps which lead to a lath and plaster vestibule in the roof level.
- 2.11 The interior of the building has been substantially altered, and retains few features of interest.



Figure 2.6: Subdividing wall abutting a bricked up window.



Figure 2.7: Vestibule in the roofspace.

Setting

- 2.12 The site occupies a highly central position in the town centre, and its context is distinctively urban. Looking northwards up Drake Street, buildings are predominantly late 18th to 19th century buildings that are three storeys in height with varying materials including red brick,

render and stone. There is a good degree of enclosure to Drake Street created by the flanking buildings, the topography gently rises and the gently curving nature of Drake Street lends to a key vista into this part of the Conservation Area.

- 2.13 In contrast, looking northwards the site fronts onto open space comprising the public realm where the River Roch has been culverted at South Parade, the Conservation Area Appraisal notes that that this sweeping terrace marks the junction of Drake Street with the former limit to development on the southern bank of the river. These buildings are modest 3 storey shops which have undergone recent refurbishment works as part of the Heritage Action Zone scheme. Buildings fronting onto this central space vary in age, scale, style and materiality; for example neo-classical, art deco and contemporary 21st century development adjoin each other. Surrounding development is typically three to four storeys in height, with varying roof lines. Rochdale Town Hall is an exception to this and its tower is an imposing feature to the open nature of this part of the town centre.

3. Historic Development

Rochdale Town

- 3.1 Situated at the foot of the Pennines and north of Manchester, Rochdale is a former industrial town. It made its wealth through the wool trade, and later cotton weaving. It is also known for the 'Rochdale Pioneers' that established the first co-operative, an establishment that now stretches across the globe.
- 3.2 Located on the River Roch, from which the town takes its name, Rochdale is mentioned in the Domesday book (1086) as Recedham Manor (parts of which can be traced back to the 9th century). A market charter, issued in 1251, allowed for a weekly market on a Wednesday and an annual fair on the 28th of October.
- 3.3 The main period of growth was during the 16th century, when Rochdale became known for its wool and established itself as one of the principal towns in Lancashire. This growth continued throughout the 18th and early 19th century, until the introduction and subsequent success, of the mechanised loom which brought the town's prosperity to an end.
- 3.4 In the early 19th century, there was growing unrest within Rochdale, not just because of the economic downturn and spiralling wages of the working class, but also from the middle-class merchants and entrepreneurs who had no power or political franchise. Riots were common and by the 1810s, the town had a barracks to ensure all uprisings were quickly dealt with. However, there was still an atmosphere of political resilience and many of the residents were involved in the Peterloo Massacre of 1819, having gone with Samuel Bamford (a radical reformist of the working class) to hear Henry 'Orator' Hunt, a fellow reformist, speak. The resulting Reform Act of 1832 which gave Rochdale representation in parliament, gave the vote to more men. Despite this, less than 1000 of the town's 28,000 strong population fitted the criteria of being able to vote. The inadequacies of the 1832 Reform Bill sparked the beginnings of the Chartist movement which would become a national protest organisation in favour of giving more power to the middle and working classes, from the late 1830s to the late 1850s.

- 3.5 Out of the economic and political struggle, the Rochdale Pioneers created a co-operative in 1844. This enabled people to purchase basic goods at lower prices whilst also allowing members to gain ownership of the business and make profits. The first co-op shop was established on Toad Lane, where the museum now resides. By 1900, there were over 2 million members across the country.
- 3.6 In 1856 Rochdale was made a municipal borough, following which the town hall was commissioned in celebration. This coincided with improvements being made in the surrounding area and the appointment of Messrs Stansfield and Sons to create a public park. Broadfield Park (now grade II listed), as it became known, was opened in successive phases between 1870 and 1874 with later additions, such as St Chad's, being added well into the 20th century.
- 3.7 In 1903 plans emerged to cover the River Roch which ran through the centre of the town, because of lack of even ground and thus allowing the town to expand. This wasn't completed until 1923, when six bridges were joined together. In 2016 a section of the river was opened to not only alleviate the flood risk that it posed, but to also create links to the town's past.
- 3.8 Development in Rochdale continued with the construction of the inner ring road in the mid 20th century, which significantly altered Rochdale's historic layout. The 1950s and 60s was a period of economic decline for Rochdale due to the collapse of the textile industry in the Northwest of England more generally, in favour of cheaper textile products from abroad. Even today, many companies within the region still have some connection to the textile industry.

