



KAM LEI FONG (UK) LIMITED

WARWICK MILL, MIDDLETON

Planning Statement





KAM LEI FONG UK LIMITED

WARWICK MILL, MIDDLETON

Planning Statement

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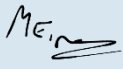
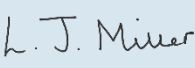
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EXECUTIVE SUMMARY

The proposal comprises an exciting new mixed use neighbourhood providing 281 new homes plus new commercial and retail units (which are envisaged to include a coffee shop, restaurant, gym and/or co-working office spaces) and enhanced public realm (including a new publicly accessible square), new and improved landscaping.

The proposals will breathe new life into a Grade II Listed vacant mill, remove the eyesore of derelict London House, and allow the site to fully contribute to the on-going regeneration of Middleton. Warwick Mill is in a particularly poor state of repair and without considerable intervention and investment; there is a very real risk of the building's deterioration accelerating which could result in total loss.

The iconic mill will be refurbished and repurposed for residential use including a rooftop extension, with the former London House demolished to make way for new homes, commercial and retail spaces and open space.

The proposal plays a key part in revitalising this part of the town centre as earmarked in Middleton Town Centre's Masterplan, valuably delivering new homes on brownfield land at the edge of the town centre and accessible by walking, cycling and well-served by buses.

The redevelopment of the site will enhance connectivity and permeability of the site within the wider area. The redevelopment will integrate with the surrounding developments to create an inclusive character.

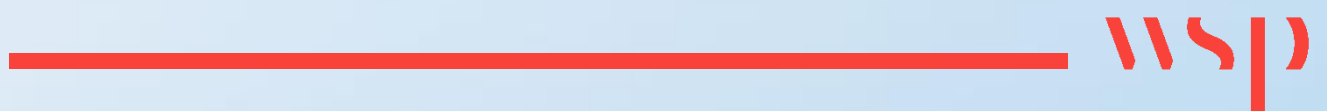
The proposed development has been subject to extensive pre-application discussions with local stakeholders including Rochdale Borough Council, local Members and Ward Councillors, in addition to the local community through a comprehensive public consultation exercise. Key stakeholders are supportive of the redevelopment proposals and the positive impact it will have on the area.

The extensive technical assessments demonstrate that the proposed development will not give rise to any significant adverse impacts on the area or amenity of nearby neighbours. Impacts can be successfully mitigated and overall from a heritage perspective the development will not cause any significant detrimental impact or harm upon the significance of the heritage asset, with any harm outweighed by the economic and social benefits the proposal will deliver. The development therefore constitutes sustainable development and raises no material considerations which would outweigh its accordance with the Development Plan when taken as a whole.

The principle of development is therefore fully acceptable, and the proposal accords with policy.

1

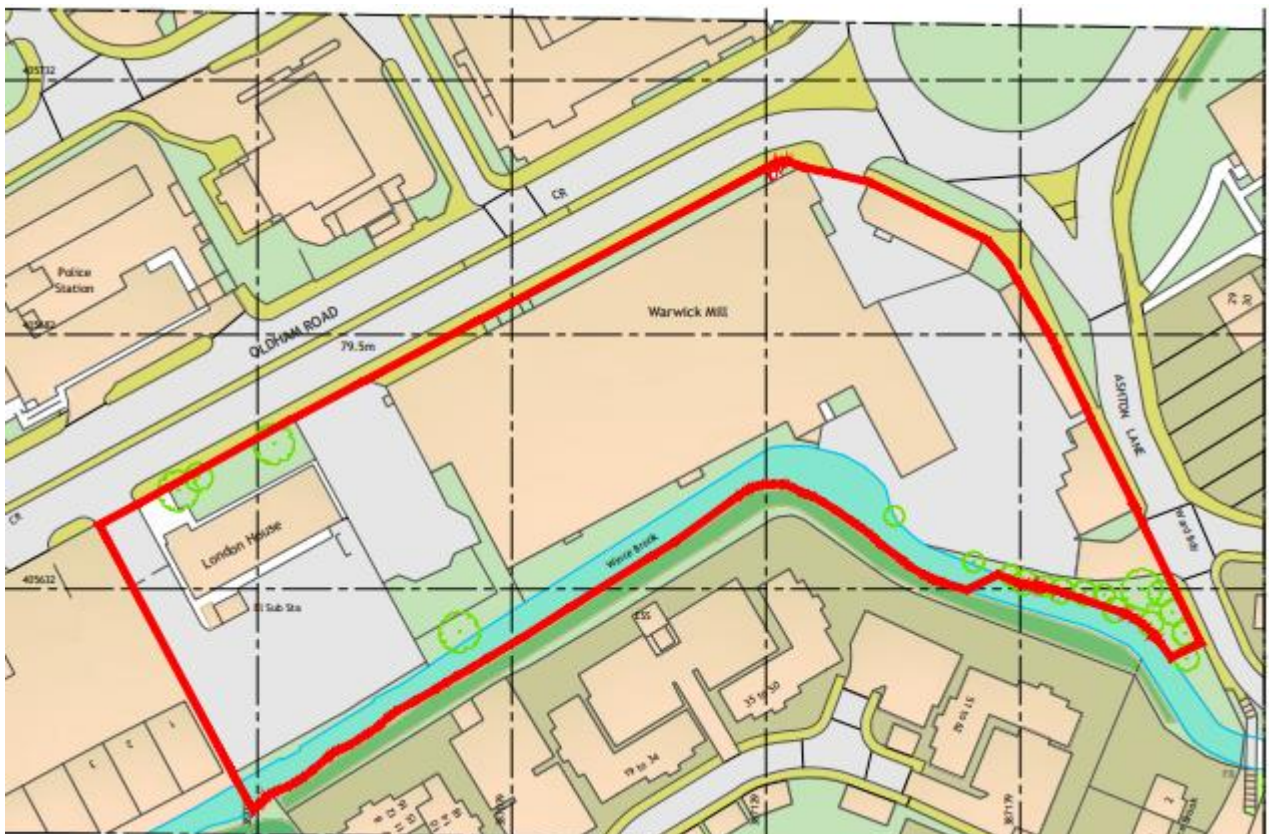
INTRODUCTION



1 INTRODUCTION

- 1.1.1. WSP has prepared this Planning Statement on behalf of Kam Lei Fong (UK) Limited (the applicant). It supports a full planning application being submitted to Rochdale Borough Council (RBC) (the Local Planning Authority – LPA) for the following development:
- ‘Redevelopment of site comprising re-purposing of Warwick Mill to residential (Use Class C3) and flexible commercial space (Use Class E) and demolition of existing London House and erection of a new building for a mix of uses comprising residential apartments (Use Class C3) and flexible commercial space (Use Class E). Ancillary hard and soft landscaping; rationalisation of and improvements to vehicular accesses onto Oldham Road (A669) and Ashton Lane; vehicular and cycle parking; and associated works and infrastructure.’*
- 1.1.2. In justifying the suitability of the proposed development, this Planning Statement assesses the development proposal against the Development Plan, relevant national policy and other material considerations. This Planning Statement is also accompanied by suite of plans and reports which provide detailed evidence and assessment upon which the content of this Planning Statement is based. This approach meets the requirements of Section 70(2) of the Town and Country Planning Act 1990, as well as Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 1.1.3. The enclosed Site Location Plan at **Appendix A** identifies the full extent of the site to which the proposed development relates.

Figure 1-1 - Site Location Plan



- 1.1.4. The site currently comprises a vacant listed mill (Warwick Mill) which is a positive heritage asset but in need of significant refurbishment. It also comprises the derelict London House, an uninspiring former office building which performs very poorly in terms of its impact on the local townscape and environment. As such, the site is in significant need of redevelopment to fully contribute to the on-going regeneration of Middleton.
- 1.1.5. The iconic mill will be refurbished and repurposed, with neighbouring land developed, to provide new homes, commercial and retail spaces and open space. The proposal plays its part in revitalising the town centre as earmarked in Rochdale's Spatial Strategy for Middleton.
- 1.1.6. The proposal will deliver the following benefits for the local and wider community;
- Refurbishment and repurposing of listed Victorian mill;
 - Regeneration of an unsightly site in a key location in Middleton;
 - Creation of 281 high-quality homes across two separate buildings including provision of 340 cycle parking spaces;
 - Provision of ground floor commercial, leisure and retail use under Use Class E;
 - Provision of open space and improvement to street scene on Oldham Road and existing Wince Brook;
 - New tree planting and landscaping provision;
 - Creation of jobs throughout the construction phase and during occupation; and,
 - Generation of increased local spend and council tax revenue.

1.2 THE APPLICANT

- 1.2.1. Kam Lei Fong (UK) Limited is committed to delivering a high-quality development and jobs in Middleton Town Centre and to help keep the economy moving. They have assembled a design team with a wealth of experience of working within urban centres and see Middleton as a key location for future investment to help to drive increased confidence and renewal in the wider area. They intend to deliver this new development in the next few years.

1.3 ENVIRONMENTAL IMPACT ASSESSMENT

- 1.3.1. In order to establish whether or not an Environmental Impact Assessment (EIA) should be submitted, the proposal has been screened under the Town and Country Planning (Environmental Impact Assessment Regulations 2017 (the EIA Regulations).
- 1.3.2. An EIA Screening Opinion Request was submitted to RBC in January 2022 with an updated letter provided in July 2023. The report and update letter are enclosed at **Appendix B**.
- 1.3.3. RBC has not yet issued their formal Screening Opinion and whilst the development will have some impact on the surrounding area, the overall opinion is that the development does not require an EIA.

1.4 STRUCTURE OF THE PLANNING STATEMENT

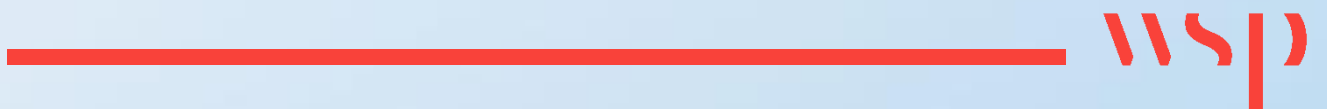
- 1.4.1. This Planning Statement is structured as follows:
- Executive summary;
 - Section 1: Introduction;
 - Section 2: Site and surroundings;
 - Section 3: Proposed development;
 - Section 4: Statement of Community Involvement;



- Section 5: Planning policy context;
- Section 6: Sequential and Retail Impact Assessment;
- Section 7: Affordable Housing Statement;
- Section 8: Planning considerations;
- Section 9: Other material considerations;
- Section 10: S106 Heads of Terms; and
- Section 11: Planning balance.

2

SITE AND SURROUNDINGS



2 SITE AND SURROUNDINGS

2.1 THE SITE

- 2.1.1. The site subject to this application is known as Warwick Mill, Middleton, Rochdale.
 - 2.1.2. The site extends to approximately 1.21 ha and comprises an existing vacant mill building with a derelict office building known as London House which has been vacant since March 2015.
 - 2.1.3. It lies on the junction of Oldham Road and Ashton Lane. To the north is Oldham Road (A669), a dual carriageway, beyond which lies Tesco Extra and Middleton shopping centre. East of the site is Ashton Lane beyond which there is residential development and a church. Industrial units are situated to the east, beyond London House.
 - 2.1.4. To the rear, Wince Brook forms the southern boundary to the site with residential apartments ranging between 3 and 4 storeys in height backing onto the Brook and beyond.
- Warwick Mill*
- 2.1.5. Warwick Mill is a former cotton mill, which is currently vacant, located approximately 200m south of Middleton Town Centre.
 - 2.1.6. The mill is a Grade II Listed Building design by George Stott of Joseph Stott and Son completed in 1909. The mill is of red-brick construction with five storeys, a basement, and a water tower, which bears the name 'Warwick Mill' in white glazed tiles. A George Saxon steam engine was fitted in 1909 in the engine house at the southeast end of the mill building.
 - 2.1.7. The mill features a two-storey engine house which projects southwards from the mill.
 - 2.1.8. The lodge is a single storey rectangular building which sits directly outside the mill along with a small brick outbuilding located at the entrance to the site off Ashton Road.
 - 2.1.9. The mill closed in 1965 and has since been partly used for short term tenancies mainly associated with warehouse storage use, up to 2016. It has been vacant since then.
 - 2.1.10. The mill is in a particularly poor state of repair and without considerable intervention and investment; there is a very real risk of the building's deterioration accelerating which could result in total loss.
 - 2.1.11. The mill itself enjoys an edge of town location positioned directly off Oldham Road and therefore presents a prominent building within the street scene and wider Middleton. The setting of the mill is from all points in particular its height and sheer scale which gives it a significant presence.

London House

- 2.1.12. London House is a six-storey former office building originating from the 1960s. The building has been vacant since March 2015. A surface carpark is situated to the rear of London House, accessed to its east from Oldham Road, although the carpark is now not in use.

PLANNING HISTORY

- 2.1.13. In terms of the site's planning history, **Table 2-1** outlines the relevant planning applications using RBC's online planning history search function:

Table 2-1 – Planning History

Application Reference	Description of Development	Decision Date
15/01015/FUL	The demolition of London House and the conversion and renovation of Warwick Mill and the associated lodge building to provide a mixed use development comprising showrooms for the trading of wholesale and retail non-food goods, new food and drink outlets (Use Classes A3 and A4) along with ancillary uses, including the addition of a new loading bay and operations buildings at the western end of the lower ground floor, the installation of new plant zones and plant rooms at roof level and the creation of a new surface car park	Approved December 2015
15/01016/LBC	Internal and external alterations to the lower ground, upper ground, first, second & third floors and Lodge Building at Warwick Mill to facilitate the mixed use of the premises, comprising showrooms for the trading of wholesale and retail non-food goods, new food and drink outlets, together with ancillary uses including the creation of a new loading bay and operations buildings at the western end of the lower ground floor; the creation of a new vertical circulation core between the lower ground floor and third floor; the creation of a new pedestrian entrance in the northern elevation; the installation of new plant zones and plant rooms at roof level; the replacement of all existing windows; the creation of new windows and glazed doors in the eastern elevation of the Engine Room; the installation	Approved December 2015

	of a new partial mezzanine floor within the Engine Room; the replacement and alteration of existing windows in the lower ground elevation on the southern elevation; the replacement of existing wooden floors at all levels and the installation of wooden decking adjacent to the southern elevation at lower ground floor level	
15/00279/FUL	Installation of 4 no. antennas upon the rooftop fixed to existing redundant mounting frame; 1 no. equipment cabinet to be sited upon the rooftop on freestanding steel platform with installation of cabling and other associated development.	Refused May 2015
13/00932/FUL	Removal of 6 antennas and 5 equipment cabinets and installation of 6 antennas, 6 Remote Radio Units and 4 equipment cabinets including ancillary equipment	Approved October 2013
13/00933/LBC	Listed building consent for the removal of 6 antennas and 5 equipment cabinets and the installation of 6 antennas, 6 remote radio units and 4 equipment cabinets (Resubmission of 13/00419/LBC)	Granted October 2013
13/00419/LBC	Listed building consent for the removal of 6 antennas and 5 equipment cabinets and the installation of 9 antennas, 6 Remote Radio Units and 4 equipment cabinets	Refused June 2013
13/00418/FUL	Removal of 6 antennas and 5 equipment cabinets and installation of 9 antennas, 6	Refused June 2013

	Remote Radio Units and 4 equipment cabinets including ancillary equipment	
11/D54986	Change Of Use Of Part Of First Floor Of Listed Building From Storage (Use Class B8) To Gymnasium (Use Class D2) Including Internal Partitioning Works	Granted March 2012
11/D54985	Change Of Use Of Part Of First Floor From Storage (Use Class B8) To Gymnasium (Use Class D2)	Granted March 2012
10/D53321	Application For A New Listed Building Consent To Replace Extant Listed Building Consent D48615 For The Conversion Of Existing Mill And Associated Building To 147 Apartments	Granted September 2010
10/D53320	Application For A New Planning Permission To Replace Extant Planning Permission D48614 For The Change Of Use And Conversion Of Existing Mill And Associated Building To 147 Apartments With Associated Parking	Granted September 2010

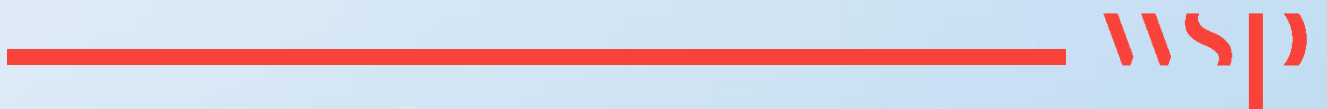
2.2 SURROUNDING AREA AND ENVIRONMENT

- 2.2.1. The site lies at the edge of the commercial centre of Middleton, with the surrounding area comprising a mix of industrial and retail buildings and surface car parks, with some residential uses.
- 2.2.2. The application site is not located within a Conservation Area nor is it located in close proximity of any identified Conservation Areas. The nearest Conservation Area is:
- Middleton Conservation Area – located approximately 120m to the north of the site.
- 2.2.3. A number of Grade II Listed Buildings are located within close vicinity of the site boundary, including:
- Church of St Michael – located approximately 350m to the east of the site; and
 - 33, 35 and 37, Middleton Gardens – located approximately 350m to the north west of the site.

- 2.2.4. The site is located on the edge of Middleton town centre which is allocated in the Middleton town centre masterplan as a mixed-use regeneration area, representing an opportunity to establish a range of higher density housing types and to regenerate former industrial land.
- 2.2.5. It is a very sustainable site and has access to a range of public transport modes. A bus stop is located on Oldham Road, approximately three minute walk from the site, as well as Middleton Bus Station which is located 250m to the north west providing services to a range of locations including Manchester City Centre, Oldham and Ashton-under-Lyne. Mills Hill railway station is also located approximately 1.5km to the east of the site which provides access to a range of destinations including Manchester, Blackburn, Kirkby, Clitheroe and Rochdale.
- 2.2.6. The site is also surrounded by a widespread cycling network given the extensive road network within the vicinity of the site. Sections of Oldham Road, Manchester Old Road and Manchester New Road provide cycle lanes.
- 2.2.7. It is also located close to and has access to amenities and services along Oldham Road and the town centre to the north, along with being in walking distance to the activities of the town centre with its associated public transport facilities.
- 2.2.8. There have been no notable applications in the last 10 years adjacent to the site.

3

THE PROPOSED DEVELOPMENT



3 THE PROPOSED DEVELOPMENT

- 3.1.1. The application is submitted in full and seeks permission for a mixed-use residential-led scheme. The description of development seeks the following:

'Redevelopment of site comprising re-purposing of Warwick Mill to residential (Use Class C3) and flexible commercial space (Use Class E) and demolition of existing London House and erection of a new building for a mix of uses comprising residential apartments (Use Class C3) and flexible commercial space (Use Class E). Ancillary hard and soft landscaping; rationalisation of and improvements to vehicular accesses onto Oldham Road (A669) and Ashton Lane; vehicular and cycle parking; and associated works and infrastructure. In summary, the proposed development will comprise 281 apartments, duplex townhouses and ground floor commercial uses (Use Class E) together with associated car parking, new vehicular and pedestrian access, public realm, landscaping and other associated works.'

- 3.1.2. The 281 apartments are provided across both Warwick Mill (total 135 dwellings) and a new residential building (referred to as 'The Loom' – total of 146 dwellings). The new building will be 10 storeys in height.

- 3.1.3. In brief, the proposal comprises:

- Redevelopment of existing Warwick Mill into 135 residential apartments with roof top extension, ground floor commercial floorspaces, parking for cycles and vehicles and internal rearrangement including private courtyard areas;
- Demolition of existing London House and redevelopment of 'The Loom' comprising 146 residential apartments with ground floor commercial floorspace and 77 parking spaces;
- Provision of a restaurant area along with an outdoor seating decking area, landscaping, tree planting and open space; and
- Creation of landscaping, public realm and streetscape including a riverside path.

3.2 PRE-APPLICATION ADVICE

- 3.2.1. Given the prominence of the site and the potential scale of development, the applicant has, undertaken extensive pre-application discussions with RBC across a period of around 2 years. Formal pre-application meetings have been held with Paul Moore, Ryan Grant, Ryan Killeen, Catherine Fenghour (Conservation Officer) and John Gillighan (Highways Officer) at RBC. These meetings were attended by members of the project team, including the applicant, architect, planning consultant and technical consultants (including heritage and highways) where necessary.

- 3.2.2. The key discussion points at the meetings included:

- Master-planning of the site;
- Relationships between the application site and the surrounding area;
- Height, massing and architecture;
- Heritage;
- Public realm, townscape and landscape;
- Public consultation and stakeholder engagement; and
- Environmental Impact Assessment screening;

- 3.2.3. The feedback received has been valuable and has positively shaped the current scheme which fits with the ambitions of Middleton Town Centre's Masterplan and RBC's Core Strategy objectives of re-use and development of brownfield land. Further details are set out within the Statement of Community Involvement (**Section Four**).

3.3 AMOUNT

- 3.3.1. The proposal will deliver 281 dwellings and include the following mix:

Table 3-1 – Apartment Schedule

Apartment Type	Amount	Percentage
Studio	18	6%
1-Bed 2-Person	152	54%
2-Bed 3-Person	110	39%
3-Bed 6-Person	1	1%

- 3.3.2. Over 2,000 sqm of commercial floorspace will be delivered across the development. **Table 3-2** provides a breakdown.

Table 3-2 – Commercial Floorspace Schedule

Commercial Floorspace	Amount (sqm)
Warwick Mill Commercial Unit	1,420
Warwick Mill Restaurant/Function Room	218.47
Restaurant Mezzanine	112.89
The Lodge Commercial Unit	161.46
The Lodge Commercial Unit	65.29
The Loom Commercial Unit 1	69.52
The Loom Commercial Unit 2	65.29
Total	2,112.92

3.4 DESIGN

3.4.1. *Warwick Mill*

- 3.4.2. Works to the ground floor consist mainly of providing pedestrian access through a new entrance to Oldham Road. At basement level there will be a new vehicular access at the western elevation to allow provision of xx parking spaces, allowing for retention of the existing floor, columns and arches. The basement will also accommodate 6 studio apartments and commercial spaces. New external doors are provided within existing openings to engine house, side entrances and store rooms.
- 3.4.3. In terms of the remainder of the building floors, it is proposed to create a central atrium to ventilate the deep floor plans, provide light and access. This will be achieved by part removing some of the interior floors, joists, and columns in part of the central area whilst retaining the majority on each floor, along with the outer walls, engine house and stair towers.
- 3.4.4. Rope race machinery and staircase will be retained while the Engine House wall feature will be restored as part of the proposals and include construction of a part mezzanine floor.
- 3.4.5. In line with works to the floors below the roof, a glazed atrium will be constructed at the roof. In addition, a number of apartments will be constructed utilising the roof space and a rooftop extension. The new apartments will be set just above the parapet level and back from the existing parapets. The view of the apartments will be indiscernible from street level.
- 3.4.6. The existing external metal fire escape will be removed to the south elevation to fully expose the original façade. The existing external walls are in good condition, the intention will be to retain these and clean the facades lightly with a few repairs to local areas of the brick face.

3.4.7. *Loom Building*

- 3.4.8. The proposed Loom building consists of a development of a residential block of 10 storeys in height, comprising 146 apartments and 130 sqm of commercial floorspace.
- 3.4.9. The Loom building will also feature basement parking and a connection in the form of a walkway to Warwick Mill, taking advantage of the levels change.
- 3.4.10. The scale and massing of the apartment building has been optimised in order to provide the most efficient layout. The Loom has been designed to complement the retained Warwick Mill in terms of maximising the public view of the Mill to clearly define the historic Mill, but also to maximise interaction between the two buildings at ground and lower ground floor levels. The proposed heights create a characterful urban gateway to and from the town centre, without harming the local area.
- 3.4.11. The building design has a plan form that contrasts the solid form of the Mill building to clearly define the contrast of the Mill building in terms of its importance in the historic growth of Middleton, with a modern structure defining the future of Middleton. A large podium level has been designed at first floor level with direct links back to the Mill to encourage movement between the two buildings.
- 3.4.12. The upper floor levels are set back from lower levels to the Wince Brook elevations to reduce the building scale and to acknowledge the existing housing development across from the Brook. These setbacks allow for roof terraces to be developed for residents' use.
- 3.4.13. Further detailed commentary and assessment is included within the accompanying Design and Access Statement.

Figure 3-1 - Concept visuals of Warwick Mill and Loom building



3.5 ACCESS AND HIGHWAYS

- 3.5.1. There will be two vehicular accesses onto the Oldham Road (A669) and one onto Ashton Lane, making use of existing vehicular accesses and improving where necessary.
- 3.5.2. The existing access that serves London House from the Oldham Road (A669) will be retained to provide access to the residential car parking within The Loom but would be an ingress only.
- 3.5.3. The existing dropped kerb access from the A669 Oldham Road between Warwick Mill and London House would be improved to a kerbed bellmouth to provide access to the residential car parking within Warwick Mill and egress from The Loom.
- 3.5.4. The access onto the Oldham Road / Ashton Lane roundabout would be retained, however, this would become a pedestrian access and for emergency vehicles only.
- 3.5.5. The proposals prioritise pedestrian movement within the site to emphasise the sense of safety for the residents and visitors. Vehicle access within the site is kept to a minimum.
- 3.5.6. The scheme includes provision of four separate car parking areas.
- 3.5.7. A total of 77 parking spaces are provided across the development area with 24 in ground floor area of the mill, 29 for the Loom building and 20 for the restaurant area. Four of the spaces will be provided to a disabled standard and appropriate levels of EV charging will be provided.
- 3.5.8. Over 100% cycle parking (340 spaces) will be provided for residents, Sheffield stands are provided in external locations for visitors.
- 3.5.9. Bin stores for the apartment building and commercial uses are provided in two locations. A main commercial collection point is located alongside the delivery bay area at the end of Warwick Mill associated with the Lodge building, Engine Room restaurants and events facility. The second collection point associated with the residential units will be via the access road at the end of the site.

- 3.5.10. The site is ideally located for access to the city centre and public transport. The limited proposed parking for the development will have significantly fewer parking spaces than are currently on site.

3.6 LANDSCAPING AND PUBLIC REALM

- 3.6.1. Substantial hard and soft landscaping will be provided within the curtilage of the site as illustrated on the submitted landscaping plans.

The Loom Podiums

- 3.6.2. The landscape strategy for the Loom Podium features a green avenue street frontage with tree planting in between the Loom building frontage and access to Warwick Mill courtyard. Podiums will sit above to the east and west of the Loom building and feature two separate decking areas with timber pergolas, private terraces, raised planting beds, lawns and tree planting.

- 3.6.3. *The Loom Roof*

- 3.6.4. Another landscaping feature incorporated into the design of the Loom building includes an extensive resident's green roof area (292 m²) on the 8th Floor of the Loom building.

Warwick Mill central atrium

- 3.6.5. The central atrium is split into two areas with green spaces for quiet recreation and play for young children. This will also include a patio area with raised planting beds interspersed.

Warwick Mill 4th Floor Terraces

- 3.6.6. This will feature four quiet gathering areas with raised planting beds.

Restaurant area, Riverside decking and riverside foot path

- 3.6.7. These areas provide semi-private outdoor gathering areas with benches facing the brook. Naturalistic planting will support a riverside foot path linking the outdoor area of the commercial unit with the decking areas behind the visitor car parking in the mill courtyard.

