

HERITAGE & CONSERVATION CONSULTATION RESPONSE

Application Details

Heritage, Conservation & Design team officer

Catherine Fenghour

Date

17 February 2026

Application reference

25/01088/FUL and 25/01089/LBC

Address

All Saints Church, Foxholes Road, Rochdale, OL12 0EF

Proposal

Conversion of existing church to a single-family dwelling including formation of new footpath, parking and boundary fencing; internal alterations and replacement of stained-glass window to side elevation

Affected Heritage Assets

Designated heritage assets

- All Saints Church (grade II)

Non-designated heritage assets

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Summary

Further information and amendments required.

Assessment

Site description and significance

The application site comprises All Saints Church Hamer. The Church is located off Foxholes Road in Rochdale. It closed to public worship in December 2019 and is currently vacant.

The Church was designed by renowned Church architect, Medland Taylor. It is one of his earlier Church designs, being built in 1865. It is plainer than many of his other churches but still has some internal and external features of interest. Despite being vacant, many historic features remain,

including the stained-glass windows (many of these were installed in the early 20th century), pews, pulpit, font and organ. The church has previously undergone reordering within the southern transept, which included the installation of new glazed partitions. Externally, the church is constructed of rubble stone with a slate roof.

The Church is of special architectural and historic interest, being built to serve the surrounding housing, retaining many original and historic features both internally and externally, and being designed by a renowned church architect. It also holds communal value, due to its role as the parish church for the area. It is listed at grade II for this special architectural and historic interest.

Relevant legislation and planning policy

Planning (Listed Buildings and Conservation Areas) Act 1990

Sections 16(2) and 66(1) - In considering whether to grant listed building consent/planning permission for any works/development the local planning authority [...] 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.

National Planning Policy Framework (NPPF 2025) chapter 16 deals with conserving and enhancing the historic environment. Paragraph 212 requires great weight to be given to a designated heritage asset's conservation. This is irrespective of the level of any potential harm. Paragraph 213 confirms that any harm to, or loss of, the significance of a designated heritage asset, should require clear and convincing justification.

Paragraph 215 states 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, where appropriate, securing its optimum viable use.

At a local level Places for Everyone (PfE) policy JP-P2 and Rochdale CS policy P2 apply. Policy P2 seeks to conserve, enhance and promote key heritage assets, including listed buildings.

Assessment of proposals

The proposal is for the conversion of the church to a single residential property. Internal works are also proposed and include: removal of pews and choir stalls, and installation of new partition walls. One stained glass window is proposed to be removed, as this includes a war memorial inscription. Clarification is required regarding the proposals for other key features, including the altar, font, organ and pulpit.

Principle of proposed use

The Church closed for regular public worship in December 2019 and has been vacant since this date. In the absence of a viable use, this grade II listed church is at risk of deterioration and potential loss of significance. It is understood that the church had a dwindling congregation and was unable to fund the maintenance and repair of the building. In accordance with NPPF paragraph 212, great weight should be given to the asset's conservation.

Non-worship uses, including residential, generally require a greater degree of intervention and loss of historic fabric, than reuse by another congregation. Such non-worship uses often require the removal of liturgical features and pews to provide usable floor space. Where regular occupation is proposed, there are also likely to be greater demands for heating and services. A residential use would also result in the building no longer being publicly accessible.

The proposals to convert the building to residential use, irrespective of the works proposed, would result in less than substantial harm to the significance of this designated heritage asset, as it would change the character of the space and remove it from public access.

This less than substantial harm needs to be weighed against the public benefits of the proposal, including, securing its optimum viable use. Please can further information be provided regarding any other uses considered for the building and any interest that there has been since its closure in 2019. This information is required to establish whether the harm resulting from a proposed residential use has been clearly and convincingly justified.

Removal works

The proposed demolition plans show the removal of various partition walls, the organ screen, the pews, choir stalls, altar and a stained-glass window.

Organ panelling

The proposed plans show the decorative organ panelling which faces into the northern aisle to be removed. This appears to be part of the historic decorative joinery and its loss would result in less than substantial harm to the building's significance through the loss of historic fabric. The scheme should be amended, so that this panelling can be retained. The plans show an ensuite to be sited adjacent the organ. These concerns could be addressed by omitting the ensuite or re-siting it to the other side of the proposed bedroom.

