

Heritage Statement

37-39 Dale Street, Milnrow

September 2025



adapt heritage

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1. Introduction

- 1.1 This Heritage Statement has been prepared by Adapt Heritage on behalf of Howe Rigout & Construction Ltd (the 'Applicants') in connection with a full planning application (Ref: 24/00754/FUL) for the conversion of the first and second floors of the former Milnrow Club and the construction of seven dwellings on land to the north (the 'Proposed Development') at 37-39 Dale Street, Milnrow (the 'Application Site').
- 1.2 The submitted description of development is as follows:
- "Change of use of the first and second floors of the existing commercial building from Use Class E to 4 self-contained residential apartments Use Class C3 and the erection of 7 x 3 bedroom dwellings on land immediately adjacent to the north."*
- 1.3 The Site itself does not contain any designated heritage assets, but we understand that the former Milnrow Reform Club has been identified as a non-designated heritage asset under the terms of the National Planning Policy Framework (NPPF) (2024). The Site is also proximate to a number of listed buildings including 45/47 Dale Street (Grade II Listed) and 49/51 Dale Street (Grade II Listed).
- 1.4 Under The Planning (Listed Buildings and Conservation Areas) Act 1990, Rochdale Borough Council (the 'Council'), in determining the full planning application, has a statutory duty to pay special attention to the desirability of preserving listed buildings, their setting or any features of special interest they may possess (s.66). The meaning of 'preservation' in this context, as informed by case law, is taken to be the avoidance of harm.

- 1.5 The National Planning Policy Framework (NPPF) (2024) provides the Government's national planning policy on the conservation of the historic environment. In respect of information requirements for applications, Paragraph 207 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

- 1.6 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 of relevant heritage assets and the contribution made by setting and the Application Site.
- Section 5 provides an assessment of the impact of the Proposed Development in light of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF and local planning policy (set out in detail at **Appendix 1**).
- Section 6 sets out the summary and conclusions.



¹ MHCLG (2024) National Planning Policy Framework (NPPF) – Annex 2: Glossary

1.7 The assessment has been undertaken on the basis of existing published information, proportionate archival research and on-site visual survey in August 2025. It has been produced in accordance with guidance set out in Historic England's Advice Notes including:

- Advice Note 2: Managing Significance in Decision Taking in the Historic Environment (2015);
- Advice Note 3: The Setting of Heritage Assets (2017); and
- Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019).

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2. The Heritage Assets

Context

- 2.1 Annex 2 of the NPPF (2024) 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

- 2.2 A site visit was undertaken in August 2025 to identify designated and non-designated heritage assets with potential to be affected by the Proposed Development.

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) confirms that there are two listed buildings proximate to the Application Site:

Name	Grade	Designation Date	List Entry
45/47 Dale Street	II	23 April 1986	1068492
49/51 Dale Street	II	23 April 1986	1162525

Non-Designated Heritage Assets

- 2.5 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.”³

Rochdale Non-Designated Heritage Assets

- 2.6 Rochdale Borough Council maintains a list of Non-Designated Heritage Assets (NDHAs) within the area which was last updated on Wednesday 28 June 2023. The Council applies the following criteria when assessing NDHAs:

- **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

MHCLG (2024) National Planning Policy Framework (NPPF) – Annex 2: Glossary

³

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



- 2.7 As of August 2025, there are no formally recognised NDHAs in close proximity to the Application Site that are likely to be affected by the Proposed Development. However, it is understood that the former Milnrow Reform Club (forming part of the Site) has since been identified as a NDHA by the Council. This building is therefore assessed within this report.



3. The Application Site and the Surrounding Area

Location and Context

- 3.1 The Application Site (Figure 3.1) is located in the centre of Milnrow and comprises two distinct components: the former Milnrow Reform Club, which fronts onto Dale Street, and a parcel of open land to the rear, accessed via Chapel Gate. The Site is bound by Dale Street to the south, existing residential properties to the west, Delph Street to the north, and Chapel Gate to the south-east. At the junction of Chapel Gate and Delph Street is a small modern substation. Beyond this, to the south-east, lie the Grade II Listed 45–47 and 49–51 Dale Street.



Figure 3.1: The Application Site © Google Maps (2024)



Figures 3.2 & 3.3: Northern and Southern Components of the Application Site (August 2025)

- 3.2 The northern part of the Site (Figure 3.2) comprises a vacant parcel of land, partially enclosed by palisade fencing and a dry-stone wall along Chapel Gate. It is overgrown with unmanaged vegetation and appears to have most recently accommodated a now-demolished industrial or service structure. The southern part (Figure 3.3) contains the former Milnrow Reform Club, fronting directly onto Dale Street.