- 3.6.8. The restaurant area will feature an outdoor area with decking for diners. Beyond this area, it is proposed that as part of the landscaping strategy, an area with a focal tree is provided with further wall planters to soften level changes towards the restaurant parking area located further back.

- 3.6.9. The public realm materials have been chosen so that they are high quality, low maintenance and have a suitable design life.

- 3.6.10. Over 50 standard and multi-stem trees are proposed to be planted across the various areas surrounding the Loom and Warwick Mill buildings.

3.7 FLEXIBLE COMMERCIAL SPACE

- 3.7.1. The proposals include 2,112 sq m of flexible commercial floorspace (Use Class E) located at the ground floor fronting the main road, thus it capitalises from existing footfall from Oldham Road and seeks to create a destination for local residents bringing much needed active frontage to this part of Oldham Road.

- 3.7.2. The commercial floorspace includes a commercial unit within The Mill, a restaurant/function room and commercial units located at ground floor level for the Loom building.

- 3.7.3. This commercial space will integrate well with walking routes and public transport connections.

4

STATEMENT OF COMMUNITY INVOLVEMENT



4 STATEMENT OF COMMUNITY INVOLVEMENT

- 4.1.1. The comprehensive pre-application process undertaken by Kam Lei Fong (UK) Limited and the project team has considered relevant national and local policy guidance. The importance of pre-application consultation and community engagement are emphasised in the following:
- Localism Act (2011);
 - National Planning Policy Framework (NPPF) (2021); and
 - Rochdale Council's Statement of Community Involvement (SCI) (August 2021).
- 4.1.2. The NPPF promotes effective engagement between applicants, communities, LPAs and other interested parties throughout the process. Paragraph 132 of the NPPF states that applicants should work closely with those directly affected by their proposals to evolve designs that take account of the views of the community.
- 4.1.3. Paragraph 5.9 of the Council's SCI states that:
- "Involvement in the process can often be useful before an application is formally submitted. The Council encourages applicants to undertake discussions with us prior to submitting their application. This will help to identify key issues and planning policies and identify any problems at an early stage, such as the need for a traffic assessment or flood risk assessment, to enable the applicant to address them".*
- 4.1.4. Paragraph 5.10 goes on to state:
- "For significant development proposals, the Council has adopted guidance to encourage applicants/developers to consult with the local community before submitting their application. This enables the applicants to explain their proposals, receive feedback on which they might be able to act, create an atmosphere of genuine interest in the views of the local community and provide more certainty about any level of concern and the issues of concern."*
- 4.1.5. It is against this background that consultation with the LPA, local community and Councillors has been undertaken.

4.2 CONSULTATION WITH THE LOCAL PLANNING AUTHORITY

- 4.2.1. Given the prominence of the site and the potential scale of development, the applicant has undertaken extensive pre-application discussions with RBC over the last two years with initial discussions commencing in spring 2021. Various iterations of sketch layouts and the vision for the site have been discussed with officers.
- 4.2.2. Formal pre-application meetings have been held (both in person and via video conference) with planning officers at RBC Council including Paul Moore, Ryan Grant and Ryan Killeen throughout 2021, 2022 and 2023. These meetings were attended by members of the project team, including the applicant, planning consultant and technical consultants (including heritage and highways) where necessary. Several of these meetings have also been attended by Council Officers from the policy, highways and heritage teams.
- 4.2.3. The key discussion points at the meetings included:
- Principle of development of the site;
 - Masterplanning of the site;

- The Listed Building status of the Mill;
- Relationships between the application site and the proposed access;
- Public realm and landscape;
- Public consultation and stakeholder engagement;
- Environmental Impact Assessment screening; and
- S106 obligations

4.2.4. The feedback received has been valuable and has positively shaped the current scheme which fit with the ambitions of Rochdale's Core Strategy, the Middleton Town Centre Masterplan and the aspirations for this site within the emerging Places for Everyone draft Joint Plan.

4.3 CONSULTATION WITH HISTORIC ENGLAND

4.3.1. Pre-application consultation was undertaken with Historic England in November 2021. They were issued initial plans of development proposals and provided the opportunity to comment. Overall, Historic England were supportive of the proposals and they were pleased to see proposals for the conversion of the listed Mill acknowledging that it would not only secure the future of an important historic building but would also have an environmental benefit.

4.3.2. They did raise a number of concerns over specific elements of the proposal and these have all been considered and addressed in detail the accompanying Heritage Assessment. A full copy of Historic England's comments is provided at **Appendix C**.

4.4 COUNCILLOR ENGAGEMENT

4.4.1. Members of the project team (including the planning consultant and architect) along with the Head of Planning at RBC presented emerging proposals of the scheme to Ward Members and Middleton Township Councillors in November 2021 and January 2023. Members had the opportunity to ask questions and discuss the proposals. Overall, the proposals were positively received.

4.4.2. In June 2022, all Middleton Township Councillors including Cllr Neil Emmott (Leader of the Council) and Cllr Dylan Williams (Assistant to the Leader) and Cllr Peter Williams (assistant portfolio holder for Regeneration and Housing) and Cllr Burke (Vice Chair of the Planning and Licensing Committee) were consulted via email and provided with a preview link to the consultation website (explained below) and copies of draft proposed Computer Generated Images.

4.4.3. The correspondence offered the opportunity for a virtual meeting to be organised where members of the team would be on hand to explain the proposals in greater detail and also answer any questions.

4.5 CONSULTATION WITH THE LOCAL COMMUNITY

4.5.1. The consultation process for this application was designed to allow the local community to view the draft proposals and share their feedback with the team before the scheme is finalised and the application is submitted.

4.5.2. As a result, a letter, which provided details of the proposals was distributed to 645 properties across the distribution area shown on **Figure 4-1**. The letter was posted on 19 June 2023 and contained a link to a dedicated website and email address, presenting draft plans and further detail of the scheme proposals.

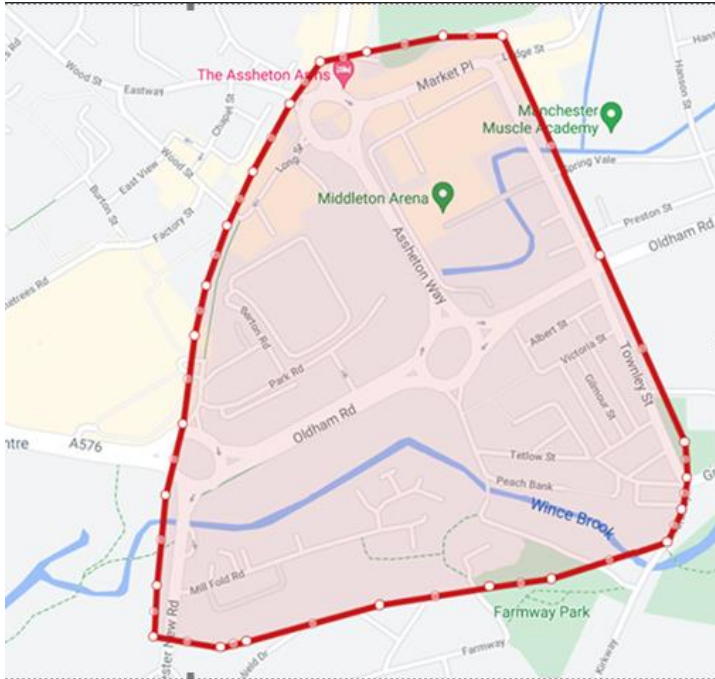
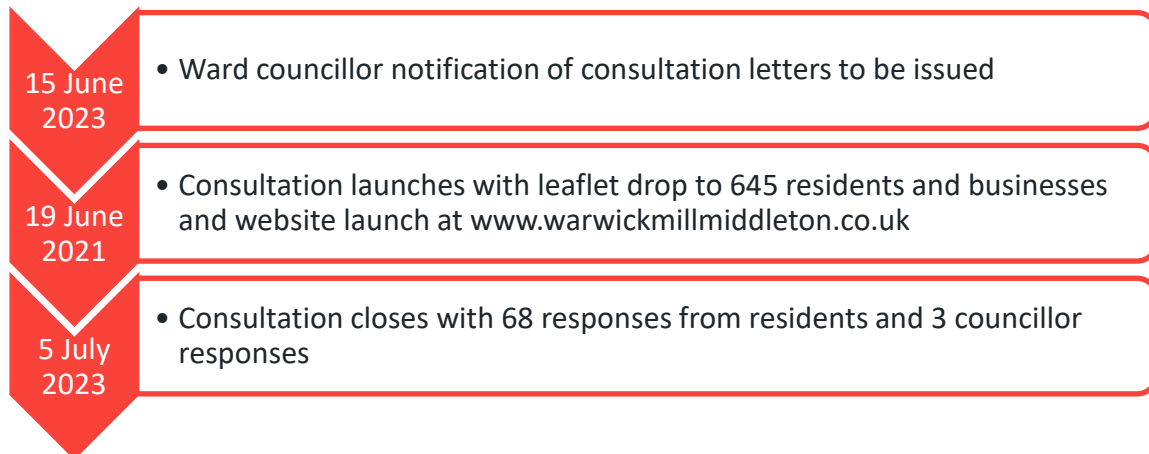


Figure 4-1 - Extent of properties consulted (Source: Google Maps)

4.6 ONLINE CONSULTATION EVENT

- 4.6.1. An online 'virtual exhibition' was launched to the public on 19 June 2023 in the form of a website (www.warwickmillmiddleton.co.uk). While the consultation ran until 5 July 2021, the site remained open as a point of information until submission of the application.
- 4.6.2. Ahead of the public launch, Ward Councillors were invited to preview the website, provide feedback on the scheme and request a meeting if desired.
- 4.6.3. The website comprised a virtual public exhibition with plans and information, along with the ability to provide feedback. The information set out included details on the developer, the site's location, the proposals, designs, a summary of key disciplines and timescales moving forward. An email address and telephone number were provided to enable members of the public to ask questions and provide feedback.
- 4.6.4. The website also contained a dedicated questionnaire inviting visitors to engage and respond to the initial proposals. For those without internet access, a phone number was also included on the letter.
- 4.6.5. The following flowchart sets out the process and timeframes for each of the steps in the community consultation process.

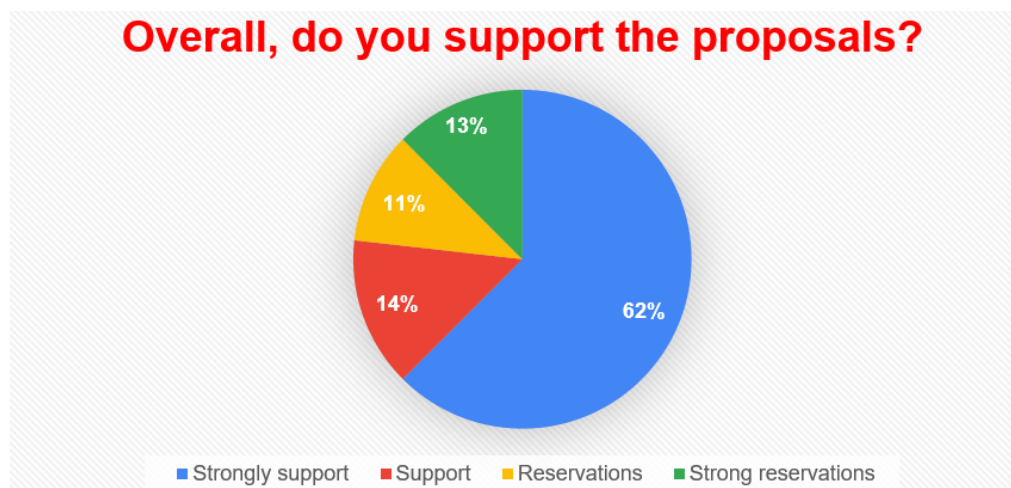
4.7 TIMELINE OF KEY EVENTS



4.8 RESULTS

- 4.8.1. The majority of feedback was positive however there were also a number of queries about aspects of the scheme or comments where certain elements could be improved.
- 4.8.2. The majority of respondents were positive and acknowledged that the proposal would improve the site and surrounding, although a small minority of local residents were concerned about certain elements of the proposals. **Figure 4-2** provides a summary.

Figure 4-2 - Questionnaire response - Support for the proposals



- 4.8.3. The concerns raised related to the proposed development's design, the quantum of development, the impact on the setting of a heritage asset and highways concerns. The applicant and project team were aware of these potential issues and had already been in discussions with Council as part of the pre-application process.
- 4.8.4. Some specific comments are detailed below:

'Let's not limit the use of Warwick Mill to just one or two retail and or dining options. The size of the building surely allows us to offer several retail spaces. There should really be multiple eating

establishments, bars, coffee, shops, and small spaces for retail stores. Let's make it a true destination for the people of Middleton and beyond. Take a look at the offerings at Altrincham Market, the Produce Hall in Stockport and even Mackie Mayors in Central Manchester.'

'The new adjoining building on the site of London House appears to be very high and could severely block the view from houses/apartments on the nearby Millfold estate. Consideration must be given to the owners/tenants of those houses/apartments, with the possibility of reducing the height of the new building.'

'A few more bars and cafes would be nice.'

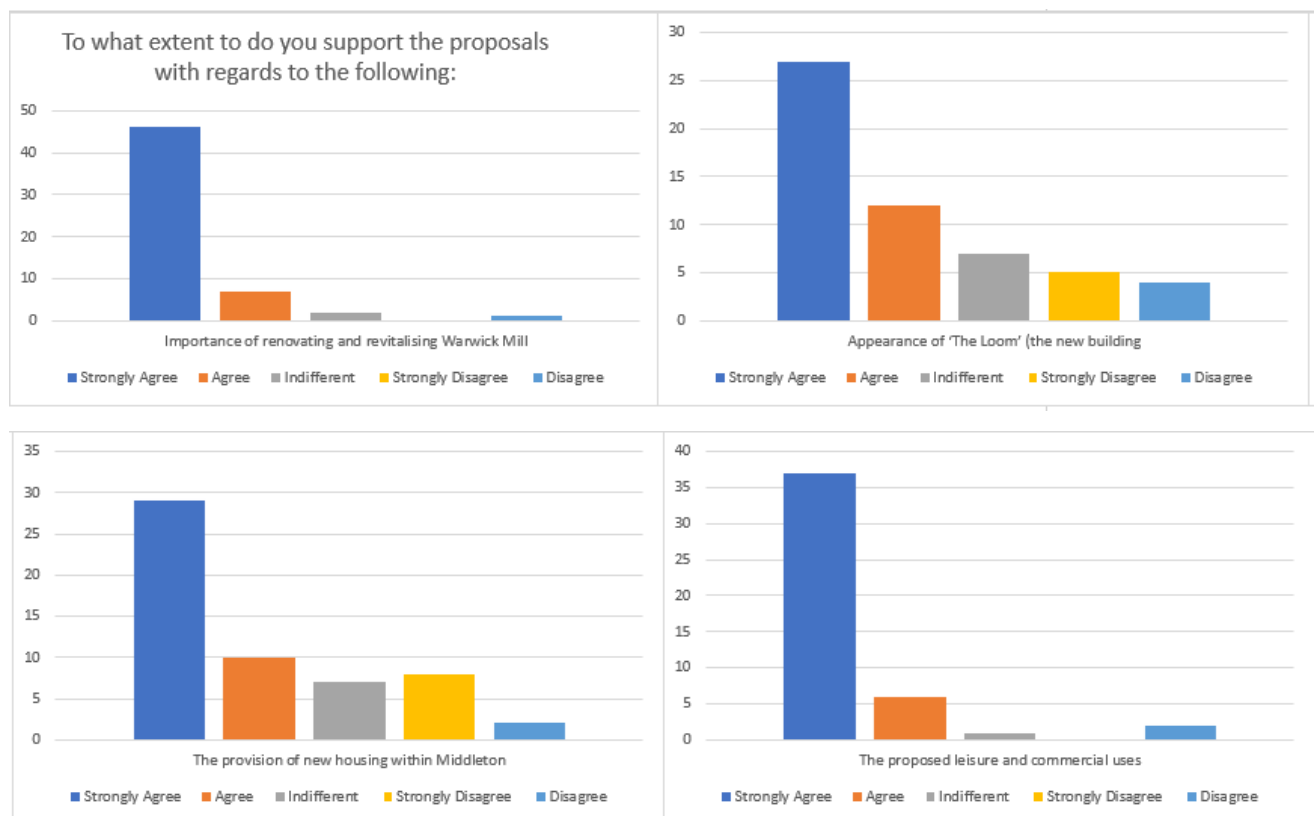
'One of my main concerns would be the traffic - I note you mention you will be doing traffic studies, which will no doubt illustrate how congested it can get round that area - rush hour can be a nightmare. So if that problem can be solved, or at least improved, it would benefit the rest of the town too.'

4.8.5. Other isolated comments related to the following:

- Potential for independent shops;
- Consider more retail space inside the Mill;
- Potentially encourage new tram links;
- Alleviate pressure to build housing on open land elsewhere.

4.8.6. In terms of responses to specific elements of the proposal, the below question pointed to clear support for the inclusion of commercial ground floor units and the provision of residential uses within the exiting Mill.

Figure 4-3 - Questionnaire responses - development proposals



4.9 ADDRESSING THE FEEDBACK

4.9.1. The following section outlines the response the design team have provided as a result of comments made during the consultation.

PUBLIC COMMENTS

Table 4-1 – Key issues received from the public

Consultation Response	Design Team Response
Level of affordable housing	A viability assessment is being undertaken to determine the level of affordable housing the proposed development can viably deliver. This will be submitted alongside the planning application and then will be peer-reviewed on behalf of the Council.
Design, height and massing of the buildings	Some concern was raised about the design and appearance of the residential buildings, specifically how the 'Loom' will sit, particularly compared with other developments built locally. A Heritage and Townscape and Visual Impact Assessment Statement is included with the submission. The proposals for the Loom building have been broken down into an L-shaped building form with a communal podium terrace on the 1st floor of the building directly fronting onto Oldham Road to enable separation with the adjacent Mill. The Loom Building has been designed to complement the retained Warwick Mill in terms of maximising the public view of the Mill to clearly define the historic Mill, but also to maximise interaction between the two buildings at ground and lower ground floor levels. The building design has a plan form that contrasts the solid form of the Mill building to clearly define the contrast of the Mill building in terms of its importance in the historic growth of Middleton, with a modern structure defining the future of Middleton. The angled facades are purposely modern to reflect Middleton's future growth in respect of the Middleton's Town Centre Masterplan. Tall full height windows to the facades maximise light penetration to the single aspect residential units, with infill panels between to complement the solidity of the Mill. The upper floor levels are set back from lower levels to the Wince Brook elevations to reduce the building scale and to acknowledge the existing housing development across from the Brook. These set backs allows for roof terraces to be developed for residents use. The design has been considered from city scale to component scale and provides the scheme with an ordered, subtle but rich and elegant appearance.

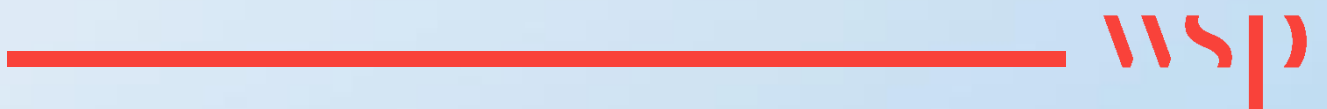
Highways impacts	Some concern was raised about the provision of sufficient number of parking spaces and impact of the development on the existing highway network such as Oldham Road. 77 parking spaces are now provided across the whole development. 100% cycle parking will be provided for residents and Sheffield stands are provided in external locations for visitors. The scheme therefore has not been designed around the car. As the scheme is close to the town centre and public transport, it encourages people to walk and cycle, and discourage people from owning cars. This is a social and environmental benefit in terms of air quality, health and wellbeing, existing highway network and future trade. A Transport Assessment and Travel Plan have been prepared for this proposal which looks at the highway network. The assessment has been undertaken using standard appraisal methods. The assessment shows that the scheme is located in an accessible position with good opportunities for access by sustainable modes (including walking, cycling and public transport). The assessment also shows that the proposal will not generate a significant level of traffic and will not have a material impact on highway operation or road safety. The proposal includes measures to support residents to live sustainably and to further reduce the potential impacts from the development. These include legible and direct pedestrian routes that connect to external areas, a high level of cycle parking, disabled and EV parking, and a Travel Plan. Other proposals have also been developed to facilitate deployment of yellow double lines outside the application site for overspill street parking. The Transport Assessment shows that the proposal meets both local and national policy requirements and will assist RBC to meet its wider ambitions to reduce carbon generated by developments.
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4.10 SUMMARY

- 4.10.1. This Statement of Community Involvement has demonstrated that extensive pre-application consultation and engagement has taken place in the lead up to submitting the planning application. This includes engagement with Council Officers, Ward Councillors and the local community.
- 4.10.2. This engagement and consultation has been helpful and the feedback received has been considered as the proposed site layout has evolved. Most notably a key difference has been the introduction of a green spine through the centre of the scheme, which was incorporated in response to feedback from Council Officer in relation to ensuring green spaces are fully integrated and dispersed throughout the scheme.
- 4.10.3. Overall, the application accords with the approach to pre-application consultation and has been prepared in the context of the NPPF, Localism Act and RBC's SCI.

5

PLANNING POLICY



5 PLANNING POLICY

- 5.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.1.2. The Development Plan for the site comprises:
- Rochdale Core Strategy 2016 ('The Core Strategy');
 - Saved Policies of the Unitary Development Plan 2006 ('the UDP');
 - Middleton Town Centre Masterplan 2022;
 - Greater Manchester Joint Waste Development Plan Document (2012); and
 - Greater Manchester Joint Minerals Plan (2013).
- 5.1.3. Other material considerations include the National Planning Policy Framework (NPPF), Supplementary Planning Documents (SPDs), and Planning Practice Guidance (PPG).

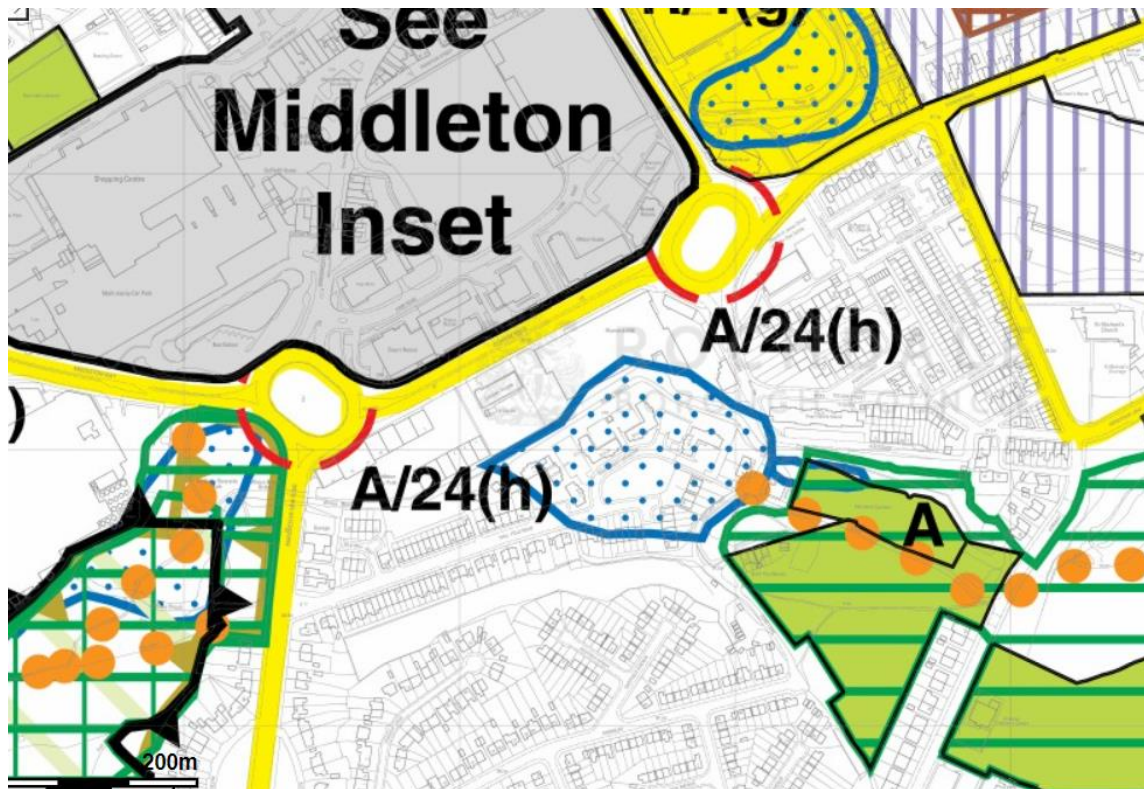
5.2 NATIONAL PLANNING POLICY FRAMEWORK

- 5.2.1. The NPPF was updated on 20 July 2021 and is a key material consideration in the determination of planning applications.
- 5.2.2. The key sections of the NPPF applicable to this application comprise:
- Section 2: Achieving sustainable development
 - Section 5: Delivering a sufficient supply of homes
 - Section 7: Ensuring the vitality of town centres
 - Section 8: Promoting healthy and safe communities
 - Section 9: Promoting sustainable transport
 - Section 11: Making effective use of land
 - Section 12: Achieving well-designed places
 - Section 14: Meeting the challenge of climate change, flooding and coastal change
 - Section 15: Conserving and enhancing the natural environment
 - Section 16: Conserving and enhancing the historic environment
- 5.2.3. The relevant paragraphs are provided in full at **Appendix D**.

5.3 SAVED POLICIES ROCHDALE BOROUGH COUNCIL'S UNITARY DEVELOPMENT PLAN (2006)

- 5.3.1. RBC's UDP map (1996-2016) is still in place until the Council adopts their Allocations Development Plan. As identified in **Figure 5-1** (below) the plan identifies the majority of the site as 'white land' and has not been allocated for a specific use. The map does identify a small portion of the site within the Development and Flood Risk area (Policy EM/7).

Figure 5-1 - Extract of the UDP Planning Policy Map



5.3.2. The policy states that:

'Development will not be permitted in areas identified as flood plains, or other areas where development could contribute to increased flood risk, unless an appropriate flood risk assessment has been carried out and all of the following criteria are met:

- a) It will not increase the risk of flooding within the flood plain or in adjoining areas by reducing flood storage capacity, increasing flows within a flood plain or through the additional discharge of surface water;*
- b) It will not itself be at risk from flooding;*
- c) Appropriate sustainable drainage systems are used;*
- d) Adequate access adjacent to the water course for maintenance is provided;*
- e) Existing or proposed flood defences are protected;*
- f) It would not result in extensive culverting; and*
- g) Flood defence works required as a consequence of development are provided at the developer's expense.'*

5.3.3. Oldham Road (A669), which borders the northern boundary of the site, is identified as a Strategic Highway Network and the southern boundary of Middleton Town Centre lies directly beyond.

