

## DELEGATED DECISION CHECKLIST AND REPORT

| APPLICATION NO. | CASE OFFICER | DATE       |
|-----------------|--------------|------------|
| 22/01393/LBC    | Jake Powell  | 06/02/2023 |

**Address:** 132 Drake Street, Rochdale, OL16 1PN

**Proposal:** Change of use from offices (Class E) to 8 apartments including first floor rear extension and loft conversion with rear dormer windows, front and rear rooflights, insertion of new ground, first and second floor side windows, and internal alterations including new staircase, wall openings and new partition walls; new 1.8m high wall, railings and gate.

|           |                            |   |                       |   |
|-----------|----------------------------|---|-----------------------|---|
| PUBLICITY | Weekly list expired?       | Y | Site notice expired?  | Y |
|           | Neighbour letters expired? | Y | Press Notice expired? | Y |

|            |                                                             |   |                                        |   |
|------------|-------------------------------------------------------------|---|----------------------------------------|---|
| DELEGATION | Significant departure from local plan?                      | N | Contrary to national policy?           | N |
|            | Applicant a Council Member or officer?                      | N | Contrary to previous decision?         | N |
|            | Major with 10 or more objections and recommending approval? | N | Called in or Planning Panel objection? | N |

|          |                                   |   |
|----------|-----------------------------------|---|
| COMMENTS | Planning Panel comments received? | N |
|          | Neighbour comments received?      | N |

|     |                                                  |   |
|-----|--------------------------------------------------|---|
| EIA | Screening opinion completed and saved to Onbase? | N |
|-----|--------------------------------------------------|---|

|            |                                                                      |   |
|------------|----------------------------------------------------------------------|---|
| CONDITIONS | Pre-commencement conditions proposed?                                | N |
|            | Pre-commencement conditions agreed (or notification period expired)? | N |

|                |        |
|----------------|--------|
| RECOMMENDATION | REFUSE |
|----------------|--------|

CHECKED AND SIGNED OFF BY: AT

DATE: 06.02.2023

## **SITE**

The application relates to no. 132 Drake Street, an end property which lies on the corner of Drake Street and Moore Street. It is an attractive red brick two storey building, originally constructed as a dwelling and retains a number of original features, including the door surround. Originally constructed as a private house, it came to be used as the Board of Trade Labour Exchange in the 20<sup>th</sup> century. The building is listed at Grade II for its special architectural and historic interest. Its Historic England listing states:

“II House, now offices. Early C19. Brick with stone dressings and stone slate roof. Double depth, 2 rooms wide with central entrance and staircase. The 3-bay, 2-storey front elevation has stone sills and cambered brick arches to the sash windows, a stone sill band to the first floor, and open-pedimented door surround with attached Tuscan columns and fanlight, and a wooden modillion eaves cornice.”

It is currently vacant and in a poor state of repair. To the rear of the site is an area of hardstanding currently in use as parking.

The site is located within the Rochdale Town Centre Conservation Area, as well as the Defined Urban Area.

## **PROPOSAL**

The application seeks listed building consent for the change of use of the 132 Drake Street from offices (Class E) to 8 residential units (Class C3). To facilitate this change of the use the application proposes the construction of a first floor rear extension, construction of two dormer extensions to the rear roofslope, installation of rooflights to the front and rear roofslope, alterations to the fenestration throughout the site, as well as internal alterations.

Furthermore, the application proposes the construction of a detached two-storey dwelling on the area of hardstanding to the rear of the site. This dwellinghouse would face onto Moore Street and would be provided with one vehicular parking space, in addition to some soft landscaping on site. At ground floor the dwelling will provide a kitchen/dining area, a wash cabinet, a store and a living room. At first floor level two double bedrooms, and a single bedroom will be provided in addition to an airing cupboard and bathroom.

The application also proposes the installation of a boundary treatment of three varying types including:

- ☐ 1.8 metre high brick wall,
- ☐ 0.9 metre low brick wall with 0.9 metre tall iron railings above.
- ☐ 1.8 metre high black iron railings and gate.

## **RELEVANT PLANNING POLICY**

### **National Guidance**

National Planning Policy Framework (NPPF) – July 2021

National Planning Practice Guidance (NPPG)

Planning (Listed Building and Conservation Areas Act) 1990 (as amended)

Section 66 of the above Act 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.

