HERITAGE & CONSERVATION CONSULTATION RESPONSE

Application Details

Heritage, Conservation & Design team officer

Catherine Fenghour

Date

5 November 2026

Application reference

25/00584/FUL and 25/00585/LBC

Address

37 Rochdale Road, Middleton, M24 2PT

Proposal

Subdivision of single dwelling into two dwellings with associated internal alterations, structural repairs, replacement of windows and doors, car parking and hard landscaping

Affected Heritage Assets

Designated heritage assets

- 37 and 39 Rochdale Road (grade II)
- 33 and 35 Rochdale Road (grade II)
- 1 Towncroft Avenue (grade II)
- 51 and 53 Rochdale Road (grade II)
- Middleton Town Centre Conservation Area

Non-designated heritage assets

- 34 to 48 Rochdale Road

Summary

See comments below

Assessment

Site description and significance

The application site forms one half of a pair of semi-detached houses, designed by notable Middleton born architect, Edgar Wood. Built in 1892 in the Art Nouveau style, it sits within a wider

group of his buildings, which include 1 Towncroft Avenue, 33 and 35 and 51 and 52 Rochdale Road, all of which are also listed at grade II. Across the street, there is a terrace also designed by Edgar Wood (34 to 48 Rochdale Road (evens)). This terrace has been heavily altered but is still of some architectural interest and owing to its links to Edgar Wood, is identified as a non-designated heritage asset.

37 Rochdale Road is built in red brick with a front bay and gable. The houses are imposing features within the streetscene, owing in part to their three-storey height and distinctive Art Nouveau inspired architecture. 37 Rochdale Road was last used as a hotel but has been vacant since the hotel closed, several years ago. 39 Rochdale Road is occupied as a residential dwelling.

In 2020 Planning permission and listed building consent were granted for the subdivision of the house into two properties (19/01310/FUL and 19/01311/LBC refer). These permissions were subject to various conditions, requiring the submission of additional information.

An application to discharge conditions on the above planning permission and listed building consent was made in June 2020 (20/00624/DOC and 20/00625/DOC refer). The information provided to discharge these conditions was for the most part insufficient. The only conditions discharged related to details of the build-up of the ceilings (condition 7 on 19/01311/LBC) and landscaping (condition 7 on 19/01310/FUL).

Despite key conditions having not been discharged, work started on the site. The works were not carried out in accordance with the approved plans. The front bay and rear elevation were demolished, along with various internal walls. Floor joists were also replaced in part of the building. The rear wall and internal walls were rebuilt in breezeblock, with the rear covered in cementitious render. A structural report and a detailed repair specification were required by condition. A structural report was submitted as part of the discharge of conditions applications. However, this condition was not discharged, due to a lack of information. In any case, the submitted structural report proposed localised rebuilding. It did not propose demolition of the scale carried out. Nor did it propose the rebuilding of demolished walls in breezeblock.

The works carried out were unauthorised and did not benefit from either planning permission or listed building consent. The LPA was informed of the works by the Health and Safety Executive (HSE), who served a prohibition notice on the site, due to health and safety concerns. Works stopped on site in Spring 2022. The building has sat vacant since this time, although it is now in new ownership.

It is the view of the local authority that the unauthorised works have caused substantial harm to the significance of this designated heritage asset, through the loss of historic fabric, use of inappropriate materials, such as concrete breezeblocks and the loss of key architectural features, including the front bay.

Relevant legislation and planning policy

Planning (Listed Buildings and Conservation Areas) Act 1990

When considering applications for listed building consent and planning permission, sections 16(2) and 66(1) respectively require local planning authorities to have special regard to the desirability of

preserving a listed building, its setting or any features of special architectural or historic interest, which it possesses.

Section 72(1) requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character and appearance of Conservation Areas.

National Planning Policy Framework 2026

Chapter 20 deals with conserving and enhancing the historic environment. Policy HE4 confirms that "*any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear and convincing justification...*"

Policy HE6 sets out how proposals affecting designated heritage assets should be considered. This requires local authorities to give substantial weight to an asset's conservation, irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm or total loss of significance. This policy also confirms that "*any harm to a designated heritage asset will be a matter of considerable importance and weight*".