5.4 MIDDLETON TOWN CENTRE MASTERPLAN (FEBURARY 2023)

- 5.4.1. The Middleton Town Centre Masterplan was recently adopted on 15 February 2023. The Masterplan sets out the strategic vision for Middleton and includes an approach to achieving a series of goals through a series of layered framework plans and key interventions.
- 5.4.2. The Masterplan strategic vision seeks to see the evolution of Middleton Town Centre towards an attractive and liveable destination creating streets that are pedestrian and cycle friendly and linking these together to high quality public spaces that are welcoming and encourage biodiversity and build in a resilience to climate change.
- 5.4.3. Warwick Mill and adjoining London House are included within the 'Warwick Basin' distinctive area of change. This area is anticipated to form the front door to Middleton town centre with a focus on office, residential and leisure uses.

Figure 5-2 - Figure 5-2 - Plan showing key interventions in in Warwick Basin (Source: Middleton town centre masterplan 2022)



- 5.4.4. The Masterplan recognises that a major opportunity lies in bringing historic assets such as Warwick Mill back to life through redevelopment.
- 5.4.5. The Masterplan vision sets out the proposed changes within the town centre and designates the renovation of Warwick Mill as one of its key development objectives and themes with Warwick Mill to become a key anchor fronting onto the Wince Brook River:

'Warwick Mill is a visual and emotional anchor for the town which both orientates and provides a connection with Middleton's past. The redevelopment of the mill and adjacent London House is of a

scale which could provide a create a residential quarter on the banks of Wince Brook. By incorporating new public realm adjacent to the river, the Mill complex has the potential to also provide a new destination in the town centre, which could be added to through ground floor commercial uses, which could include independent cafe's, bakeries or bars animating the area around the mill, encouraging it to become an integral part of the town centre.'

- 5.4.6. Warwick Mill and London House are identified as specific development opportunities plots in the Masterplan (plots 4.3 and 4.4). Warwick Mill (plot 4.3) is earmarked for the refurbishment and re-use for mixed-use commercial/residential development and London House (plot 4.4) is earmarked for demolition and re-build, in the form of infill development, for a mixed use with commercial at ground level.

5.5 ROCHDALE BOROUGH COUNCIL CORE STRATEGY (2016)

- 5.5.1. RBC's Core Strategy (adopted on 19 October 2016) is the lead document in the Local Plan.
- 5.5.2. Policy SD1 'Delivering sustainable development' confirms planning applications that accord with the policies in the core strategy will be approved without delay, unless material considerations indicate otherwise.
- 5.5.3. Policy DM1 'General development requirements' highlights all development proposals should be of high-quality design, enhance the quality of the area, be compatible with surrounding land uses, do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy.
- 5.5.4. Policy SO2 'To create successful and healthy communities' focuses of delivery sufficient housing to meet demand, improving the range of housing to meet everyone's needs and aspirations as well as ensuring new housing is supported by community facilities and service infrastructure.
- 5.5.5. Policy SO3 'Improving design, image and quality of place' focuses on raising design quality and promoting sustainable developments as well as improving gateways into the borough and main transport corridors to improve the image of the borough.
- 5.5.6. Policy SO4 'Promoting a greener environment' promotes ensuring development is energy efficient and contributes to carbon reduction, maximising green open areas and biodiversity.
- 5.5.7. Policy SO5 'Improving accessibility and delivering sustainable transport' highlights development should be directed to the most accessible locations.
- 5.5.8. Policy C1 'Delivering the right amount of housing in the right places' outlines the need to deliver at least 460 net additional dwellings per year up to 2028 to assist in the creation of successful, inclusive and mixed communities and meet the housing need of the borough.
- 5.5.9. Policy C3 'Delivering the right type of housing' requires all housing development to be well designed and built to appropriate densities to meet the overall needs and aspirations of the borough.
- 5.5.10. Policy P1, 'Improving image', requires high quality design for all new development to ensure new development improves the image of the borough.
- 5.5.11. Policy P2, 'Protecting and enhancing character, landscape and heritage', seeks to ensure new development protects and enhances the borough's heritage assets.

- 5.5.12. Policy P3, 'Improving design of new development', requires all new development to adhere to design principles including ensuring it contribute positively to the townscape in addition to ensuring the impact upon the environment is minimised.
- 5.5.13. Policy G1, 'Tackling and adapting to climate change', aims for new developments to address climate change and ensure the development does not increase CO2 emissions.
- 5.5.14. Policy G6, 'Protecting green infrastructure', seeks to ensure residential development provides or contributes financially towards recreational open space.
- 5.5.15. Policy G7, 'Increasing the value of biodiversity and geodiversity', outlines sites and features of biodiversity and geodiversity importance will be given full and appropriate recognition and protection and no development should result in a net loss of biodiversity or geodiversity interest in the borough and overall development in the borough should result in a net gain.
- 5.5.16. Policy G8, 'Managing water resources and flood risk', seeks to ensure that new development does not lead to any form of increased flooding locally, does not impede natural water and flood risk management, is not detrimental to existing or potential flood storage areas, contributes where possible to alleviating existing flood risk, and is well protected from flood risk.
- 5.5.17. Policy G9, 'Reducing the impact of pollution, contamination and land instability', requires that development does not have impacts that lead to an unacceptable increase in air, water, noise, light and other pollution; seeks to ensure that new residential development is not adversely affected by existing sources of pollution or ground contamination or land instability.
- 5.5.18. Policy T2 'Improving accessibility' aims to locate development in sustainable areas in order to minimise the need to travel by car and the number and length of car trips made to access local amenities.
- 5.5.19. Policy SP3/M – Strategy for Middleton seeks to prioritise the revitalisation of Middleton town centre by focusing retail, leisure, cultural and employment development in the town centre.

5.6 OTHER MATERIAL CONSIDERATIONS

PLACES FOR EVERYONE DRAFT JOINT DEVELOPMENT PUBLICATION PLAN (2021)

- 5.6.1. The Places for Everyone Joint Development Plan Document (PfE) 2020-2037 underwent a publication stage (July, 2021). Examination in public took place 2022-2023, and the Inspectors' report is awaited.
- 5.6.2. Once adopted, PfE will place a greater focus on developing Greater Manchester's brownfield sites, building at higher densities and pursuing the regeneration of sites in sustainable locations. One of the key principles behind the draft spatial strategy is to minimise future spatial outward growth and ensure that land resources in and around the regional centres are used efficiently and effectively.

GUIDELINES & STANDARDS FOR RESIDENTIAL DEVELOPMENT SPD (JUNE 2016)

- 5.6.3. The Council adopted this SPD in June 2016 to inform the development management policies relevant to residential development, and to set guidelines for specific design issues which should be address by new residential developments.
- 5.6.4. These include but are not limited to standards surrounding overlooking distances between dwellings, waste management arrangements and minimum space standards.

URBAN DESIGN GUIDANCE SPD

- 5.6.5. The Residential Design Guide forms one part of a series of the Design Guides produced jointly by Oldham Metropolitan Borough Council, RBC, and the Oldham Rochdale Partners in Action Housing Market Renewal. The aim of the document is to provide clear guidance on the quality of design expected by both boroughs.

AFFORDABLE HOUSING SPD (MARCH 2008)

- 5.6.6. This SPD sets out Rochdale's position with regards to affordable housing policy and is based around three themes:
- providing high quality homes in mixed sustainable communities for those in need;
 - widening the opportunities for home ownership; and
 - offering greater quality, flexibility and choice to those who rent.
- 5.6.7. The Council will in most cases expect the contribution to affordable housing to be made on site as an integrated part of the development.
- 5.6.8. This will promote socially inclusive and sustainable communities and minimise the delay in making the affordable housing available. Providing affordable housing off-site is not the Council's preferred method. However, in certain circumstances consideration will be had if there are good planning and housing need reasons, that on-site provision is not suitable.

PROVISION OF RECREATIONAL OPEN SPACE IN NEW HOUSING SPD (UPDATED 2007)

- 5.6.9. This SPD sets standards for the open space required within new residential development.

6

SEQUENTIAL AND RETAIL IMPACT ASSESSMENT



6 SEQUENTIAL AND RETAIL IMPACT ASSESSMENT

- 6.1.1. This section provides a sequential and retail impact assessment in relation to the flexible commercial floorspace proposed (Use Class E) as part of the development at the ground floor of the Loom and Warwick Mill buildings. The total Gross Internal Area of commercial floorspace proposed is 2,113 sqm.
- 6.1.2. The site sits outside of, but within approximately 20 meters of the Middleton town centre boundary. As identified in Core Strategy E1 'Establishing thriving town, district and local centres', Middleton is the second largest centre in the borough.
- 6.1.3. The NPPF Glossary defines main town centre uses as the following;
 - Retail development (including warehouse clubs and factory outlet centres);*
 - leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls);*
 - offices; and*
 - arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).*
- 6.1.4. With regard to the assessment of proposals for main town centre uses, the NPPF provides two policy tests, firstly relating to the sequential approach to development of all main town centre uses and secondly to the impact of retail and leisure proposals.

6.2 SEQUENTIAL ASSESSMENT

- 6.2.1. Paragraph 87 of the NPPF states that local planning authorities should apply a sequential test to planning application for main town centre uses that are not in accordance with an up-to-date plan. The paragraph goes on to state that:
 - 'Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.'*
- 6.2.2. Paragraph 88 then identifies that:
 - 'When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.'*
- 6.2.3. Policy E1 'Establishing thriving town, district and local centres' states in considering proposals for main town centre uses the Council will require the application of the sequential approach, where the application site is not in an existing centre and not in accordance with an up to date Development Plan.
- 6.2.4. In this case, the commercial floorspace accords with the aspirations of the recently adopted Middleton Town Centre Masterplan (2023), which supports adopted policy. The proposal is thus in accordance with adopted guidance and the council's aspirations.

- 6.2.5. The proposed commercial floorspace is located on the ground floor of the development proposals, within very close proximity to the boundary of Middleton town centre. The commercial floorspace is aimed at small to modest-sized businesses, which will serve the new residents living in the proposed residential scheme and the immediate surrounding area. The uses proposed aim to serve the local community and provide a local facility, as such, the catchment is not reliant on car-borne customers. Furthermore, a degree of flexibility should be applied to the sequential test as part of the application and regard should be had to the scale and nature of the main town centre uses proposed and their relationship to the rest of the scheme.
- 6.2.6. While planning policy requires applicants to adopt a flexible approach towards the sequential assessment, this must be applied within the parameters established by the Supreme Court judgment in *Tesco Stores Limited v Dundee City Council*, 2012. This has been endorsed by the English Courts in *Zurich* and considered in some detail by the SoS in the *Rushden Lakes* decision, 2013, and widely quoted in many subsequent decisions. This judgment concludes that in order for a site to be considered 'suitable', conclusions should be based on a 'real' world assessment, and whether an alternative site is suitable for the development proposed, not whether the proposed development can be altered or reduced to fit alternative sites, making allowance for a reasonable degree of flexibility in terms of the format and scale of the proposed development.
- 6.2.7. Disaggregation is no longer a requirement of the sequential test, as set out in the NPPF. The proposed scheme at Warwick Mill includes a mix of commercial uses that seek to directly serve the residential accommodation with the objective of creating a sustainable new neighbourhood, which will also assist in creating a sense of place for the overall scheme and immediate area. There is a functional need for these uses to be part of the proposed development alongside the residential units.
- 6.2.8. Requiring the proposed main town centre uses to be separated from the development as a whole will not lead to their development elsewhere, however, it will impede the delivery of a comprehensive mixed-use scheme capable of evolving into a new community. Indeed, this is acknowledged through the recently adopted Town Centre Masterplan which specifically identifies retail and commercial uses for the site to support the town's regeneration. On this basis, it was agreed with the LPA that undertaking a search for sequential sites is not considered to be necessary as there would be very limited sites that could accommodate the whole of the proposed development.

6.3 RETAIL IMPACT ASSESSMENT

- 6.3.1. Policy E1 'Establishing thriving town, district and local centres' requires an impact assessment for retail, leisure and office where the proposed application exceeds the locational requirements floorspace thresholds.

- 6.3.2. Paragraph 90 of the NPPF sets out two parts to the impact test, stating that:

'When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sqm of gross floorspace). This should include assessment of:

- *the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*

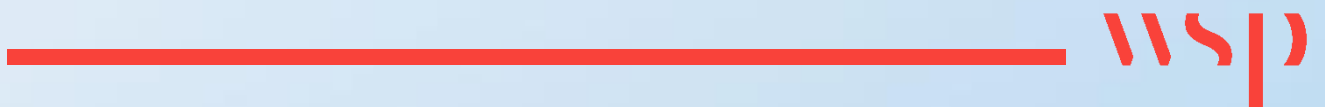
- *the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment (as applicable to the scale and nature of the scheme).*

- 6.3.3. Overall the total of commercial floorspace proposed across Warwick Mill and the Loom is 2,113 sqm and whilst the NPPF threshold is 2,500 sqm of gross floorspace, RBC policy outlines a threshold of 1,000sqm for Middleton.
- 6.3.4. The commercial floorspace proposed falls under the national threshold and therefore in accordance with national policy an impact assessment is not required and the delivery of the commercial units is acceptable.
- 6.3.5. With regards to local policy, whilst the proposed development may exceed the requirement, the precise uses of the commercial floorspace proposed is still to be confirmed and flexible uses is sought at this stage. It is unlikely that all the floorspace proposed will be utilised as retail as the flexible commercial use sought includes a range of uses including restaurants and cafes. Given this, there is a high probability that the retail floorspace provided within the scheme will fall below the local threshold and there will be no effect from a retail impact perspective.
- 6.3.6. In addition, Policy SP3/M of the Core Strategy seeks to direct new retail, leisure and cultural development towards Middleton town centre in order to help regenerate the area alongside Core Strategy Policy P1. This is reiterated through the Middleton Town Centre Masterplan. The proposals would therefore be wholly in accordance with this policy.
- 6.3.7. Based on the above, the application site at Warwick Mill is available and suitable to accommodate the proposed development as a whole including associated car parking and landscaping. On this basis and through pre-application discussions with RBC it is considered that the proposed development will not require a comprehensive sequential or retail impact assessment and the proposed commercial development is entirely appropriate at the proposed Warwick Mill scheme.



7

AFFORDABLE HOUSING STATEMENT



7 AFFORDABLE HOUSING STATEMENT

- 7.1.1. This following section sets out the affordable housing statement as identified in the Council's validation checklist.
- 7.1.2. This planning application proposes 281 new homes.
- 7.1.3. Of these, there will be:
- 18 x studio apartments;
 - 152 x 1 bed apartments;
 - 110 x 2 bed apartments; and
 - 1 x 3 bed apartment.
- 7.1.4. Core Strategy Policy C4 seeks affordable housing on all developments of 15 dwellings or more and the Council will seek a contribution to affordable housing of 7.5% of the development sales value of the affordable scheme. Based on the proposed scheme of 281 units, this equates to 38 affordable homes.
- 7.1.5. Both national planning policy and guidance and RBC local policy identifies that the overall financial viability of a scheme should be considered to establish if a development can provide and deliver affordable housing.
- 7.1.6. Planning Practice Guidance sets out that Local Planning Authorities should seek to work with interested parties to promote their development. To incentivise the bringing back into use of sites, Local Planning Authorities should: *"Take a flexible approach in seeking levels of planning obligations and other contributions to ensure that the combined total impact does not make a site unviable."*
- 7.1.7. Policy C4 also states that:
- 7.1.8. ***'A key issue in providing affordable housing is how it impacts on the overall viability of the scheme. In order to ensure that the viability of sites is not compromised the Council has carried out an Economic Viability of Affordable Housing Requirements assessment. This study demonstrates that the level of affordable housing set out in the policy can be achieved. Any applicant seeking to reduce the affordable housing requirement will be required to demonstrate why through a detailed financial appraisal of the scheme.'***
- 7.1.9. A Financial Viability Assessment will be submitted during the application determination process which will consider the financial viability of the proposals, taking into account development costs and the anticipated value of the proposed development on completion. This will be used to determine if the development can contribute to the delivery of affordable housing.
- 7.1.10. RBC is aware of the site's challenges including the state of disrepair it is currently in and the costs and work required to regenerate and repurpose the iconic Grade II listed mill. Notwithstanding the above, the proposals will provide a high quality residential-led development in this area of Middleton which is a key part of the development growth aspirations of RBC and it will assist in diversifying the housing market in the area. The proposal will see the development of an under-utilised, vacant site which currently detracts from the vitality and viability of the area, into a well-designed new development and deliver 281 quality homes and ground floor commercial uses on this prominent site.

8

PLANNING CONSIDERATIONS



8 PLANNING CONSIDERATIONS

- 8.1.1. This section demonstrates that the principle of the proposed development aligns with the adopted Development Plan and the key planning considerations. **Section Nine** then goes onto to consider other material considerations.

8.2 DEVELOPMENT IN MIDDLETON

- 8.2.1. The site is located on the edge of Middleton town centre which is allocated in the Middleton Town Centre Masterplan as a mixed-use regeneration area, representing an opportunity to establish a range of higher density housing types and to regenerate former industrial land. Specifically, the site is within the 'Warwick Basin' distinctive area of change. This area is anticipated to form the front door to Middleton town centre with a focus on office, residential and leisure uses.
- 8.2.2. The principle of the proposed residential-led development along with ancillary commercial, retail and leisure uses are acceptable within the Warwick Basin area of the Middleton Town Centre Masterplan and is consistent with Local Policy and the Framework. The development will bring forward much needed homes on previously developed land, which supports the NPPFs drive to boost the supply of homes in sustainable locations.
- 8.2.3. The proposed development will ensure the delivery of a key landmark site on the edge of Middleton town centre which is allocated for mixed use development. The principle of development is established.
- 8.2.4. The mill is in a particularly poor state of repair and without considerable intervention and investment; there is a very real risk of the building's deterioration accelerating which could result in total loss.
- 8.2.5. The proposals submitted including layout, appearance, scale, density and landscaping (further details are outlined below) are entirely appropriate for the site and its context.

8.3 SUSTAINABLE DEVELOPMENT ON A BROWNFIELD SITE

- 8.3.1. The proposal represents sustainable development in line with the definition set out at NPPF paragraph 119, as set out in more detail below.
- 8.3.2. The site is in a sustainable location for homes. The principles of sustainable development underpin the proposal, which makes the best use of brownfield urban land and re-uses an existing building. The proposal delivers positive improvements in the quality of built and historic environments, providing new residential development, commercial space and improvements to the public realm.
- 8.3.3. It aligns with many of the key principles of the NPPF. The NPPF sets a presumption in favour of sustainable development which meets economic, social and environmental benefits (paragraph 8). Amongst other objectives, NPPF:
- emphasises the importance of significantly boosting the supply of homes (para 60);
 - encourages residential development on appropriate town centre sites (para 86(f));
 - seeks to focus significant developments in sustainable locations which offer a choice of transport modes (para 105); and
 - encourage putting heritage assets to viable uses in order to sustain and enhance their significance (para 197(a))

- 8.3.4. The submitted Heritage Appraisal provides a detailed appraisal of the proposed development against heritage guidance contained within the NPPF. This is summarised later on in this chapter. The less than substantial harm caused to the designated heritage assets is significantly and demonstrably outweighed by the substantial development benefits.
- 8.3.5. Overall, the proposed development accords with the main thrust of the NPPF for the re-use of disused buildings on brownfield land and development which delivers economic, social and environmental benefits.

8.4 DELIVERING A MIX OF HOUSING

- 8.4.1. NPPF confirms the Government's objective of "significantly boosting the supply of homes." Evidence underpinning the emerging Places for Everyone joint plan signals the need to boost housing on brownfield land in Rochdale.
- 8.4.2. The Rochdale Core Strategy sets out the target for 460 additional homes per year over the period 2012 to 2028. A key part of the Council's housing strategy is to promote and support development which widens the choice of housing available to residents.
- 8.4.3. The range and type of housing that would be provided by the proposed development at Warwick Mill would contribute to widening the choice of housing available to residents. The provision of 281 residential units represents 61% of Rochdale's annual target, beneficially contributing to the need to supply good quality, comfortable homes for communities.
- 8.4.4. Policy C3 'Delivering the right amount of housing in the right places' sets out that the Council will deliver the right type of homes by (amongst other principles) focusing on higher density development in and around Middleton town centre and along major transport corridors .
- 8.4.5. The proposals comprise a mix of studio, 1, 2, 3 bedroom homes helping to deliver a range of house types that meet local needs whilst also aligning with the Council's desire for high density development in and around Middleton town centre.
- 8.4.6. The proposed dwellings are high quality, energy efficient and will assist in mitigating any risk of residents moving away from the borough to secure a home.

8.5 DELIVERING A HIGH STANDARD OF DESIGN

- 8.5.1. The Design and Access Statement (DAS) and accompanying plans have been prepared by GMA Architecture. The proposals have been prepared in light of careful consideration and response to the site's context, heritage assets and the site's opportunities and challenges.
- 8.5.2. The design vision for the proposed development is to create a high quality sustainable development that provides social, economic and environmental benefits for the proposed residents and community of Middleton town centre.
- 8.5.3. The site presents many opportunities as it is located in a prominent position on Oldham Road and is in close proximity to Middleton Town Centre. The challenges including access and the dilapidated state of the mill are addressed and justified through the proposed design.
- 8.5.4. The design embraces these challenges and turns them into opportunities to produce a high-quality architectural aesthetic that will sit harmoniously in the urban context. The design has been fully considered with regards to use, amount, scale, layout, elevational treatment, appearance, accessibility, sustainability and materiality to ensure that the development benefits its immediate

location but will also generate wider reaching long term community benefits for the town making a significant contribution to the continued regeneration of Middleton.

- 8.5.5. Given the surrounding regeneration context of the area, the redevelopment of this site will set a precedent for future redevelopment in this area and the design has worked hard to offer the best solution in layout terms taking into account the local vernacular. This accords with paragraphs 119, 126 and 130 of the NPPF which promotes an efficient use of land, the use previously developed land and optimising the potential of a site to accommodate appropriate development.
- 8.5.6. The scheme has been considered throughout the evolution of the design process. The applicant has worked closely with the local planning authority and consultees to refine the design so that it best takes account of protecting and improving the character and quality of the area. It is acknowledged that the site sits in a sensitive location given the Grade II listed mill. The proposed development takes a sensitive approach to layout and form of the proposed new building which fully respects the setting of the Grade II mill and its assets.
- 8.5.7. Core Strategy Policy P1 ‘Improving Image’ expects all development to have regard to specific issues including high quality design in all new developments with additional emphasis placed on developments located within town centres. The design response to each of the policy requirements is set out in **Table 8-1** below.

Table 8-1 – Development response to Policy P1 ‘Improving Image’

Policy P1 considerations	Development response
Requiring design which is of a high standard, demonstrating innovation and originality;	The scale and form of the building responds to the surrounding areas both with regard to height and massing. Site specific considerations have informed the design. The design development is set out within the Design and Access Statement prepared by GMA Architects.
Working with developers of major developments to incorporate public art in the design of buildings and spaces or contribute to public art projects as appropriate	The proposals include the former engine room and associated machinery. Where practical, the proposals have sought to ensure that the original features of the mill remain.
Helping to ‘green’ the urban environment, for example by securing tree planting on sites and along streets and roads	The proposals include the planting of over 50 native trees across the public realm areas introducing substantial green infrastructure to a site devoid of biodiversity in addition to hard and soft landscaping and public realm across the site.
Promoting the development and re-use of under-used land and buildings, maximising the potential for heritage assets to provide a sense of place and image	Proposals will breathe new life into a Grade II Listed vacant mill and remove the eyesore of London House and allow the site to fully contribute to the on-going regeneration of Middleton. Warwick Mill is in a particularly poor state of repair and without considerable intervention and investment; there is a very real risk of the building’s deterioration accelerating which could result in total loss.

Creating people-friendly, safe, vibrant, uncluttered public areas	The new public space within the application site will benefit the proposed development and will also contribute positively to the wider public space network in the town, and the aspirations for the Middleton Town Centre Masterplan area. Private amenity space is also proposed for future residents. This includes internal atrium and landscaping terraces across a number of podiums.
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- 8.5.8. Core Strategy policy DM1 ‘General Development Requirements’ expects all development to have regard to the specific issues including effects on amenity such as noise, light, air quality, road safety and traffic generation; accessibility; community safety and crime prevention; vehicular access; and, green infrastructure. The design response to each of the policy requirements is set out in **Table 8-2** below.

Table 8-2 - Development response to Policy DM1 ‘General Development Requirements’

Policy DM1 considerations	Development response
Are of high quality design and take the opportunity to enhance the quality of the area;	Place making has been improved with the addition of new public realm and the provision of active frontage and entrances in locations to enhance vitality and animation of the streets.
Are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents / users	The impact of the proposals on surrounding townscape views has been fully assessed within the planning application. The technical assessments are supported by a Townscape Visual Impact Assessment. Through design development, the layout, massing, site position and facade have been tested and refined so that the building reaches its potential and provides a high-quality addition to Rochdale’s built environment. The Heritage Assessment takes into consideration the key views and demonstrates that the proposed development is in accordance with the requirements of the Historic England guidance Statement of Heritage Significance (2019) and Conservation Principles, Policies and Management for the Sustainable Management of the Historic Environment (2008).
Do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy	The proposed tree planting will assist in enhancing the visual amenity of the proposed development and will assist in creating attractive landscaped areas at various points within the site and along its boundaries. In addition, the design concept has taken into account the future occupiers of the mill by designing

	the Loom building as a 'U' shaped plan form to allow increased daylighting levels to apartments and partial separation from the mill. The creation of a podium deck for resident's use will result in improved natural light to all apartments.
Mitigate against any impacts due to noise, air, dust, light and odour pollution, traffic generation or inadequate access, where such mitigation is identified as being necessary	The enclosed air quality assessment concludes that the residual dust impacts arising from the construction phase are not considered to be significant provided mitigation measures are undertaken.
Provide satisfactory vehicular access with adequate parking, manoeuvring, and servicing arrangements taking into account of the proposed use and location	Likely levels of vehicle movements are not predicated to have a significant effect upon air quality or traffic generation.
Do not have an adverse impact on health, through its impact or the effect of existing problems e.g. land contamination, or poor air quality	The enclosed air quality assessment concludes that the residual dust impacts arising from the construction phase are not considered to be significant provided mitigation measures are undertaken.
Provide, or demonstrate the availability of, the service and community infrastructure necessary to meet local needs e.g. local shops, community, leisure and sport facilities and provision of open space	The development complies with the inclusive design standards and therefore enables everybody to be able to enter the buildings, use its facilities and leave safely, independently and with ease. The development will also promote active travel and exercise by encouraging and prioritising walking and cycling through the provision of safe internal cycle storage and the creation of functional and interesting pedestrian linkages throughout the site and connecting to the wider public realm locally.
Minimise opportunities for crime against people or property;	The buildings have been designed to improve safety and security of the area via passive overlooking and through small design improvements arising from consultation with GMP.
Take account of ground conditions including unstable or contaminated land - where a potential risk exists, a survey should be carried out and any necessary remedial measures identified and carried out	The majority of ground breaking works will be undertaken on the land currently occupied by London House which has been subject to previous development and thus has been subject to ground-breaking works previously.
Incorporate, where appropriate, high quality landscape schemes	The proposals include the planting of over 50 native trees across the public realm areas introducing substantial green infrastructure and addition to a generous amount of public open space to a site devoid of any including provision of hard and soft landscaping and public realm proposed across the site.

