
132 Drake Street
Rochdale
Lancashire

A
Heritage Impact Assessment

October 2022
Mercian Heritage Series No.1997

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Rochdale
Lancashire**
NGR: SD 89870 13017

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Heritage Impact Assessment**

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Summary

Proposals are being developed to restore No.132 Drake Street, on the south side of central Rochdale, to residential use. As the building is Grade II listed, this consultancy was commissioned to undertake a heritage impact assessment of the proposals under the guidelines of the National Planning Policy Framework. It concludes that the present building is of early-19th century date, built at or shortly after the street was laid out. It has been in office use for many years and has been somewhat degraded as a result. The proposals will result in a minor degree of 'less than substantial harm', but that would be compensated for in the planning balance by the refurbishment of the building, the change back to residential use, and the provision of new dwellings in the town.

1. Introduction

Proposals are being developed to convert No.132 Drake Street, Rochdale – latterly used as offices – back to the residential use for which it was built, in the form of new apartments.

As the building is Grade II listed, this Consultancy was commissioned to undertake a heritage impact assessment to better understand the date, development and significance of the existing building and the site as well as an overall heritage impact assessment of the proposals on it and on any adjacent heritage assets. This is to comply with the guidelines of the *National Planning Policy Framework* and the LPA's own planning guidelines.

1.1 Report Format

The report format is quite simple. After this brief introduction there is an outline section on the requirements of the NPPF (Sections 2-3) and an outline history of the site (Section 4). Section 5 is a description of the existing building and Section 6 outlines the proposals. Section 7 is a heritage impact assessment, Section 8 a short conclusion and Section 9 a list of the references used in the compilation of this report.