Overview of Historic Development

- 3.3 Below is an overview of the historic development of the Application Site and the surrounding area. It has been informed by proportionate archival research, historic map regression and a review of existing published sources.
- 3.4 Milnrow originated as a rural settlement located on the edge of the Pennines, east of Rochdale, and historically formed part of Butterworth township. Although its medieval origins are documented, it remained a modest agrarian community until the late 18th century. From the 1770s onwards, the town grew significantly due to the expansion of domestic textile production, particularly hand-loom weaving. This domestic industry helped with Milnrow's transformation into a small industrial town.
- 3.5 Milnrow developed along Dale Street, which became its principal thoroughfare. Early development consisted of stone-built dwellings, many of which incorporated workshops or weaving lofts at upper levels. Surviving buildings such as 49–51 Dale Street (late 18th century) and 45–47 Dale Street (early 19th century) are representative of this tradition, with multi-light mullioned windows indicating their use as weavers' houses. These structures reflect the transition from rural domesticity to semi-industrial domestic workspaces, a pattern common across the South Pennines.
- 3.6 The mid-19th century brought further change with the construction of civic and institutional buildings. Among them was the Milnrow Reform Club, a purpose-built venue for political, social and educational use, likely constructed in the mid-to-late Victorian period. It does not appear on the First Edition Ordnance Survey of 1848–51 (Figure 3.3) but is shown on the 1893 Ordnance Survey (Figure 3.4) and reflects the principles of the period, associated with self-improvement and working-class organisation. The building's classical detailing and formal massing distinguish it from surrounding domestic buildings and reinforce its civic status.



Figure 3.3: Ordnance Survey of Milnrow surveyed in 1844-1848 and published in 1851 © National Library of Scotland

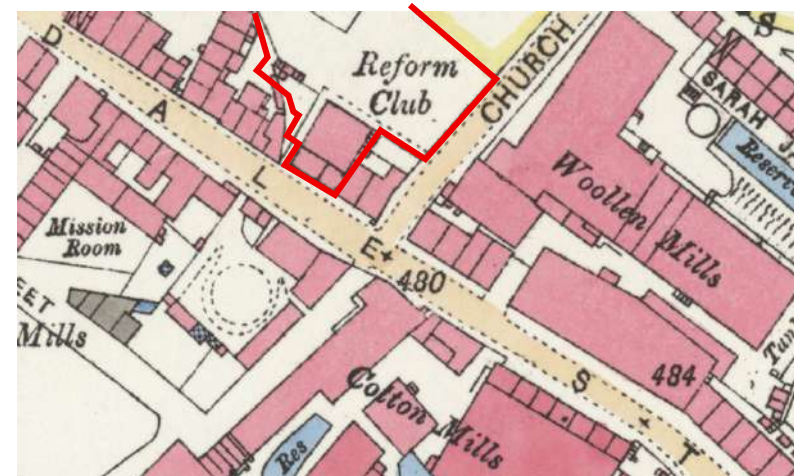


Figure 3.4: Ordnance Survey of Milnrow surveyed in 1891 and published in 1893 © National Library of Scotland



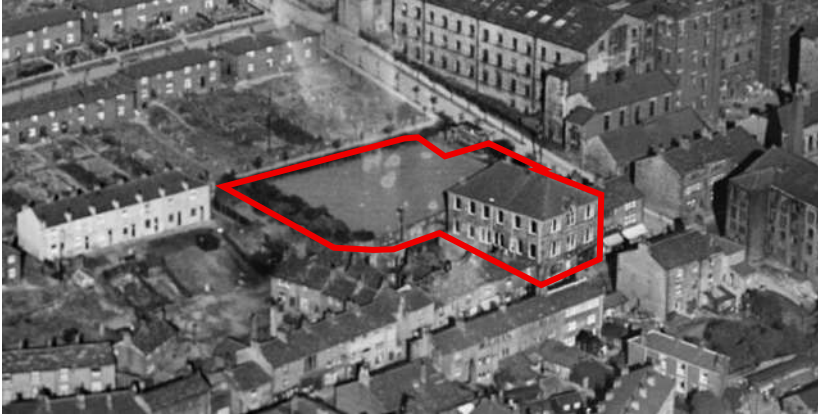


Figure 3.5: Aerial Photograph of Milnrow, 1926 © Historic England (Ref: EPW016714)

