



Paul Butler Associates

Planning, Development & Heritage Consultants

Cassel & Fletcher

42-46 Drake Street, Rochdale

Heritage Statement

05 February 2024

Paul Butler Associates, 31 Blackfriars Road, Salford, Manchester M3 7AQ
t. 0161 835 3530 | e. pba@paulbutlerassociates.co.uk | w. www.paulbutlerassociates.co.uk

Professional Planning, Development & Heritage Advisors since 1992.

Our professional staff are Members of the Royal Town Planning Institute (RTPI) or the Chartered Institute for Archaeologists (CIfA)

© Paul Butler Associates Ltd. All Rights Reserved.

Job Number: 24.1980

Project: 42-46 Drake Street, Rochdale

Client: Cassel & Fletcher

File Name: 24.1980 Cassel & Fletcher, 42-44 Drake Street, Rochdale Heritage Statement

Document Preparation/Checking Record:

	Name and Qualifications	Position	Date
Prepared by:	Mark Clifford Bsc. (Hons) MA IHBC	Principal Heritage Consultant	29/01/2024
Checked by:	Lynsay Ewart BSc (Hons) MSc MRTPI	Principal Planner	31/01/2024
Issued by:	Lynsay Ewart BSc (Hons) MSc MRTPI	Principal Planner	31/01/2024

Document Revision Record:

Issue No.	Date	Details of Revisions

Contents

1. Introduction	3
Approach and Methodology	3
The Proposal	4
2. The Application Site and its Surroundings	5
Site location	5
Designations	5
The site and its setting	6
3. Historic Development	8
Rochdale	8
The site area	8
4. Assessment of Significance	11
The site area	13
The Rochdale Town Centre Conservation Area	13
Institute for the Deaf, 23 Church Lane, Rochdale (Grade II)	14
Broadfield Park (Grade II)	14
5. The Heritage Planning Context	15
Town and Country Planning Act 1990	15
Planning (Listed Buildings and Conservation Areas) Act 1990	15
National Planning Policy Framework	15
National Planning Practice Guidance (NPPG)	17
Historic Environment Good Practice Advice 2: 'Managing Significance in Decision-Taking in the Historic Environment' (2015)	18
Historic England Advice Note 3: The Setting of Heritage Assets (2 nd Edition)	18
Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets	19
Historic England: Conservation Principles Policies and Guidance	19
Rochdale Adopted Core Strategy	19
6 Impact Assessment	22
The Rochdale Town Centre Conservation Area	22
Institute for the Deaf, 23 Church Lane (Grade II)	23
Broadfield Park (Grade II)	23
Summary of Impacts	24
Compliance with Planning Policy	24
Bibliography	26
Appendix A – Historical Sources	27

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 a proposed development at 42-46 Drake Street, Rochdale ('the site'). This Heritage Statement has been prepared to consider the potential impact of the scheme on the significance and setting of any nearby designated and non-designated heritage assets.

1.2 This Statement should be read in conjunction with the supporting planning drawings prepared by the architect, BM Architectural.

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: 2023), 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 for applicants 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 and its surroundings were undertaken on 23rd January 2024.

The Proposal

- 1.7 The proposal is to develop a currently vacant plot of land on the corner of Drake Street / Nelson Street located to the south of Rochdale Town Centre. The proposed development comprises a four storey apartment building with pediment and roof dormers to Drake Street stepping up to a further storey along Nelson Street.
- 1.8 The proposal is of red and buff brick slips, off-white detailing in polished reconstituted stone or ceramic tile, and aluminium frame windows, with an artificial slate roof. There is retail unit on the ground floor with apartments above.

2. The Application Site and its Surroundings

Site location

- 2.1 The site sits within the boundary of Rochdale Town Centre on a corner plot between Drake Street and Nelson Street. The core of the town centre and Rochdale Metrolink stop is approximately 150m to the north of the site following Drake Street.

Designations

- 2.2 The site does not contain any listed buildings but sits within the Rochdale Town Centre Conservation Area. There is the Grade II Listed Institute for the Deaf, 23 Church Lane, which backs onto the site at the rear and 150m north along Drake Street is the Grade II Listed Wellington Hotel. Further along Nelson Street to the west is the Grade II Listed Broadfield Park.



Figure 2.1 Plan of the site area showing: the site location (red); the Deaf Institute, Grade II Listed (blue); and Broadfield Park, Grade II Listed (green). All the area pictured is within the Rochdale Town Centre Conservation Area.