Drake Street

- 3.9 Regency Drake Street is a character area within the Rochdale Town centre Conservation Area. Drake street was constructed during the late Georgian period, when the town needed to improve its transport links and was named after a reverend of the time, Reverend Drake. The street connected the centre of town to the Rochdale canal, which opened in 1788 to Stalybridge and 1804 to Manchester, and later the railway station (1838). The street's creation allowed for development opportunities south of the river and in the Victorian and

Edwardian period, as well as much of the 20th century, it was a primary shopping area. Today, the Metrolink tram is a key feature of the street as the main shopping area moved away, towards Yorkshire Street in the 1990s.

1 Drake Street

- 3.10 As noted in the listing description, 1 Drake Street was built at some point between 1764 and 1795 for the wealthy wool merchant Thomas Smith and his family; they then went on to build mills behind it. This was the family's town residence, spending the other half of their time at Summer Castle, which was further down Drake Street but has now been demolished.
- 3.11 It was later converted to a school and by 1818, it operated as the 'Wellington Hotel' into the 20th century. More recent uses have included a nightclub / bar, and restaurant use. Historic photographs (see figures 3.1-3.3) show a balcony on the first floor of the sixth bay above the bar entrance, and lamp above the central entrance; the balcony no longer exists but a modern lamp has been installed in the same location. Although it is possible the main façade was re-faced it has always been shown from early 20th century photos in its current form so this presumably took place during the 19th century. It was known as the main coaching house within the town and the area outside known as 'Speaker's Corner'. There is a blue plaque which commemorates the 8,000 people who gathered outside of the building following the 1832 reform act which kick started the chartist movement. Hence, it became a backdrop for Rochdale's political significance.
- 3.12 OS mapping published in 1851 (see appendix 1) shows the building identified as the Wellington Hotel at this time. Built form to the south, east and north of the site forms a central courtyard. This is likely the pitch roof development on site today, where the courtyard has been infilled with a flat roof element. The built form to the north may be retained in places where the later extension of the building fronts Smith Street, however the slight angle to the building line suggests this has more likely been demolished and the building extended on Smith Street, there was also a separation between the buildings shown on 19th century maps. Land to the south on the eastern side of Drake Street is sporadically developed at this stage. The river runs to the north of the site with industrial uses located to the west. The application building, a bridge over the River Roch and a foundry are all named 'Wellington'. The blue

plaque on the building suggests this was after the Duke of Wellington, the peerage title which was created for Arthur Wellesley following his victory over Napoleon in 1815.

- 3.13 Mapping published in 1910 shows that the river has been culverted and tramlines are in place along South Parade and Drake Street, with a tramway shelter adjacent to the site. Land to the south on the eastern side of Drake Street is now densely developed, as is land to the east of the site on Farrier Street and Samuel Street. Mapping published in 1960 continues to show an open courtyard to the rear of the building, confirming the flat roof infill was undertaken after this date.



Figure 3.1: The Site as The Wellington Hotel, c1900.



Figure 3.2: The Site as The Wellington Hotel – c1910.



Figure 3.3: Wellington Hotel, with Butts Mill visible on the left. C1950s.

4. Significance

- 4.1 Significance can be defined as the value of a heritage asset to this and future generations because of its heritage interest. The interest may be a combination of archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. The understanding of the significance of a place is vital to inform sensitively managed change. In accordance with Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets the following criteria are employed within this report to assess significance:
- 4.2 **Archaeological interest** – Where the heritage asset holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- 4.3 **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 skills, like sculpture.
- 4.4 **Historic interest** – An interest in past lives and events (including pre-historic) which heritage assets can illustrate or be associated with. 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.

