

Lambert Smith Hampton

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Planning Supporting Statement

For

Spotland Bridge New Mill Ltd

In respect of

Spotland Bridge New Mill

Prepared by
Lambert Smith Hampton
3 Hardman Street
Spinningfields
Manchester
M3 3HF

Tel: 0161 228 6411
Fax: 0161 228 7354
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1. Introduction

1.1 This Planning Supporting Statement [PSS] has been prepared on behalf of Spotland Bridge Mill Ltd [SBML] in respect of a property known as Spotland Bridge New Mill ["the Mill"]. The Mill's address is Spotland Bridge New Mill, Spotland Bridge, Rochdale, and it is located at the junction of Spotland Road and Bridgefold Road. The Local Planning Authority for the area is Rochdale Council ["the Council"]. The Mill complex comprises a group of buildings built in two main phases.

1.2 The PSS is submitted in respect of two separate but linked applications for Listed Building consent. The first application seeks consent to allow retrospective and proposed works to the building to allow it to be occupied as B1 office accommodation. The second application seeks consent to allow the replacement of existing windows within the Mill

1.3 The Mill is "Listed" for the purposes of Section 1 of the Planning (Listed Building & Conservation Areas) Act 1990 as being a building of "special architectural or historic interest". SBPL have engaged the services of a specialist in conservation issues and heritage assets – Mrs Marion Barter of Marion Barter Associates ["MBA"] to advise on the Mill, its significance and the potential impact of proposed works. MBA have prepared two report discussing certain aspects of the Mill in the context of the two applications mentioned above, the MBA reports accompanies this PSS and the two documents should be read in parallel. The MBA report contains a full copy of the List Entry at its Appendix 1. The MBA report adopts a description of the different elements of the complex as follows;

- Building 1: West Mill of circa 1833
- Building 2: Engine House of circa 1833 altered circa 1935
- Building 3: Boiler House of circa 1833 altered
- Building 4: Chimney of circa 1833
- Building 5: House of circa 1833 altered and
- Building 6: Warehouse of 1895, with floors added 1910 and 1912

1.4 This PSS has been prepared following a meeting with the Head of the Council's Planning Department. The proposed works are articulated with the application drawings and the MBA reports and it does not accompany an application for "Listed Building Consent". The objective of the applications is to establish an agreed sustainable solution to ensure long term future of the Mill in an appropriate manner and in such a way that it can be enjoyed for its contribution to the quality of life of existing and future generations

The principal Directors of SBML have experience of owning other Mill buildings within Rochdale area; their aspiration is that the Mill be capable of being re-used as a high quality business centre which provides efficient, viable and useable business accommodation for local and regional businesses. **In summary they aspire to restoring the Mill to full and beneficial occupation in such a way that will allow it to contribute to the local economy.** We believe that this process will ultimately entail the Council reaching a balanced planning decision in which planning harm is weighed against planning benefit and a nuanced planning judgement reached. We note at the outset that this balancing exercise will require some recognition of the viability challenges facing SBML.

2. The Site and its Location

2.1 The Site of the Mill building ["the Site"] and its general location will be known to the Council and we do not therefore propose to provide a detailed site description. Nor do we propose providing a description of its heritage significance as this is provided in the MBA reports to which we refer later. The Site contains several buildings and a large area of hardstandings its general location is shown on the Plan at Appendix A. The Site the subject of this Statement is shown in the Plan attached as Appendix B to this PSS.

2.2 The Mill lies approximately 1km to the north west of Rochdale town centre within the existing urban area. The Mill and the site upon which it sits is previously developed land. The Mill lies in an accessible location being less than 150m from a bus stop which provides access to a high frequency bus route. The Mill historical use has been for uses falling within classes B1, B2 & B8 of the Town & Country Planning Uses Classes Order. Whilst a modest minor change of use is sought in relation to part of the Mill which is the subject of a separate application for planning consent, the ongoing use is intended to remain unchanged. Whilst historically the Mill has been granted both planning and listed building consent in the past to allow its conversion to a residential apartment, the current proposals of SBML envisage that the Mill will remain in active employment use. An active employment use is consistent with its historical development and therefore has heritage benefits to the understanding of the building context and purpose and also delivers long term employment opportunities for the town

2.3 As discussed above a more detailed description of the Mill is contained in the two MBA reports. We have however in the light of the fact that one of the applications for listed building consent seeks approval for the replacement of existing windows within the Mill included several photographs of the existing windows showing their poor state of repair as Appendix C to this PSS.