- 2.3 The Historic Environment Record on the Heritage Gateway was reviewed; other than the previously mentioned listed buildings and conservation area there is an entry just north of the site relating to excavations undertaken in 2007/08 –

Description: Excavation of the iron and brass foundries was completed in December 2007; a watching brief was maintained until August 2008.

County: ROCHDALE

Grid reference: SD8980013300

Map reference: [EPSG:27700] 389800, 413300

Period/Subjects: POST MEDIEVAL - IRON FOUNDRY; POST MEDIEVAL - BRASS FOUNDRY

Identifiers: [ADS] Depositor ID – 1540523 [ADS] Associated ID – AIP Record Number: E.02.2848/2008

The site and its setting

- 2.4 The site area is currently vacant and undeveloped. Adjacent to the plot on Drake Street is a two-storey property with a single storey projecting extension taking the property to the pavement edge. The property has grey render and a slate roof. It is possibly 19th century in date but is now heavily altered.



Figure 2.2 View from Drake Street looking across the vacant site area; the rear of the Grade II Listed Deaf Institute is in the background



Figure 2.3 A view along Drake Street with the site area on the right hand side

- 2.5 Directly opposite the site is a car park and a mid-to-late 20th century commercial development of no interest. Continuing along Drake Street there are similar former residential properties with ground floor shops that are presumably early 19th century with later alterations.

- 2.6 The character of the area is predominantly commercial on the ground floor with residential above. Buildings are generally between two to three storeys. The local materiality is red brick, there are examples of sandstone and many rendered properties, although the render most likely representing a later addition. The topography has Drake Street falling gently towards the town centre to the north.
- 2.7 Along Nelson Street, which forms the side of the plot, properties generally present side or rear elevations of less architectural interest. At the top of Nelson Street, where it meets Church Lane, there is a partial view of the clock tower of the Grade I Listed Town Hall.
- 2.8 The land on Church Street slopes deeply towards the town centre and has a granite sett surface, the Grade II Listed Institute for the Deaf fronts onto this road. The building is of pale stock brick with timber sliding sashes, some with leaded lights and coloured glazing.
- 2.9 The corner of Broadfield Park is set opposite this junction, although there is no visibility in or out of the park due to a line of heavy tree coverage and the boundary wall.



Figure 2.4 A view from the corner of Church Lane and Nelson Street near the edge of Broadfield Park. The Grade II Listed Deaf Institute is visible to the left with the site area in the distance



Figure 2.5 A view across the site area towards Drake Street

3. Historic Development

Rochdale

- 3.1 First mentioned in the Domesday Book, Rochdale started as a medieval market town and developed into an industrial town. The Industrial Revolution brought the Rochdale Canal and the expansion of the woollen and cotton industries, but also hardships which prompted in 1844 the opening of the world's first modern co-operative shop by the Rochdale Society of Equitable Pioneers.
- 3.2 The manufacture of woollen cloth, particularly baize, kerseys and flannels, was important from the reign of Henry VIII. At this time the industry was rooted in the domestic system but towards the end of the 18th century mills powered by water were built.
- 3.3 Waterpower was replaced by steam power in the 19th century and coal mines, mostly drift mines, were opened where coal from the lower coal measures outcropped around the town. By the mid-1800s the woollen trade was declining and the cotton trade, which took advantage of technological developments in spinning and weaving, grew in importance. Rochdale became one of the world's most productive cotton spinning towns when it rose to prominence during the 19th century as a major mill town and centre for textile manufacture during the Industrial Revolution. It was a boomtown of the Industrial Revolution, and amongst the first ever industrialised towns.
- 3.4 The socioeconomic change brought by the success of Rochdale's textile industry in the 19th century led to its rise to borough status. Much of the town's surviving heritage dates from this period. During the 20th century Rochdale's spinning capacity declined with many of the former mill buildings closed by the late 20th century.

The site area

- 3.5 The Regency period saw the rapid expansion of Rochdale thanks to the continued success of the woollen industry. In 1810 the need for improved transportation links saw the development of Drake Street, named after Reverend Drake, which connected the town centre to the Rochdale Canal and later the railway station (HPA Architects, 2023).

3.6 The Rochdale Town Plan (Sheet 8) of 1848 shows the site area was developed by this point. Two narrow properties front onto Drake Street and a series of small buildings appear to front onto Nelson Street with a passage to a courtyard at the rear (see **Figure 3.1**).