Adopted Rochdale Core Strategy (CS):

|            |                                                            |
|------------|------------------------------------------------------------|
| <b>SO3</b> | <b>Improving design, image and quality of place</b>        |
| P2         | Protecting and enhancing character, landscape and heritage |
| P3         | Improving design of new development                        |

**DM1 General development requirements**

Unitary Development Plan (UDP):

|       |                    |
|-------|--------------------|
| G/D/1 | Defined Urban Area |
|-------|--------------------|

**RELEVANT SITE HISTORY**

|              |                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 88/D21839    | Change Of Use From Solicitors' Office To Office Use Within Class B(1). Granted subject to conditions.                                                                                                                                                                                                                                                                                   |
| 88/D22084    | Free Standing Name Sign. Refused.                                                                                                                                                                                                                                                                                                                                                       |
| 91/D27595    | Change Of Use From Class B1 (Non Public Offices) To A2 (Offices To The Public). Grant subject to conditions.                                                                                                                                                                                                                                                                            |
| 92/D28803    | Installation Of Non-Illuminated Wall Mounted Signs To Front Elevation Of Listed Building. Granted.                                                                                                                                                                                                                                                                                      |
| 22/01393/FUL | Change of use from offices (Class E) to 8 apartments including first floor rear extension and loft conversion with rear dormer windows, front and rear rooflights, insertion of new ground, first and second floor side windows, and internal alterations including new staircase, wall openings and new partition walls; new 1.8m high wall, railings and gate. Pending consideration. |

**CONSULTATION RESPONSES**

**Conservation**

While a suitable scheme could be developed for the site, I am not able to support the current proposals. These would result in less than substantial harm to the significance of the designated heritage assets. This harm has not been clearly and convincingly justified and would not be outweighed by public benefits.

**Relevant Policy and Legislation**

Section 16 (2&3) of the Planning (Listed Building and Conservation Areas) Act 1990 advises that *"in considering whether to grant listed building consent for any works 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. Any listed building consent shall (except in so far as it otherwise provides) ensure for the benefit of the building and of all persons for the time being interested in it."*

Paragraph 197 of the NPPF states that *"In determining applications, local planning*

*authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness”.*

Paragraph 200 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 202 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.’*

The Planning (Listed Buildings and Conservation Areas) Act 1990 refers to the ‘preservation’ or ‘enhancement’ of the special architectural or historic interest of the heritage asset or its character and appearance. The NPPF sets out in Chapter 16 of the document decision-making policies using different terminology, referring in particular to ‘conservation of significance’. It is important to note that ‘conservation’ and ‘preservation’ are concerned with the management of change in a way that sustains a heritage asset’s special interest or significance. However, ‘conservation’ has the added dimension of taking opportunities to enhance significance where opportunities arise and where appropriate.

Rochdale CS policy P2 deals with *‘protecting and enhancing character, landscape and heritage’*. Paragraph 2a states that the borough’s heritage will be protected by conserving, enhancing and promoting key heritage assets, both statutory and non-statutory. Key heritage assets include the borough’s listed buildings and Conservation Areas.

#### Description of site and significance

The application site lies on the corner of Drake Street and Moore Street. The development of Drake Street dates back to the laying out of the canal basins and wharves. The late Georgian, planned character is still discernible today in the form of buildings and street layout. The application site which was extant by 1824 is an example of the late Georgian development of the area. It is an attractive red brick two storey building, originally constructed as a dwelling and retains a number of original features, including the door surround. Originally constructed as a private house, it came to be used as the Board of Trade Labour Exchange in the 20<sup>th</sup> century. The building is listed at grade II for its special architectural and historic interest. It is currently vacant and in a poor state of repair. It also appears to have undergone some recent, unauthorised alterations, including the insertion of UPVC windows.

The special architectural and historic interest of the building is reflected in its listing at grade II.

#### Impact of proposed works

##### *Conversion to residential*

132 Drake Street was originally constructed as a dwelling, before being converted to a commercial use in the 20<sup>th</sup> century. In heritage terms, there is no objection in principle to the conversion back to a residential use.

### *Dormer windows*

The proposal includes the insertion of two large pitched dormer windows on the rear elevation of the existing property. These dormer windows would be incongruous and bulky features, which would fail to respect the finer proportions and detailing of the existing building. They would disrupt the currently unbroken roof-slope and would likely require the removal of historic roof fabric, although in the absence of any timber survey this cannot be confirmed.