Paragraph 4 of this policy states that "*where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building and enabling energy efficiency and low carbon heating measures to be employed.*"

Paragraph 5 states that "*where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply:*

a. *The nature of the heritage asset would otherwise prevent all reasonable uses of the site;*
b. *No suitable use for the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
c. *Conservation by grant-funding or some form of not for profit, charitable or public ownership is not possible; and*
d. *The harm or loss is outweighed by the benefit of bring the asset back into use."*

Paragraph 6 confirms that "*within this context, development which would cause substantial harm to, or the total loss of, the significance of grade II listed buildings [...] should be exceptional*."

Places for Everyone (PfE)

JP-P2: Heritage

This policy seeks to positively conserve, sustain and enhance the area's historic environment, heritage assets and their settings. It also confirms that proposals will be considered having regard to the national planning policy framework.

Rochdale Core Strategy

Policy P2 deals with protecting and enhancing the borough's character, landscape and heritage. this policy seeks to conserve, enhance and promote key heritage assets, which include the borough's listed buildings and conservation areas.

Assessment of proposals

These applications seek to convert the building into two dwellings, as well as carry out works to restore the building, including the rebuilding of the front bay and rebuilding of the external face of the rear elevation. The proposals also include for the reinstatement of timber windows and architectural features, as well as repair works.

As noted above, the unauthorised works have resulted in a high degree of harm to the significance of the listed building. It is considered that these works have met the threshold for substantial ham to the significance of this designated heritage asset, owing to the loss of key architectural features and the rebuilding works which have been done in inappropriate materials.

The building has been vacant for an extended period, including before the unauthorised works were carried out. The building was also vacant at the time of its listing in September 2017. Internal photographs included in a report by ARS Ltd in April 2016 show the interior of the building to have been largely stripped back to brick, although fragments of the original/historic features remained, including quarry tiles at the entrance, glazed tile hearth and plasterwork with a rose motif in one of the rooms. The long-term vacant nature of the building and its condition at the time of listing are also relevant considerations.

Principle of development

Planning permission and listed building consent were previously granted for the subdivision of the building into two dwellings (19/01310/FUL and 19/01311/LBC refer). The subdivision of 37 Rochdale Road into two dwellings would result in some changes to its historic plan form, through the insertion of a new partition wall and new stairs.

Despite the unauthorised works, the historic plan form is still legible and makes an important contribution to the significance of the asset. The subdivision of the space and the installation of new partition walls would undermine the legibility of the original plan form. As a result, the proposals to subdivide the property into two dwellings would result in a degree of harm to the asset's significance.

The principle of this subdivision has already been established by the previous permissions.

Structure and repair works

37 Rochdale Road is in a poor state of repair. Its current condition stems from both its long-term vacancy, as well as the unauthorised works carried out by the previous owner. In October 2024, a structural report was carried out by Thomasons Structural Engineers. A review of the building's structural condition was carried out in February 2026 by May Structural Engineers. Most recently an addendum to the original structural report was carried out in August 2026 by Thomasons. This recommends temporary propping of the front bay and the replacement of the sheeting and boarding to prevent further water ingress.

Given the condition of the building, it is essential that full details of the repair works are known. This is to ensure that repair works are compatible with the building and to understand the extent of any harm stemming from them. As extensive unauthorised works have already taken place, these details would ideally be submitted upfront as part of the applications. If not, they should be required, prior to any further works taking place. Given the structural implications of the repair works, a report detailing the necessary repairs should be carried out by a structural engineer, ideally one who is CARE accredited.

External works

The proposals include for the rebuilding of the front bay. Ideally a methodology would have been included as part of a repair schedule. Many of the existing bricks and terracotta details survive on site. These should be reused as far as possible. Where additional bricks and terracotta detailing is not available, new materials should match the existing precisely and samples should be provided for comparison on site prior to their use.