Have assessed whether the development may be affected by ground instability	A Preliminary Contamination and Geotechnical Risk Assessment has been carried out. The report recommends that intrusive exploratory works with in-situ laboratory testing is undertaken. This will allow underlying geology to be determined including the thickness of any Made Ground and any pollutant linkages.
Have considered the availability of water and wastewater infrastructure, and any need for additional capacity.	A Flood Risk and Drainage Strategy has been undertaken which ensures there is sufficient water and wastewater infrastructure for the development proposals.
Do not lead to impacts detrimental to the conservation interests of European Protected Sites	There will be no effects on biodiversity or landscape. The site is of low archaeological interest and the development will enhance the setting of heritage assets.

8.6 CONSERVING, ENHANCING AND BRINGING A HERITAGE ASSET BACK INTO USE

- 8.6.1. Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 set out a duty for local planning authorities as decision maker to have regard to the desirability of:
- “preserving the building or its setting or any features of special architectural or historic interest which it possesses”.*
- 8.6.2. The application site does not lie within a conservation area. A Heritage and Townscape and Visual Impact Assessment Statement has been conducted (by Townscape Consultants) which is submitted with this application. In line with S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and the requirements set out at NPPF paragraph 189, the submitted Heritage Appraisal conducts a thorough assessment of the significance of all the buildings on site and identifies the most historically significant buildings.
- 8.6.3. The Heritage Appraisal demonstrates understanding of the significance of the assets and of the wider context in which the heritage assets sit, alongside assessment of the potential impact of the development on the heritage assets and their context.
- 8.6.4. The report includes brief analysis of Warwick Mill’s historical development, overall layout and identifies those parts of the heritage asset that make up its significance with the main proposed interventions internally and externally assessed against current heritage policy.
- 8.6.5. The report concludes that the proposed development to the heritage asset will lead to a moderate/high level of impact and harm due to the internal changes proposed, including the part removal of interior walls, however, the adverse impacts are to be mitigated by substantial heritage benefits of the scheme, principally the repair and retention of the most significant component parts of the mill and the high quality and sensitive design of the new proposed development. This identified harm is “less than substantial” in terms of the relevant test set out at paragraphs 199 to 202 of NPPF (as set out at in the submitted Heritage Statement and Impact Assessment).

- 8.6.6. The proposal accords with Core Strategy Policy P2 ‘protecting and enhancing character, landscape and heritage’ which supports protecting and enhancing heritage assets and prioritising the conservation of heritage assets at risk from decay, giving special attention to designated heritage assets in this regard.
- 8.6.7. As already noted, the proposed demolition and conversion works have been carefully balanced against the important heritage considerations. As the mill has a wide footprint and floorplate, it is clear that in order to retain and repurpose the building, internal areas within the building need to be opened up through partial demolition of internal floors to allow access and light to the retained floors.
- 8.6.8. Alternative uses have been considered but given the building constraints and costs of refurbishment, these are not practicable or viable. The optimum viable use for the retained mill building is conversion to residential use.
- 8.6.9. The proposed development has a positive impact on its setting, location and wider townscape, with the introduction of the new high quality and distinctive building, ‘The Loom’.
- 8.6.10. In accordance with Core Strategy Policy P2 the development makes a positive contribution to the protection and enhancement of the Borough’s heritage assets. The proposal is of an appropriate scale, form, height, massing, alignment and detailed design which will contribute to local distinctiveness, complement the built form and scale of heritage assets and respect the character, appearance and setting of the locality.
- 8.6.11. In line with NPPF paragraph 202, the Heritage Appraisal and this Planning Statement have identified the significant public benefits arising from the proposal (see below for a full summary of the significant economic, social and environmental benefits). When weighed against the harm identified within the Heritage Appraisal, these public benefits weigh substantially in favour of granting planning permission and securing the site’s optimum viable use.

8.7 PUBLIC BENEFITS

- 8.7.1. The development will deliver significant environmental, social and economic benefits. The benefits associated with this application should be considered as part of the heritage public benefits test, and also the overall planning balance and the heritage case.

ECONOMIC BENEFITS

- 8.7.2. Temporary economic benefits such as:
- Construction of the new development alongside regeneration of the mill will create both direct and indirect construction jobs over the construction period;
 - Generation of gross value added to the local economy by the temporary construction employment;
- 8.7.3. Permanent economic benefits such as:
- Generation of Council Tax receipts and New Homes Bonus payments to RBC from the apartments proposed;
 - Creation of employment opportunities (direct and indirect) from the commercial units; and
 - Increased footfall to a currently under-used site benefiting commercial and leisure uses nearby in Middleton town centre.

SOCIAL BENEFITS

8.7.4. Social benefits including:

- Support for local skills through job creation;
- Generation of positive social outcomes in relation to reduced carbon footprints of residents, enhanced carbon literacy, reduced fuel poverty, crime prevention, community cohesion and inclusiveness;
- Provision of recreational space thus improving health and well-being;
- Providing a mix of new homes for the local community in Middleton contributing towards the housing need; and
- Helping to create a vibrant town centre that is well used by residents.

8.7.5. The introduction of residential development to Warwick Mill will deliver the restoration of the existing historic mill buildings. It will bring about a vibrant development and introduce activity on the site which is derelict. The heritage considerations are considered more fully below and within the accompanying Heritage Assessment prepared by Townscape Consultants.

8.7.6. The introduction of flexible commercial space will further increase footfall and opportunities for socialising and relaxing which will benefit the wider area.

ENVIRONMENTAL BENEFITS

8.7.7. Environmental benefits including:

- Reuse of previously development land. This directly assist meeting sustainable development as outlined in national and local policy by delivering housing on previously developed land;
- Significant improvements to a listed building, which is currently dilapidated;
- Re-use of an existing building and refurbishing the mill to a high standard. This includes taking advantage of improving the quality of the building fabric which has been maximised. The accompany Energy Statement and Structural Report demonstrate that the proposed works to Warwick Mill have been designed to a high standard;
- High quality design, both of the refurbished existing building and new building, which will improve the appearance of the built environment in Middleton town centre, better revealing the significance and appreciation of Warwick Mill and enhance the relationship to the brook.

8.7.8. Environmental benefits will be delivered through the implementation of an energy strategy that will underpin an energy efficient development. The provision of photovoltaic panels (PV) for renewable energy generation for future residents to help RBC continue to meet its ambitions towards being carbon neutral by 2038.

8.7.9. Parking provision within the scheme comprises 77 parking spaces encouraging inhabitants and visitors to find alternative means of travel to and from the site. Car share and car pool initiatives will further help to reduce reliance on private car, and a Travel Plan will be put in place for the new residents to be encouraged to choose sustainable means of transport over private car journeys.

8.7.10. The proposal incorporates 340 cycle parking spaces which will further support the reduction in vehicle usage and use of sustainable transport methods. It will also benefit the public by promoting healthy communities.

- 8.7.11. Ecological benefits arising from additional landscaping in the form of trees and native ornamental grasses and hedges will be introduced creating a landscaped ecological mitigation area to generate year-round biodiversity benefits.
- 8.7.12. The proposal will provide a 10% BNG on site which will contribute positively to the conservation of biodiversity.
- 8.7.13. The additional soft landscaping and the green infrastructure proposals woven throughout the design creating connections to the existing Wince Brook also represents a visual and biodiversity benefit that would contribute towards the Borough's green infrastructure network. It will also contribute towards improving the physical and mental wellbeing for informal recreational users.
- 8.7.14. In this respect, the proposed development will enhance the natural and built environment in accordance with the requirements of paragraph 8 of the NPPF, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change.

8.8 SUMMARY

- 8.8.1. This chapter demonstrates that the proposed development will provide substantial economic, social and environmental benefits to the area.
- 8.8.2. The proposed development will contribute vastly to the strategic ambitions of RBC by aligning with the pro-economic growth and regeneration policies of the NPPF, the Development Plan and Middleton Town Centre Masterplan by delivering a high-density residential development, ancillary commercial floorspace and clear contributions towards the delivery of accessible and high-quality public realm.
- 8.8.3. These many public benefits outweigh the identified "less than substantial harm" to the heritage assets in line with the NPPF test as paragraph 199.
- 8.8.4. Overall, the proposed development will have a substantial and positive impact upon the local economy, social wellbeing and the environment. It follows that the proposed development constitutes sustainable development and therefore accords with paragraph 8 of the NPPF.
- 8.8.5. These benefits are significant material considerations which weigh heavily in favour of the proposed development and justify the grant of planning permission.

9

MATERIAL CONSIDERATIONS



9 MATERIAL CONSIDERATIONS

- 9.1.1. This section of the Planning Statement presents the assessment of all other material considerations, not covered within the previous sections.

9.2 AIR QUALITY

- 9.2.1. An Air Quality Assessment (prepared by RPS Consultants) supports this application. The site lies within the Greater Manchester Combined Authority Air Quality Management Area.
- 9.2.2. The assessment investigated likely dust impacts from the construction phase and the operational air quality impacts of the development.
- 9.2.3. The report concluded that the dust risk is likely to be an important consideration. However, implementing the mitigation measures set out in the report will reduce the impact to a 'not significant' level category.
- 9.2.4. For the operational phase, arrivals at and departures from the proposed development may change the number, type and speed of vehicles using the local road network. The development also includes building emissions from two gas-fired boilers. The key sources of emissions to air once the development is operational are traffic emissions and building emissions.
- 9.2.5. Detailed atmospheric dispersion modelling was undertaken for the first year in which the development is expected to be fully operational, 2024. Pollutant concentrations are predicted to be well within the relevant health-based air quality objectives at the façades of both existing and proposed receptors.
- 9.2.6. The operational impact of the proposed development on existing receptors is predicted to be 'negligible' taking into account the changes in pollutant concentrations and absolute levels. Using the criteria adopted for this assessment together with professional judgement, the operational air quality effects are considered to be 'not significant' overall.
- 9.2.7. The proposed development therefore accords with paragraph 186 of the NPPF, Core Strategy Policy G9.

9.3 ARBORICULTURE

- 9.3.1. An Arboricultural Impact Assessment was prepared by Tree Solutions in support of this application.
- 9.3.2. The report shows three individual trees of Category B moderate value, one of Category C low value and one of category U value. Three tree groups are assessed as Category C and one group as Category U.
- 9.3.3. One Category B and One Category C tree will be removed to help facilitate development.
- 9.3.4. It is considered that significant improvement in the longer-term to the visual amenity associated with the site will be achieved through suggested replanting as part of the landscaping strategy.
- 9.3.5. All existing landscape will be retained and enhanced where possible and over 50 new trees will be planted which will be a significant improvement on the existing tree coverage.
- 9.3.6. The proposed development therefore accords with paragraphs 131 and 174 of the NPPF and Core Strategy Policy G1, G6 and G7.

9.4 ARCHAEOLOGY

- 9.4.1. Whilst any ground-breaking works associated with the proposed development have the potential to remove any buried archaeological remains, there is limited ground works proposed on the area of the site where Warwick Mill is situated. The majority of ground breaking works will be undertaken on the land currently occupied by London House which has been subject to previous development and thus has been subject to ground-breaking works previously.
- 9.4.2. The impact of the proposed development would be considered less than substantial, which is demonstrated through the Desk Based Assessment (DBA) prepared by Salford Archaeology which accompanies the planning application.
- 9.4.3. The DBA confirms that if further archaeological investigation is required this may comprise a programme of archaeological evaluation trial trenching or a strip and record evaluation to establish the presence or absence of buried archaeological remains.
- 9.4.4. The proposed development therefore accords with paragraph 194 of the NPPF and Core Strategy Policy P2.

9.5 CRIME AND SECURITY

- 9.5.1. A Crime Impact Statement has been prepared by Greater Manchester Police's Design for Security team and is submitted as part of this planning application.
- 9.5.2. The assessment considers that the current crime rate within 500m of the proposed scheme is high but must be considered in the context of the location being within a town centre with a dense concentration of retail establishments, licenced premises and restaurants.
- 9.5.3. Careful attention has been paid to the creation of a safe, inclusive and accessible development. The efforts made by the applicant to ensure that the development is resistant to acts of criminal behaviour have been recognised by Greater Manchester Police; as articulated through the commentary contained within the Crime Impact Statement.
- 9.5.4. The proposals will bring into use a derelict building which currently attract anti-social behaviour in the area.
- 9.5.5. Recommendations made by the Design for Security team include:
- Defensible space should be provided to ground floor apartment windows;
 - Slot windows should be protected from damage; and
 - Access control and physical security of the buildings should be carefully considered.
- 9.5.6. In this respect, this scheme accords with paragraph 92 of the NPPF which highlights that development should create safe, inclusive and accessible places which promote health and well-being.

9.6 DRAINAGE AND FLOOD RISK

- 9.6.1. A Flood Risk Assessment has been undertaken by RPS consultants and is enclosed as part of the application.
- 9.6.2. The assessment states that the site is largely at a 'very low' risk of flooding. A small area in the west is at a low risk of flooding. This appears to be in the current car parking area. The risk appears to be coming from the north and south and resulting in the pooling at the car parking in the central west.

This is likely to be as a result of the topographical depression within the car park to direct water to the gully drains.

- 9.6.3. The report concludes that further refined fluvial modelling is being undertaken and the results will be submitted to RBC during the determination stage of the application. A further technical note will be produced which will incorporate results and mitigation measures.
- 9.6.4. At this stage and based on the work undertaken to date, given the brownfield nature of the site, runoff is anticipated to discharge to the adjacent brook in line with current drainage plans. A conceptual drainage strategy will be provided once design plans are finalised following the flood modelling.
- 9.6.5. It will detail model outputs, present recommendation for practicable flood resilience/resistance options, and seek to provide SuDS options to manage surface water runoff in accordance with best practice.
- 9.6.6. Mitigation is also proposed around sewers including a maintenance and inspection plan for the on-site sewers.
- 9.6.7. The above strategy complies with paragraph 163 and 165 of the NPPF and Core Strategy Policy G6 – Enhancing Green Infrastructure Adaptation to Climate Change and Policy G8 Flood Risk.

9.7 ECOLOGY

- 9.7.1. A Phase One Habitat Survey, Ecological Scoping and Preliminary Bat Roost Survey (August 2021) were undertaken by ecological consultants and show that the development area was found to be typical of the urban landscape it is situated in, comprising of a mixture of scrub, the mill and associated buildings, some broadleaved tree species, Invasive Non-Native Plant Species, and a watercourse passing along the development's southern boundary.
- 9.7.2. An addendum to the August 2021 PEA report was undertaken (by RPS) in July 2023 which is intended as an update to identify whether habitats or suitability for protected species have changed significantly within the development site and therefore whether there is any change to the expected impact, required mitigation or if further surveys were necessary.
- 9.7.3. Overall, from the appraisal and addendum, it has been concluded that the development may affect the following ecological receptors, this may be in a beneficial or adverse manner:
 - Alkrington Woods Local Nature Reserve (LNR) and Site of Biological Importance (SBI) located 0.4km directly west are connected to the site via Wince Brook. Any pollution or runoff into Wince Brook may have an impact on this non-statutory designated site. No other designated sites are considered vulnerable to impacts from this development.
 - Wince Brook is the only habitat on site considered notable. It is unlikely to be impacted by the development and provides an opportunity for biodiversity enhancement. There are no records of water vole (*Arvicola amphibius*) or otter (*Lutra lutra*) within the last ten years and the riparian area adjacent to the site is considered unsuitable for either species.
 - The Warwick Mill building has been assessed as having moderate bat roost potential in 2021 and the 2015 bat survey confirmed it was a common pipistrelle (*Pipistrellus pipistrelle*) roost at that time. This is the only feature on site considered to have bat roost potential. No mature trees are present on site and the other three buildings were evaluated as possessing negligible bat roost potential.

- Feral pigeons (*Columba livia*) were recorded flying in and out of Warwick Mill, they nest all year round and a specialist is required to remove them. A pair of pied wagtails (*Motacilla alba*) were also active at its rear and may have a nest inside, its removal would have to occur outside the breeding season (March to August). Similarly, any clearance of the woody vegetation on site would need to occur outside the breeding season or have an experienced ecologist/ornithologist present to check for nests.
- Invasive species Japanese knotweed (*Fallopia japonica*), buddleia, and Himalayan balsam (*Impatiens glandulifera*) are present on site and could be spread during development. A 7m exclusion zone will be required around the Japanese knotweed and treatment until it cannot recover. Himalayan balsam should be removed before it seeds (August to October) and buddleia, a less serious invasive, can be removed at any time of the year.

- 9.7.4. None of the identified parcels of priority habitat are considered likely to be affected by the construction activities or operation of the proposed development including Wince Brook.
- 9.7.5. Taking into account the above findings, further bat surveys are recommended to assess the use of the Mill by these species. At least two dusk bat surveys of the Mill would be required between April and August. Through consultation with the Greater Manchester Ecology Unit (GMEU) it has been agreed that due to the time constraints associated with surveying for the species, such surveys can be completed post-submission as a condition of the development along with any necessary measures to robustly mitigate for the potential effects of the development to the species.
- 9.7.6. In relation to BNG, the BNG Assessment (undertaken by RPS) demonstrates a 10% net gain in habitat units will be created on site post-development in addition to a 100% net gain in hedgerow units. This will significantly enhance and contribute positively to the conservation of biodiversity on site.
- 9.7.7. There are no ecological constraints to the development and the site could provide ecological enhancements to the locality. This accords with Core Strategy Policy G6 and G7 Increasing the value of biodiversity and geodiversity and paragraphs 179 and 180 of the NPPF.

9.8 ENERGY AND SUSTAINABILITY

- 9.8.1. As required by policies G2 and G9, an Energy Statement has been prepared and is submitted with the planning application and assesses measures to reduce the carbon emissions of the proposed residential development .
- 9.8.2. The Energy Statement (by Ingine) notes that as Warwick Mill is listed the improvements possible to the fabric are limited however every opportunity has been taken where practical to improve thermal performance.
- 9.8.3. All new-build developments must comply with Building Regulations which now, through Approved Document L 2021 (SD-L 2021) and the improvements proposed provide for a 10% reduction in carbon emissions over the provision 2013 edition.
- 9.8.4. This will be achieved by including a number of measures in the proposals including high specification glazing to minimise heat losses, reduce summer overheating, combination of air source heat pumps and water source heat pumps and use of photovoltaic panels (PV).
- 9.8.5. The proposal therefore accords with policies G1, G2 and G9 which seek to reduce energy demand from new development and reduce future emissions in line with the energy hierarchy.

9.9 FIRE SAFETY

- 9.9.1. A fire statement (produced by Jensen Hughes) accompanies the planning application. This sets out the principles, concepts and approaches relating to fire safety that have been applied to the proposed development to ensure it meets the fire safety requirements.
- 9.9.2. A Gateway One Fire Report is also under preparation and will be submitted to RBC during the application's determination period. This is required as the proposed Loom building is over 7 storeys in height and therefore meets the requirement for a planning Gateway One Report.
- 9.9.3. Discussions have been had with RBC building control officers and the report will be finalised further to these discussions and once the design plans are finalised. In accordance with national legislation, the report will provide further detail on how the proposed development has been designed to fully integrate fire safety.

9.10 GROUND CONDITIONS

- 9.10.1. Policy G9 seeks to reduce the impact of contamination and land instability as a result of new development, requiring any risks arising from contaminated land or land instability and appropriate mitigation to be identified before development takes place.
- 9.10.2. In accordance with policy G9 a Preliminary Contamination and Geotechnical Risk Assessment has been carried out by RSK consultants.
- 9.10.3. The reports states that made ground of variable thickness and extent is likely to be present owing to both past and present development within the subject site.
- 9.10.4. Therefore, there is generally a moderate to low-level risk associated with ground contamination within the site.
- 9.10.5. The report recommends that intrusive exploratory works with in-situ laboratory testing is undertaken. This will allow underlying geology to be determined including the thickness of any Made Ground and any pollutant linkages.

9.11 LANDSCAPING

- 9.11.1. A Landscaping Strategy (produced by Place Design and Planning) has been prepared and forms part of the application submission. The strategy demonstrates how the residential scheme can retain and enhance existing natural assets where possible, provide ecological benefits, enhanced recreational opportunities and enhanced planting opportunities.
- 9.11.2. The landscaping has been carefully considered and integrated within the layout to ensure the protection of the amenity of the area for future occupants in terms of daylight, sunlight, privacy and soft landscaping.
- 9.11.3. The proposal seeks to deliver a high quality of hard and soft landscaped areas throughout the development, to reflect the generosity and quality of spaces within and surrounding Warwick Mill. This will provide modern space where residents can socialise.
- 9.11.4. The landscape strategy fully explains the proposal, but in synopsis it ensures that the site's biodiversity is enhanced (including a 10% net gain) through use of different species and biodiversity rich planting and seeding mixes. Landscape areas will be designed and managed in a way to benefit

wildlife, local residents and workers, introducing a variety of vegetation, habitats and publicly accessible spaces.

9.11.5. The landscaped areas will provide significant environmental benefits and boost the overall biodiversity of the local area. As a result of the above, the proposal delivers significant enhancements in terms of landscaping and therefore accords with policies.

9.11.6. The proposal therefore accords with Core Strategy policies P2, P3 and G6.

9.12 NOISE

9.12.1. A Noise Impact Assessment by Sandy Brown was conducted on-site to determine the existing noise climate around the proposed development and looked into various points including sound insulation performance, external amenity areas, noise break out assessments and plant noise.

9.12.2. The assessment included unattended environmental noise surveys at the site to establish a baseline and calculations were undertaken to determine the requirements for glazing to achieve internal noise levels limits in compliance with BS8233:2014.

9.12.3. The assessment indicates that both Warwick Mill and the Loom fall into the negligible risk category for the south facing façade and high risk category for the north, west and east facades. Windows will likely need to be closed overnight to achieve the required noise limits and appropriate ventilative cooling will be provided.

9.12.4. The proposal therefore accords with Core Strategy Policy G9.

9.13 TRANSPORT

Transport Assessment

9.13.1. A Transport Assessment has been prepared by RPS to support the application. The assessment considers the proposed development's sustainability and access arrangements.

9.13.2. The assessment confirms that the site is sustainably located with easy access to a range of transport options including bus, railway stations. Furthermore, local amenities and services are located within a reasonable walking and cycling distance.

9.13.3. The statement sets out that safe and appropriate access can be gained to site from three proposed vehicular access points.

9.13.4. Access capacity assessments were carried out; it was found that proposed vehicular access points would not cause any capacity issues.

9.13.5. The analysis of road safety has not identified any road safety issues on the network. The development proposals would generate low volumes of traffic of similar classifications to those currently on the network and there is nothing to suggest the development proposals would change or alter the injury accident rates.

9.13.6. It is considered that the site is such that the potential for sustainable modes of transport can be taken up, safe and suitable accesses are provided, the proposals would not result in a cumulative impact on the highway network that is severe and the proposals would not have an unacceptable impact upon road safety.

9.13.7. The Transport Assessment concludes that the development is acceptable from a highways perspective. The impact on the local highway network is not severe and therefore accords with NPPF guidance.

Travel Plan

9.13.8. A Travel Plan undertaken by RPS accompanies this application and sets out an assessment of the site and future occupier travel trends in order to implement a strategy/plan which will ensure take up of sustainable modes of future travel in order to decrease dependence on private cars.

9.13.9. The applicant has been closely involved in the development of the Travel Plan and is committed to its successful implementation on completion of the development. The Travel Plan outlines specific goals including:

9.13.10. Provision of physical infrastructure which offers a safe and convenient means of travel for pedestrians and cyclists;

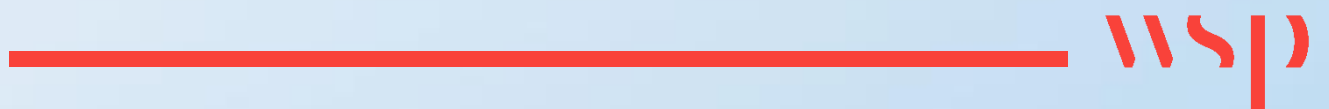
- Travel Plan Coordinator;
- Yearly Travel Information Packs to residents;
- Provision of a car club with four club car spaces; and
- Resident's travel survey.

9.13.11. The Travel Plan also contains an Action Plan of potential measures and the associated timescale.

9.13.12. The proposed development therefore aligns with paragraphs 104, 110, 111, 112, 113 and 130 of the NPPF and Core Strategy Policy T1 and T2 which supports promoting sustainable transport.

10

S106 HEADS OF TERMS



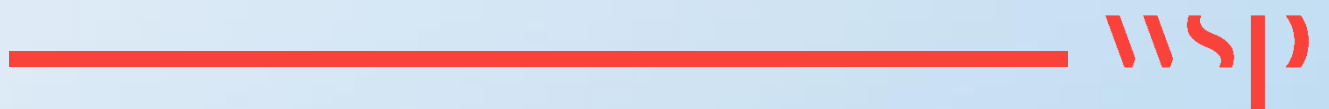
10 S106 HEADS OF TERMS

- 10.1.1. This section sets out the draft Heads of Terms based on the relevant development policies and supplementary guidance in addition to pre-application discussions.
- 10.1.2. The applicant will continue discussions with the relevant departments and consultees to clarify the final range/scope and quantum of obligations sought in a manner to ensure compliance with relevant development policies and guidance in addition to national planning policy.
- 10.1.3. The detail of the obligations below will be agreed with the LPA as part of the application process. The applicant reserves the right to withdraw or amend these obligations during negotiations with the LPA, particularly if any obligations cannot be fully justified in accordance with Regulation 122 of the Community Infrastructure Regulations 2010 (as amended) and Government Guidance on Planning Obligations.
- 10.1.4. It is also important to note, that the NPPF, and the RBC Core Strategy does allow applicants the opportunity to provide a viability assessment to justify why certain obligations cannot be provided and for this to be considered in the decision-making process. Viability of the development proposals is currently being assessed and a viability appraisal will be issued to the Council during the determination period to assist with discussions on planning obligations.
- 10.1.5. In accordance with the NPPF, the applicant intends to enter into detailed discussions with the Council in respect of planning obligations to be captured within a Section 106 legal agreement.
- 10.1.6. It is likely that contributions towards the following will be sought;
- Education;
 - Public Open Space; and
 - Highways (Depending if any offsite improvements are required).
- 10.1.7. The final developer contributions are subject to negotiation with the LPA during the course of the planning application regarding both the range/scope of developer contributions and the amounts.



11

PLANNING BALANCE



11 PLANNING BALANCE

- 11.1.1. This Planning Statement has been prepared by WSP on behalf of Kam Lei Fong UK Limited. The purpose of this Planning Statement is to assist RBC in the consideration of a planning application at the former Warwick Mill site in Middleton for:

'Redevelopment of site comprising re-purposing of Warwick Mill to residential (Use Class C3) and flexible commercial space (Use Class E) and demolition of existing London House and erection of a new building for a mix of uses comprising residential apartments (Use Class C3) and flexible commercial space (Use Class E). Ancillary hard and soft landscaping; rationalisation of and improvements to vehicular accesses onto Oldham Road (A669) and Ashton Lane; vehicular and cycle parking; and associated works and infrastructure.'