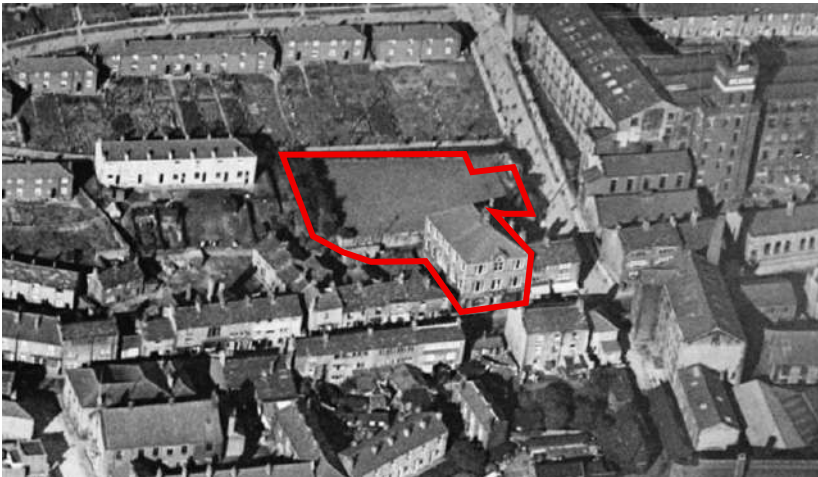


Figure 3.6: Aerial Photograph of Milnrow, 1926 © Historic England (Ref: EPW016716)

3.7 The land to the rear of the Reform Club, now forming the northern portion of the Application Site, remained undeveloped through much of the 19th century. As shown on the 1893 OS map (Figure 3.4), the land remained open and likely formed part of the curtilage or grounds associated with the Club. By the early 20th century, aerial photographs from 1926 (Figures 3.5 and 3.6) confirm it had become a bowling green, consistent with the Reform Club's social function.

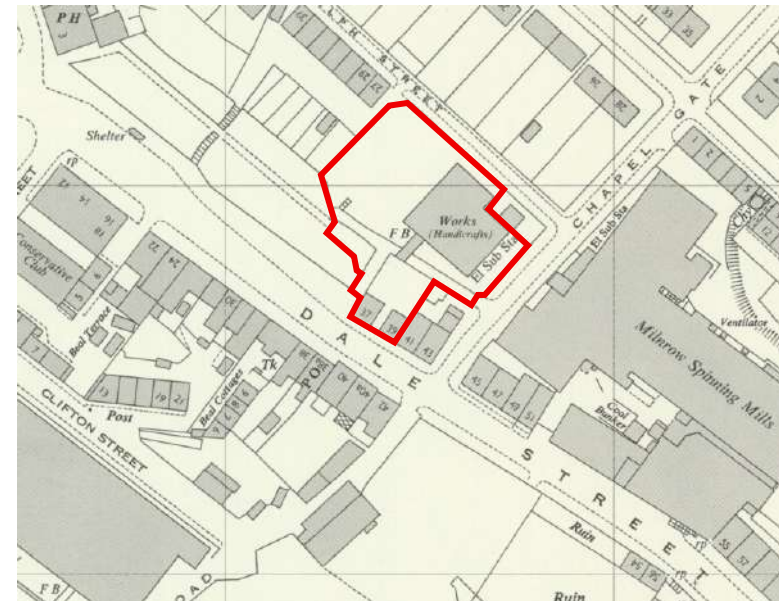


Figure 3.4: Ordnance Survey of Milnrow surveyed in 1968 and published in 1968 © National Library of Scotland

3.8 By the mid-20th century, the Ordnance Survey of 1968 indicates that the bowling green had been replaced by a small works or industrial building, reflecting the wider pattern of light industrial expansion within Milnrow at this time. This coincided with the piecemeal redevelopment of former mill



sites nearby, including the clearance of larger industrial complexes to the east, and the introduction of post-war housing further north and west. These changes began to soften the area's formerly industrial character, establishing a more mixed and fragmented urban grain.

- 3.9 Throughout the 20th century, Dale Street retained its mixed-use character, combining residential, commercial and civic uses within a consistent historic grain. The Reform Club continued in use, though it was later adapted to incorporate commercial units at ground-floor level. Despite incremental change, including modern development on surrounding plots and demolition,, the building retains its architectural legibility and prominence within the townscape.
- 3.10 Today, the Application Site reflects contrasting conditions. The northern portion, formerly the bowling green and then the site of a small industrial works building, is now vacant, semi-overgrown, and enclosed by modern fencing, offering limited townscape value and no surviving built fabric of interest. In contrast, the southern part of the Site contains the former Milnrow Reform Club, a locally significant civic building that retains its historic form, architectural integrity, and prominence within the streetscape.
- 3.11 The buildings at 45–47 and 49–51 Dale Street lie outside the Application Site but help to reinforce the area's historic identity and linear development pattern. Together, these elements illustrate the layered evolution of Milnrow's urban form, from its weaving and civic past to more recent phases of redevelopment and infill.



4. Assessment of Significance

Significance and Special Interest

- 4.1 The NPPF (2024) 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.”⁴

Listed Buildings

- 4.2 Listed buildings are defined as designated heritage assets that hold architectural or historic interest. The principles of selection for listed buildings are published by the Department of Digital, Culture, Media and Sport⁵ and supported by Historic England’s Listing Selection Guides for each building typology.