3. Planning History

3.1 The Mill's Planning History as it appears online on the Council's website indicates recognition of the need for the Mill to undergo substantial changes to maintain it in active use. The planning history as recorded is set out below: -

- 83/D15327 Spotland Bridge Mill Spotland Bridge Rochdale Change Of Use From Dress Manufacturers To Retail \ Wholesale Warehouse – Details not available

- 08/D51590 | Internal and External Alterations to Existing Listed Mill Buildings to Allow Mixed Use Development | Spotland Bridge, New Mill, Mellor Street, Rochdale – Granted subject to conditions 17/03/2009

- 08/D51589 | Change Of Use And Refurbishment Of Existing Buildings Including New Story To East Mill To Provide Mixed Use Scheme Comprising 84 Apartments, 1079 SQ M Of Commercial Floorspace (B1/B2) With Associated Car Parking And Landscaping | Spotland Bridge, New Mill, Mellor Street, Rochdale – Granted subject to conditions 18/03/2009.

- 11/D54883 | Application For A New Planning Permission To Replace An Extant Planning Permission (D51589) For Change Of Use And Refurbishment Of Existing Buildings Including New Storey To East Mill To Provide Mixed Use Scheme Comprising 84 Apartments, 1079 SQ M Of Commercial Floorspace (B1/B2) With Associated Car Parking And Landscaping | Spotland Bridge New Mill, Mellor Street, Rochdale – Granted subject to conditions 04/01/2012

- 11/D54884 | Change Of Use And Refurbishment Of Existing Buildings Including New Storey To East Mill To Provide Mixed Use Scheme Comprising 84 Apartments, 1079 SQ M Of Commercial Floorspace (B1/B2) With Associated Car Parking And Landscaping | Spotland

3.2 The Mill's Planning History demonstrates that the consents grated in 2012 envisaged that not only would Mill undergo significant physical change, it would also move away from its "traditional" commercial use, becoming primarily a building used for residential purposes. As we have highlighted above the SBML proposal envisages that the Mill should remain in commercial use

4. The Proposal

4.1 SBML's objective arising out of the two applications for listed building consent is to establish the Mill as a high-quality sustainable business centre. SMBL are in current discussions with a number of potential occupiers of the proposed accommodation. One of these occupiers is the local health care trust who wish to occupy a floor of the Mill. The Directors of SBML have a track record in delivering such developments in Rochdale. Blue Pit Mill provides just similar accommodation for a range of local and regional businesses.

4.2 SBML aspire that the Mill should become a "business centre" similar in character and quality to Blue Pit Mill. Photographs of Blue Pit Mill are contained at Appendix D. Details of the "Blue Pit Community" can be found at www.bluepitmill.co.uk.

4.3 The Historic England publication "Engines of Prosperity: new uses for old mills" ["the EoPnufom report"] describes how properties such as Spotland Bridge New Mill offer an opportunity to provide much needed commercial floorspace:-

> *"Creating additional commercial floor space for new and growing businesses is at the heart of the Strategic Economic plans for Greater Manchester and Lancashire. The 1,996,597, sq m of vacant mill floor space provides an excellent opportunity to meet this needs"*

4.4 Applying a standard employment density as per advice published by Homes England, the Mill has the potential to generate in the region of 150 jobs.

	Approach
Existing Floor Area	4014 sq. m GIA Mill building currently vacant
Appraisal	4014 x (100 -15) % = 3412 sq. m NIA Or 4014 x (100 -20) % = 3211 sq. m NIA Assume an average of 3412 + 3211 = 6623 / 2 = 3312

4.5 Assuming that the Mill would be used in the same way as Blue Pit Mill the Homes England document advises:-

> *"A managed workspace is commercially rented serviced premises from which small businesses can trade. The delivery of managed workspace could potentially accommodate a range of spaces, from small office suites through to workshop and light industrial units. The principal focus of these spaces is on providing more formal, individual spaces for small and start-up businesses with a number of shared facilities such as meeting rooms and reception services with an onsite management. These tend to be orientated towards meeting 'general' business needs rather than target specific sectors or activities".*

4.6 The guidance goes on to suggest that Employment Densities for a Managed Workspace range between 12 - 47 FTE jobs per sq.m. Based upon the experience of Blue Pit Mill we have assumed a figure of 20 FTE jobs per sq.m.