The proposed dormer windows would result in less than substantial harm to the significance of the designated heritage asset and should be omitted

### *Rooflights*

The supporting heritage statement acknowledges that the front and side elevations are of highest significance. A key element of the building's frontage is its simple unbroken roofslope. The introduction of any rooflights on this principal elevation would result in a cluttered roofscape, which would detract from the fine proportions and composition of the existing building.

This element of the proposal would result in less than substantial harm to the significance of the designated heritage asset. The rooflights along the frontage should be omitted. Any rooflights along the rear elevation would need to be thoroughly justified. If accepted, they would need to be kept to a minimum.

### *First floor rear extension*

A first floor rear extension is proposed over the existing flat roof outshot. This extension would obscure much of the existing rear elevation and flank wall of the two storey outrigger, which the heritage statement notes to be original. It would also include the blocking up of existing windows, one of which appears to be original, with the other two later 20<sup>th</sup> century insertions.

The size and massing of the new extension, the obscuring of historic fabric and the loss of original window openings would result in this element of the proposal causing less than substantial harm to the significance of the heritage asset. This element requires thorough justification and if the principle of an extension is accepted it would need to be reduced in scale and designed to minimise the impact on the historic fabric.

### *Internal works*

Internally a number of changes are proposed at ground and first floors, including the insertion of subdivisions and the partial demolition of original walls. The further subdivision of rooms and the removal of historic fabric would result in less than substantial harm to the significance of the heritage asset. The layout of the proposed units should be reconfigured (including but not limited to omitting lobby areas) to minimise the need for further subdivision and removal of original walls.

The building does not currently have any habitable accommodation within the loft space. Roof spaces often retain significant amounts of historic fabric, as they are likely to have undergone fewer changes than the main habitable rooms. Two apartments are proposed within the loft space.

As noted above, the proposed dormer windows and roof lights are unlikely to be acceptable. Notwithstanding this, if the conversion of the loft space is proposed, then further details are required, including a survey of the roof and timbers. In the

absence of this information, the extent of harm or loss, resulting from the changes to this space cannot be properly assessed.

### *External works*

The proposal includes the demolition of the wall surrounding the existing service yard. This wall appears to have been constructed in various phases, and the majority is constructed of a red engineering brick. There is unlikely to be any harm to significance from the removal of this wall.

Windows and doors - the existing windows on the property are UPVC and are unauthorised. These appear to have been installed in recent years. Timber windows of an appropriate style should be reinstated. Details should be required by condition.

In the event that planning permission and listed building consent are granted, a schedule of repairs and external works should be required by condition.

### *New dwelling*

The proposal also includes a new dwelling on the land to the northwest of the building, which is currently used for ancillary car parking. As part of this, new boundary treatments and landscaping are proposed.

Historic maps indicate that at one time, there were buildings along the Back Drake Street frontage. However, there is no indication of their scale or height. Based on their footprints and the secondary nature of Back Drake Street, they are unlikely to have been of the size and scale of 132 Drake Street.

In any case, these buildings and structures are no longer present. The proposed dwelling would be set down from the main ridge of 132 Drake Street. However, its two storey height and proximity to the listed building, would result in it being an intrusive and incongruous feature within its setting. The dwelling would not appear to relate architecturally to its surroundings, where simple dual pitched forms dominate. The palette of materials, which includes concrete tiles and UPVC windows, is also of concern.

The proposed boundary treatments, which include walls with railings, would not reflect boundary treatments within the surrounding area. Any boundaries should be simple brick walls.

The proposed dwelling, as a result of its position, height, scale, massing, architectural design and materials, would be an intrusive and incongruous feature within the setting of the listed building and this part of the Conservation Area. It would result in less than substantial harm to the significance of these assets. A building of the size and scale proposed is unlikely to be acceptable in this location and should be omitted from the proposals.

### *Conclusions*

The proposal would result in less than substantial harm to the significance of these designated heritage assets. It is not considered that the clear and convincing justification required to comply with NPPF paragraph 200 has been provided.

It is acknowledged that the existing building is currently vacant and in a poor state of repair. However, the proposed works would result in a considerable degree of harm to the listed building and the wider Conservation Area. It has not been demonstrated that the proposals are the only means of bringing the building back into use, and as such it cannot be considered to be its optimum viable use.

The level of harm to the significance of 132 Drake Street and the Rochdale Town Centre Conservation Area would not be outweighed by the public benefits associated with the development.