Non-Designated Heritage Assets

- 4.3 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

- 4.4 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.”⁶

- 4.5 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.

- 4.6 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

- 4.7 As set out earlier, the following assessments are proportionate to the significance of the relevant listed buildings and the nature and scale of the Proposed Development. It has been informed by published information, desktop archival research and on-site visual survey.
- 4.8 The assessments have been produced in accordance with following guidance set out in Historic England’s Advice Notes including Managing Significance in Decision Taking in the Historic Environment (2015), The Setting of Heritage Assets (2017); and Statements of Heritage Significance (2019).

⁴ MHCLG (2024) *National Planning Policy Framework (NPPF) – Annex 2: Glossary*
⁵ DCMS (2018) *Principles of Selection for Listed Buildings*

⁶ Historic England (2017) *Good Practice Advice Note 3: The Setting of Heritage Assets*



Former Milnrow Reform Club (Non-Designated Heritage Asset)



Figure 4.1: Principal Elevation of the Former Milnrow Reform Club (August 2025)

Architectural Significance

- 4.9 The former Milnrow Reform Club is a three-storey building dating from the late 19th century which is prominently situated on Dale Street. It is constructed in sandstone ashlar at ground-floor level with coursed stone above, under a pitched slate roof. Its principal (street-facing) elevation is symmetrical in composition and articulated with formal classical elements that mark it out from the more modest vernacular buildings in the surrounding area.



- 4.10 The central bay is expressed through a raised parapet and a large segmental-headed opening at second-floor level, which contains a Venetian-style tripartite window, a key focal point in the elevation. This window is framed by stone surrounds and surmounted by a shaped gable with ashlar copings and a central keystone, lending the building a civic quality that elevates it above the surrounding domestic streetscape.



Figure 4.2: Principal Elevation of the Former Milnrow Reform Club (August 2025)

- 4.11 At first-floor level are tripartite window openings which feature plain stone surrounds with deep lintels, while the stringcourse between the ground and first floors is inscribed with the building's original name "Milnrow Reform Club" carved directly into the ashlar. The ground floor is arranged around a deep-set central entrance bay with rusticated stone pilasters and a round-arched door opening. At the base of each pilaster are ceremonial stones

(Figures 4.3 and 4.4) which relate to the opening of the building; the right states *"This stone was laid by James Duckworth Esq of Castleton Hall, Rochdale"* whereas the left one is not as discernible due to degradation and the existing shopfront.



Figures 4.3 & 4.4: Stones to Main Entrance (August 2025)

- 4.12 Either side are modern shopfronts that have altered the original frontage but do not detract significantly from the building's legibility or overall form. The ashlar plinth and rhythm of the original bays are still perceptible and continue to give a sense of civic solidity.
- 4.13 The side (west) elevation, at Figure 4.5, which is visible from Dale Street, is more utilitarian and plain in character. It is constructed in coursed rubble sandstone and is well-proportioned, and features regularly spaced vertical window openings, aligned with internal floor levels. Although the fenestration is simpler than the front, its consistency and alignment give the elevation an architectural rhythm. As set out at Section 3, this elevation was not intended to be seen and was originally screened from view and has only been in exposed in later years following the clearance of neighbouring houses along Dale Street.



Figure 4.5: Side Elevation of the Former Milnrow Reform Club (August 2025)

- 4.14 The rear elevation (Figure 4.6), though plainer, is functional and retains its original character. Some rear windows appear to have been altered or blocked over time, and a later access ramp was inserted to the lower level. Nevertheless, the overall composition remains intact and readable.





Figure 4.6: Rear Elevation of the Former Milnrow Reform Club (August 2025)

- 4.15 The former Milnrow Reform Club is a strong example of small-scale civic architecture in a local context. It demonstrates good-quality stonework and elevational hierarchy, combining robust materials with restrained classical detailing. Its proportions and use of traditional materials respond to the prevailing character of the area, while offering a step-change in scale and form that befits its historic role as a place of public assembly.

Historical Significance

- 4.16 The Reform Club is of local historic interest as a purpose-built venue for political and social activity in 19th-century Milnrow. Reform Clubs were a national phenomenon, often associated with the Liberal movement, but were also commonly adopted in smaller towns and districts as spaces for education, debate, and communal gathering — particularly for the working and middle classes. Milnrow's example, though modest in scale compared to city-centre institutions, nonetheless reflects these broader social currents and represents a tangible link to the town's civic identity and associational culture.