4.7 Thus following the Homes England advice and assuming a 10% vacancy rate the potential

that the Mill represents maybe calculated as follows:-

	Approach
Appraisal 20 sq.m	3312 / 20 = 166 FTE
Assumption as to vacancy rates	3312 x (100 -10)% = 2981 2981 / 20 = 150 FTE

4.8 Thus one of the key benefits in delivering the regeneration / restoration of the Mill is the potential to accommodate in a accessible location in a sustainable manner

4.9 The EoPnufom report lists a number of key ingredients for successful mill reuse. First within that list is:-

"Recognition of viability challenges facing owners in securing occupiers"

4.10 The same report also recognises that:-

- *Where mills are located in unfavourable market locations there is often insufficient certainty form an occupier perspective to make an investment proposition viable*
- *Heritage assets are still viewed by some institutions as a non-mainstream investment class*
- *There is limited appetite for forward funding genuinely speculative projects in any property class let alone one involving bringing back to use a derelict listed asset"*

4.11 Enquires made by MBA associates also indicate that there is very little prospect of grant aid to support viability in this instance, representing a further challenge.

4.12 The site planning history as previously discussed demonstrates that the site has been available with both the necessary planning and listed building consents to allow it to be brought forward for conversion and reuse for the last 11 years. Despite the existence of the consents the site has not been successfully regenerated, we believe that this bears witness to the clear difficulty associated with the delivery of regeneration projects of this nature.

4.13 SBML are of the view that key to the issue of viability is the nature of the windows.

4.14 It is clear from inspection that the current "wooden" windows in the Mill site are in poor condition and failing as shown in the photographs attached at Appendix A . It is SBML view that standard window maintenance procedures are simply not viable given commercial property rents within Rochdale. Paragraph 4.6 of the MBA report notes that the current windows are not original stating:-

"These windows are replacements for the originals 1830s windows, and are probably of late 19th or early 20th century date, made from pine"

4.15 Further not all of the windows have been replaced using the original 9-pane design. The report continues:-

"Where the 9-pane mill windows have been replaced with larger-paned windows to different designs probably in the 1930s or later in the 20th century, these later windows have low significance"

In considering the significance of the windows the MBA report concludes:-

"In summary, the 9-pane windows contribute to the significance of the mill, but are not its most important element; due to the vast scale of the building, the window details are relatively incidental to the character of the elevations, compared with say, a listed cottage where the details of the windows would be proportionally much more important to the overall significance of the building"

4.16 The proposal is therefore to replace all the individual windows within the Mill. (Building 1) The preference is for replacement with slim profile PVC-U windows.

4.17 SBML believe that recognition, as part of a balanced planning judgment, that the current windows within the Mill can be replaced is essential to moving forward with the regeneration of the Mill given viability issues. From analysing the likely initial costs to resolve the current issues it is clear that PVC-U is the most cost effective solution both in terms of both implementation costs and ongoing maintenance costs.

4.18 Furthermore, analysing ongoing maintenance costs of PVC-U windows it is clear that this would be significantly more cost effective than wood. The ongoing maintenance cost could not be absorbed by either SMBL or prospective occupiers in the context of prevailing rents and accordingly the clear public benefits would be thwarted.

4.19 The cost of replacement and maintenance is set out below;

Wooden Window Cost	Total	Comment
350 x £2,350 each + VAT	£822,500	New 9 panel hardwood double glazed wooden window with opener to match existing supply only (unpainted)
350 x £ 175 each + VAT	£61,250	To undercoat and paint window before installation
350 x £166.66 + VAT	£58,333	350 at 3 per day installed by 2 men costing £250 each in labour
350 x £20 + VAT	£7,000	Fixings and silicone for each window
Access equipment	£15,570	scaffold and cherry picker for 23-26 wks
TOTAL	£964,653	

Aluminium Window Cost	Total	Comment
350 x £1106.70	£387,345	New Aluminum profile double glazed window powder coated black on black with opener and trickle vent to comply with building control recommendation. Using the thin profile alum frame to give the appearance of wood.
350 x £87.50 + VAT	£30,625	350 at 4 per day installed by 2 men costing £250 each in labour

350 x £20 + VAT	£7,000	Fixings and silicone for each window
Access equipment	£11,976	Scaffold and cherry picker for 18-20 wks
TOTAL	**£436,946**	