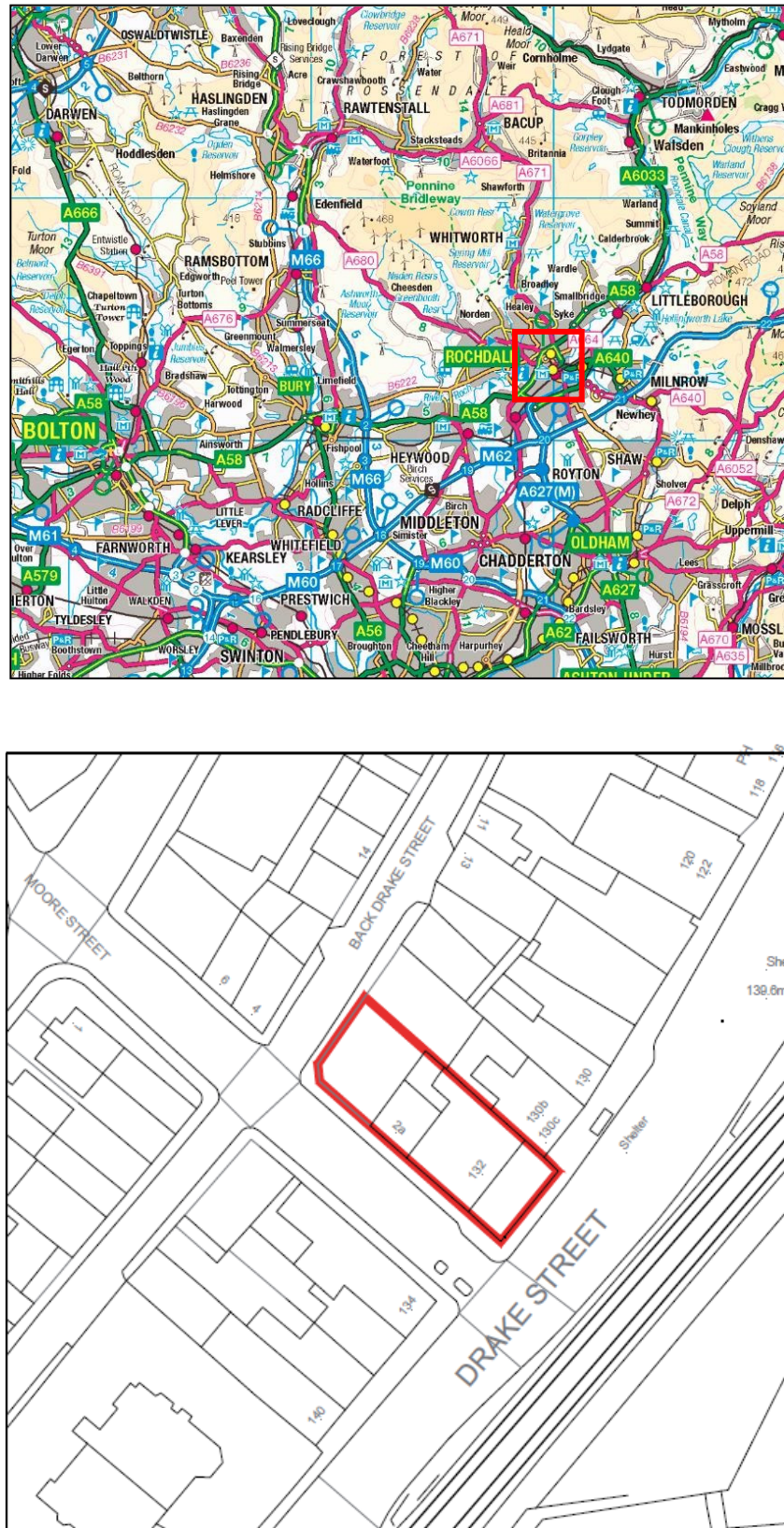


Fig.1: Location plan (OS OpenData).

2. Planning Guidelines

2.1 The National Planning Policy Framework

Planning law relating to listed buildings and conservation areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of the Act deals with the responsibilities of local planning authorities – the decision makers - when dealing with planning applications that could impact on heritage assets and states that:

*‘In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.*¹

Government guidelines regarding the listed buildings and conservation areas legislation in the 1990 Planning Act changed twice in two years, resulting in the introduction of a new *précis* of planning guidance published in March 2012 – the *National Planning Policy Framework* (NPPF) – which replaced all other separate Planning Policy Guidelines and Planning Policy Statements.² A revised version of the NPPF was published in July 2018 and again in February 2019.³ The glossary of the NPPF described ‘heritage assets’:

‘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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).’

The main relevant paragraph in the NPPF states that local planning authorities should require applicants:

*‘...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 proposals on their significance’.*⁴

¹ Planning (Listed Buildings and Conservation Areas) Act 1990 c.9 section 66 (1), 41

² Department for Communities & Local Government, 2012, *National Planning Policy Framework*.

³ Ministry of Housing, Communities & Local Government, 2018, *National Planning Policy Framework*.

⁴ *Op. cit.*, para. 189

3. Heritage Impact Assessments

3.1 General Introduction

The purpose of a heritage impact assessment (HIA) is to meet the relevant guidance given in the NPPF. This outlines the need to inform the planning decisions when considering proposals that have the potential to have some impact on the character or setting of a heritage asset. It is not concerned with other planning issues.

The nature of the heritage assets and the potential impact upon them through development are both very varied. The heritage assets include both designated heritage assets – such as listed buildings, scheduled ancient monuments and conservation area – and non-designated heritage assets, a rather uncomfortable and sometimes subjective category that includes locally listed buildings, field systems, buried archaeological remains and views. The degree of impact a development could have on such assets is variable and can sometimes be positive rather than negative. The wide range of possible impacts can include loss of historic fabric, loss of historic character, damage to historic setting, and damage to significant views.

Under the requirements of the NPPF and of other useful relevant guidance, such as English Heritage's *Conservation Principles* and *Informed Conservation*, and recent material from the newly formed Historic England, the process of heritage impact assessments can be summarised as involving three parts:

1. understanding the heritage values and significance of the designated and non-designated heritage assets involved and their settings;
2. understanding the nature and extent of the proposed developments;
3. making an objective judgement on the impact that the proposals outlined in Part 2 may have on the information outlined in Part 1.⁵

3.2 Definition of Setting

Setting, as a concept, was clearly defined in PPS5 and was then restated in the NPPF which describe it 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.'