3.7 By the mid-1850s the site would become occupied by Ivesons Bros., a local furnishings and carpet retailer with several stores around Rochdale that operated between 1818-1995. There is no obvious change in the site's planform shown on the Rochdale - Lancashire LXXXIX.1.16 of 1890 suggesting the earlier buildings were possibly remodelled and retained.



Figure 3.1 (Rochdale Town Plan (Sheet 8) Surveyed 1848, Published 1851. Scale 1:1056).



Figure 3.2 (Rochdale - Lancashire LXXXIX.1.16 Surveyed 1890, Published 1892. Scale 1:500).

3.8 On 30th December 1898 Mrs Iveson's Hosier store on the corner of Drake Street was said to be a 'mass of flames' resulting in £300 worth of damage (Lincolnshire Echo, 1898). Archive images of the site show it with a terracotta date stone of '1901' along with 'AI' [Ann Iveson] and this was likely a result of remodelling of the existing building that followed the fire of 1898 (see **Figure 3.3** and **Figure 3.4**).

3.9 In 1907 the existing buildings along Church Lane were cleared and replaced by the surviving Deaf Institute by architects S.Butterworth and W.H. Duncan of Rochdale.

3.10 A record in *The Builder* of 1925 notes an extension to the existing Iveson buildings, this extension was the former pale yellow terracotta warehouse to the rear of the site along Nelson Street and a matching building on the opposite side of the road (No.14 Nelson Street which is the only surviving part of the complex).

'ROCHDALE.—New premises are being erected by Messrs. Iveson Bros., house furnishers, of 46, Drakestreet, as an extension to the existing buildings. The plans have been prepared by

Mr. T. Townsend, architect, Fleece-street, Rochdale, and the contractors are Messrs. Thomas Wilkinson & Son, Walpole-street, Rochdale' - (The Builder, 1925).

- 3.11 Broadfield Park was laid out on former glebe land acquired by the Rochdale Corporation in 1860, designed by Messrs Stansfield and Son, Landscape Gardeners, of Todmorden. The corner of the park closest to the site area was presented to the town in 1893 but was not laid out until 1925 to a design by the Borough Surveyors Department.
- 3.12 Following vacancy in 1998 the Iveson stores fell into disrepair before ultimately being demolished in the early 21st century. Before demolition the buildings were shown of red brick of four storeys (to the corner plot) with a prominent canted corner rising to a pediment with a further lantern rising a further storey above this. The 1925 warehouse to the rear was of faience and red brick and rose a further storey along Nelson Street.



Figure 3.3 Photo of Drake Street, likely late 19th century the Iveson Store is shown on the left of the image



Figure 3.4 Photo of Drake Street, likely early 20th century, note the terracotta date band is just visible.

4. Assessment of 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' sometimes considered of local 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.

Figure 4.1 Criteria for significance assessment

4.6 A summary of significance of the assets that may be potentially impacted by the proposal is shown on the following pages using the above criteria.

The site area

- 4.7 The site area was the site of the Iveson Bros. store which was an architecturally and historically important building along Drake Street that has since been demolished removing any historic interest.
- 4.8 There is likely some archaeological evidence of the existing buildings remaining. Potential for below ground archaeology is considered further in the submitted Archaeological Desk Based Assessment prepared by Paul Butler Associates.
- 4.9 The site is visually a negative contributor to the wider Conservation Area and a gap site in the streetscape.
- 4.10 The site area is of detrimental significance.

The Rochdale Town Centre Conservation Area

- 4.11 The Conservation Area covers a large expanse of the town and is broken down into character zones in the draft appraisal. The site sits within the Regency Drake Street Character Area.
- 4.12 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.
- 4.13 *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)
- 4.14 The Rochdale Town Centre Conservation Area is of High Significance.

Institute for the Deaf, 23 Church Lane, Rochdale (Grade II)

- 4.15 The former Deaf Institute has strong architectural and aesthetic qualities from the polychromatic brick detailing and banding and is a good survival of Edwardian architecture; the list entry also notes a good survival of internal architectural features.
- 4.16 The building has historical interest as an increasingly rare example of a purpose-built institute for the deaf providing a centre for social recreation, worship, and training, which was also associated with the rehabilitation of disabled First World War soldiers and later in the 20th century with the pioneering educational work with deaf children undertaken by the Ewings.
- 4.17 The contribution made by setting includes a visual connection to the clock tower of the Town Hall and the granite sett road surface to Church Lane, although the loss of neighbouring developments and the Technical School opposite removes part of the streetscape.
- 4.18 The rear elevation has a lower level of architectural treatment and fencing and car parking to the rear negatively impacts the setting.
- 4.19 The Institute for the Deaf is of High Significance.