PVC Window Cost	Total	Comment
350 x £280 each + VAT	£98,000	New 9 panel PVC-U double-glazed window Black on Black with opener and trickle vent to comply with Building control recommendation. Using the thin profile PVC-U frame and transom to give the appearance of wood
350 x £87.50 + VAT	£30,625	350 at 4 per day installed by 2 men costing £250 each in labour.
350 x £20 + VAT	£7,000	Fixings and silicone for each window.
Access equipment	£11,976	Scaffold and cherry picker for 18-20 wks.
TOTAL	**£147,601**	

4.20 Additional costs incurred if wooden windows were to be installed, would be (on a 5-year rotor) the need to repaint all windows;

£63,700	-	2 men painting 3 windows per day 26 week program
£9,090	-	Access equipment hire including transport to and from site and diesel whilst in use
£6,480	-	Scaffold access to East mill east elevation and West mill south elevation 5week program
£2,625	-	Paint and materials
£81,895	-	**this assumes a perfect situation with no bad weather or breakdowns re the access equipment, an estimate of a 10-15% contingency would be circa £8-£12k**

4.21 It is clear from the above that the financial implications of requiring replacement wooden windows in the context of prevailing rents for managed workspace would render the project unviable. Even were wooden windows to be used the ongoing maintenance costs of wood would mean that the building's service charge would be uncompetitive.

4.22 SMBL would be committed to deliver the regeneration of the Mill in the event that the council were willing to accept the proposal. That is to say SBML would be willing to speculatively undertake the installation of the PVC-U windows in advance of letting the building thereby delivering in part the regeneration of the building, a public benefit in itself. The subsequent occupation of the building would be delivering the additional benefit of job creation.

4.23 The design of PVC-U window their layout and colour is intended to minimise impact yet at the same time ensure a professional and attractive business environment. SMBL is keen to replicate the appearance of the 9-pane design but in a material which is financially viable and provides long term financial sustainability for both SMBL and prospective occupiers. The proposed windows also have the thermal and acoustic properties sought by potential

occupiers. These thermal and acoustic properties also contribute to the sustainability of the Mill as a business centre.

4.24 It is submitted that to a “layman” the Mill once refurbished will be visually sympathetic to the surrounding area. It is further submitted that the change in the window materials would form part of an “on-going” narrative in the history of the Mill as a viable commercial building. The MBA report confirms that the original windows were replaced potentially as part of a package of works in the early 20th century indented to ensure the viability and ongoing usability of the Mill. The change now proposed by SBML may be seen in the same light change intended to ensure the long term future of the Mill which would not result in “substantial harm” to the Mill.

4.25 Many of the features of High and Medium Significance such as the chimney, the boiler house, and the former house would be retained. Key elements of the sites Historical, Evidential / Archaeological, Aesthetic and Architectural would be sustained or enhanced.

4.26 SBML are of the firm opinion that, should the current wooden windows be replaced with PVC-U, as proposed there would therefore not only be public benefits arising to the local economy one of Rochdale’s designated heritage assets will subsequently benefit by way of a more certain future.

4.27 The objective of delivering a sustainable viable building suitable for use within a modern is identical to that achieved at Blue pit Mill.

4.28 In addition to the replacement of the windows a separate application has been submitted seeking consent to allow both retrospective and proposed interventions to the Mill to ensures its successful regeneration as a business centre. The proposed works involve a number of interventions which are set out in the application drawings and discussed in the MBA reports. It is noted that the interventions proposed to allow the continuing use of the Mill in a sustainable manner is less than that consent historically to allow the conversion of the property from an employment use to residential apartments

5. Planning Policy Summary

5.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 [PLBCA Act] confirms the duty of the Local Planning Authority to have special regard to the desirability of preserving listed buildings, their setting and any features of special architectural or historic interest.

5.2 Section 66(1) of the Act states that in considering whether to grant planning permission for development that affects a listed building or its setting, 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**.**

5.3 Similarly, Section 72 (1) of the Act states that, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

5.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, to the extent that development plan policies are material to an application for planning permission, the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. This requirement is reiterated in Paragraph 2 of the National Planning Policy Framework [NPPF].