4.5 The criteria for relative levels of significance of each asset is outlined below –

Significance	Criteria
Very High	Sites, buildings, landscapes and remains of 'exceptional', 'more than special interest' or sometimes considered nationally or internationally important. These include World Heritage Sites; Grade I Listed and Grade II* Listed assets; Scheduled Ancient Monuments or archaeological remains of equivalent significance.
High	Sites, buildings, landscapes and remains of acknowledged 'special interest' and sometimes considered nationally important. These include Conservation Areas; Grade II Listed Assets; and archaeological remains of national importance.
Medium	Sites, buildings, landscapes and remains of 'some interest' and generally considered of local or regional importance. These include Non-Designated Heritage Assets; Locally Listed Assets and archaeological remains of regional interest.
Low	Sites, buildings, landscapes and remains of 'limited interest'. These include historic sites that through level of alteration or typology are of insufficient significance to be considered Non-Designated Heritage Assets or Locally Listed.
Neutral	Sites, buildings, landscapes and remains of 'no or negligible interest'. These include sites or landscapes of no (or very minor) interest.
Intrusive / Detrimental	Sites, buildings, landscapes and remains of 'no or negligible interest' that harm the setting or significance of wider assets.

1 Drake Street

Architectural and Artistic Interest

5.1 The principal architectural value derives from the front elevation of the building, which retains a good degree of architectural integrity although this possibly represents a later refacing of an older building. Key features which contribute to this significance include the stone dressings, pediment door surround and decorative eaves, cornice, the chimneys and

decorative ridge tiles. There was likely more chimneys based on the location of chimney breasts internally, but these have since been removed. The original window openings to the front elevation largely survive, with the exception of the bar entrance that has been installed to the sixth bay. However, this alteration is historic (as seen on photos from the early 1900s) and of interest with ionic pilasters and a decorative entablature above.

- 5.2 Internally, the application floorspace has been subject to substantial alteration to the planform, structural fabric, and to the internal finishes. There are few features of note internally and therefore the architectural interest relates predominantly to the building's exterior. **The asset has high architectural and artistic interest.**

Historic Interest

- 5.3 The application building was built as a townhouse for Thomas Smith (1743-1806), a wealthy woollen merchant who built fulling mills behind it. It's beginning as a wool merchant's residence has some significance since the manufacture of woollen cloth was important for Rochdale from as early as the reign of Henry VIII. By the mid-1800s, the woollen trade was declining and the cotton trade grew in importance. From 1818, the building was used as the Wellington Hotel, named after the newly created title for the Duke of Wellington. Between 1825 and 1839 the police commissioners met here, and in 1844 the building was still owned by the Smith family. The hotel was the main coaching inn within Rochdale. The building's association with the area outside known as 'Speaker's Corner' is of historic significance, where a blue plaque which commemorates the 8,000 people who gathered outside of the building following the 1832 reform act which kick started the chartist movement. Hence, the building became a backdrop for Rochdale's political significance. **The asset has high medium-historic interest.**

Archaeological

- 5.4 The asset itself has visibly had a series of alterations and phases that are visible in its heritage fabric that may change understanding of the development of the site and the date of the building. The building is said to date from the latter half of the 18th century, but has been subject to significant internal alteration while the front elevation has also been refaced. Fabric that is likely original to the building's construction can be seen in limited locations, for

example the hewn timber lintel and brickwork which can be seen spanning a window at first floor. The extension fronting Smith Street has been built in the location of earlier built form, and therefore there may be surviving below ground remains. The potential for 18th century fabric may enhance our understanding of the building's construction and our understanding of the asset, and therefore may warrant further investigation beyond the scope of this report. **The asset has medium archaeological interest.**

Contribution made by Setting

- 5.5 The asset's setting is enhanced by the backdrop of enclosed views up Drake Street when looking north. This takes in terraced properties with a relatively modest facades, but typography and consistency in enclosure makes a level of contribution to the building's setting. This is juxtaposed by long range views of the front elevation of 1 Drake Street which takes in buildings which vary in style, age and materiality but all possess a good degree of architectural embellishment. 1 Drake Street forms one of the many building facades that front onto this area of public realm where the river has been culverted, while contemporary glazed buildings are visible in the backdrop. **Setting makes a medium contribution to the asset's significance.**