Positive Contribution

- 4.17 The Reform Club makes a positive contribution to the townscape of Dale Street and Milnrow more widely. Its scale, architectural treatment and civic character distinguish it from the narrower, more modest stone terraces that characterise the immediate area. As a corner piece within the built form of the street, it acts as a visual anchor that breaks the domestic rhythm and reinforces the historical layering of uses along the street — from residential and commercial to institutional and civic.

- 4.18 The building also holds group value with the listed buildings at 45–47 and 49–51 Dale Street, with which it shares traditional materials, vertical emphasis, and fine grain.

Designed Landscape

- 4.19 There is no evidence that the Reform Club was set within a formally designed landscape. However, historic map regression indicates that the land immediately to the rear once have functioned as a bowling green, likely associated with the club in its early years. It was later redeveloped with an industrial works and has since been cleared. Any former designed landscape has therefore been diminished and no longer contributes towards the local significance of the building.



Contribution made by Setting

- 4.20 The former Milnrow Reform Club occupies a prominent position on the northern side of Dale Street, within the historic core of Milnrow. Its immediate setting is defined by a consistent frontage of traditional stone-built terraces and small-scale civic buildings that line the linear route of Dale Street. The building forms part of a visually and historically coherent group, sharing traditional materials, roof forms and vertical emphasis with the nearby listed buildings at 45–47 and 49–51 Dale Street.



Figure 4.7: View of the Former Milnrow Reform Club (August 2025)

- 4.21 The building is experienced primarily from Dale Street (Figures 4.7 and 4.8), where its symmetrical composition and classical detailing offer a distinct contrast to the more utilitarian character of adjacent buildings. This elevates its prominence and reinforces its original function. Areas of post-war clearance along Dale Street to the west also allow for partial views of its west-facing side elevation, further revealing its overall scale and institutional form.



Figure 4.8: View of the Former Milnrow Reform Club (August 2025)

- 4.22 To the rear, the building historically looked out onto open land and, later, a bowling green. The area has undergone change, including 20th-century industrial infill and subsequent clearance. In its current form, the rear setting is not considered to contribute meaningfully to the local significance of the building.

45/47 Dale Street (Grade II Listed)



Figure 4.9: 45/47 Dale Street (August 2025)

Special Architectural or Historic Interest

- 4.23 45–47 Dale Street (Figure 4.9) comprises a pair of early 19th-century three-storey stone-built houses, constructed in hammer-dressed, watershot sandstone with a graduated stone-slate roof. The principal (east-facing) elevation is modest but characterful, laid out symmetrically over three storeys with one bay per unit.
- 4.24 Each house features a ground-floor entrance to the right-hand side, set within a square-cut stone surround, and a single window to the left at ground level. The first and second floors contain six-light flat-faced mullioned windows set beneath continuous sill bands, typical of local weavers' cottages and domestic workshop buildings. These mullioned windows, with several blocked lights, contribute to the architectural character and hint at past industrial functions.



- 4.25 The fenestration pattern is simple but distinctive, with regularly aligned windows giving a strong vertical rhythm to the façade. The front elevation retains architectural integrity, albeit with some minor modern interventions such as replacement window units and areas of painted stonework. The use of high-quality local stone, traditional detailing, and original roof form enhances the building's architectural interest.



Figure 4.10: Rear of 45/47 Dale Street (August 2025)

- 4.26 To the rear, the buildings are more plainly treated, constructed in coursed rubble stone. The window and door openings on this elevation appear to reflect historic configurations but are in generally poor condition. Despite these changes, the rear elevation retains its overall form and massing and continues to support an understanding of the building's original use and construction.
- 4.27 The buildings are of historic interest as representative examples of domestic-industrial housing linked to Milnrow's 19th-century textile economy. The triple-storey arrangement and presence of upper-floor multi-light mullioned windows are particularly characteristic of hand-loom

weavers' dwellings, where upper storeys were used for weaving rooms to take advantage of natural light. This typology was widespread across the Pennine fringe but is becoming increasingly rare in well-preserved form.

- 4.28 Their location on Dale Street, one of Milnrow's historic thoroughfares, and their alignment with other early stone-built dwellings reinforces their evidential value. Together, the buildings help to tell the story of Milnrow's development as a small industrial township, where cottage industries gradually gave way to larger-scale textile manufacture in mills. As such, 45–47 Dale Street contributes to the understanding of the socio-economic structure of the early 19th century and forms part of a broader narrative of working-class housing and local industry.