5.5 In this case the 'Development Plan' comprises:-

- The Greater Manchester Joint Waste Development Plan;
- The Greater Manchester Joint Minerals Plan;
- Rochdale Core Strategy; and
- "saved" policies of the Rochdale UDP

5.6 There are a number of saved policies of the Rochdale UDP the focus of which is ensuring the preservation of Listed Buildings and their settings these include:-

- Policy G/BE/9 – Conservation of the Built Heritage
- Policy BE/12 – Demolition of Listed Buildings;
- Policy BE/13 – Changes of use to Listed Buildings; and
- Policy BE/14 - Alterations and Extensions to Listed Buildings

5.7 Of most relevance to the proposal to replace the windows at the Mill is Policy BE/14 which states:-

> *"Development proposals affecting the character of a Listed Building must not harm the architectural value or historic interest of the host building, its curtilage and the surrounding area. In particular, applications for Listed Building Consent involving alterations and extensions (and repairs where materials and/or techniques differ from the original) will need to demonstrate, through the provision of detailed plans, that:-*
>
> *a) Account has been taken of the scale and proportions of the host building, and its relationship to other buildings and their setting;*

b) Sympathetic and high quality materials are used;

c) Internal spaces, features and fixtures are retained; and

d) Appropriate detailing is employed throughout, particularly the arrangement and design of fenestration and appropriate roof forms.

In cases where Listed Building Consent for alteration or extension is given, and where it is appropriate to record the character of the building before works commence, a condition may be attached to such consent, or a legal agreement sought with the applicant relating to a proper programme of recording."

5.8 The explanatory text which accompanies the policy states that "Listed Building owners should ensure that appropriate advice and expertise is employed in preparing and submitting a proposal". SBML have engaged the services of MBA. MBA have reported that *"changes can be justified where they relate to ensuring that the mill is occupied and has a viable use.."*

5.9 We also note the policy's requirement that where agreement to make alterations is forthcoming an appropriate record of the character of the building should be completed. SMBL would agree in the event that the Council were to authorise the replacement of the windows to a comprehensive recording survey of the current windows.

5.10 It is relevant to note that the application of the policies of the Development Plan cannot be take place in such a way as to conflict with or negate the obligatory provisions of the statutory requirements set out above (Section 66 and 72 of the PLBCA Act].

5.11 Part 16 of the National Planning Policy Framework ["NPPF"] sets out guidance on the approach to be taken in considering proposals which would affect "heritage assets. Annex 2 of the NPPF contains a definition of a "Designated Heritage Asset", describing such assets as:-

"A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation"

5.12 Paragraph 189 states that:-

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes,

or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation".

5.13 This detailed assessment of the "Significance" of Spotland Bridge New Mill is set out in the report prepared by MBA. Section 4 of the MBA report describes the concept of Significance and the way in which the concept is approach by Historic England. In simple summary the

MBA report concludes that the Mill has:-

- High Significance for Historical Values:
- High Significance for Aesthetic Values;
- Medium Significance in terms of its Architectural Value; and

5.14 The MBA report goes on to consider the contribution of the Mill to the Setting, and finally reviews the Significance of the Mill windows at paragraph 4.6.

5.15 The NPPF goes on to state at paragraph 190 that:-

> "*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal*".

5.16 At paragraph 191 it cautions that:-

> "Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision".

5.17 Paragraph 192 requires local planning authorities to 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"*

5.18 It continues at paragraph 193, stating 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 (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". At 194 it 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. Substantial harm to or loss of...grade II listed buildings...should be exceptional"*

5.19 The NPPF is supported by Planning Practice Guidance.[PPG] This includes guidance on 'Conserving and enhancing the historic environment'.

5.20 The guidance explains that significance is important in decision-taking as heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

5.21 A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

5.22 The guidance explains that:-

"the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places."

5.23 Disrepair and damage and their impact on viability can be a material consideration in deciding an application. Any deliberate damage is not a material consideration. In terms of considering future viable uses the planning guidance recognises that:-

"*By their nature, some heritage assets have limited or even no economic end use… **It is important that any use is viable, not just for the owner, but also the future conservation of the asset".*** [Emphasis added]

5.24 In terms of demonstrating public benefits the guidance states:-

"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress…Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits".

5.25 Paragraph 196 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". [Emphasis added]

5.26 The MBA report considers in detail the harm arising through the replacement of the existing windows. The report concludes:-

"It is considered that the replacement of all timber windows on the mill will constitute a moderate change to the listed mill as a whole, affecting an element of medium to high significance; this will cause moderate harm to the listed building. Moderate harm is at a level less than substantial harm,[Emphasis added] so it is important to balance the harm against the public benefit"

5.27 In this instance, given the scale of the works proposed, and the resultant impact on the historic fabric and appearance of the building, through the use of 'modern' materials for the replacement windows, it is considered that the development would result in "less than substantial" harm, and therefore the test in paragraph 196 applies.

