

HERITAGE & CONSERVATION CONSULTATION RESPONSE

Application Details

Heritage, Conservation & Design team officer

Catherine Fenghour

Date

17 June 2026

Application reference

PL/2026/0411 and PL/2026/0412

Address

Holy Trinity Parkfield, Sunny Brow Road, Middleton, M24 4AX

Proposal

PL/2026/0411 - application to vary conditions 2 (plans), 9 (external materials) and 14 (tree protection) and to remove conditions 11 (air source heat pump) and 15 (planting details) of planning permission 23/00718/FUL

PL/2026/0412 - application to vary condition 2 (plans) and remove condition 4 (existing original timber features) of listed building consent 23/00719/LBC

Affected Heritage Assets

Designated heritage assets

- Holy Trinity Parkfield (grade II)

Non-designated heritage assets

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Summary

I cannot support the current proposal for amendments to the approved permission. Insufficient information has been provided for some elements, while other elements, such as the use of reconstituted stone would cause a greater degree of harm to the significance of the asset, which has not been justified.

Assessment

Site description and significance

Holy Trinity Church is a mid-19th century, constructed of coursed stone beneath a slate roof. The Church was designed by a local architect, George Shaw of Uppermill.

The Church is listed at grade II and has highly significant features including the stained-glass windows and finely carved stone reredos of the Last Supper within the Chancel. Other original features include the pews and choir stalls. The World War One memorial plaque referred to in the listing description has been moved to another site.

The Church is listed at grade II for its architectural and historic interest. It has laid vacant since being deconsecrated. Planning permission and listed building consent were granted in February 2025 for the conversion of the Church into a single dwelling.

Relevant legislation and planning policy

Planning (Listed Buildings and Conservation Areas) Act 1990

Sections 16(2) and 66(1) require the local planning authority to 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)

Chapter 16 deals with conserving and enhancing the historic environment. Paragraphs 207 to 215 set out how proposals affecting designated heritage assets should be assessed. Paragraph 212 states 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. [...] This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

Paragraph 213 confirms that *“any harm to, or loss of, significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), 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 deal with preserving and enhancing the borough’s heritage. These policies confirm that proposals will be determined in accordance with national planning policy.

Assessment of proposals

PL/2026/0411

Proposed variation of conditions:

Condition 2 – approved plans

- The proposed changes appear to relate largely to the internal layout – these are listed building matters rather than planning matters and are considered below under PL/2026/0412
- The revised plans show 1.8m high railings along the boundary. No details appear to have been provided of these railings? These details are required so that the impact of the development can be properly assessed. There are concerns that railings of the height proposed in a prominent position along the frontage of the site would detract from the setting of the Church.

Condition 9 – external materials

- The garage as approved is a large and incongruous structure, which would detract from the setting of the listed building. It was approved as part of the planning application balancing exercise, where the less than substantial harm arising from the proposal was weighed against the public benefits stemming from the proposal, including bringing the vacant building back into use.
- The use of a natural stone was important to minimise the visual harm caused by the garage and ensure an appropriate match with the Church. It was made clear in the officer's report accompanying the planning permission that the use of recon stone would not be supported. Recon stone, which is made of crushed stone and cement is often a poor match for natural stone on historic sites, as it lacks the variations in texture and appearance and weathers differently. No justification has been put forwards for this change, which would cause a greater degree of less than substantial harm to the significance of the designated heritage asset than the approved scheme.

Condition 14 – tree protection

- No heritage comments

Removal of conditions

Condition 11 - air source heat pump

While there are no objections to the removal of this element, it is noted that part of the justification for the garage was to house the associated plant and equipment. With this element omitted, the justification for a garage of the size proposed is unclear.

Condition 15 – planting

- No heritage comments

PL/2026/0412

Variation of condition

Condition 2 - approved plans

- The revised plans show the existing ground floor to be replaced in its entirety with limecrete. The application form states that this is required due to extensive rotting and the requirement to cut out large parts of the floor to accommodate the first-floor structure.
- No additional information appears to have been provided in relation to the floor condition. Has a timber survey been recently carried out of the floor to inform this conclusion? Existing fabric should be retained wherever possible. Further information is required to justify the loss of the flooring and the subsequent harm to significance stemming from the loss of historic fabric.

Condition 4 – schedule of repairs

The applicant has provided some revised wording for this condition. However, this revised wording is not clear and does not match the approved plans. The revised wording relates solely to timber features. It also states that all timber features will be retained unless deemed structurally unviable. It is not clear who would determine this.

The existing condition is not limited to timber features. It is important that the schedule of repairs is not limited to the woodwork. Instead, it should cover all features of interest in the building, which are to be retained.

No justification or explanation has been put forwards for this change. Given the uncertainties and the focus on timber repairs only, the revised wording proposed by the applicant is not supported.

Re-consultation

Yes – in the event of any changes.