Contribution made by Setting

- 4.29 The buildings are located within a linear, tightly grained historic streetscape and sit within a coherent group of late 18th- and 19th-century buildings of similar scale, material and alignment. Their setting is primarily defined by the immediate townscape of Dale Street, where local stone is the predominant building material.
- 4.30 They share a strong visual and contextual relationship with the adjoining Grade II listed buildings at 49–51 Dale Street, and with the former Milnrow Reform Club (non-designated heritage asset) to the south. This group relationship enhances their significance by embedding them within a layered and diverse historic context, where domestic, civic and commercial buildings interrelate (Figure 4.10).
- 4.31 The rear setting is more open, backing onto vacant land near Chapel Gate, though this does not materially affect the ability to appreciate the listed buildings' significance. Views from the west and east remain largely uninterrupted, and the buildings retain their legibility and contribution to the wider character of the area.



49/51 Dale Street (Grade II Listed)



Figure 4.11: 45/47 Dale Street (August 2025)

Special Architectural or Historic Interest

- 4.32 49–51 Dale Street (Figure 4.11) form a pair of late 18th-century two-storey houses of modest domestic scale, constructed from hammer-dressed, watershot stone to the front elevation and brick to the rear. The buildings sit under a graduated stone-slate roof and are of single-bay, double-depth plan form. Each house features a front entrance door to the right, set within a square-cut stone surround, and a three-light flat-faced mullioned window at ground-floor level. Above, a continuous horizontal band of windows spans both units, originally comprising eleven lights in total, although several have since been blocked.
- 4.33 Despite their simplicity, the buildings retain a distinctive architectural character. Their low eaves, regular masonry, and long window band are all features typical of the late 18th century in this region. While some modern

alterations are evident, including replacement windows and the blocking of lights, the form, materials and composition of the buildings remain largely intact.

- 4.34 The rear elevation, constructed in stone, is less formal but retains the original plan form. It includes three- and five-light windows with stone lintels, some of which retain traditional 8-pane casement sashes. This survival of original joinery, where present, adds to the architectural interest of the rear, despite other changes. The brickwork is typical for rear elevations of this period, used where visibility and status were of less importance.
- 4.35 As relatively early examples of domestic architecture in Milnrow, 49–51 Dale Street are of considerable historic interest. Constructed in the late 18th century, they pre-date the height of the Industrial Revolution and offer insight into local housing before the widespread mechanisation of textile production. Their architectural form — particularly the wide horizontal window band — is indicative of early workshop adaptations, again suggesting domestic loom use.
- 4.36 The buildings illustrate the transition from purely domestic structures to mixed-use workshop dwellings and reflect the local pattern of intensifying settlement along Dale Street as Milnrow expanded in the late 18th and early 19th centuries. As such, they provide important evidence of the town's early development and the incremental evolution of its built environment.
- Contribution made by Setting**
- 4.37 These buildings form part of a visually and historically coherent group of traditional buildings on Dale Street and are integral to the character of the street. Their immediate setting comprises a tight-knit historic frontage of

similarly scaled stone-built properties, creating a consistent building line and reinforcing the fine urban grain of the town centre.



Figure 4.12: View along Dale Street (August 2025)

- 4.38 Their relationship with the adjacent listed buildings at 45–47 Dale Street strengthens their significance, particularly in illustrating the development of Milnrow across different phases, from Georgian through to Victorian. They also contribute to the setting of the non-designated Milnrow Reform Club, which, despite its later date and more civic character, shares materials, roof form and alignment with these earlier structures.
- 4.39 Views of the buildings from both directions along Dale Street, and from the adjacent development site to the north, remain legible. They continue to define a key section of the town's historic core and contribute to the area's sense of place, character and continuity.



Contribution made by the Application Site to the Significance of the Listed Buildings

- 4.40 As set out in Section 3, the northern part of the Application Site is a vacant parcel of land previously used as a small works or industrial building in the mid-20th century. It has since been cleared and now consists of rough ground, enclosed by palisade fencing and partially overgrown. The land has historically been separated from the street-frontage plots along Dale Street.
- 4.41 There is no meaningful historical or functional relationship between the Application Site and the Grade II listed buildings at 45–47 and 49–51 Dale Street. Historic maps indicate that the site was not connected to their historic plot boundaries, which were tightly defined along Dale Street and oriented towards the street. The listed buildings are best understood through their principal elevations, which contribute to the linear historic grain of the street frontage.
- 4.42 There is no direct intervisibility between the listed buildings and the Application Site due to the topography of the land, intervening built form, and boundary treatments. The listed buildings are not readily experienced in the context of the Application Site, and the site plays a limited role in the appreciation of their architectural or historic interest.
- 4.43 The Application Site, in its current form, makes no meaningful contribution to the significance of the listed buildings at 45–47 and 49–51 Dale Street. While technically within their wider setting, it does not form part of the aspects of setting that contribute to their significance. With reference to Paragraph 219 of the NPPF, the site's redevelopment would not result in harm to the heritage assets and may provide an opportunity to improve the visual quality of the surrounding townscape.