Broadfield Park (Grade II)

- 4.20 The Park is an important and early example of a municipal park that covers a significant portion of the town centre. It opened in successive phases from the 1870s to the 1920s and was partly designed to form a setting for Rochdale Town Hall. The area closest to the site area forms an early 20th century extension to the Park of 1925.
- 4.21 The Park has strong aesthetic qualities with important views in and across it through various parts of the town and most notably forms an important visual backdrop and setting to Rochdale Town Hall.

Broadfield Park is of High Significance.

5. The Heritage Planning Context

Town and Country Planning Act 1990

- 5.1 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.
- 5.2 In this instance the development plan comprises the Rochdale Adopted Core Strategy (2016) along with policies within the Rochdale Borough Unitary Development Plan and Policies (2016). The provisions of these documents are discussed below.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.3 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’.
- 5.4 Paragraph 72 states that ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.
- 5.5 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

- 5.6 The Revised NPPF which was published in July 2018 and most recently updated in December 2023, sets out the Government's planning policies regarding the conservation of the historic environment.
- 5.7 Section 16, *Conserving and Enhancing the Historic Environment*, and policies 195-214 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’.

- 5.8 Paragraphs 200 and 201 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.
- 5.9 Paragraph 203 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.
- 5.10 Paragraph 205 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 206 follows that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.
- 5.11 Paragraph 207 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 208 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.
- 5.12 Paragraph 212 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)

5.13 The NPPG was published in March 2014 (updated 2023). The Guidance includes a section on the historic environment. Relevant paragraphs from the Guidance are set out below:

- All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.
- 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.
- 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.
- An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building.
- 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.
- 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.

- 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.

5.14 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)

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

5.15 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)

5.16 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

- 5.17 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

- 5.18 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.

Rochdale Adopted Core Strategy

- 5.19 *Rochdale's Core Strategy* (2016) outlines the approach to heritage and the built environment under section 9, in particular - *P2 Protecting and enhancing character, landscape and heritage*; key policies of relevance are shown below:
- 5.20 *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: 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.*

- 5.21 *2. We will protect the borough's heritage by: a. Conserving, enhancing and promoting key heritage assets, both statutory and nonstatutory, 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. b. 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; c. Using heritage assets positively and intelligently to strengthen identity and image and support the visitor economy, particularly in development and regeneration schemes; and d. Prioritising the conservation of heritage assets at risk from decay, giving special attention to designated heritage assets in this regard.*

Rochdale Borough Unitary Development Plan and Policies (2016)

- 5.22 The Unitary Development Plan from the 1996-2016 Local Plan is still in place until the Allocations Development Plan is adopted.
- 5.23 *The Rochdale Borough Unitary Development Plan and Policies* provides an overview of the objectives of the borough, section G/Be/9 provides key policies in relation to heritage with those relevant to the proposal extracted below -
- 5.24 *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.

- 5.25 *Be/15 new development affecting the setting of a listed building; development will not be permitted, where through its siting, scale, design or materials, would harm the setting of a listed building.*
- 5.26 *Be/17 new development affecting conservation areas; 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.*
- 5.27 *Be/19 protection of parks and gardens of special historic interest; development proposals which would result in the loss of, or cause harm to the historic character, structure or setting of any part of a designated historic park or garden will not be permitted.*

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 stresses that impacts on heritage assets should be avoided and if it cannot be avoided, it should be minimised or mitigated. 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 discusses the potential for impacts on the heritage assets previously outlined.

The Rochdale Town Centre Conservation Area

- 6.4 The Conservation Area covers a broad expanse of the town centre and the area potentially impacted is around the Drake Street character area. The proposal will represent a small increase in height to the neighbouring two storey property and add some height and massing along Drake Street and Nelson Street. However, neither of these elements are considered harmful as they largely recreate the historic massing of the historic streetscene.
- 6.5 Along Nelson Street the proposal will help re-create the historic grain of the streetscape that was evident from the existing warehouse building. The step up along Nelson Street and the canted corner reflects the existing buildings that were on-site.
- 6.6 The proposal will act as one of the taller developments along Drake Street but the street character, although predominantly former weaver's houses of three storeys, does have taller buildings interspersed throughout; such as Champney's Hall of four storeys with a raised pediment and No. 57-59 of four storeys. The proposed height will therefore not be out of character for this part of the Conservation Area and allows the development to act as a landmark corner plot in the way the previous Iveson Bros. store was.