⁵ English Heritage, 2008, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*; Clark, K, 2001, *Informed Conservation: Understanding Historic Buildings and Their Landscapes for Conservation*

The latest version of the Historic England guidance on what constitutes setting is virtually identical to the former English Heritage guidance:

‘Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.’⁶

The new Historic England guidance also re-states the earlier guidance that setting is not confined entirely to visible elements and views but includes other aspects including environmental considerations and historical relationships between assets:

‘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. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance’.⁷

In terms of the setting of heritage assets the approach is the same but the latest Historic England guidance - *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3* (GPA3) of 2017 - suggests a five-step approach.⁸

The steps are:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

⁶ Historic England, 2017, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3* (2nd ed.), para.9

⁷ *Op.cit.*, Part 1, reiterating guidance in the PPG of the NPPF.

⁸ *Op.cit.*, para.19

3.3 Definition of Significance

The glossary of the *Planning Practice Guidance* (PPG) to the NPPF defines significance 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’.

The PPG also states that:

‘Local planning authorities may identify non-designated heritage assets. These 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. In some areas, local authorities identify some non-designated heritage assets as ‘locally listed’’.⁹

but cautions that:

‘A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process’.¹⁰

3.4 Definition of Harm

Current guidance by Historic England is that ‘change’ does not equate to ‘harm’. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – *substantial* and *less than substantial*. Paragraph 201 of the revised NPPF 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 or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable use of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use’.¹¹*

⁹ Planning Practice Guidance, 2014, paragraph 39

¹⁰ *Ibid.*

¹¹ Ministry of Housing, Communities & Local Government, *op. cit.*, para.201

Paragraph 202 of the revised NPPF states that:

‘Where a development proposal would 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 proposals including, where appropriate, securing its optimum viable use’.

Similarly, Paragraph 203 states that:

‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.

Recent High Court rulings have emphasised the primacy of the 1990 Planning Act – and the fact that it is up to the decision makers in the planning system to *‘have special regard to the desirability of preserving the [listed] building or its setting’*.

As stated by HH Judge David Cooke in a judgment of 22 September 2015 regarding impact on the setting of a listed building:

‘It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.’

The judgment was endorsed by Lord Justice Lewison at the Court of Appeal, who stated that:

*‘It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused’.*¹²

¹² Court of Appeal (PALMER and HEREFORDSHIRE COUNCIL & ANR) in 2016 (Case No: C1/2015/3383) para.34.

4. Setting & Outline History

4.1 Rochdale

Rochdale developed on the south bank of the River Roch in the southern foothills of the Pennines. It is presumed to be of Saxon origin and at the time of the Domesday Survey of 1086 was included in the entries for Cheshire. The medieval town developed around a bridge over the River Roch, close to which was the parish church of St. Chad's and the market place. Camden, writing in the later-16th century, described it as *'a market town well frequented'*. Iron mining is known nearby in the 14th century and coal by the 16th century but the town was essentially still rural.

In 1700 Celia Fiennes described Rochdale as *'a pretty neat town, built all of stone'* and a few years later, in 1724, Daniel Defoe described it *'as a good market and of late much improved in the woollen trade'*. Development began to accelerate from the beginning of the 18th century based on the demand for woollen cloth, originally a cottage industry but radically altered in character after the first mills in the town were built at the end of the century.

The often grumpy traveller John Byng passed through the town in 1792 and wrote that *'All around Rochdale they are building away and have swell'd it from a small market town into a great city'*. Shortly afterwards the much delayed cross-Pennine Rochdale Canal opened to the town – built to a 'broad' rather than 'narrow' gauge; from the east it opened to the town in 1798 and the western section to Manchester finally opened in 1804. The town's growth accelerated, mainly because of the cloth manufactures, and this was further helped by the opening of main line railways from 1839 onwards.

After the First World War came the early signs of decline in the town's prosperity and mills began to close due to foreign competition in the 1920's. By the middle of the century large areas of the town had become run down, though since the end of the century there have been efforts to regenerate the town and its environs and to provide alternate employment opportunities.