The proposal would fail to preserve the special interest of the listed building and would neither preserve nor enhance the character and appearance of the conservation area. It would not meet the tests set out within the 1990 Act.

## **Historic England**

No comments.

## **Georgian Group**

The Group raises no objection in principle to the conversion of the building to apartments however we raise the following concerns with the proposed schemes.

132 Drake Street is a fine example of an early-nineteenth-century house of a type and construction typical of the area and period.

The proposed scheme of works is to convert the house to form 8no. apartments involving removal of some walls, introduction of new partition walls, conversion of attic space to form apartments and raising the height of an existing single storey extension.

The Group raises particular concerns about the proposed conversion of the attic space with the introduction of rooflights to the front roof slope and dormers to the rear roof slope. We likewise raise concerns over the proposed raised height of the existing single storey extension.

### **Attic Conversion**

The Group raises significant concerns that the proposed attic conversion will result in a considerable level of harm to the building through the introduction of the required dormers and rooflights required for its illumination. The specific concerns with the dormers and rooflights are explored below. We advise that the requirement for the attic conversion is poorly explained within the supporting documentation and is neither clearly nor convincingly justified. The attic and associated works therefore immediately fail to meet the requirements of NPPF (2021) paragraph 200 viz. *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification*

### **Rooflights**

We raise significant concerns over the proposed rooflights to the House, we recommend that rooflights over the principal elevation of the house would harm the fine proportions and composition of the house.

We therefore advise that the proposed rooflights presently fail to meet the requirements of NPPF paragraph 199. Viz. *'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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

The Group advises further that the harm these rooflights would cause to the overall character and aesthetic value of 132 Drake Street, would further harm its contribution to the Rochdale Town Centre Conservation Area and thereby weaken the integrity of

the broader conservation area. We therefore advise that this is contrary to Rochdale Core Strategy policy P2 (1e) and P2 (2a-d).

#### Rear Dormers

The Group further raise concerns that the impact of the proposed rear dormers on the roof structure has not been fully explained or explored within the supporting documentation. The Group therefore recommends that the applicant submits a full photographic timber schedule for the house roof structure; detailing the age and condition of the timbers and any impacts that the proposed rooflight insertions would have on them.

#### Rear Extension

The Group advises that the proposed raising of height of the rear extension will result in the loss of 2no. windows in the rear elevation of unspecified age or significance. We advise that without further information we proceed on an assumption that both window openings are original to the building and comprise the last unobscured vestiges of the much-eroded historic rear elevation. We must therefore advise that these window openings have considerable evidential value as evidencing the design of the rear elevation and the historic planform of the building.

The proposals to block up 1no. of these windows and convert the other into a doorway would therefore cause some harm to this evidential value, confusing the legibility of the historic planform of the house. The proposal thereby fails to give the due regard to the conservation of the listed building as required by NPPF paragraph 199.

We furthermore advise that the justification for the proposed extension is neither clearly nor convincingly articulated within the supporting documentation and that the proposal thereby further fails to meet NPPF paragraph 200.

#### Conclusion

When making a decision on all listed building consent applications or any decision on a planning application for development that affects a listed building or its setting, a local planning authority must 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. Preservation in this context means not harming the special interest of the building, as opposed to keeping it utterly unchanged. This obligation, found in sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (1), applies to all decisions concerning listed buildings. Under section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 they also have a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

The Group recognises the poor condition that 132 Drake Street is in, and we welcome the overall proposal to return the house to use as residential apartments. We advise however that the proposed works would cumulatively cause considerable harm to the special architectural and historical significance of the building as Grade II listed heritage asset and would thereby also cause harm to the character and integrity of the surrounding conservation area.

We advise that the proposed 8no. apartments is too many to be sustainably accommodated within the listed building without causing harm and that the proposed extra 2no. apartments in the attic are poorly justified. We therefore recommend that the number of apartments is reduced to a more sustainable number, omitting the proposed attic conversion. We further recommend that the applicant submits additional and improved supporting documentation, particularly a window schedule and a timber schedule.

The Group therefore recommends that the applicant withdraws this proposal and revises it to address the above objections. If the applicant is unwilling to do so, Listed Building Consent should be refused.

## **REPRESENTATIONS**

Letters of notification were sent to surrounding neighbours, a site notice was placed in the vicinity of the site and a press notice was released. No responses have been received.

