

HERITAGE & CONSERVATION CONSULTATION RESPONSE

Application Details

Heritage, Conservation & Design team officer

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Date

11 August 2026

Application reference

25/01088/FUL and 25/01089/LBC

Address

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

Proposal

[AMENDED PLANS] Conversion of existing church to a single-family dwelling including formation of a 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

Some matters still outstanding

Assessment

Please read in conjunction with previous comments. This response relates solely to the amendments – new comments in purple

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.

The Church Commissioners have provided a letter, which sets out the legislative framework for closed churches, as well as details of the marketing and interest in the Church. Based on the information provided, it has been demonstrated that there has not been any viable interest in the Church for non-residential uses.

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.

The organ panelling is now shown to be retained.

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.

The revised plans appear to show some of the pews to be retained sited around the edges of the nave, but these are not annotated. Likewise, the choir stalls also appear to be shown for retention but should be annotated as such.

Please can the demolition plan be annotated, to state that the areas in red are for demolition (if this is the case, as assumed) and the proposed ground floor plan annotated, so all elements being retained are clearly shown and annotated.

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.

The revised plan shows the font to be retained. The organ area is shown on the proposed plans, but it is not clear if the organ itself is proposed to be retained. The heritage statement should be updated to confirm that these elements would be retained.

The plans appear to show the pulpit and altar being retained. These should be annotated for clarity.

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.

A scheme for the relocation of this window should be submitted by condition. This is required to ensure that it is not damaged during relocation, and that the location is publicly accessible and will provide a long-term secure home for this war memorial.

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.

A section has been provided, although there is some uncertainty regarding how the new partitions would sit with the existing columns (as they appear to overlap on the section drawing). It would be useful if an indicative elevation and plan of the relationship could be provided.

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.

The submitted section shows a new floor to be installed above. this should be annotated and a large-scale section of the floor build up shown. This is required to minimise harm to the existing floor as a result of the works.

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.

No further details appear to have been provided?

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.

No further details appear to have been provided?

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.

The revised plans show a low-level stone wall with native heading. Full details of boundary treatments (including samples of stone and details of coursing etc), as well as hard and soft landscaping should be required by condition.

Conclusions

While some matters have been addressed, there are still outstanding issues, including those raised by the Victorian Society and Historic Buildings and Places. These need to be addressed prior to the applications being determined.

Re-consultation

Yes