Rochdale Town Centre Conservation Area

- 5.6 Rochdale Town Centre Conservation Area boundary covers the heart of the historic market town and the former weaving industry. It is split into five characteristic areas. 1 Drake Street is on the cusp of two of the character areas, one being Regency Drake Street and the other Old Town. The Regency Drake Street area focuses on the expansion of the town in the late Georgian and regency period. The creation of Drake Street allowed for opportunities for new development south of the river. The appraisal (HPA Architects, 2023) notes that this area is noted for its diverse building stock. This stems from high density development for the provision of shops, warehouses and merchant's houses. This area also includes some of the remaining industrial buildings in the town centre, which were once filled with mills and foundries.
- 5.7 The Area Appraisal states "*The gateway view from the northern extent of this character area looking south along Drake Street provides a welcoming, yet imposing view of 3 storey*

terraces lining either side of the street. The strong continuation of these buildings helps draw people along the street and guides people towards the southern part of the town.” (HPA Architects, 2023)

5.8 The Rochdale Town Centre Conservation Area is of High Significance.

5. The Heritage Planning Context

Town and Country Planning Act 1990

- 5.9 Section 38(6) of the Planning Act states that the determination of planning applications must be made in accordance with the Development Plan unless other material considerations indicate otherwise. This establishes the Development Plan as the primary decision-making document when considering planning applications.
- 5.10 In this instance the development plan comprises the Rochdale Core Strategy (2016), the Unitary Development Plan (2006) and the Greater Manchester joint plan Places for Everyone (2024). The relevant provisions of these documents are discussed below.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.11 The Planning Act (1990) defines a conservation area as ‘an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance’. Paragraph 72 states that ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.
- 5.12 In considering development affecting Listed Buildings, special regard will be given to the desirability of preserving the building, its setting or any features of special architectural or historic interest (Section 66, Planning [Listed Buildings and Conservation Areas] Act 1990).

National Planning Policy Framework

- 5.13 The Revised NPPF which was published in July 2018 and most recently updated in December 2024, sets out the Government's planning policies regarding the conservation of the historic environment.
- 5.14 Section 16, Conserving and Enhancing the Historic Environment, and policies 202-221 of the NPPF sets out the heritage context. The NPPF states that heritage 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’.

- 5.15 Paragraphs 207 and 208 require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting; and that 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; local planning authorities should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
- 5.16 Paragraph 210 sets out three considerations which local planning authorities should consider when determining applications-
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.17 Paragraph 212 notes 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. Paragraph 213 follows that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.
- 5.18 Paragraph 214 identifies a series of criteria that must be met where substantial harm to or total loss of significance will be caused to a designated heritage asset; it has to be demonstrated that substantial loss or harm is necessary to achieve substantial public benefits that outweigh that harm or loss. Paragraph 215 states that where a development 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.
- 5.19 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 (para 216)

- 5.20 Paragraph 219 states that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance; and, that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

National Planning Practice Guidance (NPPG)

- 5.21 The NPPG was published in March 2014 (updated 2019). The Guidance includes a section on the historic environment. Relevant paragraphs from the Guidance are set out below:
- 5.22 All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.
- 5.23 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.
- 5.24 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 apply.
- 5.25 An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building.
- 5.26 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.

- 5.27 Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.
- 5.28 It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies.
- 5.29 With regard to assessing substantial harm, National Planning Practice Guidance advises: 'Whether a proposal causes substantial harm will be a judgment for the decision taker, 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.' (Paragraph: 018 Reference ID: 18a-018-20190723).

Rochdale Council Core Strategy (2016)

- 5.30 The following policy deals with heritage and is of relevance to the proposals:
- 5.31 P2 Protecting and enhancing character, landscape and heritage: This state states that the Council 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.

Rochdale Borough Unitary Development Plan and Policies (2006)

The Unitary Development Plan (UDP) is still in place until the Allocations Development Plan is adopted. The following policy is of relevance.

- 5.32 Be/17 new development affecting conservation areas: This states that development proposals will be permitted that preserve or enhance the character or appearance of a conservation area. In assessing a proposal, the following principles – where relevant – will be taken into account: a) its relationship to existing buildings, the site and its surroundings; b) its design - including elevations, roof form, materials, finishes and detailing; c) the retention, replacement and restoration of historic features and details of buildings, and - in the public realm - walls, paving and street furniture; d) the retention and enhancement of landscaped areas, trees and natural features; e) the design of new shop fronts (and replacements and/or alterations to those existing) should reflect the character or appearance of the conservation area, consistent with the provisions of policy be/5; f) the design and siting of advertisements, new street furniture, paving and other highway surfaces and related structures (e.g., lighting and signs); and g) the design and siting of car parking and servicing facilities. Development proposals should include detailed plans and drawings enabling its implication(s) for the character and appearance of the conservation area to be established.