5.28 Rochdale's mills are an important part of the town's heritage, and continue to feature in the townscape. However achieving viable, continuing use can be difficult, and costs of maintenance high as shown in the earlier section.

6. Discussion & Conclusions

6.1 We have considered the issues involved with the proposed replacement of the windows at the Mill. In the light of the forgoing it is our belief that the following conclusions may be drawn. The planning history of the Mill shows an acceptance of a need for change if the Mill is to have a long term sustainable future. Indeed the degree of change which has been contemplated in the past involved not only changes to the fabric of the building but also its use. Part of understanding the significance of the Mill is it use as an employment site. SBML propose following their involvement with the site that the use for employment continue to remain.

6.2 SBML envisage that the site be used in a similar manner to Blue pit Mill as a business centre (managed workspace). The use of the site as managed workspace brings with it substantial public benefits by virtue of the potential to capture circa 150 jobs within Rochdale. The most recent literature on the reuse of Mills published by Historic England clearly recognises that one of the key problems facing the owners of Listed Mill buildings such as Spotland Bridge New Mill is viability, namely the lack of institutional funding and grant aid.

6.3 The site planning history seems to support this view, despite listed building and planning consents being in place for nearly 10 years the development for which consent has been granted has not been forthcoming. SBML is prepared to make immediate investment in the Mill but that investment must be realistic and result in long term viability. When the cost of replacement and maintenance of the wooden windows is considered the proposition is not viable, by contrast PVC-U seen in the context of commercial rents would improve the viability to a point whereby investment can be carried out.

6.4 The provision of PVC-U windows will improve the thermal performance of the building bringing both environmental and economic benefits. The use of PVC-U also delivers noise insulation benefits. These benefits will also the proposed managed workspace to secure a higher EPC rating.

6.5 The adjoining borough of Oldham has accepted the principle of replacing 400 wooden windows with PVC-U in a listed Mill building to support the ongoing viability of that building. In the case of the property in Oldham (Manor Mill Victoria Street Chadderton) this was accepted despite the fact that in is our understanding that the Mill was fully occupied and the applicant company's Head Office at the time the application was made. In the case of Spotland Bridge Mill, the building in question is virtually vacant and assessed as "vulnerable" in the Greater Manchester Textile Mill Survey 2017. Thus with Spotland Bridge New Mill there is a bigger viability gap to be bridged than was the case at Manor Mill.

6.6 SMBL have engaged the services of MBA to review the significance of the windows, it has been concluded that the replacement of the windows will cause "moderate harm" to the listed building. "Moderate harm" is less than "substantial harm" and accordingly paragraph 196 of the NPPF is engaged. This requires that were a proposal will lead to less than substantial harm the harm should *be weighed against public benefit.*