## **ANALYSIS**

No. 132 Drake Street is a Grade II listed building that was extant by 1824 and is an example of the late Georgian development of the area. It is an attractive red brick two storey building, originally constructed as a dwelling and retains a number of original features, including the door surround. Originally constructed as a private house, it came to be used as the Board of Trade Labour Exchange in the 20<sup>th</sup> century. The building is listed at grade II for its special architectural and historic interest. It is currently vacant and in a poor state of repair. It also appears to have undergone some recent, unauthorised alterations, including the insertion of UPVC windows. The special architectural and historic interest of the building is reflected in its listing at grade II.

Paragraphs 126 and 130 of the National Planning Policy Framework (NPPF) state that good design is a key aspect of sustainable development and that planning policies and decisions should ensure that developments function well and add to the overall quality of the area and are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

Paragraph 197 of the NPPF states that *“In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness”*.

Paragraph 200 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 202 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.’*

The Planning (Listed Buildings and Conservation Areas) Act 1990 refers to the ‘preservation’ or ‘enhancement’ of the special architectural or historic interest of the heritage asset or its character and appearance. The NPPF sets out in Chapter 16 of the document decision-making policies using different terminology, referring in particular to ‘conservation of significance’. It is important to note that ‘conservation’ and ‘preservation’ are concerned with the management of change in a way that sustains a heritage asset’s special interest or significance. However, ‘conservation’ has the added dimension of taking opportunities to enhance significance where opportunities arise and where appropriate.

Policy P2 of the adopted Core Strategy states that the Council will protect the Borough’s heritage by conserving, enhancing and promoting key heritage assets,

both statutory and non-statutory, including consideration of their wider settings. Saved UDP Policy BE/17 only permits development that preserves or enhances the character and appearance of the conservation area. Section 72 of the Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended) requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

Policy P3 of the adopted Core Strategy requires all new developments, regardless of location in the borough, to adhere to high standards of design. Policy DM1 of the Core Strategy states that all development proposals will be expected to demonstrate that they are of high quality design and take the opportunity to enhance the quality of the area, in addition to requiring a number of other basic planning considerations.

### **Assessment of proposed works**

In considering the acceptability of the proposed works, these are each addressed in turn below.

#### *Dormer windows*

The application proposes the construction 2 no. large dual pitched dormer extensions to the rear roof slope of the building.

These dormer windows would not be modest in size in line with the recommendations of the Guidelines & Standards for Residential Development SPD, and would appear visually bulky dominating the rear roofslope, raising concerns regarding their impact on the host structure. These concerns are further compounded by their siting, which would clearly viewable from the streetscene when viewed from Moore Street.

The proposed dormer windows would therefore appear as incongruous additions to the structure and streetscene, and which would detract from the character and appearance of the site and surrounding area. These extensions would result in less than substantial harm to the significance of the designated heritage asset.

#### *First floor rear extension*

The application also seeks consent for the construction of a first floor rear extension, above an existing single storey flat roof element.

Whilst it is noted that this extension would mimic features of other rear elements, with the dual pitched roof and similar finish, the size and massing of the extension would appear inappropriate adding to the visual bulk of the rear of the site.

Furthermore, the positioning of this extension would obscure original elements including the rear elevation and flank wall of the existing two-storey outrigger, in addition to blocking up existing windows, one of which appears to be original. The proposed extension would therefore result in both obscuring parts of the historic fabric of the site, and result in a loss of historic fabric via the blocking up of an original window. It is therefore considered that the proposed first floor rear extension would have an unacceptable impact on the character and appearance of the site and surrounding, and result in less than substantial harm to the designated heritage asset.

#### *Alterations to the fenestration*

The application also seeks consent for a number of alterations to the fenestration. This includes the installation of 5 no. roof lights to the front roof slope, and 1 no. roof light to the rear roof slope.

A key detail of the site which provides its architectural significance is the front elevation, including its unbroken and bare front roof slope. The installation of the proposed roof lights onto this roof slope would result in a cluttered appearance, which would detract from the proportions and composition of the existing building. These would therefore have an unacceptable impact on the character and appearance of the site and surrounding area, and would result in less than substantial harm on the designated heritage assets.

It is noted that the proposed individual roof light to the rear roof slope, would be minor in scale, and could be considered an appropriate addition to the existing building, with proper justification. However, no justification has been given for this addition.

The application also seeks consent for the installation of a number of windows across the ground, first and second floor.