5. Impact Assessment

Summary of Legislation and National Planning Policy

- 5.1 Under The Planning (Listed Buildings and Conservation Areas) Act 1990, Rochdale Borough Council, in determining the full planning application, has a statutory duty to pay special attention to the desirability of preserving listed buildings, their setting or any features of special interest they may possess (s.66). The meaning of 'preservation' in this context, as informed by case law, is taken to be the avoidance of harm.
- 5.2 Paragraph 210 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.
- 5.3 Paragraph 212 requires when considering the impact of development on the significance of a designated heritage asset that great weight should be given to the asset's conservation. '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.'*
- 5.4 Paragraph 216 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.

- 5.5 Paragraph 219 of the NPPF 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.

- 5.6 Further details of the heritage legislation, national and local planning policy and guidance for consideration of the Proposed Development is set out in **Appendix I**.

The Proposed Development

- 5.7 The Proposed Development consists of a full planning application for the conversion of the first and second floors of the former Milnrow Club and the construction of seven dwellings on land to the north.
- 5.8 The submitted description of development is as follows:

"Change of use of the first and second floors of the existing commercial building from Use Class E to 4 self-contained residential apartments Use Class C3 and the erection of 7 x 3 bedroom dwellings on land immediately adjacent to the north."
- 5.9 Further information on the design and appearance of the Proposed Development is set out within the supporting Design and Access Statement and architectural drawings.

Impact Assessment

- 5.10 This impact assessment employs national advice provided by Historic England as an appropriate framework for analysis, including Historic Environment Good Practice Advice (GPA) in Planning 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 proposed use of new development successful in its context.

Former Milnrow Reform Club (Non-Designated Heritage Asset)

- 5.11 The proposed development includes the retention and re-use of the former Milnrow Reform Club, with residential development to the rear of the site. The building itself is to be retained in its current form, with no external alterations proposed to the principal elevation or side and rear façades. The only physical intervention relates to the insertion of a limited number of conservation-style rooflights to the front-facing roof slope.
- 5.12 These rooflights would be of traditional proportions and flush-fitting design, appropriate for the age and character of the building. Owing to the height of the building and the compact urban grain of Dale Street, they would be minimally visible from public vantage points and would not disrupt the building's symmetrical composition or formal architectural character. Any potential visual impact would be minor and can be further mitigated by conditioning the final specification and positioning of the rooflights.
- 5.13 There is no alteration proposed to the overall scale, form or massing of the building. The proposal would ensure the continued beneficial use of the former Reform Club and help secure its long-term preservation through active occupation and maintenance. The setting of the building, comprising the tightly grained historic streetscape of Dale Street, would remain unchanged and its landmark role within the streetscene maintained.
- 5.14 As such, the proposed works would result in no harm to the significance of the Reform Club as a non-designated heritage asset and would support its ongoing conservation and use.

45/47 Dale Street (Grade II Listed)

- 5.15 The listed buildings at 45/47 Dale Street are not physically affected by the proposals. They front directly onto Dale Street and are separated from the Application Site by intervening built form. The land to the rear has never formed part of their historic curtilage and has no historical functional association.
- 5.16 Due to the sloping topography of the land, there would be a degree of intervisibility between the new development and Dale Street, with elements of the proposed housing likely to be visible above the rooflines of the listed buildings in some views. However, these would be limited to glimpses between or beyond the historic frontage and would not interrupt or diminish the appreciation of the listed buildings' principal façades or their contribution to the linear historic streetscape.
- 5.17 The modest scale and gabled forms of the proposed dwellings reflect the prevailing residential grain of the area, aligning with nearby terraces along Delph Street and helping the development read as a natural extension of the historic townscape
- 5.18 The proposed dwellings are of modest height and follow a stepped form that responds to the rising ground levels across the site. The simple massing and linear layout reference the prevailing built form, and the use of high-quality natural materials ensures that the proposals read as contextually appropriate within their setting.
- 5.19 It is therefore concluded that the proposals would result in no harm to the special architectural or historic interest of 45/47 Dale Street, including any contribution made by its setting.



49/51 Dale Street (Grade II Listed)

- 5.20 The listed buildings at 49/51 Dale Street occupy a similar relationship to the Application Site. They front onto Dale Street and are not physically connected to the land to the rear, which historically lay beyond their curtilage. There is no functional or historical relationship between the listed buildings and the development site.
- 5.21 As with 45/47 Dale Street, the sloping nature of the site means that there may be some limited intervisibility between the proposed development and Dale Street, including potential glimpses above or between existing rooftops. However, such views would be incidental and peripheral and would not alter the appreciation of the listed buildings' form, materials or architectural significance.
- 5.22 The proposed dwellings sit comfortably within the layered urban context, with a scale and alignment that reflects the historic grain of Milnrow. The linear arrangement of plots and use of traditional materials and well-defined boundaries, ensures that the development appears coherent with the historic setting rather than in contrast to it.
- 5.23 The development would therefore result in no harm to the significance of 49/51 Dale Street, including any contribution made by their setting.