Places for Everyone (2024)

- 5.33 The Places for Everyone Plan (2024) has been adopted by Rochdale in March 2024. The following policy is of relevance.
- 5.34 Policy JP-P2: Heritage: This policy states that the GM authorities will proactively manage and work with partners to positively conserve, sustain and enhance our historic environment and heritage assets and their settings. The policy explains how knowledge should be used to inform the positive management and integration of our heritage.

5.35 Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. These include historic town centres, places of worship, historic transport routes including the canal network, industrial buildings and structures including textile mills, farmsteads and other sites, buildings, and areas of identified archaeological, architectural, artistic and/or historic value.

5.36 Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy... Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process.

Historic Environment Good Practice Advice 2: 'Managing Significance in Decision-Taking in the Historic Environment' (2015)

5.37 This document provides advice to local authorities, planning and other consultants, owners, applicants and other interested parties. It sets out practical guidance to assist interested parties in making an assessment of the impact of proposals on the significance of heritage assets.

Historic England Advice Note 3: The Setting of Heritage Assets (2nd Edition)

5.38 Published in December 2017, this document sets out guidance on managing change within the setting of heritage assets, including historic buildings, sites, areas and landscapes. Building on the historic environment provisions of national planning policy, the document provides advice on the definition of 'setting' before setting out key principles for assessing the implications of development proposals on the settings of heritage assets.

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

5.39 This Guidance was published in October 2019 and covers the National Planning Policy Framework 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 changes to heritage assets.

Historic England: Conservation Principles Policies and Guidance

- 5.40 This Guidance was published by Historic England (then English Heritage) in April 2008. The Document is designed to provide a logical approach to making decisions and offering guidance on all aspects of England's historic environment. Guidance is provided on understanding heritage values (evidential, historical, aesthetic, and communal), and assessing heritage significance.

6. Impact Assessment

- 6.1 Heritage impact is defined as the potential level of harm or benefit to the special architectural or historic interest caused by a proposed development. The NPPF does not prescribe a format for analysis of heritage significance and/or impact.
- 6.2 Scale or severity of impacts or changes can be judged taking into account their direct and indirect effects and whether they are temporary or permanent, reversible or irreversible. The cumulative effect of separate impacts should also be considered. Change can be either harmful or beneficial to heritage significance.
- 6.3 The following methodology is based on the guidance set out by ICOMOS (2011) *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*, although intended for World Heritage Sites it provides a sliding scale of impacts that can be applied to assets on all significance levels.

Impact Grading	Criteria
High Beneficial	Comprehensive changes to an asset or its setting resulting in a major enhancement of significance.
Medium Beneficial	Significant changes to an asset or its setting resulting in a notable enhancement of significance.
Low Beneficial	Modest changes to an asset or its setting resulting in a slight enhancement of significance.
Neutral	No or negligible change to an asset or its setting resulting in no or negligible change to significance.
Low Adverse	Modest changes to an asset or its setting resulting in slight harm to significance.
Medium Adverse	Significant changes to an asset or its setting resulting in notable harm to significance.
High Adverse	Comprehensive changes to an asset or its setting resulting in major harm to significance.

Figure 6.1: Scale of heritage impact.