The application form indicates that these existing windows are timber with a white finish, and any proposed windows would match the existing. However, it appears that a number of uPVC windows have been installed in recent years without authorisation. Timber windows should be reinstated, and installed throughout, details of which would be required by condition. Furthermore, in the event of an approval, the reinstatement of these windows would be included in schedule of repairs and reinstatement to be carried out by the application, which could be secured via a condition.

#### *External Wall*

The application also proposes the removal of an existing rear wall of the rear service yard.

The removal of this would not detract from the character of the site, due to its limited visual impact. This wall appears to have been constructed over various phases, with the majority constructed in red engineering brick. Considering the walls limited architectural or historic significance, its removal would not result in any harm on the significance of the designated heritage assets. In the event of an approval, details of the removal of this wall would be included within the conditioned schedule of repairs, reinstatements and external works.

#### *Internal Works*

The application also seeks consent for a number of internal alterations at ground, and first floor level. This includes the insertion of subdivisions and the partial demolition of original walls.

The further subdivision of rooms and the removal of historic fabric would result in less than substantial harm to the significance of the heritage asset.

Within the loft space, the application also seeks to convert this area to residential accommodation for two apartments. Roof spaces often retain significant amounts of historic fabric, as they are likely to have undergone fewer changes than the main habitable rooms.

Whilst it is noted that the proposed dormer windows and roof light's to a facilitate this conversion are considered to result in harm to the heritage asset, further information

is required including a survey of the roof and timbers existing, to properly assess the extent of harm or loss, result from the changes to this roof space.

### *New Dwelling*

An application has been submitted for planning permission for the construction of a new two storey dwellinghouse on an area of hardstanding to the rear of no. 132 Drake Street. Whilst it may be considered that this proposed dwellinghouse would result in harm to the significance of the listed building, as the proposed dwellinghouse is situated outside of the curtilage of the designated heritage asset, its impact will not be considered within the analysis of this recommendation.

In conclusion, the proposal would visually detract from the character and appearance of the site, result in a loss of historic fabric, and fail to sustain and enhance the historic and architectural significance of the designated heritage asset, resulting in less than substantial harm to the Grade II listed no. 132 Drake Street. Furthermore, insufficient information has been provided to assess the impact of the proposed loft conversion on the heritage asset.

### **Impact on Listed Building – Balancing Exercise**

The NPPF requires, where harm to a heritage asset is identified, that a balancing exercise is undertaken with respect to the public benefits of a scheme. Paragraph 199 of the NPPF requires great weight to be given to the assets conservation.

The proposal would result in less than substantial harm to the significance of these designated heritage assets. It is not considered that the clear and convincing justification required to comply with NPPF paragraph 200 has been provided. Furthermore, insufficient information has been provided to assess the impact of the proposed loft conversion on the heritage asset.

It is acknowledged that the existing building is currently vacant and in a poor state of repair. However, the proposed works would result in a considerable degree of harm to the listed building. It has not been demonstrated that the proposals are the only means of bringing the building back into use, and as such it cannot be considered to be its optimum viable use.

The level of harm to the significance of 132 Drake Street would not be outweighed by the public benefits associated with the development.

The proposal would fail to preserve the special interest of the listed building and would neither preserve nor enhance the character and appearance of the conservation area. It would not meet the tests set out within the 1990 Act.

### **RECOMMENDATION**

#### **REFUSE for the reason(s):**

1. Insufficient information has been provided to assess the impact of the proposed loft conversion on the Grade II listed building. Notwithstanding this insufficient information, the development would detract from the character and appearance of the site and fail to sustain and enhance the historic and architectural significance of the heritage asset, in addition to result in the loss of historic fabric, which would result in less than substantial harm to the significance of the designated heritage asset. The less than substantial harm would not be outweighed by public benefits and the development would fail to preserve the special interests of the listed building. The application is therefore contrary to policies P2 and P3 of the adopted Rochdale Core

Strategy, the National Planning Policy Framework and the Planning (Listed Buildings and Conservation Areas) Act 1990.

**Notes for Applicant:**

For the avoidance of doubt, this decision relates to the following plans:

- PL01 Proposed conversion of existing listed building into eight flats 7 one new detached dwelling to rear
- PL02 Proposed conversion of existing listed building into eight flats 7 one new detached dwelling to rear
- PL03 Proposed conversion of existing listed building into eight flats 7 one new detached dwelling to rear

Report Author Jake Powell