4.2 No.132 Drake Street

Drake Street was a product of deliberate town planning as the old town expanded rapidly at the start of the 19th century. The street was mainly laid out around 1810 and was named after the vicar of the day – the Rev. Drake. As well as connecting the town centre with the new canal basin, it was, compared to the older streets, wide and generously proportioned. It played a significant part in the expansion southwards of the town.

No.132 was built on the north-western side of the street directly opposite the canal basin, and on the corner of a new side street – Moor Street. To the rear was a service lane which became a street in its own right – Back Drake Street. No.132 was probably built soon after the street had been laid out and was a fairly high status detached dwelling for a middle class family – though later additional properties were built between its rear boundary and Back Drake Street. These had already been built by the detailed Ordnance Survey mapping of the later-1840's. By the 1920's mapping it was labelled 'Employment Exchange' and had thus been converted into offices – and remained as offices until the very recent past.

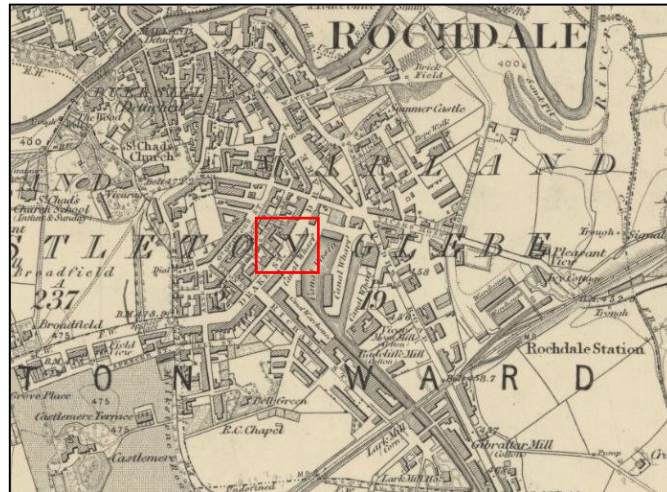


Fig.2: Extract from the 1st edition of the 6" Ordnance Survey map, surveyed in the 1840's.

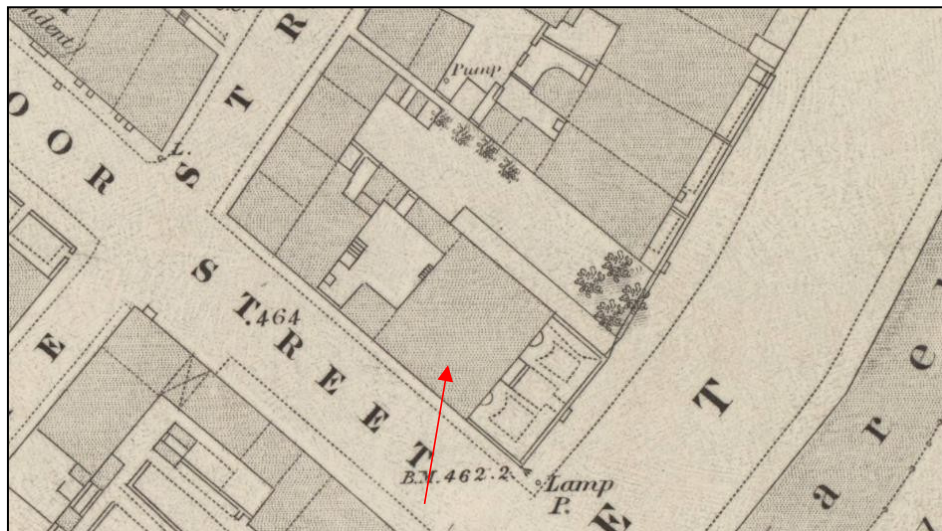


Fig.3: Extract from the 1:500 Ordnance Survey map, surveyed in 1849.