6.7 In our view there are clear public benefits:-

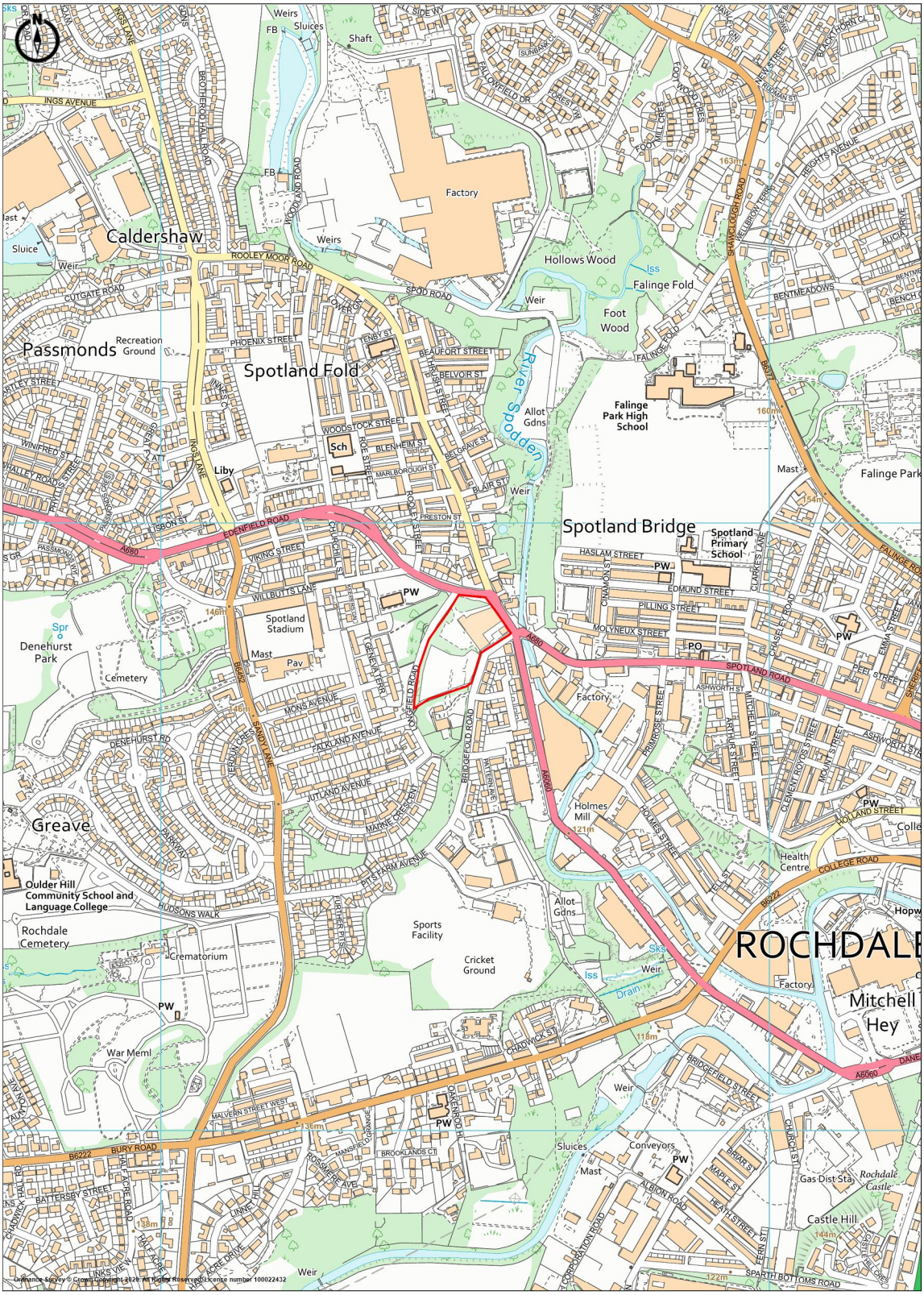
- Investment in the local economy with the potential to generate 150 jobs;
- The provision of affordable commercial floorspace for local businesses;
- Investment in the building to ensure its long term care and maintenance including its removal from the “vulnerable category”;
- Delivering environmental benefits
- Securing the long term viable future of the building

6.8 We consider that on balance the harm arising by virtue of the installation of PVC-U windows is outweighed by the public benefits and accordingly both statutory requirements and the advice in NPPF are met.

6.9 In the light of the forgoing we believe that on balance consent ought to be granted to allow the replacement of the windows and the works proposed to the Mill

Appendix A

General Location Plan



Promap V2
LANDMARK INFORMATION

Ordnance Survey © Crown Copyright 2020. All Rights Reserved.
Licence number 100022432
Plotted Scale - **1:10000**. Paper Size - **A4**

Appendix B

Site Plan



Promap V2
LANDMARK INFORMATION

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Plotted Scale - **1:1250**. Paper Size - **A4**