- 11.1.2. The site has been identified by the Council as a key regeneration opportunity. It is allocated in the Middleton Town Centre Masterplan for housing led mixed-use growth and is located adjacent to Middleton town centre. There is a clear policy thrust (as set out within the Core Strategy and Middleton Town Centre Masterplan) to focus higher density housing types and regenerate former industrial land within the town and adjacent to town centres to create a vibrant town centre that is well used by residents.
- 11.1.3. The proposals will breathe new life into a Grade II Listed vacant mill, remove the eyesore of derelict London House, and allow the site to fully contribute to the on-going regeneration of Middleton. Warwick Mill is in a particularly poor state of repair and without considerable intervention and investment; there is a very real risk of the building's deterioration accelerating which could result in total loss.
- 11.1.4. The range and type of housing that would be provided by the proposed development at Warwick Mill would contribute to widening the choice of housing available to residents. The provision of 281 residential units represents 61% of Rochdale's annual target, beneficially contributing to the need to supply good quality, comfortable homes for communities.
- 11.1.5. The site's status in heritage terms means that the site has been subject to extensive pre-application discussions with Council officers and Historic England over a number of years, and the final proposed scheme is the produce of these discussions.
- 11.1.6. The extensive pre-application consultation confirms that the site is suitable in principle of new housing. The scheme balances the importance of respecting the heritage designation and restoring the asset to its optimal use, and the delivery of much needed new housing. The proposed development at Warwick Mill will provide a deliverable and sustainable solution to the growth needs of Rochdale.
- 11.1.7. The proposal meets the statutory test of S66 of the Planning and Listed Buildings Act with the harm caused by the internal alterations of the listed building less than substantial and outweighed by the public benefits of the retention and restoration of the mill and the very significant other public benefits derived from the scheme.
- 11.1.8. In applying S38 of the Act, the proposed development accords with the development plan as a whole. It also represents sustainable development as defined within the NPPF, constituting a suitable and deliverable site for residential apartments which will bring about a vibrant development and introduce activity onto a site which is dilapidated and derelict.

11.1.9. The development will facilitate the regeneration and retention of a historically significant building, whilst delivering a high quality design and contributing to the regeneration of Middleton town centre.

11.1.10. The proposed development delivers a great number of benefits for the local community, including:

- The regeneration of a brownfield site in the urban area, in accordance with national and local policy which encourages the use of brownfield land to boost the supply of housing.
- The provision of commercial ground floor uses and creation of active frontages which will increase footfall and activity in the area and in doing so increase the vitality and viability of Middleton town centre;
- Deliver a range of house types suitable for all ages and will help to diversify the housing stock;
- Delivery of new housing in a sustainable and central location, adjacent to the bus station and close to the mainline train station and retail core;
- Deliver significant investment into the local area through increased household expenditure and consumer spending;
- The creation of additional council tax payments that can be reinvested in the area;
- The creation of new jobs and training opportunities in the construction sector during the build programme in addition to jobs created from the commercial units;
- Delivery of new high quality onsite public realm and landscaping which will provide areas for recreation and connect the onsite uses to the wider urban area; and
- Biodiversity enhancements, including a 10% net gain, which will contribute positively to the conservation of biodiversity.

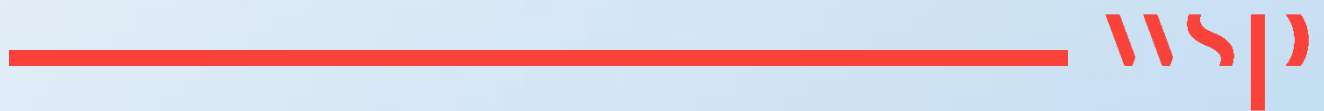
11.1.11. S38 states that development should be determined in accordance with the development plan unless material considerations indicate otherwise. The proposal accords with the development plan as a whole.

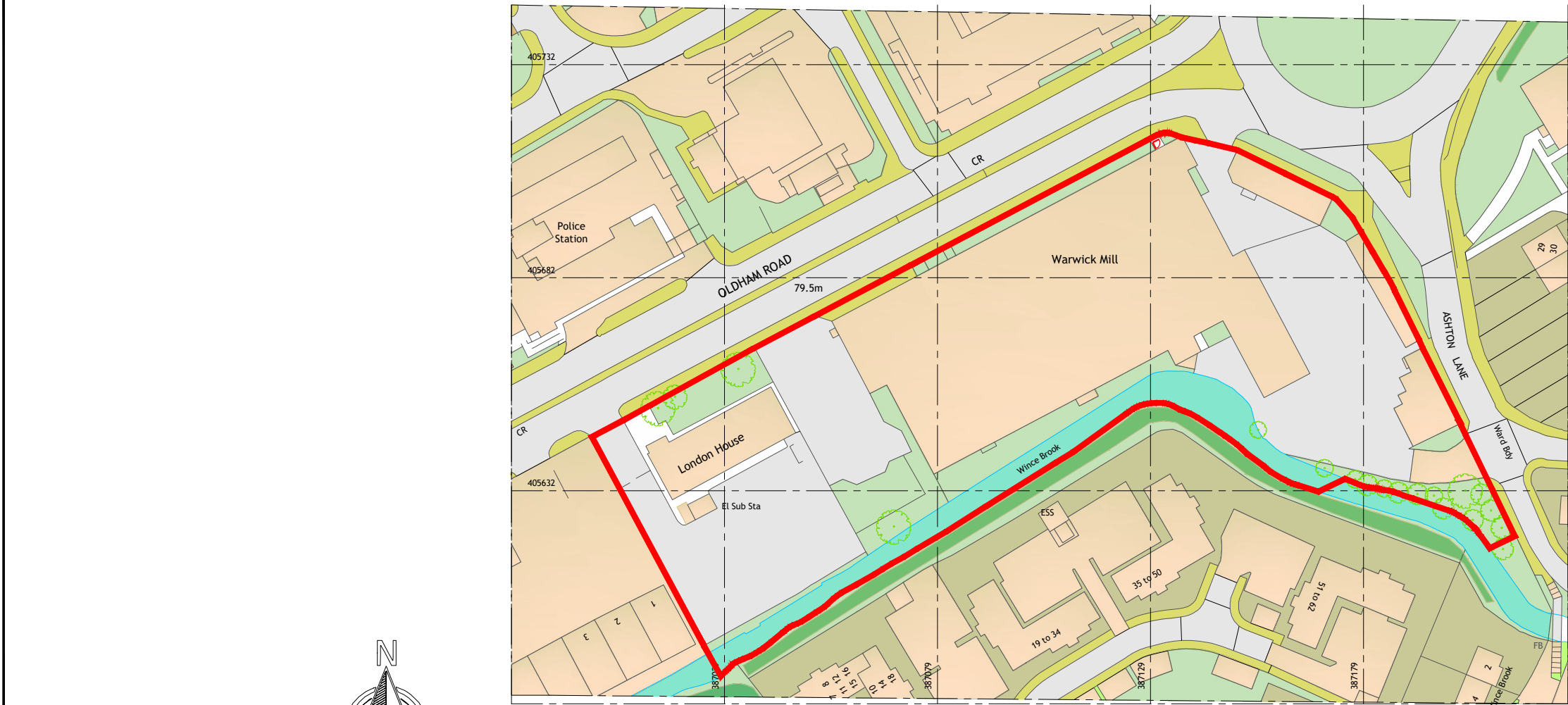
11.1.12. The extensive technical assessments demonstrate that the proposed development will not give rise to any significant adverse impacts on the area or amenity of nearby neighbours. Impacts can be successfully mitigated. The development therefore constitutes sustainable development and raises no material considerations which would outweigh its accordance with the Development Plan when taken as a whole.

11.1.13. NPPF paragraph 11 is engaged and therefore, in line with paragraph 11(c), the application should be fully supported, and planning permission granted without delay.

Appendix A

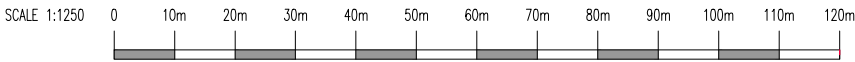
SITE LOCATION PLAN





Notes :

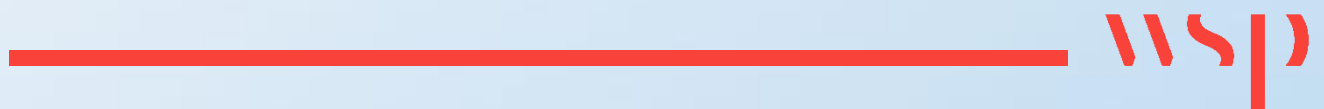
- Dimensions are to be checked on site before fabrication and construction
- Any discrepancies are to be immediately notified to the architects
- Structural measurements are to be taken from the structural engineers drawings
- Do not scale
- Copyright reserved by GMA



REV	DESCRIPTION	DATE	GMA ARCHITECTURE Architects and Designers UK House 82 Heath Road Twickenham TW1 4BA Telephone 020 8891 5959 Fax 020 8607 9933 Email enquiries@gmaarchitecture.co.uk www.gmaarchitecture.co.uk		DRAWING ISSUE STATUS PLANNING		Client KAM LEI FONG LTD	Scale 1:1250 @ A3	Date June 23	Drawn MD	Checked IL
			Project WARWICK MILL MIDDLETON, ROCHDALE M24 1 AZ		Drawing Warwick Mill Development SITE LOCATION PLAN		Type 01	Client 277-01	Drawing No WM SP 001	Revision	

Appendix B

EIA SCREENING REQUEST





Kam Lei Fong (UK) Limited

WARWICK MILL, ROCHDALE

Request for EIA Screening Opinion



Kam Lei Fong (UK) Limited

WARWICK MILL, ROCHDALE

Request for EIA Screening Opinion

TYPE OF DOCUMENT (VERSION) PUBLIC

PROJECT NO. 70084210

OUR REF. NO. RPT.001.ME.70084210

DATE: JANUARY 2022

Kam Lei Fong (UK) Limited

WARWICK MILL, ROCHDALE

Request for EIA Screening Opinion

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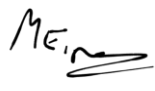
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SITE LOCATION PLAN

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ARCHAEOLOGICAL DESK-BASED ASSESSMENT

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APPENDIX D

PHASE 1 PRELIMINARY GROUND INVESTIGATIONS RISK ASSESSMENT

1. INTRODUCTION

BACKGROUND

- 1.1.1. WSP has prepared this request for an Environmental Impact Assessment (“EIA”) screening opinion on behalf of Kam Lei Fong UK Limited (“the applicant”).
- 1.1.2. The request is prepared in support of a forthcoming full planning application for a proposal comprising:
- Change of use and conversion of Warwick Mill to mixed-use facilities including residential development comprising up to 140 apartments;
 - Demolition of adjacent London House and erection of mixed-use residential development comprising up to 145 apartments; and
 - Commercial (Use Class E) development comprising up to 6,500 sqm floorspace.
- 1.1.3. The enclosed Site Location Plan at **Appendix A** identifies the full extent of the site to which the proposed development relates.
- 1.1.4. This report is a formal request for a screening opinion, under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (“the Regulations”). It has been prepared having regard to Planning Practice Guidance (“PPG”) to assist the Council in making a ‘screening direction’ in determining whether the development is ‘EIA development’ as defined under the Regulations.
- 1.1.5. This EIA Screening Request follows extensive pre-application engagement with Rochdale Borough Council (“RBC”).

REQUIREMENT FOR EIA

- 1.1.6. The term ‘EIA’ describes a procedure that must be followed for certain types of project before it can be given ‘consent’. The procedure is a means of drawing together, in a systematic way, an assessment of a project’s likely significant environmental effects. This helps to ensure that the importance of the predicted effects and the scope for avoiding, preventing, reducing or, if possible, offsetting them are properly understood by the public and the authority granting consent (the ‘determining authority’) before it makes its decision.
- 1.1.7. The first stage of the procedure is to determine whether the proposal constitutes ‘EIA development’. In accordance with Regulation 2(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (“the Regulations”), ‘EIA development’ means development which is either:
- Schedule 1 development; or
 - Schedule 2 development likely to have significant effects on the environment by virtue of factors, such as its nature, size or location.
- 1.1.8. In accordance with Regulation 2(1) of the Regulations, ‘Schedule 1 development’ means development (other than exempt development) of a description mentioned in Schedule 1 of the Regulations. ‘Schedule 2 development’ means development (other than exempt development) of a description mentioned in column 1 of the table in Schedule 2 of the Regulations where:
- Any part of that development is to be carried out in a sensitive area; or

- Any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development.
- 1.1.9. The emerging scheme exceeds the thresholds set out at Schedule 10(b) of the Regulations which require urban development projects exceeding 150 dwellings to be screened.
- 1.1.10. Under Regulation 6(1) of the EIA Regulations 2017, there is a requirement for an applicant to make a request for a screening opinion to provide the following:
- A plan identifying the site (**Appendix A**);
 - A description of the development, including a description of the physical characteristics of development, the proposed development and, where relevant, of demolition works and operation (Chapters 2 and 3);
 - A description of the characteristics and location of development, with particular regard to the environmental sensitivity of geographical areas likely to be affected (Chapter 6); and
 - To the extent the information is available, a description of any likely effects of the proposed development on the environment (Chapter 7).
- 1.1.11. The contents of this report have been prepared to the best of WSP's knowledge based on available information within the public domain, together with the results of surveys undertaken by a supporting team of specialist consultants to help inform our assessment and conclusions.
- 1.1.12. In summary, it is WSP's view that there are no significant environmental effects arising from the development and therefore it **does not** comprise EIA development as defined under the Regulations.

2. BACKGROUND

THE SITE

- 2.1.1. The site subject to this request for an EIA Screening Opinion is identified on the location plan contained at **Appendix A**. It is known as Warwick Mill, Rochdale.
- 2.1.2. Warwick Mill is a former cotton mill, which is currently vacant, located approximately 200m south of Middleton Town Centre.
- 2.1.3. Warwick Mill is a Grade II Listed Building design by George Stott of Joseph Stott and Son completed in 1909.
- 2.1.4. The site extends to approximately 1ha and lies on the junction of Oldham Road and Ashton Lane. To the north is Oldham Road, a dual carriageway bordering the north of the site. East of the site is Ashton Lane beyond which there is residential development and a church.
- 2.1.5. South of the site is Wince Brook with residential apartments ranging between 3 and 4 storeys in height backing onto the Brook beyond.

SURROUNDING AREA AND ENVIRONMENT

- 2.1.6. The surrounding area is largely a mix of industrial and retail buildings and surface car parks, with some residential uses.
- 2.1.7. The application site is not located within a Conservation Area nor is it located in close proximity of any identified Conservation Areas. The nearest Conservation Area is as follows:
 - Middleton Conservation Area – located approximately 120m to the north of the site
- 2.1.8. A number of Grade II Listed Buildings are located within close vicinity of the site boundary, including:
 - Church of St Michael – located approximately 350m to the east of the site; and
 - 33, 35 and 37, Middleton Gardens – located approximately 350m to the north west of the site.
- 2.1.9. The site is located in centre of the town of Middleton which is earmarked under an upcoming masterplan to be a mixed-use regeneration area, representing an opportunity to establish a range of higher density housing types and to regenerate former industrial land.
- 2.1.10. The development site is also located close to and has access to amenities and services along Oldham Road and the town centre to the north, along with being in walking distance to the activities of the town centre with its associated public transport facilities.

PLANNING HISTORY

- 2.1.11. In terms of the site's planning history, the table below outlines the relevant planning applications using RBC's online planning history search function:

Application Reference	Description of development	Decision Date
15/01015/FUL	The demolition of London House and the conversion and renovation of Warwick Mill and the associated lodge building to provide a mixed use development comprising showrooms for the trading of wholesale and retail non-food goods, new food and drink outlets (Use Classes A3 and A4) along with ancillary uses, including the addition of a new loading bay and operations buildings at the western end of the lower ground floor, the installation of new plant zones and plant rooms at roof level and the creation of a new surface car park	Approved December 2015
15/01016/LBC	Internal and external alterations to the lower ground, upper ground, first, second & third floors and Lodge Building at Warwick Mill to facilitate the mixed use of the premises, comprising showrooms for the trading of wholesale and retail non-food goods, new food and drink outlets, together with ancillary uses including the creation of a new loading bay and operations buildings at the western end of the lower ground floor; the creation of a new vertical circulation core between the lower ground floor and third floor; the creation of a new pedestrian entrance in the northern elevation; the installation of new plant zones and plant rooms at roof level; the replacement of all existing windows; the creation of new windows and glazed doors in the eastern elevation of the Engine Room; the installation of a new partial mezzanine floor within the Engine Room; the replacement and alteration of existing windows in the lower ground elevation on the southern elevation; the replacement of existing wooden floors at all levels and the installation of wooden decking adjacent to the southern elevation at lower ground floor level	Approved December 2015
15/00279/FUL	Installation of 4 no. antennas upon the rooftop fixed to existing redundant mounting frame; 1 no. equipment cabinet to be sited upon the rooftop on freestanding steel platform with installation of cabling and other associated development.	Refused May 2015
13/00932/FUL	Removal of 6 antennas and 5 equipment cabinets and installation of 6 antennas, 6	Approved

	Remote Radio Units and 4 equipment cabinets including ancillary equipment	October 2013
13/00933/LBC	Listed building consent for the removal of 6 antennas and 5 equipment cabinets and the installation of 6 antennas, 6 remote radio units and 4 equipment cabinets (Resubmission of 13/00419/LBC)	Granted October 2013
13/00419/LBC	Listed building consent for the removal of 6 antennas and 5 equipment cabinets and the installation of 9 antennas, 6 Remote Radio Units and 4 equipment cabinets	Refused June 2013
13/00418/FUL	Removal of 6 antennas and 5 equipment cabinets and installation of 9 antennas, 6 Remote Radio Units and 4 equipment cabinets including ancillary equipment	Refused June 2013
11/D54986	Change Of Use Of Part Of First Floor Of Listed Building From Storage (Use Class B8) To Gymnasium (Use Class D2) Including Internal Partitioning Works	Granted March 2012
11/D54985	Change Of Use Of Part Of First Floor From Storage (Use Class B8) To Gymnasium (Use Class D2)	Granted March 2012
10/D53321	Application For A New Listed Building Consent To Replace Extant Listed Building Consent D48615 For The Conversion Of Existing Mill And Associated Building To 147 Apartments	Granted September 2010
10/D53320	Application For A New Planning Permission To Replace Extant Planning Permission D48614 For The Change Of Use And Conversion Of Existing Mill And Associated Building To 147 Apartments With Associated Parking	Granted September 2010

3. PROPOSED DEVELOPMENT

- 3.1.1. The proposed development will comprise the demolition of London House, up to 285 residential dwellings (Use Class C3a) and up to 6,500 sqm of commercial uses (Use Class E) floorspace together with associated car parking, new vehicular and pedestrian access, public realm, landscaping and other associated works.

PHYSICAL CHARACTERISTICS

- 3.1.2. The development will comprise:
- The demolition of London House;
 - The change of use, conversion and rooftop extension of the existing mill to mixed-use facilities including residential and commercial uses;
 - A maximum of 285 apartments;
 - A maximum of 6,500 flexible commercial floorspace (Use Class E);
 - Maximum height of six storeys for Warwick Mill; and
 - The erection of a new building (known as the Loom) which will be a maximum of ten storeys in height.
- 3.1.3. In addition to the proposed residential and commercial floorspace, the site-wide application comprises:
- Implementation of a hard and soft landscaping scheme across the site
 - Installation of secure cycle storage for future residents;
 - Ground floor level secure cycle parking storage and car parking; and
 - Other elements of engineering works and infrastructure as required.
- 3.1.4. Drainage will be sustainable, with a strategy for both surface water and foul to accompany the planning application, confirming appropriate discharge to the local networks.
- 3.1.5. Waste associated with the development will be typical of this kind of town centre mixed-use. A Waste Management Plan will accompany the application.
- 3.1.6. The development will not produce any hazardous, toxic or noxious substances or pollutants. Likewise, the development will not generate pollutants or contaminants that could affect ground or water resources.

DEMOLITION AND CONSTRUCTION

- 3.1.7. Controls on the emissions of noise, dust and vibration as well as impacts of construction traffic, operating hours and other potential nuisances will be suitably controlled through planning conditions.
- 3.1.8. A method statement will also be provided ahead of the demolition of buildings and structures on site.
- 3.1.9. There will be ground works as part of the development, to create the building plots and for foundations. Nevertheless, they will be typical for a scheme of this scale.
- 3.1.10. It is proposed that the main contractor shall operate under formal arrangements and will follow best practice construction management and pollution control guidelines. On site mitigation and contamination measures will be included, and the main contractor shall ensure energy, water and transport emissions are monitored onsite.

- 3.1.11. The production of waste associated with the proposed development will be typical of a mixed-use development of this scale, but measures will be put in place to ensure any waste arising from the demolition phase will be mitigated and managed accordingly. Construction waste will be handled in accordance with best practice and is likely to be controlled via a planning condition and Construction Management Plan.
- 3.1.12. There will be no hazardous waste or substances used in the construction and the use of natural resources will be typical for city centre development.
- 3.1.13. The total construction process is expected to take around 24-36 months and last until around the start of 2025.

4. SCREENING

4.1.1. Having regard to the Regulations, we examine the key likely issues associated with the proposal on this site below. We highlight where details are already known or whether further details will be provided alongside the planning application. We firstly assess those issues of the most significance, and then consider other issues which may also be of relevance.

4.1.2. There are two schedules under the Regulations which, if a development falls into, EIA screening is required.

Schedule 1 Development

4.1.3. 'Schedule 1 development' is specifically defined – the proposal is not Schedule 1 development.

Schedule 2 Development

4.1.4. 'Schedule 2 development' is defined as development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

4.1.5. Schedule 2 includes:

- Any part of a development is to be carried out in a sensitive area; or
- Any applicable threshold or criterion in the corresponding part of Column 2 of that table is exceeded or met in relation to that development.

4.1.6. The site is not located within or near a 'sensitive area' such as a Site of Special Scientific Interest ("SSSI"), National Park, Broads, World Heritage Site, Scheduled Ancient Monument or Area of Outstanding Natural Beauty.

4.1.7. Schedule 2 of the Regulations details development types where an EIA could be required, subject to certain thresholds being exceeded and subsequent screening against Schedule 3 of the Regulations.

4.1.8. The site falls within the following category:

- *Infrastructure projects*
- *(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas*

4.1.9. The site is around 1ha and comprises up to 285 dwellings which exceeds part (ii) of the Applicable Thresholds and Criteria of Schedule 10(b) of the Regulations.

4.1.10. Schedule 2 sets out the description of development and applicable thresholds and criteria for the purpose of the definition of 'Schedule 2 Development'. The thresholds are indicative, and each proposal is subject to its own assessment. In making this assessment, LPAs must take into account the relevant 'Selection Criteria' which are provided in Schedule 3 of the Regulations.

Schedule 3

4.1.11. Schedule 3 identifies three broad criteria which should be considered:

- The characteristics of the development (size, use of natural resources, quantities of waste and pollution generated and risk of accidents);
- The environmental sensitivity of the location; and

- The characteristics of the potential impact (extent, magnitude, probability, duration and frequency).

4.1.12. Planning Practice Guidance (PPG) (paragraph 018, ID 4-018-20170728) confirms that not all criteria from Schedule 3 will be relevant in every case.

4.1.13. The same paragraph of PPG states:

“Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced. See the indicative thresholds and criteria. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development.”

4.1.14. The PPG provides indicative screening thresholds, to help determine whether significant effects are likely. The relevant indicative criteria and thresholds are summarised below

- *Infrastructure projects*

(b) Urban Development Projects – (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings). (Key issues: physical scale of such developments, potential increase in traffic, emissions and noise)

4.1.15. The proposed development does not exceed the indicative criteria or threshold for 10(b). However, PPG is clear that each development will need to be considered on its own merits, regardless of whether a development exceeds the indicative thresholds.

4.1.16. As such, the following chapters assess the proposal against the three broad criteria, to consider whether or not the proposed development would have a significant environmental impact on the local area.

5. CHARACTERISTICS OF DEVELOPMENT (SCHEDULE 3 PART 1)

- 5.1.1. Schedule 3 Part 1 of the Regulations states that the characteristics of development must be considered with particular regard to the following:

Size and design of the development

- 5.1.2. The site extends to circa 1 ha.
- 5.1.3. The proposed development will include the renovation of an existing mill building and creation of one building above ground comprising up to residential 285 dwellings and up to 6,500 sqm of commercial space. The buildings will be mid-rise, with a maximum height of 10 storeys above ground level.
- 5.1.4. The new build element of the development will be taller than existing developments adjacent to and to the south of the site. However, it is considered that the scale of development generally follows the surrounding urban form.

Cumulation with other existing development and/or approved development

- 5.1.5. We have undertaken a review of Rochdale Council's online planning search function to identify significant potential projects within Middleton town centre which were approved within the last three years or which are currently under construction.
- 5.1.6. There were no identified projects identified using this search criteria, which had potential for cumulative effects.

The use of natural resources

- 5.1.7. Whilst the development would require the use of natural resources, some of which are non-renewable, these will be common with most residential developments. Furthermore, the proposed development would not involve any significant or unusual use of natural resources and would not result in the use of natural resources that are considered to be rare or of particular scarcity. On the contrary, it is the applicant's intention to utilise highly sustainable and recycled construction materials where practicable.
- 5.1.8. There is unlikely to be any valuable land or soil on site, due to its previously-developed status. Water use will be typical of a scheme of this scale. The site has very little biodiversity interest.

Production of waste

- 5.1.9. Whilst waste arisings are inevitable, it will be subject to the waste hierarchy, including during construction and operation.
- 5.1.10. It is proposed that the production of waste and excavation arising from the construction works will remain on site as far as practical.
- 5.1.11. Waste generated from the construction phase will not be significant to have any harmful impact. Conditions can be secured to mitigate and control the management of waste exports from the site.

Pollution and nuisance

- 5.1.12. The proposed development will inevitably lead to some, albeit minimal, increase in noise and air pollution associated with the operation of plant and machinery and associated vehicle movements. However, any noise and air quality emissions are likely to be of limited significance and localised

effects when assessed against existing background noise and air quality levels in the area – noting Oldham Road immediately fronting the site.

- 5.1.13. The nearest residential receptors are existing residential properties located to the south of the site on Whitecroft Meadow, approximately 25m to the south of the site. However, when coupled with the minimal increase in pollution anticipated, the potential for nuisance is likewise minimal and not likely to be classified as significant.
- 5.1.14. The planning application will be supported by detailed technical assessments – some of which are summarised in Chapter 7.
- 5.1.15. In summary, there is no likelihood of significant pollution of nuisance effects arising from the development (and in accordance with the criteria listed in PPG).

The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge

- 5.1.16. Given the type and quantum of development and controls that will be enforced by planning conditions, the risk of major accidents or disasters is minimal. As such, this aspect does not trigger the need for EIA.

The risk to human health

- 5.1.17. As summarised in Chapter 7, it is considered that there would be no significant risks to human health, including from water, air or noise pollution. In terms of ground conditions, suitable controls will be enforced by planning condition during the construction phase.

6. LOCATION OF DEVELOPMENT (SCHEDULE 3 PART 2)

- 6.1.1. Schedule 3 Part 2 of the Regulations states that the environmental sensitivity of geographical areas likely to be affected by the development must be considered.

Existing and approved land use

- 6.1.2. The site is an established brownfield site comprising buildings which are currently vacant and therefore do not present the best and most logical use of land for the area.
- 6.1.3. The most sensitive land use to the development is residential and industrial warehouse/storage. The nearest residential receptors are considered to be the existing residential properties located on Whitecroft Meadow approximately 25m to the south of the site. In addition, industrial storage buildings about the western boundary of the site.

The relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground

- 6.1.4. There are no known natural resources within the area or beneath the ground that would be affected by the proposed development.

The absorption capacity of the natural environment

- 6.1.5. There would be no impact upon the absorption capacity of the natural environment on the basis that none of the following are present on site:
- Wetlands, riparian areas, river mouths;
 - Coastal zones and the marine environment;
 - Mountain and forest areas;
 - European sites and other areas classified or protected under national legislation;
 - Areas in which there has been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure.
- 6.1.6. In terms of the “densely populated areas”, it is noted that the surrounding area is densely populated; this would potentially be sensitive to new land uses and development, but as the proposal is for a mixed-use residential development, the likelihood of significant effects is limited.
- 6.1.7. In terms of “landscapes and sites of historical cultural or archaeological significance”, the surrounding landscape and townscape is a transitional area from the high-density, high-rise city to the surrounding inner town and suburban parts of south Middleton. This landscape has limited significance. The site itself has historic and cultural significance, as it is formally part of a mill. Work done to date by Townscape Consultants on the historic significance of the site concludes that the proposals strike a balance between the special architectural and historic interest of Warwick Mill and the development will not present any detrimental impact or harm to the heritage asset.

7. TYPES AND CHARACTERISTICS OF THE POTENTIAL IMPACT (SCHEDULE 3 PART 3)

- 7.1.1. Schedule 3 states that the likely significant effects of the development on the environment must be considered in relation to criteria set out in chapters 5 and 6 (characteristics and location of development), with regard to the impact of the development on the factors specified in Regulation 4(2), taking into account eight considerations, as follows:
- a) Magnitude and spatial extent of the impact;
 - b) Nature of the impact;
 - c) Transboundary nature of the impact;
 - d) Intensity and complexity of the impact;
 - e) Probability of the impact;
 - f) Expected onset, duration, frequency and reversibility of the impact; and
 - g) Possibility of reducing the impact.
- 7.1.2. An assessment of the potential impacts has been made on the basis of advice from a number of specialist consultants and a thorough understanding of the baseline conditions. This understanding is informing the proposed development to ensure that any possible effects can be managed and mitigated, so as not to cause any significant adverse environmental effects.
- 7.1.3. The following potential impacts have been considered and will be addressed in the forthcoming planning application, where necessary:
- Archaeology;
 - Transport and Highways;
 - Ecology;
 - Townscape and Visual Impact
 - Noise and Disturbance;
 - Air Quality
 - Flood Risk;
 - Ground Conditions; and
 - Heritage.
- 7.1.4. Overall, the proposal is unlikely to have significant environmental effects for the reasons set out below.
- Archaeology**
- 7.1.5. Salford Archaeology has produced an Archaeological Desk-Based Assessment (DBA) which is provided at **Appendix B** and will accompany the planning application submission.
- 7.1.6. The site comprises the Grade II listed building known as Warwick Mill. The mill was built in 1907 by Stott and Sons, famous architects of Lancashire cotton mills.
- 7.1.7. The mill has seen little alteration since its construction, however, the engine house and boiler house have been demolished. The sites of the boiler house and engine house have not been developed since their demolition.
- 7.1.8. The site was also previously occupied by Irk Mill (formerly Park Mill). Irk Mill was constructed in the second half of the nineteenth century and demolished in the late twentieth century. The site of Irk

Mill has been partially redeveloped. This later development comprises an office building known as 'London House'.

- 7.1.9. The site has the potential to contain remains of the engine house and boiler house of Warwick Mill and remains of Irk Mill. These remains would be of local significance.
- 7.1.10. Whilst any ground-breaking works associated with the proposed development have the potential to remove any buried archaeological remains, there is limited ground works proposed on the area of the site where Warwick Mill is situated. The majority of ground breaking works will be undertaken on the land currently occupied by London House which has been subject to previous development and thus has been subject to ground-breaking works previously.
- 7.1.11. The impact of the proposed development would be considered less than substantial, which is demonstrated through the DBA which will accompany the planning application.
- 7.1.12. The DBA confirms that if further archaeological investigation is required this may comprise a programme of archaeological evaluation trial trenching or a strip and record evaluation to establish the presence or absence of buried archaeological remains. Any necessary mitigation would be secured through a planning condition in line with paragraph 203 and 205 of the National Planning Policy Framework (NPPF).

Transport and Highways

- 7.1.13. RPS is undertaking the transport and highways work associated with the development proposals and a Transport Assessment and Travel Plan will accompany the planning application submission.
- 7.1.14. The site is located approximately 135m from Middleton Bus Station which lies to the north-west of the site and approximately 1.5km from Mills Hill Rail Station which lies to the east. The station provides services across the UK including to other major cities and local services in the North West.
- 7.1.15. In terms of public transport provision, Middleton Bus Station provides bus services serving destinations across Greater Manchester. Bus stops are located within walking distance to the site. The stops provide regular access to services to the local area as well as Rochdale, Oldham and Manchester.
- 7.1.16. The site is ideally located for access to the town centre and public transport. The proposal would result in the ability to reside in a central location encouraging active travel journey modes. Parking space within the proposal will be limited in order to encourage take up of active travel and public transport travel modes. The proposed development would therefore increase opportunities for residents to live and work locally and would help to contain trips within the area.
- 7.1.17. Guidance on the environmental impact assessment of traffic and transport is set out in the Institute of Environmental Management and Assessment (IEMA) publication '*Guidelines for the Environmental Assessment of Road Traffic Guidance Note Number 1*', 1993.
- 7.1.18. The IEMA guidelines sets out a suggested screening process to delimit the scale and extent of the environmental impact assessment as follows:
 - Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
 - Rule 2: Include any other specifically sensitive areas where total traffic flows have increased by 10% or more.

- 7.1.19. This guidance is based upon research, knowledge and experience of environmental effects of traffic, with less than a 30% increase generally resulting in imperceptible changes in the environmental effects of traffic. At a simple level, the guidance considers that projected changes in total traffic flow of less than 10% creates no discernible environmental effect, hence the second threshold as set out in Rule 2.
- 7.1.20. Traffic flow data along the A669 Oldham Road directly outside the site is available from a Department for Transport (DfT) traffic survey undertaken in 2017. This recorded an Annual Average Daily Traffic flow (AADT) of 25,854 total vehicle movements, of which 479 were Heavy Goods Vehicles (HGVs).
- 7.1.21. The development proposals include for 62 car parking spaces, which equates to 1 car parking space per 4 units (i.e. 25% of units will have a car parking space). This in itself constrains car ownership at the development and thus constrains the number of vehicle movements that will be generated by the development proposals.
- 7.1.22. Detailed calculations on the number of vehicle movements that would be generated by the proposals are ongoing, however, at this stage, it is estimated that approximately 250 vehicle movements would be generated per day (AADT). The proposals are not predicted to generate any regular HGV movements.
- 7.1.23. Based upon the above, the development proposals would equate to an increase in traffic flows along the A669 Oldham Road of less than 1%. This is significantly lower than the thresholds set out in the IEMA guidelines and thus there would be no discernible traffic and transport related environmental effects resulting from the development proposals.
- 7.1.24. Based on the work RPS has undertaken to date, there are likely to be no significant transport impacts as a result of the proposed development given its sustainable location and limited parking provided.
- 7.1.25. Well-lit cycle parking facilities would also be provided in convenient locations on site to make cycling to the site more attractive for existing and future residents at the site.
- 7.1.26. As such, an environmental impact assessment of the development proposals is not required on account of potential significant effects resulting from traffic and transport.

Construction Phase Effects

- 7.1.27. A CEMP ("Construction Environmental Management Plan") would be implemented and would include restrictions on vehicle routing to the site. Access routing for construction vehicles would be assessed and the least disruptive routes for HGV movement would be progressed.
- 7.1.28. The CEMP would also restrict the hours of operation and access to the site during construction. This would avoid peak highway hours when Rochdale Road is sensitive and times of day when children are travelling to and from school.
- 7.1.29. With the CEMP in place, construction effects are unlikely to be significant from a transport perspective. The construction traffic effects would also be phased and would be of a temporary nature.
- 7.1.30. It is considered that the proposed development will not result in any adverse environmental effects such that an EIA is required.

Ecology

- 7.1.31. The following ecology surveys have been completed by RPA of Warwick Mill and surrounding environment to assess the potential effects of the development to ecological receptors.
- 7.1.32. A Phase One Habitat Survey, Ecological Scoping and Preliminary Bat Roost Survey (August 2021) were undertaken by ecological consultants and show that the development area was found to be typical of the urban landscape it is situated in, comprising of a mixture of scrub, the Mill and associated buildings, some broadleaved tree species, Invasive Non-Native Plant Species, and a watercourse passing along the development's southern boundary.
- 7.1.33. From the appraisal, it has been concluded that the development may affect the following ecological receptors, this may be in a beneficial or adverse manner:
- Alkrington Woods Local Nature Reserve (LNR) and Site of Biological Importance (SBI) located 0.4km directly west are connected to the site via Wince Brook. Any pollution or runoff into Wince Brook may have an impact on this non-statutory designated site. No other designated sites are considered vulnerable to impacts from this development.
 - Wince Brook is the only habitat on site considered notable. It is unlikely to be impacted by the development and provides an opportunity for biodiversity enhancement. There are no records of water vole (*Arvicola amphibius*) or otter (*Lutra lutra*) within the last ten years and the riparian area adjacent to the site is considered unsuitable for either species.
 - The Warwick Mill building has been assessed as having moderate bat roost potential in 2021 and the 2015 bat survey confirmed it was a common pipistrelle (*Pipistrellus pipistrelle*) roost at that time. This is the only feature on site considered to have bat roost potential. No mature trees are present on site and the other three buildings were evaluated as possessing negligible bat roost potential.
 - Feral pigeons (*Columba livia*) were recorded flying in and out of Warwick Mill, they nest all year round and a specialist is required to remove them. A pair of pied wagtails (*Motacilla alba*) were also active at its rear and may have a nest inside, its removal would have to occur outside the breeding season (March to August). Similarly, any clearance of the woody vegetation on site would need to occur outside the breeding season or have an experienced ecologist/ornithologist present to check for nests.
 - Invasive species Japanese knotweed (*Fallopia japonica*), buddleia, and Himalayan balsam (*Impatiens glandulifera*) are present on site and could be spread during development. A 7m exclusion zone will be required around the Japanese knotweed and treatment until it cannot recover. Himalayan balsam should be removed before it seeds (August to October) and buddleia, a less serious invasive, can be removed at any time of the year.
- 7.1.34. Taking into account the above findings, further bat surveys are recommended to assess the use of the Mill by these species. At least two dusk bat surveys of the Mill would be required between April and August. Through consultation with the Greater Manchester Ecology Unit (GMEU) (provided at **Appendix C**) it has been agreed that due to the time constraints associated with surveying for the species, such surveys can be completed post-submission as a condition of the development along with any necessary measures to robustly mitigate for the potential effects of the development to the species.
- 7.1.35. It is concluded that there will not be any significant adverse effects to biodiversity or ecology as a result of the development and it is likely that the proposals could provide ecological enhancements

to the locality. Similarly, the development will achieve in excess of 10% Biodiversity Net Gain (BNG) as required by the Environment Bill (2021).

Townscape and Visual Impact

- 7.1.36. Townscape is preparing a setting and views assessment (which will form part of the Heritage Assessment) and will accompany the planning application submission. They will consider the impact of the development upon key views, using viewpoints agreed with Rochdale Borough Council.
- 7.1.37. The views will demonstrate that a short, medium and long view of the heritage asset will remain relatively unchanged by the proposed development and the proposed development is positioned of a similar scale and character and thus no significant adverse effects will emanate as part of the proposals.
- 7.1.38. The proposed development is considered to be entirely in keeping with the existing nearby uses, and despite a part of the development being new built form, there will be no discernible changes to the townscape character of the site and its surroundings. Localised views of the development would result in a very minor/negligible change from the existing view, but the magnitude, intensity and complexity of the impact is limited having regard to the baseline urban environment.
- 7.1.39. The townscape will be improved through the demolition of buildings on the site as it will open up the views of the listed building, enhancing its setting within the wider townscape.
- 7.1.40. Improvements to the townscape will also be shown through improved design and the new building proposed on the site.
- 7.1.41. Furthermore, new public realm integrating Warwick Mill together with the new London House (The Loom), will better reveal the significance of Warwick Mill resulting in having a positive impact on the townscape and surrounding area.
- 7.1.42. Overall, the proposal would result in a new urban form that better reveals the significance of the heritage asset. The impact of the proposed scheme on the heritage asset is therefore beneficial and do not justify EIA development.

Noise and Disturbance

- 7.1.43. A Noise Assessment has been prepared by Sandy Brown and will be submitted with the planning application.
- 7.1.44. The assessment is in accordance with BS4142, local and national planning policy and guidance. It assess the potential impact of noise emissions from mechanical plant associated with the development at the positions of existing sensitive receptors in the area along with an assessment of potential construction noise and vibration.
- 7.1.45. Construction noise and vibration requirements are based on BS 5228-1:2009+A1:2014 Code of Practice for Noise and Vibration Control on construction and open sites. This is used to determine noise egress limits for external plant and operational noise (including any amplified sound) on the basis of Rochdale Metropolitan Borough Council 'Adopted Core Strategy' dated October 2016.
- 7.1.46. Appropriate limits for noise from mechanical plant will be established as part of the assessment based on relevant local and national planning policy and guidance.

- 7.1.47. Based on the assessment work undertaken to date it is anticipated that noise emissions from required plant will again be within the acceptable limits and can suitably be controlled through planning conditions. It is considered that the proposed residential and commercial development would only lead to localised effects and that these can be controlled by typical noise-related planning conditions without the need for an EIA.
- 7.1.48. As such, the proposed development will not result in any significant adverse effects in terms of noise and disturbance.

Air Quality

- 7.1.49. The site is located within an Air Quality Management Area (AQMA) which has been declared by the Greater Manchester Combined Authority (GMCA). The area spans large portions of the City of Manchester and surrounding environs, including key arterial roads such as Oldham Road and Middleton.
- 7.1.50. The AQMA is designated due to high levels of nitrogen dioxide (NO₂) attributable to road traffic emissions. The Warwick Mill site is located within this designated AQMA. An Air Quality Assessment (AQA) is being prepared by RPS and will determine the impact of the scheme on the surrounding area and the environmental suitability of the Warwick Mill site for its proposed use.
- 7.1.51. Based on the work undertaken to date, the proposed development is not predicted to cause any exceedances of any relevant National Air Quality Objectives (NAQO). To help maintain low levels of air pollution and comply with IAQM planning guidance, reductions in air pollution can still be considered. A non-exhaustive list of measures that have been implemented to help reduce the impacts of the development is given below:
- Provision of good walking and public transport routes to and from the development that integrate with existing routes;
 - Minimising car parking on site and incorporating electric vehicle charging (EV) points; and
 - Bicycle parking facilities.
- 7.1.52. The risk of dust impacts during demolition and construction works will be assessed. With the implementation of mitigation and control measures appropriate to the level of risk, the resultant effects of the dust exposure will normally be 'not significant'.
- 7.1.53. Construction phase emissions, such as dust, will be temporary and can be suitably controlled through a Construction Environmental Management Plan and Dust Mitigation Plan, the requirement and implementation of which can be secured by planning condition.
- 7.1.54. For the operational phase, arrivals at and departures from the site may change the number, type and speed of vehicles using the local road network. The development also includes on-site boilers which also emit pollutants to air. The height and location of the boiler flue will ensure that there are no impacts on existing or proposed receptors. Detailed atmospheric dispersion modelling will be undertaken to determine the change in pollutant concentrations at existing receptors in the surrounding area and the likely concentrations at the façades of proposed receptors. Where adverse air quality effects are predicted, measures to eliminate, reduce or mitigate the effects will be identified.

- 7.1.55. Overall, it is considered that the proposed development will not result in any significant adverse effects in terms of air quality. The AQA which will support the planning application will set out any recommendations to decrease potential exposure if required.

Flood Risk and Drainage

- 7.1.56. In accordance with the Environment Agency (EA) Flood Risk Maps, the site is located mostly within Flood Zone 1 however partly in Flood Zone 2 and 3. In accordance with the NPPF, development under any of the flood risk vulnerability classifications is permitted within Flood Zone 1. Since the site is mostly in Flood Zone 1, it is not anticipated that the proposed development will have any significant effects on flood risk, either within the site or elsewhere.
- 7.1.57. OS Mapping indicates that the nearest surface water feature is Wince Brook with flows in a westerly direction along the southern boundary of the site. Wince Brook is a tributary to the River Irk the confluence being located 300m west (downstream) of the site. The River Irk flows east to west approximately 100 m north of the site and has an extended box culvert (approximately 500m long) which runs under Middleton shopping centre and the Tesco supermarket. No significant artificial watercourses or features (for example canals and reservoirs) have been identified within 1km of the site.
- 7.1.58. The EA Flood Map for Planning, which is available online, indicates that the Warwick Mill building is primarily located within Flood Zone 1, whereby the annual probability of flooding from fluvial sources is classified as less than 1 in 1000. A small portion located centrally and at the western end of the Mill building is located within Flood Zone 2, whereby the annual probability of flooding from fluvial sources is classified as between 1 in 100 and 1 in 1000. The western section of the site associated with London House, is primarily located with Flood Zone 3, whereby the annual probability of flooding from fluvial sources is classified as greater than 1 in 100. Additional areas around the Flood Zone 3 area are located within Flood Zone 2. Based on the proximity to the adjacent watercourse it is expected that the mechanism for flooding is overtopping of fluvial waters from Wince Brook.
- 7.1.59. The EA's updated Flood Map for Surface Water, which is available online, indicates that site is predominantly located in areas of 'very low risk' with some areas of 'low risk'. This corresponds with an annual probability of flooding that is less than 0.1% and between 0.1% and 1%. The surface water extents are similar to the fluvial flooding extents and in reality, at this location it is anticipated that the surface water flood extents are largely a proxy for fluvial flooding.
- 7.1.60. EA mapping indicates that the site not located within an area potentially at risk from reservoir flooding.
- 7.1.61. The EA defines a Flood Warning Area as "geographical areas where we expect flooding to occur and where we provide a Flood Warning Service. They generally contain properties that are expected to flood from rivers or the sea and in some areas, from groundwater." DEFRA online mapping indicates that the site is located in a Flood Warning Area and Flood Alert Area.
- 7.1.62. As part of the application a Flood Risk Assessment prepared by RPS will be produced considering the risk of flooding from all sources, and in particular with regard to the nature of the fluvial flood risk at the site, in order to prevent an increase in flood risk off site as a result of the development. The assessment work will accord with national planning policy, ensuring that there is no increased flooding as a result of the development to local areas and the development itself is safe.

- 7.1.63. Based on the work undertaken to date, it is considered that the development can be achieved safely without a detrimental impact on flood risk, subject to appropriate mitigation if required, and thus there is unlikely to be a significant effect off site.
- 7.1.64. A Surface Water Drainage Strategy will also be produced by RPS in support of the application with regard to the new build element of the site. For the existing Mill building it is expected that surface water drainage will tie into existing surface water drainage connections at the site. Given the presence of the adjacent watercourse, and alluvial strata beneath the site, it is unlikely that infiltration will be a suitable method for the disposal of surface water from the site, and as such the drainage hierarchy will be applied to the development, with discharge to the adjacent watercourse being the favourable option. Surface water attenuation techniques in relation to the proposed new build element of the site and appropriate to the scope of the proposed impermeable area will be considered and included where required in order to prevent any significant effects.
- 7.1.65. Overall, it is considered unlikely that there would be any significant effects from a hydrological perspective and any mitigation required will be in line with national planning required and set out as part of the FRA and Surface Water Drainage Strategy.

Ground Conditions

- 7.1.66. A Phase 1 (Hazard Identification and Assessment) Desk Study has been prepared by RSK Environment Limited and is provided at **Appendix D**. It will also accompany the planning application submission.
- 7.1.67. British Geological Survey (BGS) records indicate that the site should be directly underlain by Alluvium and Glacial Deposits to a depth of around 20 m beneath which the mudstones and sandstones of the Pennine Lower Coal Measures are present. BGS records indicate that a fault is shown that runs north-south along the western side of the site. Previous coal mining reports indicate that whilst there should be no ground movement from previous coal workings there could be unrecorded shallow workings such that the site is indicated to be in a development high risk zone.
- 7.1.68. Historic mapping shows in circa 1850 the site was 'Little Park'; by the late nineteenth century 'Park Mill' was located on the western side of the site (where London House is currently located); Warwick Mill was constructed in circa 1909 where it still remains. It is presumed that London House was constructed in circa 1975.
- 7.1.69. The Zetica Map for unexploded ordinance indicates the risk to be low. Preliminary research indicates that the site has seen industrial and commercial usage from Victorian times. A Phase 2 (Risk estimation & evaluation) intrusive investigation will be required, and this will form a planning condition. The site is currently mostly hardstanding, and the proposed end scheme will similarly contain mostly hardstanding.
- 7.1.70. If some contamination were to be present during Phase 2 investigations, then the pathway to the end users (receptors) may be broken by it being encapsulated by the hardstanding. This will be determined during the Phase 2 quantitative risk assessment and whether Phase 3 (Remediation; design, implementation and verification) should be undertaken or not.
- 7.1.71. Considering the above, the proposed development, its users and the environment will not be at risk from nor will it lead to the generation of any adverse impacts in terms of ground contamination and conditions following any necessary mitigation measures.

- 7.1.72. Irrespective of this baseline position, the nature of the proposed development will not introduce any significant adverse environmental effects in terms of contamination or pollution, furthermore, it will ensure any future risks are minimised or removed.

Conservation and Cultural Heritage

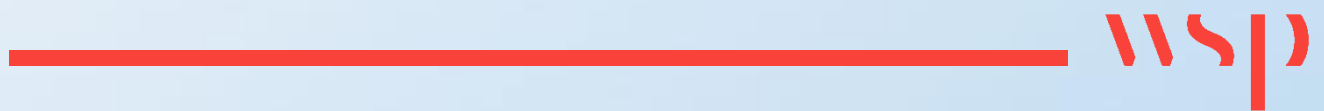
- 7.1.73. The site does not lie within a Conservation Area.
- 7.1.74. The Heritage Impact Assessment prepared by Townscape considers the effect of the proposed development upon the significance of the heritage asset; in this case, it considers the assets' settings to its significance and the potential for any harm to its significance.
- 7.1.75. A draft Heritage Impact Assessment has been shared with Rochdale Council and outlines the interventions proposed in order to bring about the regeneration and reuse of Warwick Mill. There will be direct impacts and harm on the heritage asset, which includes areas of internal demolition on some floors, together with new internal atrium and roof top residential units. In addition, a new build residential development is proposed immediately adjacent to the heritage asset.
- 7.1.76. There will be a major change to the internal layout of the mill, but in terms of setting of heritage assets, the change enables its significance to be better revealed, preserved and enables the mill to positively integrate with the surrounding townscape.
- 7.1.77. Views to, from and within the site have been considered. There will be no intrusion into key views, and the design of the new London House building will be sensitive to the heritage asset in terms of massing, architecture, layout and materials. The urban grain and spatial structure of the development will be enhanced by the replacement of the existing London House building, well-designed and with integrated public realm.
- 7.1.78. Furthermore, the proposed elevations of new building are of an improvement and calmer quality than the existing 1970/80s buildings and will thus create a more sympathetic backdrop
- 7.1.79. In summary, there will be no meaningful harm to cultural significance of the Listed building. The development will not result in any significant adverse effect on (or substantial harm to) the designated heritage asset identified as being affected by the proposal. The proposals are unlikely to result in any significant adverse effects on cultural heritage and therefore does not constitute EIA development.

8. CONCLUSION

- 8.1.1. This EIA screening report considers the likelihood of significant environmental effects arising from the proposed development. It accords with the Regulations and has regard to relevant PPG.
- 8.1.2. The extent of the impact of the new proposal would be limited and localised due to the nature and characteristics of the end use, and mitigation measures will be adopted and controlled through planning conditions, where necessary.
- 8.1.3. Whilst there will be noticeable permanent visual and townscape changes in the immediate vicinity of the site, the location of the development is not of such a sensitive nature that such changes would be significant effects, and the magnitude, spatial extent, intensity and complexity of the impacts are also moderated such that they would be likely to be significant.
- 8.1.4. The forthcoming planning application will be accompanied by a suite of technical reports and assessments, which will enable a full understanding of the scheme's potential impacts without the need for an EIA.
- 8.1.5. Considering the site location and surrounding environment, the characteristics of the development and the potential types and characteristics of potential effects, it is concluded that there will be no significant environmental effects such that the proposed development should constitute EIA development. Therefore, the preparation of an Environmental Statement is not required in support of this application.

Appendix A

SITE LOCATION PLAN





SCALE 1:500 0 10 20 30 40 50



Notes :

- Dimensions are to be checked on site before fabrication and construction
- Any discrepancies are to be immediately notified to the architects
- Structural measurements are to be taken from the structural engineers drawings
- Do not scale
- Copyright reserved by GMA

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DRAWING ISSUE STATUS

planning

Project
WARWICK MILL
MIDDLETON, ROCHDALE
M24 1AZ

Client
KAM LEI FONG LTD

Drawing
Warwick Mill Development
SITE LOCATION PLAN

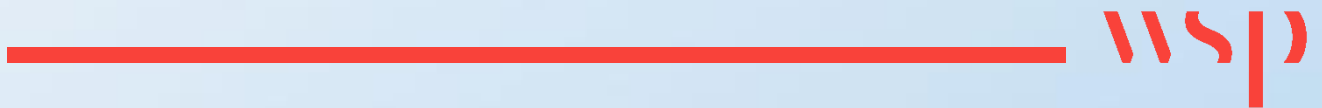
Scale	Date	Drawn	Checked
1:500@A2	Dec 21	SJS	IL

Type	Client	
01	277/01	WM SP 001

REV	DESCRIPTION	DATE
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Appendix B

ARCHAEOLOGICAL DESK-BASED ASSESSMENT





University of
Salford
MANCHESTER

Archaeological Desk- Based Assessment

Warwick Mill,
Middleton, Greater
Manchester

Client:

Kam Lei Fong (UK) Ltd

Technical Report:
Salford Archaeology

Author:

Katie Fletcher

Report No:
2021/SA/91





Site Location: The development area is located within Middleton, Greater Manchester and is bounded by Oldham Road to the north, Ashton Lane to the east, Wince Brook to the south and single-storey commercial units to the west.

NGR: Centred at NGR 387100 405668

Prepared for: Kam Lei Fong (UK) Ltd

Document Title: Warwick Mill, Middleton, Greater Manchester

Document Type: Desk-based Assessment

Report No: SA/2021/91

Version: Version 1

Author: Katie Fletcher
Position: Archaeological Supervisor
Date: December 2021

Checked By: Ashley Brogan
Position: Project Officer
Date: December 2021

Signed:

Copyright: Copyright for this document remains with the Centre for Applied Archaeology, University of Salford.

