

URBAN DESIGN CONSULTATION RESPONSE

Design Officer	Azhar Kapadi
Date	Set 1 Comments: 31.07.25 Set 2 Comments: 04.02.26
Application Reference	25/00353/FUL
Address	Former Cope Funeral Services, 156 Manchester Road, Rochdale, Manchester, OL11 4JQ
Proposal	Demolition of existing funeral home erection of 28 self-contained apartments

Introduction

The [National Design Guide](#) sets out the ten characteristics of a well-designed place. Well-designed places have individual characteristics which work together to create its physical **Character**. The ten characteristics help to nurture and sustain a sense of **Community**. They work to positively address environmental issues affecting **Climate**. They all contribute towards the cross-cutting themes for good design set out in the [National Planning Policy Framework](#).



Figure: The ten characteristics of a well-designed place

Source: National Design Guide, 2021

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Reason(s) for Consultation

- Building design and materiality

Scheme Image(s)



Source: Application submission

Assessment

This assessment has been made against:

National Guidance:

- The National Planning Policy Framework
- The ten characteristics of a well-designed place contained within the National Design Guide
- National Model Design Code
- Building for a Healthy Life design toolkit (BHL)

Local Policy:

- Rochdale Core Strategy policies:
 - S03 – To improve design, image and quality of place
 - P1 – Improving Image
 - P2 – Protecting and enhancing character, landscape and heritage
 - P3 – Improving design of new development
 - DMI (General Development Requirements)
- Supplementary Planning Documents:
 - Oldham and Rochdale Urban Design Guide
 - Oldham and Rochdale Residential Design Guide

The Unitary Development Plan (UDP)

➤ G/BE/1 - Design Quality

➤ BE/2 - Design Criteria for New Development

Greater Manchester's Streets for All Design Guide

Emerging Planning Policy - Places for Everyone (PfE) joint development plan

SET 2 COMMENTS

SUMMARY

Given the ability to submit revised drawings, the applicant has not meaningfully addressed previously highlighted weaknesses. A robust pre application process is now essential, as the current submission does not demonstrate the level of design consideration expected.

Context / Background

During the initial consultation, the scheme was considered to be poorly designed. Given the extent of revisions required to address the issues identified, it was recommended that the applicant engage with the pre-application service. Although the application remained open, the applicant has since submitted a revised scheme; the comments below relate to this updated proposal.

For reference, earlier comments have been included at the end of this consultation response.

1. Quality of Submission and Design Process - Weaknesses in Submitted Material

- Earlier feedback highlighted major concerns with the Design and Access Statement (DAS), which lacked a clear design rationale and showed no evidence of a structured design process.
- Despite substantial changes to the scheme and clear guidance on how to strengthen the DAS—the DAS has not been updated.
- There is no meaningful contextual analysis, no reference to positive local precedents, and no indication of how the proposal responds to site opportunities or constraints.
- Drawing errors persist, including:
 - Still no key showing where section cuts are taken.
 - Rear elevations are incomplete and lack context.
 - Some apartments do not meet Nationally Described Space Standards, contrary to Policy JP H3.



2. Contextual Fit and Street Scene

Massing, Form and Elevations

• Earlier concerns that the elevations would appear discordant with the street scene remain, and the latest increase in massing exacerbates this issue. Building heights should be considered in terms of their proportion and in relation to the size of the space they define and/or enclose.

• I would suggest the proposed building form would have benefitted responding to the street's terraced housing typology, which is characterised by:

- Consistent frontages
- Generous internal floor to ceiling heights
- Well-proportioned elevations
- Pitched roofs

In contrast, the proposal:

- Provides compressed floor to ceiling heights, resulting in an incoherent street elevation
- Introduces a “city centre apartment block” typology unsuitable for this inner-urban context
- Does not reflect local characteristics as encouraged by BHL: *“Positive characteristics such as street types, urban grain, plot shapes, building forms and materials should inform new development.”*



3. Site Layout and Block Structure

It appears the existing, attractive boundary stone wall is being kept. Furthermore, the inclusion of parking, bin stores, and plant areas to the rear of the development is also welcomed.

The proposal introduces several undesirable characteristics, including:

- A fragmented perimeter block structure.
- Blank or largely blank street corners, which reduce street activity, passive surveillance and limit visual interest

- Areas of leftover or purposeless space, including a newly introduced narrow gap which will create safety concerns without serving any functional purpose.
- The ground floor apartments lack privacy if residents were to use the garden area or access the car park.



Suggested Alternative Approaches

The following typologies were previously recommended for their ability to respond more sensitively to local character and treat the site as an infill intervention rather than a wholly new multi-plot development

- A two storey terrace style building remains the preferred response. If the design quality were sufficiently high to justify a variation in form, a sensitively designed and set back third storey may be acceptable but such an option should be tested and investigated much more rigorously.
- Mews housing, maisonettes, or well-proportioned apartments that reinforce the terrace rhythm could all be appropriate responses. The site appears large enough to accommodate such typologies while still offering a mix of apartment sizes
- A two-storey terrace-style building remains the preferred response. While a sensitively designed and set-back third storey may be acceptable, this would require design quality of a sufficiently high standard to justify a departure from the prevailing form and would need to be rigorously tested. Simply removing one storey from the current proposal would not resolve these fundamental design issues.
- Ground-floor apartments with individual front doors, as supported by BHL guidance.