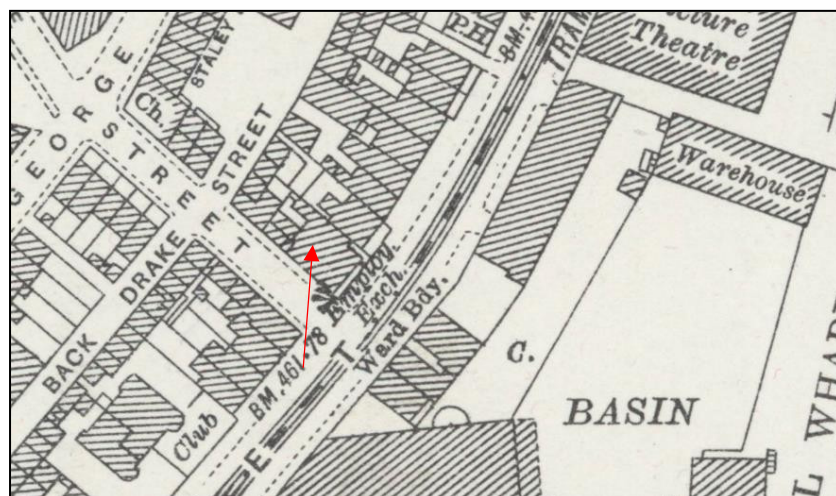


Fig.4: Extract from the 1:2500 Ordnance Survey map, revised in 1928.

5. Description

The house consists of a main front range built parallel to Drake Street and set behind a walled forecourt, with two narrow two-storey rear ranges or 'out-riggers' with a much later flat-roofed infill in between them.

5.1 The Exterior

The front range is built of dull-red hand-made brick and is of two storeys, with a three-bay façade to the street; there is an overgrown and formerly walled forecourt between the street and the house.

The central doorway on the front elevation has a semi-circular head with fanlight and a simple timber doorcase of Tuscan pilasters and an open pediment; the door is panelled and possibly original.

The window openings have rubbed brick flat-arched heads and presumably once contained balanced multi-paned sashes – but now have modern plat-glass uPVC windows instead. The first-floor sills are linked by a thin stone band course and there are timber modillioned eaves detailing.

The rear elevation between the rear outriggers has been altered; the central first-floor window appears to be primary and would have lit the stairs within, but the windows that flank it are inserted and probably of the mid-20th century.

The south-western outrigger is of plain brickwork. The side elevation to Moore Street indicates that the south-western outrigger was contemporary with the front range, there being no break in the brick coursing between the two.

The gable end of the front range is topped by a large flush ridge chimney. The fenestration is irregular – with a now blocked primary doorway and two windows on the ground floor and a single window on the first floor. These have sandstone 'flat arched' lintels and modern uPVC glazing.

The elevation of the outrigger has a presumably inserted and now remodelled shop front on the ground floor and two windows – with stone lintels and modern glazing – on the first floor. The gable end of the outrigger is in a different brick, suggesting it has been rebuilt.

The other outrigger is presumably also of brick but its visible rear and south-western elevations are slate hung and its original detailing is thus hidden. In between the two outriggers is the mid-20th century flat-roofed infill.



Pl.1: The Drake Street elevation.



Pl.2: The rear elevation to Back Drake Street.



Pl.3: The Moore Street elevation.

5.2 The Roof

The roof of the front range is plain gabled and covered with natural stone slate; it has quite a shallow pitch, due to the width of the building, and broad ridge stacks at the top of each gable end. The outriggers also have plain gabled roofs and the infill between has a flat roof.

5.3 The Interior

The interior has been much altered, especially in the past century or so when it has been used as offices, but the basic plan form has survived. The front range was designed on a two-room deep plan with a central hallway leading to a stair to the rear.

The front rooms were lit by single windows in the front wall – with an additional side window to the left-hand room – and each was heated by a fireplace in a projecting stack in the gable wall.

The north-eastern rear room was lit by a window in the rear wall and accessed by a doorway from the rear outshot; this had a fireplace on the wall flanking the stairs. The south-western rear room was partly taken up by a side corridor from the doorway on Moore Street and was lit by a window in that elevation as well as one to the rear; this room had a fireplace in a stack projecting from the gable wall.

There were originally bedrooms in each quarter of the house on the first floor. The interiors of the outriggers to the rear have been altered; that on the north-east side has a surviving section of projecting stack in its gable end.