The outer leaf of the rear elevation is proposed to be removed and replaced with a brick to match the existing. Samples of this brick should be required on site and a methodology for these works included as part of the repairs condition. It is also important that the brick detailing and stone sills to the rear elevation are reinstated as per the original. The inner leaf of the rear elevation, which was reconstructed in breezeblock is to be retained. While this is not a material considered appropriate for use on historic buildings, in this case it is acknowledged that its removal may result in more harm to the fabric of the building than its retention, as well as having structural implications. It is important that the proportions and position of the original windows are reinstated, which will require alterations to be made to the inner leaf of the rear wall. This should be included within the schedule of repairs.

Samples of any new slates should be required by condition and should be made available for inspection on site.

The proposed plans show timber windows to be reinstated throughout. Amended details of these windows should be required by condition, as the details shown on the plans are not appropriate in design terms. Historic images show sash windows (six over one in the bays and four over one elsewhere) - see heritage statement. The new windows should replicate this original fenestration pattern. Subject to appropriate detailing, the reinstatement of timber windows would be a heritage benefit.

The existing front door is not original and the architrave, which survives on 39 Rochdale Road has been replaced by a square-headed concrete surround. It is not clear if the original architrave survives below. The front doors to no.37 had also been replaced prior to the building becoming listed. The proposed plans show for the reinstatement of an architrave to match that of 39 Rochdale Road. This is welcomed and would be a heritage benefit. A methodology for these works, incorporating any structural considerations should be required by condition. Large scale details of the design should be included within this document.

The plans also indicate that the door would be replaced to match that on 39 Rochdale Road, which is original. Again, this would be a heritage benefit and large-scale details of the door and finish should be required by condition. For the avoidance of doubt, the door should also be fabricated in timber.

Other external works include the reinstatement of cast-iron rainwater goods and the repair and reinstatement of the wall ties. These works would also be a heritage benefit. The rainwater goods should be conditioned to be cast metal and finished black, and the repair of the Fleur-de-Lys and other wall ties should be secured through a schedule of repairs.

Internal works

As noted above, internally 37 Rochdale Road has largely been stripped back to brickwork, with only fragments of the original interior surviving. Some of the works to strip out the interior of the building were carried out prior to it being listed. However, the replacement of walls in breezeblock and the replacement of floor joists has occurred as part of the unauthorised works carried out by the last owner. These surviving fragments include an embossed ceiling at ground floor under the stairs, a small area of wallpaper with a rose motif, elements of lath and plaster, quarry tiles and glazed hearth tiles.

Limited information has been provided in respect of the internal works proposed. Given the internal condition of the building, as with the exterior of the building, full details of the repairs would be required. As with the exterior rear wall, the use of breezeblock is not appropriate given the age of the building. However, given the potential structural implications of removing and rebuilding these walls, it is accepted that they can be retained, subject to the heritage enhancements made elsewhere.

The plans show new partition walls to be treated with plasterboard. However, no details have been provided for the build-up of the existing interior walls, other than saying where lath and plaster survives it will be repaired and retained. Damp proof membranes have been installed internally at ground floor. These would imply that the building has previously suffered from damp. These membranes are not appropriate given the age of the building, and breathable finishes should be reinstated throughout on existing walls. A condition should be imposed to this effect and finalised as part of a schedule of finishes condition. Similarly, a methodology for the treatment of surviving fragments, such as the wallpaper and tiles should be required by condition. This can be included within the schedule of finishes condition.

Details of all service runs should also be required by condition.

Garden and boundary treatments

The existing rear garden of the property is shown to be used for parking for the new houses. The existing rollershutters are shown to be retained. A new 1.8m high close-boarded fence is shown to subdivide the parking areas.

The use of the rear garden for parking would result in less than substantial harm to the significance of the listed building, as would the subdivision of the space with a close-boarded fence. As the area to the rear is proposed to be used for parking, it is queried whether a 1.8m high boundary treatment

is required. In any case, the proposed close boarded fencing is not considered to be appropriate. An alternative boundary treatment should be proposed. This can be dealt with by condition.

Details of the proposed guard wall should be required by condition. This should include samples of the materials to be used on site. No details have been provided in respect of the existing walls. Details of any repair works should be required by condition.