None of these options have been explored, and no massing studies or 3D testing has been undertaken to justify the chosen form.

4. Materiality and Architectural Expression

The material palette and architectural expression appear arbitrary:

- The material changes from black timber, buff brick and a green wall (in the first iteration) to a predominantly grey brick—are unexplained. This suggests an absence of contextual analysis. The grey brick appears to reference poorer local examples, such as the piecemeal pebble-dash opposite, rather than the stronger and more coherent palette of the surrounding terraces. Positive precedents have not informed the proposal, while weaker examples appear unintentionally echoed.

Conclusion

The proposal continues to lack a clear design rationale, meaningful contextual analysis, or coherent development of massing and form. The quality of the submission remains weak, and key issues previously raised have not been addressed.

While I am willing to help test and refine design options, the level of input now required goes beyond what can reasonably be supported within a live application.. Given the limited improvement to date and the continued absence of a design-led approach, the current application has reached the limits of the support that can be provided, and a fresh pre-application submission is strongly recommended.

SET | COMMENTS 31.07.25

SUMMARY

The proposal's underdeveloped and generic design reflects the absence of pre-application engagement and a robust design and access statement, resulting in unresolved massing, muted materials and inactive frontages that fail to respond to the context.

I am unsupportive of this proposal.

Submitted Information

This is a notably weak application that would have benefitted significantly from pre-application engagement. Before the design can be meaningfully assessed, there are fundamental issues with the submitted drawings. For example, section drawings lack references to their origin points, and even upon scrutiny, their accuracy is questionable.

Required Amendments

The application urgently requires:

- Accurate section drawings, clearly referenced and labelled to indicate which streets are depicted
- Extended street elevations to include adjacent portions of respective streets on either side of the proposal

Design and Access Statement

The submitted Design and Access Statement is wholly inadequate. It fails to assess the site and its context or explain the rationale behind design decisions. It contains no additional imagery of the proposal or its surroundings. Design appears to have been treated as an afterthought.

I would recommend consulting this website which gives guidance on how to produce a design and access statement:

<https://www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/design-and-access-statements.pdf>

DESIGN

Scale: Although a three-storey building might be acceptable in principle, the current proposal falls short of the design quality needed to support that scale. A robust justification would require a coherent massing strategy that breaks down and articulates the upper levels, together with a carefully considered palette of materials and façade treatments that respond to and enrich the local context. Without these design interventions, a development exceeding the predominant two-storey character of the area cannot be justified.

Materiality: The proposal's material palette is undistinguished and its detailing overly simplistic, offering neither depth nor refinement. This lack of considered articulation fails to enhance character of the surrounding context. The combination of materials together is quite haphazard and it is unclear why these have been proposed.

Boundary Treatment: The fate of the existing boundary wall is unclear. The existing building benefits from a landscaped buffer, which should be retained or reinterpreted. If the building is to be brought forward, it must respond to the terraced typology and street profile, which is not addressed in the current submission.

Typology and Layout: The proposal misses the opportunity to explore maisonettes front and rear. This would allow for improved elevation design, private entrances, front doors and garden spaces—enhancing both functionality and contextual fit. Such an approach would not compromise daylighting or parking arrangements and would result in a more coherent frontage along Manchester Road.

Balconies: Front-facing balconies are inappropriate in this location. They offer no meaningful views and conflict with the established character of the area. Their visual impact is negative, particularly on a three-storey elevation.

Ground Floor Activation: Introducing front door apartments at ground level would improve continuity and strengthen the street-facing façade. These could be two-storey units with internal stairs or narrow, back-to-front layouts.

Boundary Wall and Setback: The previous building was set further back. If the new proposal is to align with the terrace line, this must be reflected in the architectural language. Current detailing is poor, with a prominent concrete slab detracting from the frontage.

Core and Entrance Design: The stair core is visually unresolved, with a disjointed material palette. The plant room's location adjacent to the main entrance is a poor design choice, undermining the sense of arrival and contributing to a weak frontage. Well-rendered CGI's would have helped communicate the scheme more effectively.

Rear Elevation and Parking: While rear parking is acceptable in principle, the elevation treatment here is underdeveloped. Replacing circular columns with brick piers would help ground the building and reinforce material continuity.

POLICY

The proposal fails to meet design policy.

Rochdale Core Strategy (2016)

C3 requires a high standard of development and layout that produces attractive places.

Policy DMI Requires all development proposals to demonstrate that they are of a high-quality design and take the opportunity to enhance the quality of the area.

Policy P3 acknowledges that good design will improve the image and attractiveness of the borough as a place to live, work and visit. This policy requires all new developments to adhere to high quality design and enhance the borough's identity and sense of place, by respecting context where it is positive.

National Planning Policy Framework

Paragraph 135b states that planning decisions should ensure that developments are sympathetic to local character and visually attractive as a result of good architecture, layout and effective landscaping.

The National Design Guide states, 'Where the character of an existing place has limited or few positive qualities, then a new and positive character will enhance its identity'.

Rochdale Borough Unitary Development Plan BE/2:

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

Urban Design Guide SPD (Oldham & Rochdale)

- o Emphasises contextual design, active frontages, and material quality
- o Encourages early engagement and use of CGIs to communicate design intent

Residential Development SPD (2016)

- o Sets expectations for layout, scale, massing, and boundary treatments
- o Advocates for private entrances and garden spaces where appropriate