Although some of the early joinery survives, including full-height panelled reveals and a couple of plain chimney pieces, the overall character of the interior is no longer domestic and sections of internal walling have been removed and other partitions added.



Pl.4: Part of the right-hand front room on the ground floor.



Pl.5: Surviving chimneypiece in the left-hand front room on the ground floor.



Pl.6: Altered stair and inserted partitions on the ground floor.



Pl.7: Typical first-floor room and window reveal.

6. The Proposals

The proposals are to convert the building back to the residential use for which it was originally constructed. This is to be in the form of six flats across two floors within the existing building.

The main change to the external appearance of the listed building will be the raising of the present flat-roofed infill next to the south-western outrigger to two storeys, matching the profile of the outrigger and built in brickwork to match and a small infill extension to the side facing Moore Street.

Internally, the most significant change will be the conversion of the loft to a pair of apartments and some changes to the internal partitions – with some being reinstated and others removed, and new partitions added to create the necessary circulation patterns within the apartments. The central core of the hallway and stairs will remain.

The existing and proposed plans and elevations are shown in Figs.6 and 7.

Fig.6: Existing plans and elevations.



Fig.7: Proposed plans and elevations.



7. Heritage Impact Assessment

7.1 Impact on the Listed Building

No.132 was Grade II list in 1985, presumably as a rare survival of a late-Georgian detached middle-class dwelling built on the then new and aspirational Drake Street. Its character and significance has, unfortunately, been eroded by its long use as offices and the unsympathetic modern uPVC windows are particularly unfortunate – as are many of the internal changes.

The principal entrance front to Drake Street will not be changed as a result of these proposals, and the Moore Street elevation will be little altered. The main changes will be to the rear through the raising of the flat-roofed infill range.

Assuming that the work to the side elevation is carried out using appropriate matching materials their impact on the street scene will be limited as will their impact on the character and significance of the building.

The rear elevation of the listed building, because of the changes made to the two outriggers and the modern infill between them – as well as the changes to the rear wall of the front range – is not considered to contribute greatly to the significance of the listed building and the proposed changes, in the context of the adaptive re-use of the building and the requirements of natural light involved, are considered to be proportionate. This also applies to the raising of the infill to two storeys in the sympathetic manner proposed.

Given the unsympathetic changes already made to the interior, the internal proposals are not considered to be of significant harm to its character. Existing surviving historic joinery will be retained and the lost partitions flanking the ground-floor of the stair hall are to be fully restored.

There will be a loss of walling between the stair landing on the first floor and the room to the south-west – but providing nibs of the walls and a downstand in the ceiling are incorporated, the earlier plan form will still be read within the building.

Within the strictures of the 1990 Planning Act and the NPPF it would be impossible to state that there would be no harm to the character or significance of the listed building, it is clear that any such harm deemed to occur by the decision takers would be at the lower end of the ‘less than substantial harm’ category.

In the planning balance that harm is considered to be more than compensated for by the restoration of the building to residential use, ensuring its renovation and long-term future, and by the creation of nine new dwellings in the process.

7.2 Impact on Adjacent Heritage Assets

There are very few heritage assets adjacent to the site; the only listed building is the former Independent Sunday School of 1829 to the north on Moore Street. Now a chapel. Its position within the streetscape means that it would not be impacted by the proposals for No.132 Drake Street.

Several other buildings within the area could be deemed to be non-designated heritage assets under the guidelines of the NPPF, but none of these would be significantly impacted by the proposals.

7.3 Archaeological Implications

Most of the proposals relate to the standing building, with no requirement for significant groundworks. Similarly, the proposed new detached property is located on a site on which there have previously been buildings. It is thus considered that there will be no archaeological implications resulting from the proposals.

8. Conclusions

For the reasons outlined above it is considered that the proposals could result in some minor harm to the listed building, though any such harm would be at the lower end of the 'less than substantial harm' spectrum. Such harm would also be countered in the planning balance by the refurbishment of the building, its return to residential use, and the provision of nine new dwellings.