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Summary

Kam Lei Fong (UK) Ltd have prepared a planning application for the mixed-use redevelopment of land at Warwick Mill, Middleton, Greater Manchester. The proposed development comprises the conversion of the Grade II listed cotton and spinning mill into several new residential apartments with commercial units and restaurants at ground floor level and associated landscaping and parking facilities. The proposals also include an extension to the west of Warwick Mills, which will provide further apartments, with plant rooms, car parking and commercial units at ground floor level.

In order to support the planning application, Salford Archaeology was commissioned to carry out an archaeological desk-based assessment of the proposed development site. This was intended to establish, as far as possible, the nature and significance of the sub-surface archaeological resource in order to enable informed recommendations to be made for the future treatment of any surviving remains.

The proposed development site lies within the Little Park area of Middleton, which formed part of Middleton Hall Park during the late medieval and post-medieval periods. At the beginning of the industrial revolution, Middleton and the neighbouring township of Tongue began to develop. By the late 18th century, small buildings had been erected along the Ashton Lane frontage, within the proposed development site, which lay within Tongue, in the parish of Prestwich-cum-Oldham.

Mid-19th-century maps show that much of the proposed development site remained undeveloped, except for the Ashton Lane frontage, which appears to have been lined with cottages. In the second half of the 19th century, a cotton spinning mill named Park Mill was established in the west end of the proposed development site. The mill was purchased by the Irk Mill Company Limited in 1890 and was renamed Irk Mill. The remainder of the proposed development site was developed during the Edwardian period when Warwick Mill was constructed.

Warwick Mill was designed by architect G. Stott of J. Stott and Sons. Building work commenced before the end of 1907. The mill is of red-brick construction with five-storeys, a basement, and a water tower, which bears the name 'Warwick Mill' in white glazed tiles. A George Saxon steam engine was fitted in 1909 in the engine house at the southeast end of the mill building. Warwick Mill is currently designated as a Grade II listed building.

Throughout the 20th century, few changes were made to the footprints of Irk Mill and Warwick Mill. A minor change included the erection of a new detached engine house at Warwick Mill by the 1950s. The new engine house is located along the Ashton Lane frontage and is part of the Grade II listing. By at least the 1960s, Warwick Mill had ceased cotton production and had begun to manufacture synthetic fibres such as Bri-Nylon, whilst Irk Mill had been converted into a furniture factory and weatherproof works.

During the last quarter of the 20th century, Irk Mill was demolished and replaced by an office building named London House. The original engine house and chimney at

Warwick Mills was demolished in the 1980s. The footprints of the former engine houses at both mills are currently undeveloped.

The potential for the site to contain buried archaeological remains is considered to be high, though demolition activity may have impacted the survival of *in-situ* buried archaeological remains. Nevertheless, it is anticipated that archaeological remains may include the original engine house and chimney at Warwick Mills and elements of power-systems at Irk Mills. Buried remains of 18th-century cottages and isolated patches of relict soils associated with Middleton Hall Park cannot be discounted, though they are likely to have been significantly impacted by the construction of the mills.

The exact scope and extent of any further investigation of the proposed development area will be determined by Greater Manchester Archaeological Advisory Service (GMAAS), in their capacity as archaeological advisor to Rochdale Metropolitan Borough Council. It may be anticipated, however, that archaeological investigation via a programme of archaeological evaluation trenching or strip and record evaluation may be required to establish the presence or absence of buried archaeological remains and, if present, their extent and significance.

Should significant archaeological remains be encountered during the archaeological evaluation, further excavation may be required to offset the harm of the development to the buried archaeological resource, in line with the guidance provided by the National Planning Policy Framework. The scope and extent of any such further investigation will be determined the by Greater Manchester Archaeological Advisory Service (GMAAS), in their capacity as archaeological advisor to Rochdale Metropolitan Borough Council.

1. Introduction

1.1 Planning Background

Kam Lei Fong (UK) Ltd have prepared a planning application for the mixed-use redevelopment of land at Warwick Mill, Middleton, Greater Manchester (referred to herein as 'the Site'). The proposed development comprises the conversion of the Grade II listed cotton and spinning mill into several new residential apartments with commercial units and restaurants at ground floor level and associated landscaping and parking facilities. An extension is also proposed to the west of Warwick Mills, which will provide further apartments, with plant rooms, parking and commercial units at ground floor level. The delivery of these proposals will necessitate earth-moving works that have potential to damage or remove any below-ground archaeological remains.

In order to support the planning application Kam Lei Fong (UK) Ltd commissioned Salford Archaeology within the University of Salford to carry out an archaeological desk-based assessment of the Site, which was intended to establish, as far as possible, the nature and significance of the archaeological resource, in order to enable informed recommendations to be made for the future treatment of any surviving remains.

1.2 Government and Local Planning Policies

1.2.1 National Planning Policy Framework (NPPF)

The significance of the archaeological resource identified within this report has been assessed as recommended in the revised *National Planning Policy Framework* (Ministry of Housing, Communities and Local Government, revised July 2021). The NPPF sets out the Government's planning policies and outlines the presumption in favour of sustainable development, which is defined by three principles: economic, social and environmental. Of the core planning principles underpinning decision making, conserving heritage assets 'in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations' is one. Section 16 deals specifically with this historic environment (paragraphs 189-208), and states that local planning authorities should consider:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

Paragraph 194 states that local planning authorities, when determining applications, should require the applicant to describe the significance of any affected heritage assets, 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'.

Paragraph 203 states that the effect of a proposal on non-designated heritage assets (designated assets are covered in paragraphs 193-96) should be taken into account in determining a planning application.

Paragraph 205 states that local planning authorities should require developers to record and advance understanding of any heritage assets to be lost, in a manner appropriate to their importance and impact, and to make this evidence publicly accessible.

1.2.2 Local Development Framework

The NPPF outlines the need for local planning authorities to create local plans and frameworks to implement the NPPF at a local level. The future use and development of land and buildings in the borough is currently guided by the Rochdale Metropolitan Borough Unitary Development Plan (UDP), adopted in 2006. The Council is now working to replace the adopted UDP with a new document called the Allocations Development Plan. Until the new Allocations Development Plan is produced, the UDP will continue to be used to make planning decisions. The UDP document sets out a framework of policies to: control the location and quality of new development; encourage and stimulate development, where appropriate; protect and improve the environment; and safeguard the borough's most important natural and built assets. Adopted in 2006, the Secretary of State issued a saving direction on policies in 2009 including policies G/BE/9 and BE/10-19 relevant to the built and historic environment.

In determining applications, local planning authorities must be able to understand the significance of any heritage assets affected by the proposed development in order to assess its impact. This would enable the conservation of 'heritage assets in a manner suitable to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations' (*op cit*, para 17), or else they can be recorded 'and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (*op cit*, Section 12.141).

Rochdale's Core Strategy adopted in 2016 outlines the need to protect and enhance the character, landscape and heritage in the borough. Policy P2 states:

- '1. We will protect and enhance the borough's character, the distinctiveness of its town centres, housing areas and countryside, and the qualities of its landscapes, utilising the considerable potential of these assets in development and regeneration schemes. We will do this by:
 - a. Requiring new development to integrate successfully with the key natural features of the borough, e.g. river valleys and the Pennine landscape;

- b. Requiring new development to take opportunities to protect and open up important views of hills and valleys which are part of the borough's unique character;
 - c. Restoring the River Roch and other water bodies to their place as key and attractive features of the borough, including opening up waterways where they have been covered, and enhancing their setting, heritage assets and biodiversity potential;
 - d. Protecting, enhancing and utilising outstanding cultural landscapes, such as the Cheesden Valley area and around Littleborough and Hollingworth Lake; and
 - e. Conserving and enhancing townscape character
2. We will protect the borough's heritage by:
- a. Conserving, enhancing and promoting key heritage assets, both statutory and non-statutory, including consideration of their wider settings. Key heritage assets of the borough include:
 - I Four outstanding conservation areas: Central Rochdale, Middleton and Littleborough town centres and Rock Nook / Summit
 - II Other designated assets such as listed buildings, conservation areas, registered parks and scheduled ancient monuments;
 - III The heritage of the Co-operative movement, the Rochdale Pioneers and the Labour movement;
 - IV The Edgar Wood and J. H. Sellers cultural heritage;
 - V The heritage of the seventeenth and eighteenth century vernacular tradition; and
 - VI The engineering heritage, including mills, canals and railways.
 - b. Conserving, enhancing and utilising other non-statutory heritage assets of local interest, be they buildings, parks, gardens or archaeological sites, including promoting their sensitive restoration;
 - c. Using heritage assets positively and intelligently to strengthen identity and image and support the visitor economy, particularly in development and regeneration schemes;
 - d. Prioritising the conservation of heritage assets at risk from decay, giving special attention to designated heritage assets in this regard'.

Rochdale Metropolitan Borough Council is advised on archaeological matters by the development control archaeologist at Greater Manchester Archaeological Advisory Service (GMAAS).

2. Method Statement

The assessment considers the potential impact of the proposed development upon any buried archaeological remains within the Site, and comprises a desk-based study and site inspection. The production of the assessment followed the Chartered Institute for Archaeologists (CIfA) standard and guidance for undertaking archaeological desk-based assessments (*Standard and Guidance for Historic Environment Desk-based Assessment*, 2017).

2.1 Research Sources

The desk-based assessment made use of the following sources:

- published and unpublished cartographic, documentary and photographic sources;
- the Greater Manchester Historic Environment Record, maintained by GMAAS;
- The North West England Regional Research Framework;
- Manchester Local Archives and the Greater Manchester Record Office in Manchester Central Library;
- The National Heritage List for England;
- Salford Archaeology's extensive library of archaeological work carried out in the vicinity of the Site.

The aim of the research was to provide the relevant historical and archaeological background relating to the development of the Site. The available sequence of historical mapping was the principal source of information, as this provides evidence for the development of the Site since the late eighteenth century. The results of the historical and archaeological research will be analysed against the current framework for the region, *The North West England Regional Research Framework*, in order to identify whether there is potential for the Site to contribute to the current initiatives and research questions listed within the agenda.

2.2 The Document

The following presents the historical and archaeological evidence for the Site. A gazetteer (Chapter 5) is presented of heritage assets and sites of potential archaeological interest identified within the Site and this information, along with map regression (Figs 3-8), is used to assess the significance of the remains (Chapter 6) and impact of the proposed development (Chapter 7). A mitigation strategy is outlined in Chapter 8, based on the assessment presented in the previous chapters.

3. The Setting

3.1 Location

Middleton lies in the southern part of the Metropolitan Borough of Rochdale, in the modern county of Greater Manchester. The town is situated on the River Irk, five miles north of Manchester and five miles southwest of Rochdale. The town may have derived its name from its position between the two towns. The Old English elements of the placename '*middel* and *tūn*' translates as 'middle farmstead or estate' (Mills 2011, 472).

The Site encompasses around c. 9800m², which includes Warwick Mill, a Grade II listed building, built in 1907. The Site (centred on NGR 387100 405668) is within the centre of Middleton and is bounded by Oldham Road to the north, Ashton Lane to the east, Wince Brook to the south and single-storey commercial units to the west (Plate 1; Fig. 1).

Topographically, Middleton lies on undulating ground, on the River Irk. The Wince Brook is a small tributary of the River Irk, the confluence of which is a short distance downstream (southwest) of the Site. The Site lies at a height of approximately 80m above Ordnance Datum.



Plate 1: Recent aerial view looking north across the Site

3.2 Geology

The underlying solid geology consists of the Pennine Lower Coal Measures of the Carboniferous period. The predominant drift geology comprises glacially deposited banded boulder clay and sand (<http://www.bgs.ac.uk>). Superficial deposits include alluvium – clay, silt, sand and gravel. The local environment was previously dominated by swamps, estuaries and deltas.

3.3 Designations

The Site contains designated one heritage asset that is afforded statutory protection as a listed building (Table 1). It does not contain any Scheduled Monuments, or any Registered Parks and Gardens, and it does not fall within a conservation area. The Middleton Town Centre Conservation Area is 250m to the north of the Site and the Manchester Old Road Conservation Area is within a 500m radius of the Site.

HER ID	Description	Grade	NGR
5189.1.0	Warwick Mill	II	SD 8711 0567

Table 1: Summary of listed buildings within the Site

A further five listed buildings are located within 500m of the Site (Table 2).

HER ID	Description	Grade	NGR
11571.1.0	Church of St Michael	II	SD 8747 0568
5398.1.0	33, 35 and 37 Middleton Gardens	II	SD 8692 0579
10430.1.0	Long Street Methodist Church and Sunday School	II*	SD 8704 0620
11609.1.0	Royal Bank of Scotland	II	SD 8708 0606
10432.1.0	Providence United Reformed Church	II	SD 8720 0610

Table 2: Summary of listed buildings within a 500m radius of the Site

4. Historical Background

The following section provides a framework to the present study, working chronologically through the periods listed below (Table 3). Key sites are summarised in the Gazetteer of Sites (Section 5, below).

Period		Date Range
Prehistoric	Palaeolithic	Pre-10,000 BC
	Mesolithic	10,000 – 3500 BC
	Neolithic	3500 – 2300 BC
	Bronze Age	2300 BC – 700 BC
	Iron Age	700 BC – AD 43
Romano-British		AD 43 – AD 410
Early Medieval		AD 410 – AD 1066
Late Medieval		AD 1066 – AD 1540
Post-medieval		AD 1540 – c 1750
Industrial Period		c AD1750 – 1914
Modern		Post-1914

Table 3: Summary of British archaeological periods and date ranges

4.1 Prehistoric Period

4.1.1 Archaeological Evidence

The current understanding of human activity in the Greater Manchester region during the prehistoric period is poor, although it is reasonable to suggest that several areas may have been conducive for late prehistoric settlement on account of the natural topography and the abundance of natural water sources (i.e. rivers) (Gregory 2007). Most Mesolithic artefacts have been recovered on the edges of peat, especially around the Blackstone edge area and Windy Hill. Prehistoric activity elsewhere in the borough is likely to have been obliterated by urban growth from the industrial revolution onwards (*ibid*). The Site is located close to the River Irk, on sands and gravels, which may have been favourable for prehistoric activity, though flint findspots are less common in the southern part of the Rochdale Borough (Arrowsmith 2010; Pearson *et al* 1985, 107).

The region's primeval woodland appears to have been cleared progressively in response to the gradual adoption of farming and associated settlement during the Neolithic, Bronze and Iron Ages. Direct evidence dating to the Neolithic and Bronze Age (c 4000-600 cal BC) is sporadic and is generally based on the chance finds of dateable artefacts and, in the case of the Bronze Age, extant burial mounds. Neolithic finds across the borough principally comprise polished stone axes and flint tools, whilst Bronze Age finds include stone axe-hammers, flint tools, and metalwork (Pearson *et al* 1985, 105-11; Davey and Forster 1975, entry 107). A Neolithic stone hammer was discovered in Middleton during the late 19th century, though the exact findspot is unknown (HER 2436.1.0). A stone axe has also been recovered just north of Middleton along the Tub Brook (Pearson *et al* 1985, 109).

During the Iron Age (c 600 cal BC-AD 43) the Rochdale area may have lain within the tribal territory of the Brigantes, who are described in several proto-historic sources, such as the accounts of the Roman historian Tacitus and the geographer Ptolemy. The Brigantes, however, appear to have occupied a large territory covering much of northern England and parts of south-west Scotland, and it is therefore likely that this group formed a loose confederation of smaller tribal groups (Hartley and Fitts 1988, 1-2). Unfortunately, the evidence for Iron Age activity in the area is sparse (Middleton *et al* 1995, 141-89; Haselgrove *et al* 2001, 25), although it has been argued that several promontory sites in the Irwell and Roch valleys may represent settlement sites (Hodgson and Brennand 2006, 53).

Other finds from the borough dating to this period include a bronze torque of Iron Age date (Pearson *et al* 1985, 105-11) and, more tentatively, several Celtic-style carved-stone heads which have been discovered across the Pennine foothills. These include an example found at Castle Farm in Castleton. This egg-shaped head was carved in a Celtic style and possessed an open mouth, thick lips and a triangular flat nose with deep nostrils, with a deep hollow under the right eye (*ibid*). A Celtic-style head comprising a gutter spout of local stone with a face carved onto the spout was discovered at St Chad's Church in Rochdale (HER 2376.1.2). The face has large lentoid eyes with a block nose, and a simple mouth can be distinguished despite the face being rather worn. Similar stone heads have been discovered across the Pennine foothills and, although they are difficult to date, it has been suggested that a proportion might date to the Iron Age, which at a much later date were incorporated into post-medieval boundaries where they acted as charms to protect livestock (Nevell 1992; Redhead 2003, 76).

4.1.2 *Archaeological Potential*

The potential for buried archaeological remains deriving from prehistoric activity within the Site is considered to be low due to development within the Site during the 19th and 20th centuries, although the possibility of isolated artefacts should not be dismissed entirely.

4.2 *Romano-British Period*

4.2.1 *Archaeological Evidence*

The Romano-British period (AD 43-450) is typified by the appearance of Roman military installations and a concomitant network of roads (*cf* Philpott 2006, 59). Items of Roman material culture, such as coins, pottery, metalwork, and glass, were introduced into the region, and the indigenous communities of the area gradually adopted some of these objects (*ibid*). Unsurprisingly, a small number of Roman artefacts are therefore known from the Rochdale Borough, though these are not seemingly associated with identifiable settlement sites. These artefacts include several Roman coin hoards that have been unearthed close to the River Roch, such as that at Castlemere (Pearson *et al* 1985, 112).

In Middleton, Roman coin was found at the confluence of the River Irk and Wince Brook in 1987, 230m southwest of the Site (HER 2681.1.0). A Roman jug was discovered at a depth of 8 feet, 330m to the north of the Site in 1887 (HER 2744.1.0). These finds are indicative of low-level Roman activity in the Middleton area.

The nearest known Roman military installation to Middleton were the forts located at Manchester and Castleshaw, both of which were associated with an extra-mural settlement, or *vicus* (Redhead 2003). That at Manchester formed an auxiliary fort established in c AD 79, which may well have been garrisoned until the end of the Roman period (Gregory 2007). Similarly, the fort at Castleshaw began life as an auxiliary fort, which was established in c AD 79, though this was abandoned in the mid-AD 90s and was replaced by a smaller fortlet in AD 105, which was then abandoned in the AD 120s.

4.2.2 Archaeological Potential

The lack of Romano-British activity in Middleton suggests that the area was sparsely populated and any potential evidence is likely to have been removed by development within the Site during the 19th and 20th centuries. The potential for remains to derive from this period is therefore considered to be very low.

4.3 Early Medieval Period

4.3.1 Historical and Archaeological Evidence

After the collapse of the Roman Empire, many of the established urban centres and forts were abandoned along with large-scale production. Greater Manchester is likely to have been a sparsely populated and isolated part of the country, demonstrated by a lack of archaeological evidence for this period. Place-name evidence indicates that Middleton derives from the Saxon period. It has been suggested that during the reign of Aethelfreth of Bernicia, in the early 7th century, an invasion took place across Lancashire, resulting in the establishment of several settlements which can be traced by the 'ton' Old English suffix (Ballard 1986). Much of Lancashire became part of the Saxon Kingdom of Northumbria shortly before it was absorbed into the neighbouring Kingdom of Mercia (Person *et al* 1986, 116).

Rochdale lay on the border of the Mercian and Northumbrian territories and is believed to have been of some significance during the Saxon period. The presence of an Anglo-Saxon settlement at Rochdale also tallies well with the dedication of its parish church to St Chad, the late-7th-century Anglo-Saxon bishop of Lichfield (Fishwick 1889, 127).

Middleton lay within the Hundred of Salford, which formed a large Anglo-Saxon territorial unit situated immediately north of the River Mersey and encompassed the Irwell Valley (Fishwick 1889, 1). Although the origins of the ancient parish of Middleton are unclear, it was potentially created in the middle Anglo-Saxon period and existed by at least 888 when the earliest church at Middleton was founded, dedicated to Saint Cuthbert (<https://www.middletonparishchurch.org.uk/about-us/history/>). Middleton's oval-shaped churchyard was laid out at this time with plenty of space around the then tiny Saxon church. A carved rectangular stone, probably a late-Saxon gravestone survives within the church (*ibid*). Little is known about the settlement pattern during the Anglo-Saxon period in Middleton, though it is believed to have centred on the church.

4.3.2 Archaeological Potential

Given the location of the Site away from known early medieval settlement activity and the development within the Site during the 19th and 20th centuries, the potential for buried archaeological remains is considered to be very low.

4.4 Late Medieval Period

4.4.1 Historical and Archaeological Evidence

At the end of the Anglo-Saxon period, in 1066, the Normans built a larger church dedicated to the French Saint Leonard. The earliest mention of a rector at St Leonard's, Middleton, is in a deed of the 12th century, in which Roger de Middleton made a grant to Geoffrey, Dean of Whalley. Among the witnesses was "Adam, Priest of Middleton" (Cleworth 1904). It is possible that the western arch of the church dates to around 1200 (Farrer and Brownbill 1911, 151-161). Middleton also had an endowed free grammar school as early as 1412, and the later buildings of this school still survive.

Middleton does not appear in the Domesday Day Book of 1086. The earliest reference to Middleton appears in the 12th century when the manor formed part of the Montbegon fee of Tottington, held later by the Lacys and the Earls and Dukes of Lancaster (Farrer and Brownbill 1911, 161-9). The parish of Middleton may have been co-extensive with the manor of Middleton, which, with its dependencies and hamlets, was held by the lord of Tottington by one knight's fee, with payments of 10s. a year for castle-ward and 13s. 4d. for sake fee.

The earliest tenant of the manor was Roger de Middleton, son of Alexander, who had adopted the local placename as his surname. Around 1180, Roger de Middleton made a grant of Ashworth, a hamlet in the parish. In 1212, Roger held the fee of one knight (in Middleton) 'of ancient tenure,' of Roger de Montbegon, and also held a plough-land in Cheetham of the King (*ibid*). The manor passed through marriage to the Bartons who held the manor until at least the mid-15th century. At this time, the parish included Pilsworth, Hopwood and Thornham as well as the outlying hamlets of Ashworth, Birtle, Ainsworth, Meadowcroft, and Lynalx.

By 1480, the greater part of the Middleton estate was held by Sir Ralph Asheton, though several messuages and lands in Middleton had been inherited by various members of the Barton family. Three years later, it was recorded that Sir Ralph Asheton held the manor of Middleton in right of his wife, by one knight's fee, rendering yearly 13s. 4d. and for ward of Lancaster Castle 10s.

Little is known about the development of the Site throughout the late-medieval period or the settlement pattern in Middleton. The Site lies 650m to the south of St Leonard's Church, which may have provided the focus of medieval settlement. The local economy was presumably based on agricultural produce and domestic-based crafts.

4.4.2 Archaeological Potential

The Site was situated away from the main settlement activity. Any potential late medieval remains have likely been disturbed by industrial period activity. Therefore, the potential for remains to derive from this period is therefore considered to be low.

4.5 Post-medieval and Industrial Period

4.5.1 Historical and Archaeological Evidence

Middleton Hall was the seat of the Asheton family and was located to the south of St Leonard's Church in a bend on the River Irk. The origins of the hall are uncertain, but it is believed to have originally been of timber construction, probably of 15th- or 16th-

century date and was surrounded by a moat (HER 2439.1.0). An account of the house written immediately before its demolition describes it as an ancient structure erected at different periods. The original timber and plaster house, pre-dating Henry VII, is said to have been built around two large courts and was protected by a bridge over the moat (HER 2439.1.0). A description in 1770 refers to timbers like an upturned ship, suggesting a cruck construction. The hall contained a large stone chimney piece bearing the date 1587. The hall was located 200m to the north of the Site. The Hall was demolished in 1845 and the site was developed into a cotton mill.

Middleton Hall Park (HER 2439.2.0) covered c. 6 hectares and consisted of a park, formal gardens, and deer park. The park surrounded the hall and ran southwards towards the River Irk. During the 19th century, the grounds were developed into farmsteads. Areas that formerly formed part of the park have associated placenames, such as Little Park. Middleton Deer Park (HER 2676.1.0) was likely located to the west of the hall.

A second moated site is believed to have been located at the Old Rectory, 650m north of the Site (GMAU 1985, 64). The original building dated to at least the early 16th century and is described by Historic England as an open-hall house. The current building was partly reconstructed in brick in the 19th century (<https://historicengland.org.uk/images-books/photos/item/IOE01/00542/02>).

Much of the St Leonard's Church was rebuilt in the 16th century by Richard Asheton. In 1524, a window commemorating the victory of the battle of Flodden Field was inserted in the south wall. It depicts Sir Richard Asheton with his wife Anna, and the body of archers he raised and equipped, kneeling in church before going to war.

During the Civil War, Ralph Asheton, lord of the manor, had a leading role on the Parliamentary side. He was appointed a deputy lieutenant of the county in 1642, in opposition to the Crown nominees, and sequestrator in 1643. As colonel of the levies, he commanded at the siege of Bolton in 1643, relieved the town of Lancaster and defeated Lord Derby at Whalley, but was himself defeated at Middlewich in Cheshire. Ralph also took part in the siege of Lathom and fought at Preston and Appleby before he died on 17th February 1650–1 (Farrer and Brownbill 1911, 165-9).

Middleton began to expand during the post-medieval period. John Speed's map of 1610 marks Middleton on the plan, indicating that it was of some importance (Plate 2). A moated site, presumably denoting Middleton Hall, seems to be captured on the plan to the west of Middleton. The hearth tax return of 1666 shows that there were 113 hearths liable. The largest dwellings were those of Lady Anne Asheton with 18 hearths, Mr Simmonds had 14, Richard Hilton the younger had 10, Susan Wrigley with 9 and Isaac Walkden, with 6 (*ibid*).



Plate 2: John Speed's map of 1610, showing Middleton

In the latter part of the 17th century, cotton manufacture began to take root in Middleton as a cottage-based industry. During this time, Middleton had a small population, and even in 1770, there were only about twenty habitations in the village (Farrer and Brownbill 1911 65-7). One of these buildings may have been Warren House (HER 2347.1.0), located 450m to the northeast of the Site.

The widow of Sir Ralph Assheton is stated to have been opposed to the introduction of the mill system, perhaps because of its destructive effect on the amenities of the place (*ibid*). Interestingly, the residents of Middleton in the Victorian period seem to have upheld these 'radical views' and sought to retain the rural qualities of the area.

At the dawn of the industrial revolution, Middleton was transformed into a prominent mill town. Silk-weaving was introduced around 1778 and played a vital role in the local economy (Farrer and Brownbill 1911, 165-9). As a result, the town began to develop with the building of two small estates of handloom weavers' houses. By 1795, the 'more profitable branches of muslin and nankeen' employed most of the weavers in the town, though silk was soon eclipsed by cotton. At the turn of the century, the town gained its first cotton mill and by 1833 all the branches of cotton manufacturing had been established. In that year the great calico-printing works were established at Rhodes.

Other trades that flourished during the 19th century included iron foundries, machinery works, dye works and the manufacture of chemicals and soap (*ibid*). An early water-powered cotton spinning mill may have been sited at Tonge Dye Works (HER 5178.1.0), located 200m southwest of the Site. Other mills. Such as Albany Mill (HER 2349.1.0), Brookside Mill (HER 17071.1.0) and Lodge Mills (HER 5185.1.0) that were set up close to the Site were established in the mid- to late 19th century.