Appendix C

Photographs of SBM

SPOTLAND BRIDGE MILL WINDOWS
ROCHDALE





SPOTLAND BRIDGE MILL WINDOWS
ROCHDALE





SPOTLAND BRIDGE MILL WINDOWS
ROCHDALE





SPOTLAND BRIDGE MILL WINDOWS
ROCHDALE





SPOTLAND BRIDGE MILL WINDOWS
ROCHDALE





Appendix D

Blue Pit Mill Photographs

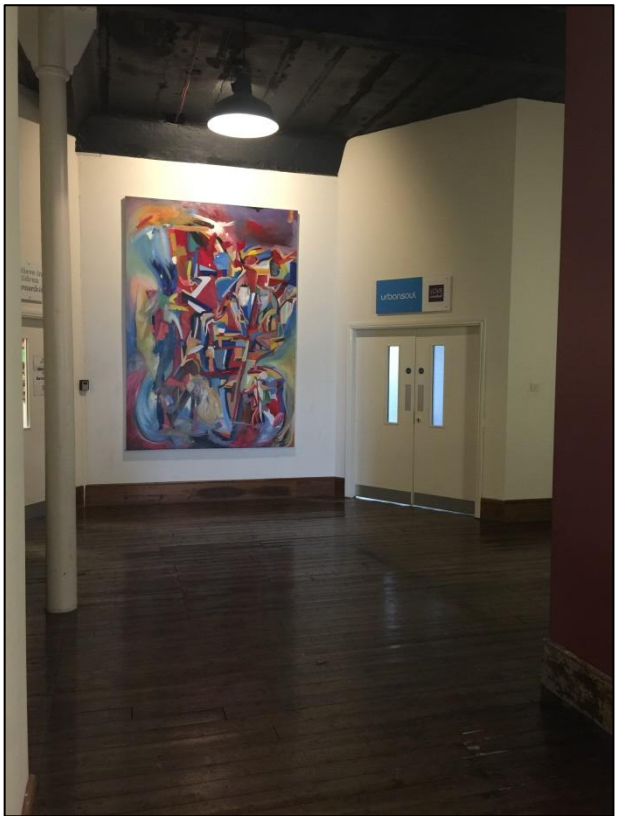
BLUE PIT MILL
ROCHDALE





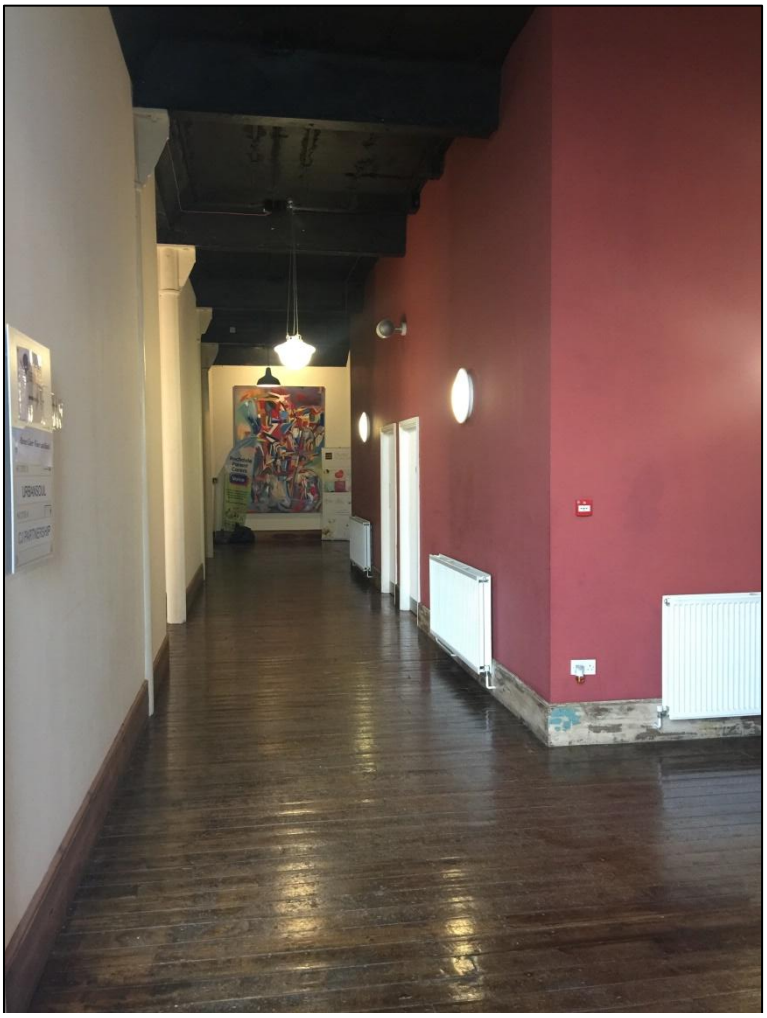
BLUE PIT MILL
ROCHDALE





Lambert Smith Hampton

BLUE PIT MILL
ROCHDALE



Lam
Smith Hampton

6th Floor
3 Hardman Street
Spinningfields
Manchester
M3 3HF

+44 (0)161 228 6411
lsh.co.uk

Lambert
Smith
Hampton