Assessment of Heritage Impacts: 1 Drake Street

Proposed Works	Appraisal of Impact on Significance
Removal of existing internal walls at first and second floor level.	A limited proportion of the existing internal walls are to be removed to facilitate the change of use. The interior of the building has been significantly altered from its original construction and since its subsequent historic use as the Wellington Hotel, nonetheless the proposals have sought to limit the amount of removals required. A number of the historic internal walls have been removed, while partitions have been inserted. The significance of the asset is primarily linked to its exterior architectural qualities and its association with the industrial, social and political history of Rochdale. The removal of the limited extent of internal walls proposed would not diminish an understanding of the asset or its significance. The heritage impact is neutral .
Insertion of subdividing walls at first and second floor level.	As noted above, the historic planform of the building has been substantially altered as a result of the various changes of use. At first floor, many of the internal walls have been removed. Whilst the historic planform is not known, the proposals will reinstate a level of subdivision to this space which is considered to result in a benefit when compared to the almost 'open-plan' and void nature of this floor level currently. The second floor level retains a higher degree of subdivision, walls have been identified as lath and plaster in places and therefore could be dated up to circa 1950s. The historic planform has been largely lost, and therefore the insertion of additional subdividing partition and blockwork walls is not considered to lessen the significance of the building. The heritage impact is neutral.
Removal of stair from ground floor commercial unit to first floor.	This stair is not historic and has been constructed using modern materials. The heritage impact is neutral .
Reinstatement of windows.	Where windows on the rear elevation at first and second floor levels have been bricked up they will be reinstated. The reinstatement of historic window openings will have a low beneficial heritage impact.
Creation of new window openings.	New window openings within the side elevation of the two storey rear element of the building will be required. This elevation has been heavily altered and modern personnel doors have been inserted at ground floor level. Former windows at first floor level have previously been bricked up, identified by the lintels and variation in brickwork. Whilst not a strict reinstatement of these former openings, the proposed windows will reinstate openings

Proposed Works	Appraisal of Impact on Significance
	where there is a historic precedent for this. The proposed creation of new window openings is considered to have a neutral impact on the asset's significance.
Insertion of rooflights	The proposals involve the insertion of 2 rooflights to the side elevation of the two storey rear element of the building. This will involve removal of a limited amount of the roof covering and have a visual impact on the appearance of the building. The rear elevation is of less interest being largely obscured by the lower infill buildings to the rear, having a more utilitarian appearance and also having been subject to insensitive alterations in the past. Therefore, the proposed rooflights are not judged to impact on the significance of the building. The heritage impact is neutral .
Secondary glazing and wall ventilation to habitable rooms.	The submitted Noise Impact Assessment recommends glazing and ventilation specifications to achieve the required internal noise levels. Secondary glazing and wall ventilation is recommended to the habitable rooms. It is anticipated that details of the secondary glazing can be secured via planning condition, however it is common practice for secondary glazing to be installed to listed buildings. There are a number of existing though wall vents visible on the building façade, and it has been confirmed that it may be possible to utilise existing vents subject to further investigation and these meeting the noise requirement. It is not considered these works would diminish the significance of the building and the impact is therefore neutral , although further details should be secured via condition.

Figure 6.2: Assessment of impact upon the application building

Rochdale Town Centre Conservation Area

- 6.4 External alterations to the building include the insertion of two rooflights, and insertion / reinstatement of window openings on the rear elevations. The rear elevation is of less interest than the front elevation of the building, being more utilitarian in appearance and having been subject to alteration. This elevation is also read in the context of the rear of adjoining properties which also present as a more 'back of house' context with shutters and servicing. This proposed insertion of window openings and rooflights to the rear elevations will not have an impact on the significance of the Conservation Area.
- 6.5 Views from South Parade or looking up Drake Street which take in the front elevation of the application building are key views within the Conservation Area; these views will not be

impacted as a result of the proposed external alterations. The heritage impact upon the Rochdale Town Centre Conservation Area is **neutral**.

Summary of Heritage Impact

- 6.6 This heritage assessment has found that the majority of works proposed will have a neutral impact on the heritage significance of the application building, with some low beneficial impact identified as a result of the proposed reinstatement of windows.

Avoiding, Minimise and Mitigating Negative Impacts

- 6.7 The proposed development has been amended to remove accommodation proposed within the roofspace, which would require installation of rooflights to the main roof of the building.

Public Benefits of the Proposals

- 6.8 This statement has identified mostly neutral heritage impact, with some low beneficial heritage impact. There is therefore no requirement in line with paragraph 215 of the NPPF to demonstrate public benefits that will be delivered by the proposals. However, nonetheless the development will be associated with the following benefits:
- 6.9 Economic: It is well documented that a shortage of housing can result in economic barriers. The provision of 10 residential units will make a meaningful contribution to Rochdale's housing delivery targets. Nearby shops and businesses will also benefit as a result of the proposals increasing the customer base. Retention of the commercial use at ground floor level will retain this floorspace ready to be occupied by a new commercial operator in the future and to bring back an active use to this frontage, helping to protect the vitality and viability of this key part of the town centre.
- 6.10 Social: The proposals will provide much needed housing in the town centre which has a full range of amenities, services and employment opportunities on the doorstep, also being well served by public transport. The proposed development will deliver good quality housing and contribute to the creation of a mixed and sustainable community.