- 6.7 The proposed materiality will comprise red and buff brick slips, with off-white detailing in polished reconstituted stone or ceramic tile, with an artificial slate roof. This broadly reflects the character of the local vernacular and also the existing buildings on site and will not appear out of character.
- 6.8 At ground floor level the proposal offers retail space and has a traditionally designed shopfront that again reflects both the character of the previous building on the site and also the properties along much of Drake Street.
- 6.9 Beyond the proposed design the proposed scheme will bring development to an infill plot that currently harmfully impacts the wider Conservation Area and disrupts the flow of the streetscape and retail units along Drake Street and therefore a scheme of appropriate scale, massing and materiality brings benefits to significance.
- 6.10 The proposal is considered low beneficial to the significance of the Rochdale Town Centre Conservation Area.

Institute for the Deaf, 23 Church Lane (Grade II)

- 6.11 The elements of primary significance to the setting of the Institute for the Deaf are the views along Church Lane of the front elevation where there will be no visibility of the proposed development.
- 6.12 The development will encroach onto the rear of the Listed Building, but this elevation is of limited significance and the proposed development will broadly reflect the built environment when the Institute for the Deaf was constructed.
- 6.13 The proposal is considered neutral to the significance of the Institute for the Deaf having neither a beneficial nor harmful impact.

Broadfield Park (Grade II)

- 6.14 There is an entrance to Broadfield Park near the corner of Nelson Street and Church Street. The Park is well screened from the road by a boundary wall and heavy tree coverage meaning there is little visibility in or out of the Park from this location.

- 6.15 As previously discussed, the development will be partially visible from the corner of Nelson Street and Church Street but this will again reflect the historic height and massing of the existing streetscape and will not interrupt a view of any significance; currently the modern council offices in the distance are visible from this location.
- 6.16 The proposal is considered neutral to the significance of Broadfield Park having neither a beneficial nor harmful impact.

Summary of Impacts

Heritage Asset	Designation	Impact
The Rochdale Town Centre Conservation Area	Conservation Area	Low Beneficial
Institute for the Deaf, 23 Church Lane	Grade II Listed	Neutral
Broadfield Park	Grade II Listed	Neutral

Compliance with Planning Policy

- 6.17 The above impact assessment demonstrates that there is no harm to significance of any designated or non-designated heritage assets and therefore no further 'clear and convincing justification' is required, as per the NPPF (2023: Para 206).
- 6.18 The proposal demonstrates how 'great weight should (and has) been given to conservation' (NPPF, 2023: Para 207) and directly relates to paragraph 212 (NPPF: 2023) requiring local planning authorities to look for opportunities for new developments within the setting of heritage assets to enhance or better reveal their significance.
- 6.19 The proposal is compliant with the core policies of Rochdale's Core Strategy (2016) in protecting and enhancing the borough's character and one of the identified key heritage assets being the Rochdale Town Centre Conservation Area.

- 6.20 As the proposal will cause no harm, Rochdale Borough Unitary Development Plan and Policies, Be/15, 4.47, Be/17, 4.48, Be/19 are fully compliant causing no harm to heritage assets, preserving and enhancing the conservation area, and the avoiding harm or loss to the significance of a protected park and garden.
- 6.21 Therefore, the proposal is fully compliant with both local and national planning policy in relation to heritage with no areas of conflict.

Bibliography

HPA Architects. (2023). *Rochdale Town Centre Conservation Area Appraisal v.3 (DRAFT)*.

Rochdale Borough Council.

Lincolnshire Echo. (1898, December Saturday 31). Serious Fires. *Lincolnshire Echo*.

Rochdale - Lancashire LXXXIX.1.16 Surveyed 1890, Published 1892. Scale 1:500. (n.d.).

Rochdale - Lancashire LXXXIX.1.16 Surveyed 1890, Published 1892. Scale 1:500. (n.d.).

Rochdale Town Plan (Sheet 8) Surveyed 1848, Published 1851. Scale 1:1056. (n.d.).

The Builder. (1925, March 6). p. 400.

Appendix A – Historical Sources



(Rochdale Town Plan (Sheet 8) Surveyed 1848, Published 1851. Scale 1:1056).



(Rochdale - Lancashire LXXXIX.1.16 Surveyed 1890, Published 1892. Scale 1:500).



Photo of Drake Street, likely late 19th century the Iveson Store is shown on the left of the image



Photo of Drake Street, likely early 20th century, note the terracotta date band is just visible.