In the recent past, planning guidance has recognised that change to historic buildings and their settings is part of their history and that buildings are not and should not be fossilised. The prospect of change, even to listed buildings, is anticipated in the government's *National Planning Policy Framework*, but was more clearly expressed in earlier guidance from 1996, *Planning Policy Guideline No.15* (PPG 15).

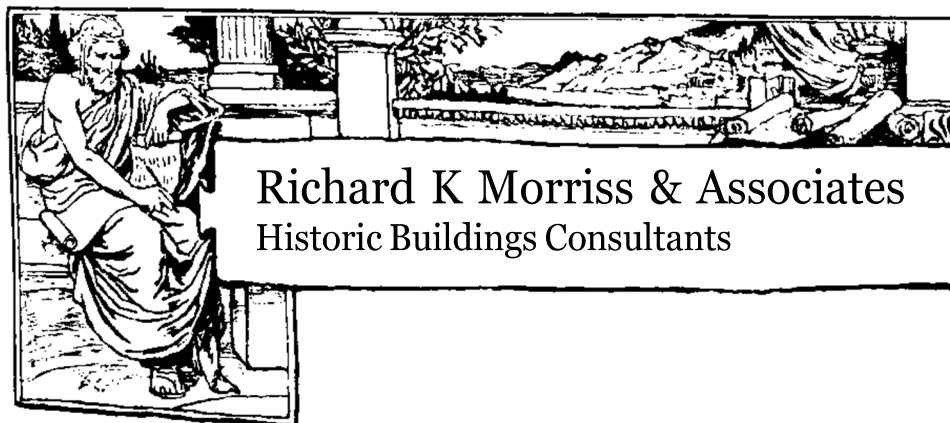
That document stated – in relation to *listed* buildings that:

'Many listed buildings can sustain some degree of sensitive alteration or extension to accommodate continuing or new uses. Indeed, cumulative changes reflecting the history of use and ownership are themselves an aspect of the special interest of some buildings, and the merit of some new alterations or additions, especially where they are generated within a secure and committed long-term ownership, should not be discounted.'

This echoes the statement in the pioneering 2008 document, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* that: *'Change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people's responses to social, economic and technological change'.*

9. References

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The Consultancy

Richard K Morriss founded this Consultancy in 1995 after previously working for English Heritage and the Ironbridge Institute of the University of Birmingham and spending eight years as Assistant Director of the Hereford Archaeology Unit. Although Shropshire-based the Consultancy works throughout the UK on a wide variety of historic buildings for clients that include the National Trust, the Landmark Trust, English Heritage, the Crown Estates, owners, architects, planning consultants and developers. It specialises in the archaeological and architectural analysis of historic buildings of all periods and planning advice related to them. It also undertakes broader area appraisals and Conservation Management Plans.

*Richard Morriss is a former Member of the Institute of Field Archaeologists and of the Association of Diocesan and Cathedral Archaeologists, is archaeological advisor to four cathedrals, occasional lecturer at Bristol and Birmingham universities, and author of many academic papers and of 20 books, mainly on architecture and archaeology, including *The Archaeology of Buildings* (Tempus 2000), *The Archaeology of Railways* (Tempus 1999); *Roads: Archaeology & Architecture* (Tempus 2006) and ten in the *Buildings of series: Bath, Chester, Ludlow, Salisbury, Shrewsbury, Stratford-upon-Avon, Warwick, Winchester, Windsor, Worcester* (Sutton 1993-1994). The latest work is an *Historic England funded monograph on the Houses of Hereford* (Oxbow 2018).*

He was a member of the project teams responsible for the restoration of Astley Castle, Warwickshire, winner of the 2013 RIBA Stirling Prize; the restoration of the Old Market House, Shrewsbury, winner of a 2004 RIBA Conservation Award; and Llwyn Celyn, Monmouthshire, winner of the RICS Conservation Project of the Year 2019. He has also been involved in several projects that have won, or been short-listed for, other awards including those of the Georgian Group for Mostyn House, Denbigh; St. Helen's House, Derby; Radbourne Hall, Derbyshire and Cusgarne Manor, Cornwall.



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