Pews and choir stalls

The plans show the removal of all pews and choir stalls. Both the choir stalls and pews appear to be original to the church and make an important contribution to its legibility as a place of worship. The loss of these features would result in the loss of historic fabric, as well as removing evidence of its original purpose. This element would result in less than substantial harm to the significance of the Church. The pews and to a lesser extent the choir stalls reduce the area of available floor space within the building. It is accepted that to enable a non-worship reuse, some of the pews are likely to be required. However, the removal of all pews and choir stalls is not considered to have been clearly and convincingly justified. The scheme should be amended to retain the choir stalls and at least some of the pews. These could be relocated elsewhere within the church, for example they could be used as benches. Retaining some of the pews and choir stalls would enable a degree of legibility of the former layout and allow for the historic fixtures to be appreciated. There would still be a degree of harm, but this would be less than the harm resulting from the total loss currently proposed.

Liturgical features

Clarification is required regarding the proposals for the font and organ, as these are shown on the plans for retention, but the heritage statement advises that they are to be removed. These features should be retained where possible. Both features should be retained as part of the works. Further information is required regarding the existing altar. If historic or original it should ideally be retained in situ. It is understood that the pulpit is to be retained.

Removal of stained-glass window

The proposals show a single stained-glass window to be removed as part of the works. It is proposed to be removed, as it contains a memorial to those who died in the First World War. The War Memorials Trust advises that when churches are closed, the war memorials are either relocated, or that the new owner will take responsibility for them and ideally allow public access for commemoration.

Confirmation is required regarding the proposals for the war memorial and where it will be relocated to, as given the proposed use, public access would not be possible. The applicants are advised to contact the War Memorial Trust regarding this aspect of the proposals.

The removal of this window would result in less than substantial harm through the loss of historic fabric. However, this can be justified, given the need for it to continue to be maintained and publicly accessible.

All other windows are shown to be retained.

Modern partitions

The Church underwent reordering in the late 1990s, and new partitions were added within the southern transepts. These partitions are not of any architectural or historic significance, and their removal would not harm significance, subject to appropriate making good.

New insertions

Partition walls

The installation of new partition walls would provide a sense of enclosure, which is not currently present in the open space. there would be some harm from this enclosure. However, this harm would be limited by the retention of the Nave as an open space, allowing clear views through to the chancel. The existing columns would also be retained within the nave.

No detailed plans have been provided of the proposed partitions and their interaction with the arches and columns. They are shown to be timber studs with glazing above. To minimise their visual impact and retain a sense of openness, they should be more lightweight and ideally include areas of glazing at lower level, where possible. If consent is granted, full details of the partitions and their means of fixing should be required by condition.

Floors

Areas of original flooring appear to survive. From discussions, it is understood that it is proposed to retain the existing flooring in-situ and provide a new raised floor. Such an approach would enable new plumbing and wire runs to be screened. A typical floor build up should be provided.

Plumbing and M&E

The proposal includes the installation of new bathrooms throughout the church. Further details are required of how services would be provided, without damaging the historic fabric, including original flooring. Given the potential harm to the historic fabric, an indicative scheme for waste and water management should be provided up front.

Similarly, details of new cable runs should also be required. This can be dealt with by condition.

The existing heating system for the church has not been specified. Please can the applicant confirm whether they are going to be upgrading/replacing the heating system as part of the proposals? If a new heating source is proposed as part of the works (such as air source heat pumps), this needs to be included as part of the proposals.

Other matters

Repairs and finishes

The church has been vacant for several years and this is reflected in its condition. There are areas where the plaster has been removed from the walls, likely to deal with damp issues. There is also evidence of areas of damp. Any new plaster should be lime based to ensure that moisture does not become trapped. If internal insulation is proposed, full details should be required and this should be breathable.

A full schedule of repairs and finishes should be required by condition. It is important that any repairs carried out are compatible with the solid wall construction of the Church and allow the building to breathe.

Building recording should be required by condition. Given the loss of historic fabric proposed and the nature of the proposed use, a level 3 survey should be required. GMAAS should be consulted on the proposals.

Boundary treatments

The site plan shows close boarded timber fencing to be installed along the side boundary of the site to enable public access to the rear. This is not considered to be appropriate and would detract from the setting of the church, harming its significance. Low level cast-iron railings or a stone wall would be more suitable alternatives, subject to details and an appropriate design. Native hedging could be used to provide additional privacy.

Conclusions

The proposed change of use would result in less than substantial harm to the significance of the designated heritage asset. This harm would come from the loss of historic fabric, the reordering and enclosure of the space and the loss of public access.

Further information is required in relation to the work carried out to find an alternative use and any interest received. Amendments are also required to the scheme to minimise the loss of historic fabric and harm to significance.

Re-consultation

Yes