Details of hard and soft landscaping should also be required by condition.

Conclusions

The unauthorised works have caused substantial harm to the significance of 37 Rochdale Road, which is a grade II listed building, as a result of the loss of historic fabric, the use of inappropriate modern materials and the removal of key architectural features including the front bay. These works have also caused harm to the significance of the Middleton Town Centre Conservation Area, through the visual harm to a key listed building in a prominent location along Rochdale Road and the impact on the group of Edgar Wood buildings, which define in large part the character of this part of the Conservation Area. There is also as it stands harm to the setting of 33 and 35 Rochdale Road, as a result of the condition and appearance of the building, with its missing front bay.

The current scheme seeks to reinstate some of the lost features and bring this important listed building back into use.

There are elements of the proposed scheme, which would be harmful to the significance of the listed building. These include:

- The subdivision into two dwellings and the impact on the original plan form
- The retention of breezeblock walls to the rear and internally.
- The subdivision of the garden and the proposed close-boarded fencing

Additionally, while these applications seek to undo much of the harm caused by the unauthorised works, this harm cannot be fully undone, given the damage and loss of historic fabric. While it is possible to replicate elements, fabric lost cannot be restored, only replicated.

Further information is required in respect of repairs and finishes and ideally this would be provided up front given the unauthorised works which have taken place. This information is required to ensure that the extent of repairs is fully understood and that the repairs are compatible with the building's construction and age. If not provided up front, then this should be provided further to any other works being undertaken.

With the removal of various unauthorised elements, it is considered that the proposal would considerably reduce the overall level of harm through the removal of some inappropriate fabric and the reinstatement of key architectural features, including the front bay. There would nevertheless still be a degree of harm to the significance of 37 and 39 Rochdale Road, given the loss of historic fabric and the retention of some aspects which are harmful, such as the breeze block walls. In accordance with NPPF paragraph HE6 this harm is a matter of considerable weight and importance.

It is considered that the proposals to restore the building and its principal facade would achieve a neutral impact on the significance of the Conservation Area and 33 to 35 Rochdale Road.

In the case of the breezeblock walls, there is clear justification for their retention, given the potential structural implications of rebuilding.

There are clear public benefits associated with the proposal. The building has been vacant for many years since the closure of the hotel. It is also in a dilapidated state and without intervention will continue to deteriorate.

The conversion into two dwellings would provide a viable use, ensuring the long-term future of the building. Given the size of the property and the relatively small gardens, it is considered unlikely that it would be brought back into use as a single dwelling. In accordance with the NPPF, great weight should be given to the asset's conservation.

The submitted plans show the reinstatement of historically appropriate elements, including timber windows, cast iron rainwater goods, and replacement front door. It also proposes essential repair works to address and minimise the impact of the unauthorised works. These include the reinstatement of the outer brick leaf to the rear wall, the rebuilding of the front bay and the repair of decorative features and finishes both internally and externally reinstatement of decorative features including wall ties, lathe and plaster and floor tiles. The reinstatement of appropriate features would be a considerable heritage benefit and should be ensured by condition.

As noted above, there would continue to be a degree of harm to the significance of the listed building, owing to the residual impacts of the unauthorised works, the retention of inappropriate materials, including breezeblocks and the subdivision of the building. However, this harm is considered to have been justified, given the potential structural implications of removing the breezeblocks and the need to find a viable use for the building to prevent its further deterioration and potential loss.

Subject to the realisation of the heritage benefits identified, it is considered that the harm stemming from the proposal would be outweighed by the public benefits. However, this would only be the case, where all the reinstatement proposals are made. The watering down of the scheme or the omission of key improvements, is likely to tip the balance between public benefits and harm against the scheme.

The following conditions should be imposed on any approval:

1. Time limit
2. Approved plans
3. Carrying out of urgent works set out in structural report
4. Schedule of repairs
5. Details of service runs
6. Bricks and tiles
7. Rainwater goods
8. Window and door details
9. Boundary treatments

Re-consultation

Yes