- 6.11 Environmental: The proposals will provide 10 residential units within an existing building, in a sustainable urban location. The scheme will provide much needed accommodation, which will help ease pressure on more sensitive greenfield and Green Belt sites. Future residents will benefit from the highly sustainable and accessible nature of the development, thereby reducing the need to travel by car and helping to reduce carbon emissions and delivering improved air quality in contrast to a development with car parking.
- 6.12 Heritage: The application floorspace is currently vacant. The proposals will return the floorspace to its original residential use, this is considered to have major heritage benefits and to be the optimum viable use for the building. The proposals will bring an active use to the upper floors of the building, which will involve a significant level of investment to bring the accommodation into a habitable condition. The active use of the building will ensure the future maintenance of this important listed building in Rochdale Town Centre, while if left vacant it would be at risk of further deterioration.

Compliance with Planning Policy

- 6.13 The proposed development is wholly compliant with local and national heritage planning policies.

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Appendix 1 – Map Regression



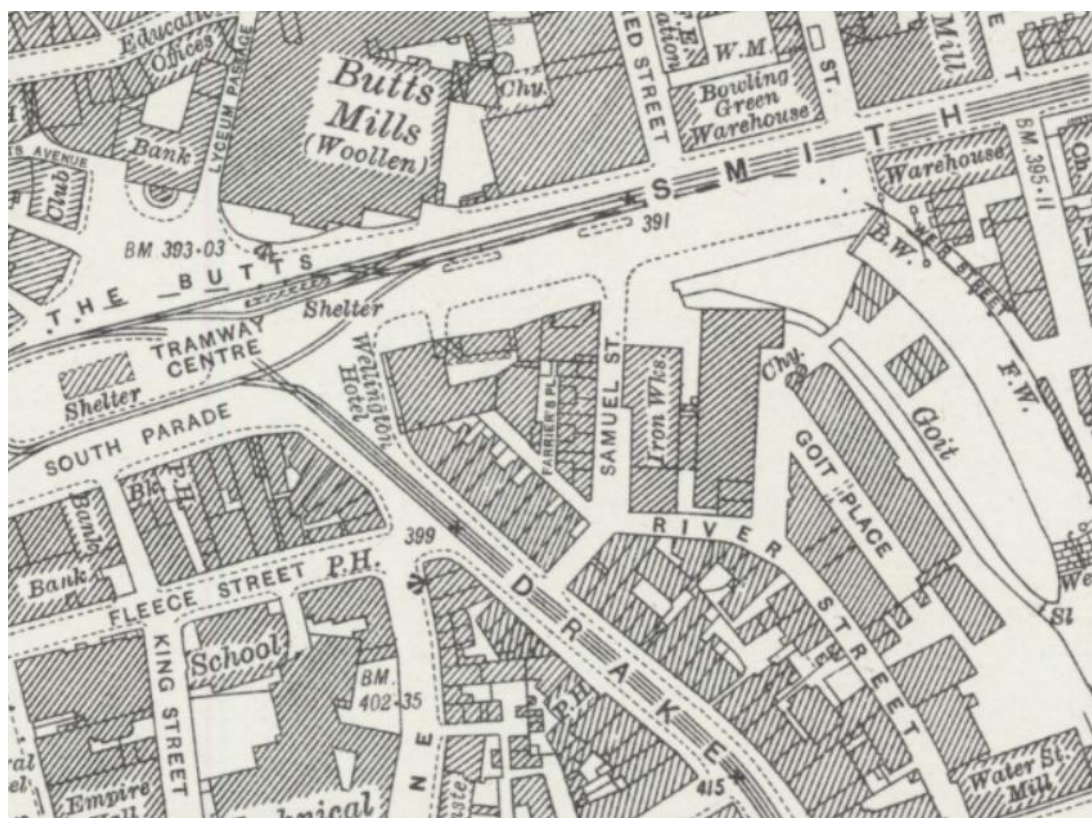
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