Statutory Duty and National Planning Policy

- 5.24 In accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Rochdale Council is required to have special regard to the desirability of preserving listed buildings and their settings. This assessment has demonstrated that the Proposed Development would preserve the special interest and setting of the nearby listed buildings, resulting in no harm.

- 5.25 In relation to the former Milnrow Reform Club, a non-designated heritage asset, Paragraph 216 of the National Planning Policy Framework (2024) requires a balanced judgement having regard to the scale of any harm or loss and the significance of the asset. In this instance, the proposals would secure its beneficial re-use, retain its external character, and ensure its long-term maintenance, resulting in no harm to its significance.
- 5.26 The proposals are therefore consistent with the objectives of paragraphs 209, 210 and 216 of the NPPF.

Local Planning Policy and Guidance

- 5.27 The proposals would conserve and enhance the historic character of the area and would not result in harm to either designated or non-designated heritage assets.
- 5.28 As such, the scheme complies with Policy P2 of the Rochdale Core Strategy and saved Policies BE/2 and BE/11 of the Rochdale Unitary Development Plan. The scheme also aligns with the principles of good design and local distinctiveness as promoted in Historic England guidance and the NPPF.



6. Summary and Conclusions

6.1 This Heritage Statement has been prepared by Adapt Heritage on behalf of Howe Rigout & Construction Ltd (the 'Applicants') in connection with a full planning application (Ref: 24/00754/FUL) for the conversion of the first and second floors of the former Milnrow Club and the construction of seven dwellings on land to the north (the 'Proposed Development') at 37-39 Dale Street, Milnrow (the 'Application Site').

6.2 The submitted description of development is as follows:

"Change of use of the first and second floors of the existing commercial building from Use Class E to 4 self-contained residential apartments Use Class C3 and the erection of 7 x 3 bedroom dwellings on land immediately adjacent to the north."

6.3 The Site itself does not contain any designated heritage assets, but we understand that the former Milnrow Reform Club has been identified as a non-designated heritage asset under the terms of the National Planning Policy Framework (NPPF) (2024). The Site is also proximate to a number of listed buildings including 45/47 Dale Street (Grade II Listed) and 49/51 Dale Street (Grade II Listed).

6.4 Under The Planning (Listed Buildings and Conservation Areas) Act 1990, Rochdale Borough Council (the 'Council'), in determining the full planning application, has a statutory duty to pay special attention to the desirability of preserving listed buildings, their setting or any features of special interest they may possess (s.66). The meaning of 'preservation' in this context, as informed by case law, is taken to be the avoidance of harm.

6.5 The Application Site, in its current form, makes no meaningful contribution to the significance of the listed buildings at 45–47 and 49–51 Dale Street.

While technically within their wider setting, it does not form part of the aspects of setting that contribute to their significance. With reference to Paragraph 219 of the NPPF, the site's redevelopment would not result in harm to the heritage assets and may provide an opportunity to improve the visual quality of the surrounding townscape.

6.6 The Proposed Development introduces buildings of a scale, form, and material palette that respect and respond to the local historic character. The redevelopment of the site with a well-designed residential scheme represents an enhancement to the streetscape and the wider setting of the listed buildings and non-designated heritage asset.

6.7 On this basis, the Proposed Development can address Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and can meet Paragraphs 210, 216, and 219 of the NPPF and the local policies contained in the Rochdale Core Strategy and Rochdale Unitary Development Plan.



Appendix I: Heritage Legislation, Planning Policy and Guidance



Heritage Legislation, Planning Policy and Guidance

Below is an overview of the relevant heritage legislation, national and local planning policy and supplementary planning documents and guidance.

Legislation

The Planning (Listed Buildings and Conservation Areas) Act 1990

Under The Planning (Listed Buildings and Conservation Areas) Act 1990, Rochdale Borough Council, in determining the full planning application, has a statutory duty to pay special attention to the desirability of preserving listed buildings, their setting or any features of special interest they may possess (s.66).

The meaning of 'preservation', as informed by case law, is taken to be the avoidance of harm.

National Planning Policy

The National Planning Policy Framework (2024)

The National Planning Policy Framework (2024) requires that great weight is given to the conservation of designated heritage assets and this reflects the statutory duty of the 1990 Act with respect to listed buildings and conservation areas.

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."*⁷

Paragraph 210 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 212 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 214 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 215 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 216 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 219 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.

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."*

For development affecting the setting of a listed building, Policy BE/15 of the UDP requires that: *"Development will not be permitted, where through its siting, scale, design or materials, would harm the setting of a listed building."*



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).





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