The manor stayed in the Asheton family until the 18th century, when it passed through marriage to Harbord Harbord, later Lord Suffield. Lord Suffield obtained a Royal Charter from King George III in 1791 to hold a weekly market and three annual summer fairs in Middleton. Suffield built a market house, warehouses and shambles in the town at his own expense. The Harbord family held the manor until 1848 when it was sold to railway contractors, Peto and Betts (*ibid*). The company was bankrupt by 1861, and the former estate was sold to various persons.

Another important family in the local area were the Tonges. Originally, Tonge was part of Alkrington and was not recorded as a manor until the 14th century. By the 16th century, the Tonge family held possession of estates in Prestwich, Middleton, Tonge and Alkrington (Farrer and Brownbill 1911, 85-7). Christopher Tonge inherited the manor and built Tonge Hall, a Grade II* listed building, 650m to the east of the Site in 1580. Tonge Hall was purchased by Mr Asheton Tonge of Alderley, stated to be a descendant of the family in around 1890.

Tonge township developed as a result of the industrial revolution. It occupied a tongue of land between the Irk on the north and the Wince Brook on the south. Tonge was served by St Michaels Church (HER 11571.1.0), which was erected in 1839 300m to the east of the Site. Land within the Site was in Tonge, which lost its status as a township by the end of the 19th century when it was merged with Middleton.

In 1840, Middleton was described as 'situated in a fertile vale, skirted by rising grounds, well cultivated and rendered pleasant by groves of trees; a narrow steep ridge of sandy soil extends along the eastern side of the place, and a large number of the buildings have been erected on the summit and slope of this hill; a considerable number of cottages which may be considered a part of the town are on the sides and at the foot of the western and eastern banks of the eminence.' (Farrer and Brownbill 1911, 165-9).

In the Victorian era, the local government was reorganised, and Middleton lost five of its townships to other boroughs, which included Pilsworth, Ainsworth, Ashworth, Birtle and Bamford and Great Lever. However, Middleton, Hopwood and Thornham gained two new townships – Alkrington and Tonge, formerly part of Prestwich. In 1974, Middleton became part of the Metropolitan Borough of Rochdale, together with Ashworth, Birtle and Bamford, previously part of Heywood.

4.5.2 Archaeological Potential

There is potential for buried archaeological remains associated with post-medieval and industrial period activity at the Site. This is likely to comprise buried structural remains of industrial works.

4.6 Development of the Site

The development of the Site and its environs may be traced reasonably well from the sequence of available historic mapping. Yates' map of the County Palatine of Lancaster dated 1786 captures land within the Site (Plate 3). Land within the Site was north of the Wince Brook and to the west of Ashton Lane. The main road through Middleton is shaded on the map in red, which presumably marked the course of Chester Old Road and Long Street. A lane was shown to have extended southeast from the main thoroughfare, crossing the River Irk and Wince Brook. A waterwheel was depicted on the map to the east of the lane on the River Irk, which is shown on later maps as a corn mill. In total, four small buildings were marked along the course of the lane before it crossed the Wince Brook. The lane presumably represented Ashton Lane, which led south to land owned by Sir Ashton Lever. A small building on the west side of the lane may have been within the Site boundary. Presumably, the small buildings were cottages that may have been involved in the burgeoning textile industries and or farming. Land within the remainder of the Site was undeveloped (Plate 3).



Plate 3: Extract from Yates' map of 1786, showing the Site

Further north, a lane forked north past St Leonard's Church and east along Tonge Lane. Middleton Hall was depicted as a large square to the south of the lane and north of the river. In total, two tracks headed south from Tonge Lane, the short west most track may have led to Tonge Hall, whilst the lane further east led into the township of Tonge. Land along Tonge Lane was annotated 'Sir Harbord Harbord', indicating that he held land in this area.

The Site lay on the periphery of the increasingly industrialised settlements at Middleton and Tonge. Land within the Site fell within the township of Tonge, which lay within the

parish of Prestwich cum Oldham. A large park was marked on the map to the northwest of the Site, whilst Alkrington Hall and Park were to the southwest of the Site. Alkrington Hall Vault (HER 2360.2.1) was the nearest building within the Alkrington Estate (460m southwest). The rock-cut vault was located to the northwest of the old kitchen gardens and 19th-century glasshouses (HER 2360.2.0). The vault reputedly contained an inscription to Robert Lever with the date 1675 inscribed on the floor. The vault was sealed in 1933.

New roads were laid during the early 19th century, which provided more direct routes from Manchester to Middleton and Oldham. The new roads are captured on Greenwood's plan of 1818 (Plate 4). Manchester New Road (HER 2309.1.0) was established by the Manchester and Rochdale Trust c. 100m to the west of the Site. The route ran north/south from Manchester to Middleton, cutting through the eastern edge of the Alkrington Hall estate. Oldham Road was built directly to the north of the Site, adjoining Manchester New Road to the west. Presumably, Oldham Road provided better connectivity between Middleton and Oldham, bypassing Middleton Town Centre. The east end of Oldham Road adjoined Tonge Lane.

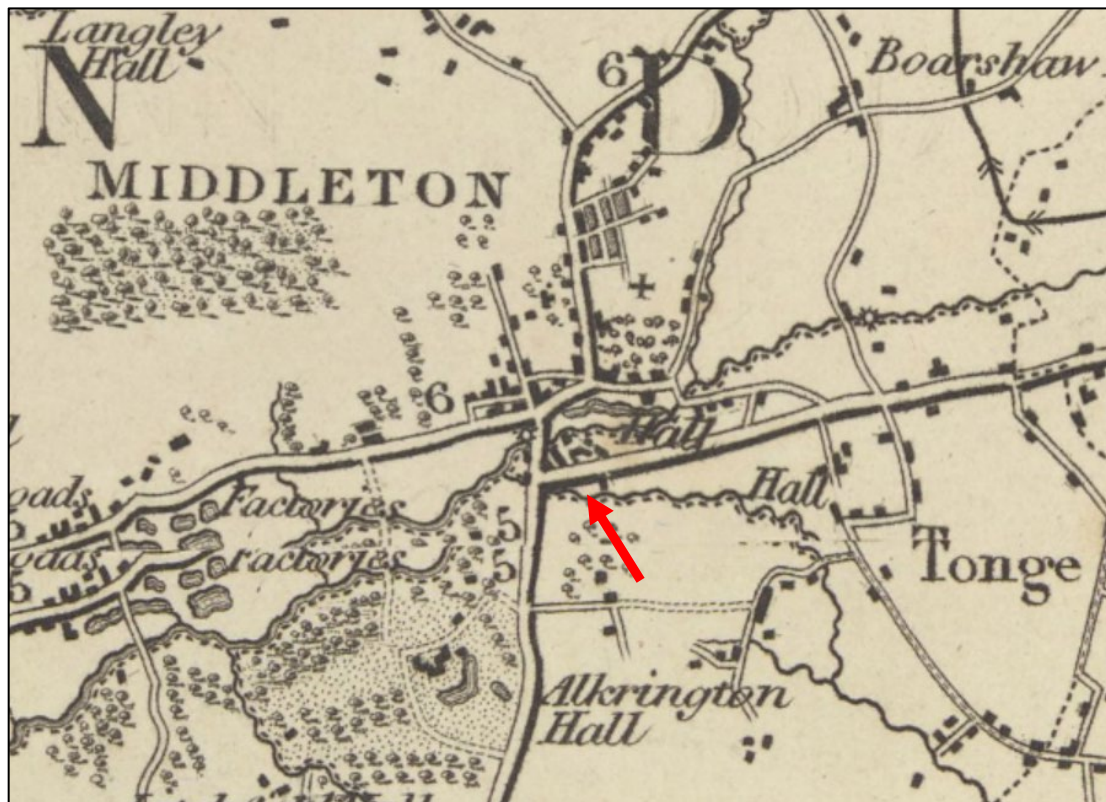


Plate 4: Extract from a map of the County Palatine of Lancaster by Greenwood 1818, showing the Site

Plots of land surrounding the Site had been developed, particularly to the north of the junction between Oldham Road and Manchester New Road. The former park had also been built upon and was partly occupied by Parkfield Mills by the 1850s (HER 5176.1.0). Factories, millponds and reservoirs are shown to the west of Middleton at Rhodes. The factories may correspond to a small complex of calico printing works and bleach works.

Greenwood's plan shows that most of the Site remained undeveloped. A building potentially occupied land in the east end of the Site. It is unclear whether the building marked on Greenwood's plan (Plate 4) was the same building or buildings that were marked on the earlier map produced by Yates (Plate 3).

By the mid-19th century, Middleton had become a mill town with several cotton factories. The Ordnance Survey map of 1851 is the first accurate map that captures the Site and surrounding area (Plate 5; Fig. 3). It shows that Spring Vale Printworks (HER 5184.1.0, 450m northeast of the Site), Lodge Mill (HER 5185.1.0, 330m northeast of the Site), a print and dye works (200m northwest of the Site) and a silk factory (75m southwest of the Site) had been established. There were several unnamed silk mills in the Tonge and Middleton area during this time, though the silk mill nearest the Site may have been occupied by Messrs Jackson and Royle in 1848 (*Halifax Guardian* 5th February 1848).

The Site lay within an area annotated as 'Little Park' on the 1851 map (Plate 5; Fig. 3). The placename Little Park refers to elements of the former Middleton Hall Park, indicating that the Site had formerly been within the grounds of the estate (HER 2439.2.0). Old Ashton Lane, currently known as Ashton Lane ran to the east of the Site. Details of the individual buildings on the west side of Old Ashton Lane were captured on the map. These buildings potentially represented the same buildings marked on Greenwood's map of 1818 (Plate 4) and Yates' map of 1786 (Plate 3). The footprints of the properties were larger than typical types of workers' houses of the period and the buildings could have represented 18th-century cottages or former farmsteads. The footprints of the two southernmost properties lay entirely within the Site. Dashed lines to the rear of these properties may have delineated ornate garden plots or could have been associated with water management features such as the pump marked on the map. In total, three properties in the northeast corner of the Site were only partly occupied within the Site. The remainder of the Site was undeveloped.

Ashton Lane was recorded in the township of Tonge, St Michaels district, in the census returns of 1851. Although it is not possible to identify the residents of the houses within the Site, the census returns provide an insight into the social history of the area. In total, 15 entries were recorded along the street. The first entry in the census returns, after Oldham Road, recorded Joseph Staveacre, a farmer of 18 acres who employed a labourer. He lived with his wife and five children. In total, four out of the five children worked in the silk factory as either handloom weavers or winders, whilst one worked as a farmhand. The neighbouring householders were employed in both the cotton and silk industries. All five of the residents in the house next door were employed in the silk industry. Other occupations included agricultural labourer, house painter, carder (cotton), block printer, errand boy and a smallware weaver (silk), though most residents were employed in the silk industry. All of the residents were born in the local area.

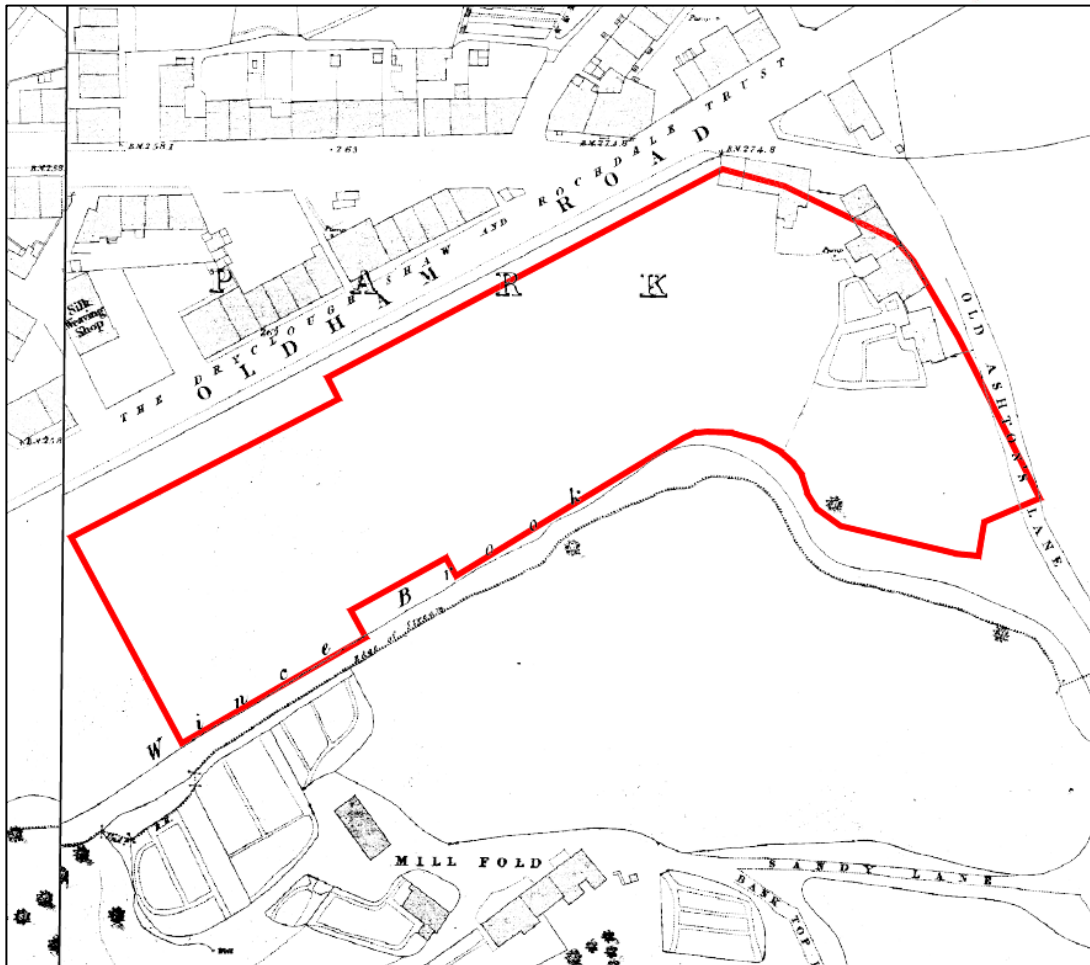


Plate 5: Extract from the Ordnance Survey map of 1851, showing the Site boundary

Park Mill (HER 2345.1.0) had been established within the west end of the Site by the late 19th century (Plate 6; Fig. 4). The first map that captures the mill building is the Ordnance Survey map of 1893 (Plate 6; Fig. 4). The map shows that the mill was roughly L-shaped in plan, with a covered entrance that allowed access into the mill yard. A smaller rectangular building was at the southern end of the yard, adjacent to Wince Brook. A dashed line was located to the north of the small rectangular building. A building annotated 'F W' was at the southern end of the main mill block. The abbreviation may have stood for felt washer (maps.nls.uk/os/abbrev). The mill was a four-storey cotton spinning mill of dark-red brick, with plain rectangular window openings and a two-aisled roof.

Another mill named Park Mill, which also manufactured cotton, was just 140m north of the Site. Several articles refer to Park Mill, Tonge, which was owned by a partnership formed by W. Hughes, J. Ferguson and G. Broadfield and later by G. Broadfield & Co (*Halifax Guardian* 5th February 1848; *Nottinghamshire Guardian* 30th April 1869). The partnership may have owned Park Mill within the Site, as the other Park Mill was presumably in Middleton. The sale of 'Park Mill, Tonge' was discussed in the *Middleton Albion* in 1870 (30th April 1870). The article states that Messrs Broadfield and Nimmo were the proprietors and that the mill had been purchased at auction by Mr Broadfield (*ibid*).

During the cotton depression, in 1879, Messrs. G. Broadfield & Co. decided to close

Park Mill, Tonge (*Dundee Advertiser* 1st July 1879). Mr Abraham Lord subsequently occupied the mill in 1886 (*Heywood Advertiser* 1st October 1886). In 1890, Irk Mill Company Limited was registered 'with a capital of £40,000 in £100 shares, to purchase Park Mill, Tonge, in the parish of Prestwich cum Oldham, Lancashire and trade as cotton spinners and manufacturers' (*Middleton Albion* 11th October 1890). The shareholders included Henry Schofield (mill manager), Robert Cooper (cotton spinner), Miles Crompton (mill manager), L. Dronsfield (machinist), John Hood (sharebroker), G. Swallow (cotton and yarn merchant) and C. Hughes (yarn agent).

The silk mill, 75m to the southwest of the Site, had been converted into a cotton mill and was annotated on the map as Tonge Mill.

The dwellings along Ashton Lane had been demolished during the second half of the 19th century (Plate 6; Fig. 4). The southeast end of the Site had been divided into four plots of land that may have contained small outbuildings. The rest of the Site remained undeveloped, and the area continued to be annotated as Little Park.

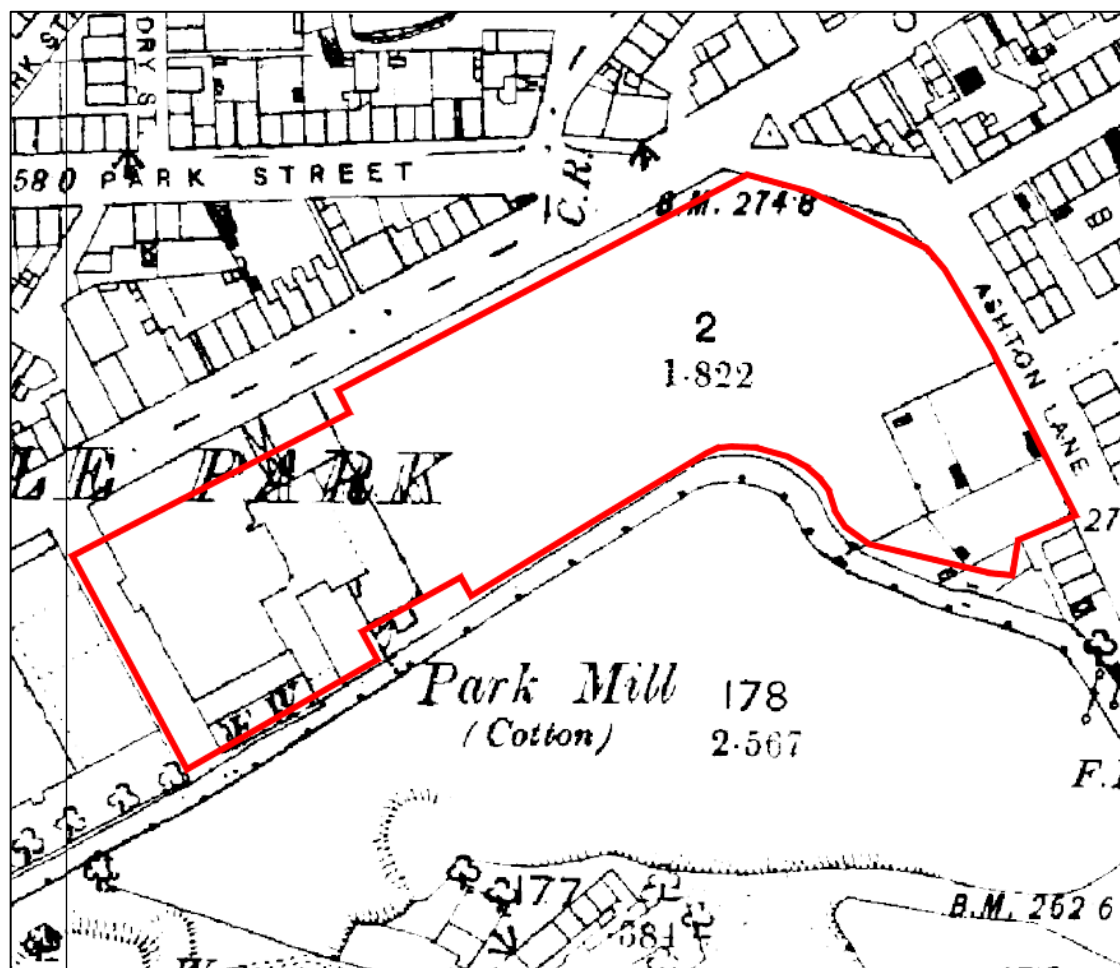


Plate 6: Extract from the Ordnance Survey map of 1893, showing the Site boundary

The next available map that captures the Site is the Ordnance Survey map of 1909 (Plate 7; Fig. 5). Park Mill had been renamed Irk Mill and continued to manufacture cotton. The dashed line on the previous map of 1893 is shown as solid, indicating the mill had been expanded and now formed a quadrangle of buildings. The mill chimney was marked adjacent to the Wince Brook. The building to the north of the chimney may

have been functioned as an engine house. A newspaper article states that the mill was fitted with two new boilers in 1910 (*Cotton Factory Times* 14th October 1910).

The east end of the Site had been divided into several plots. Some of these plots had been developed, including a row of three properties fronting Oldham Road and a larger, irregular-shaped building to the south, at the junction of Ashton Lane and Oldham Road.

The map was surveyed in 1907 and therefore did not capture Warwick Mill, which was built in the same year, designed by G. Stott of J. Stott and Sons, architects of Oldham (HER 5189.1.0). A newspaper article states that 'the Warwick Mill Company, Middleton has been registered with a capital of £80,000, to build a mill at land adjoining the Irk Mill Company, Middleton, to contain 90,000 mule spindles. Messrs Platt Bros and Co. will supply the whole of the spinning machinery, and Messrs George Saxon and Son, the steam engine. The building contract has been secured by Mr J Partington, of Middleton Junction. The building will be commenced by the end of the year. The directors are; Messrs. J. Hilton, J.P., J. Hulbert, J. Fielding, W. Prockter, C. Hardman, J. H. Howard and W. Marcroft.' (*Manchester Courier and General Advertiser* 2nd November 1907).



Plate 7: Extract from the Ordnance Survey map of 1909, showing the Site boundary

Warwick Mill is first captured on the Ordnance Survey map of 1922 and was annotated as a cotton factory (Plate 8; Fig. 6). The divided plots of land, and buildings along Oldham Road and Ashton Lane had been cleared to allow for the construction of the new mill. The footprint of the mill was rectangular with an engine house off the

southeast corner with an attached pump and boiler house. A detached chimney, settling well and water filtration tanks were also off the southeast corner of the mill. In 1909, the engine house had a George Saxon engine of 1500 hp at 65 rpm and a 26' flywheel for 30 ropes (HER 5189.1.0). A single-storey office building, associated with the mill, was erected on the Oldham Road and Ashton Lane junction.

The mill comprises a five-storey building with a basement, a water tower and a detached engine house to the rear. The water tower rises two stages above the stone-coped parapet having three windows with tripartite keystones, which are keyed into a stone band. The name of the mill is in white glazed tiles on the upper stage of the Hotel de-Ville style water tower.

The west end of the Site remained unchanged and continued to function as a cotton mill under the name 'Irk Mill' (Plate 8; Fig. 6). A newspaper article indicated that Irk Mill was planning on closing its mule spinning section in 1914 (*Rochdale Times* 27th May 1914).

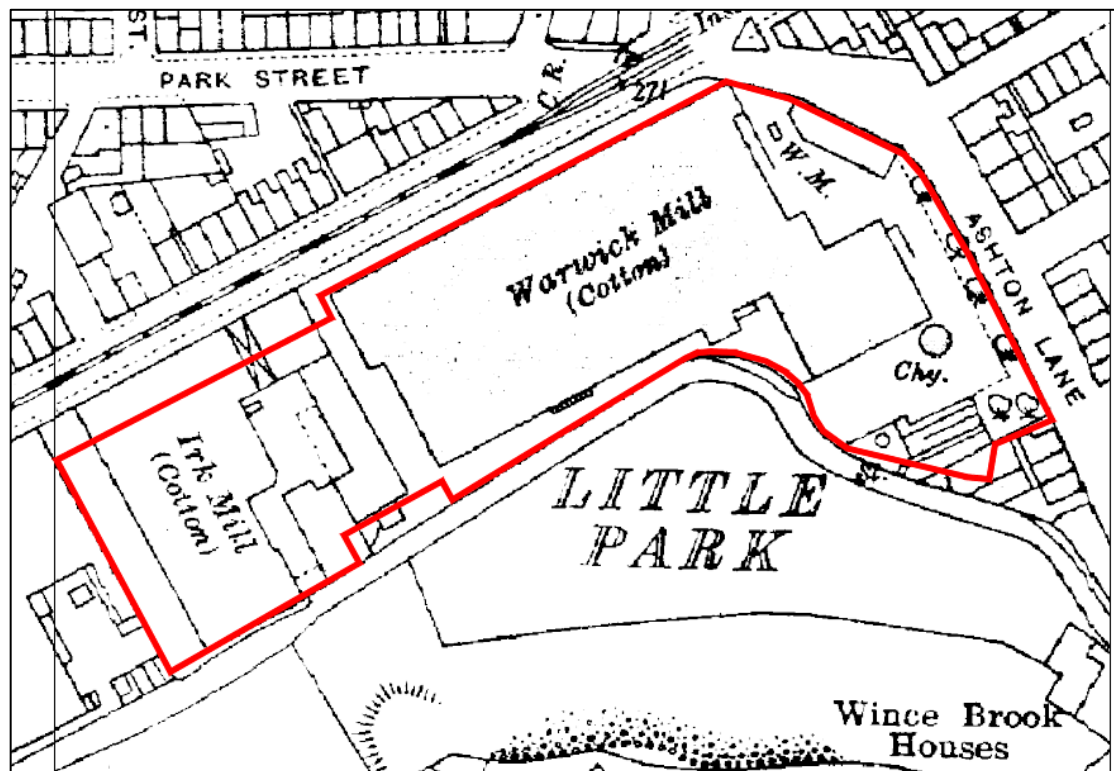


Plate 8: Extract from the Ordnance Survey map of 1922, showing the Site boundary

At the outbreak of the Second World War, training centres for volunteers were opened throughout the borough. In Middleton, Alkington Estate functioned as a training centre where 'the men could practise wiring, digging and section training' (*Rochdale Observer* 17th May 1939). The *Rochdale Observer* (17th May 1939) suggested that the 2nd Line Battalion had successfully obtained Irk Mill as headquarters. A drill hall (HER 2312.1.0) was located 170m to the southwest of the Site, which had opened in 1910.

Warwick Mill appears to have operated during the Second World War and shortly afterwards placed several advertisements for textile operatives (*Manchester Evening News* 31st May 1945; *Manchester Evening News* 11th August 1947).

After the Second World War, the Lancashire cotton industry went into decline. This was partly based on a lack of investment in new technology and partly due to production moving to countries where labour was cheaper (<https://www.liverpoolmuseums.org.uk/cotton-decline>). Synthetic materials were also gaining popularity from the 1940s.

The same configuration of buildings at Irk Mill is shown on the Ordnance Survey map of 1955 (Plate 9; Fig. 7) and the 1969 map (Fig. 8), though Irk Mill had changed into a furniture factory and a weatherproof works. A newspaper advertisement indicates that the mill had become a furniture factory by at least 1947, stating 'cabinet and chair makers wanted' (*Manchester Evening News* 2nd April 1947). The factory was occupied by Cyril Bernstein Limited.

Similarly, the same configuration of buildings at Warwick Mill are shown on the Ordnance Survey map of 1955 (Plate 9; Fig. 7) and the 1969 map (Fig. 8), except for a new detached engine house in the southeast part of the Site. This building is still extant. A fire had broken out at Warwick Mill in 1955, although it only caused minor damage, breaking three spinning mules (*Manchester Evening News* 4th November 1955).

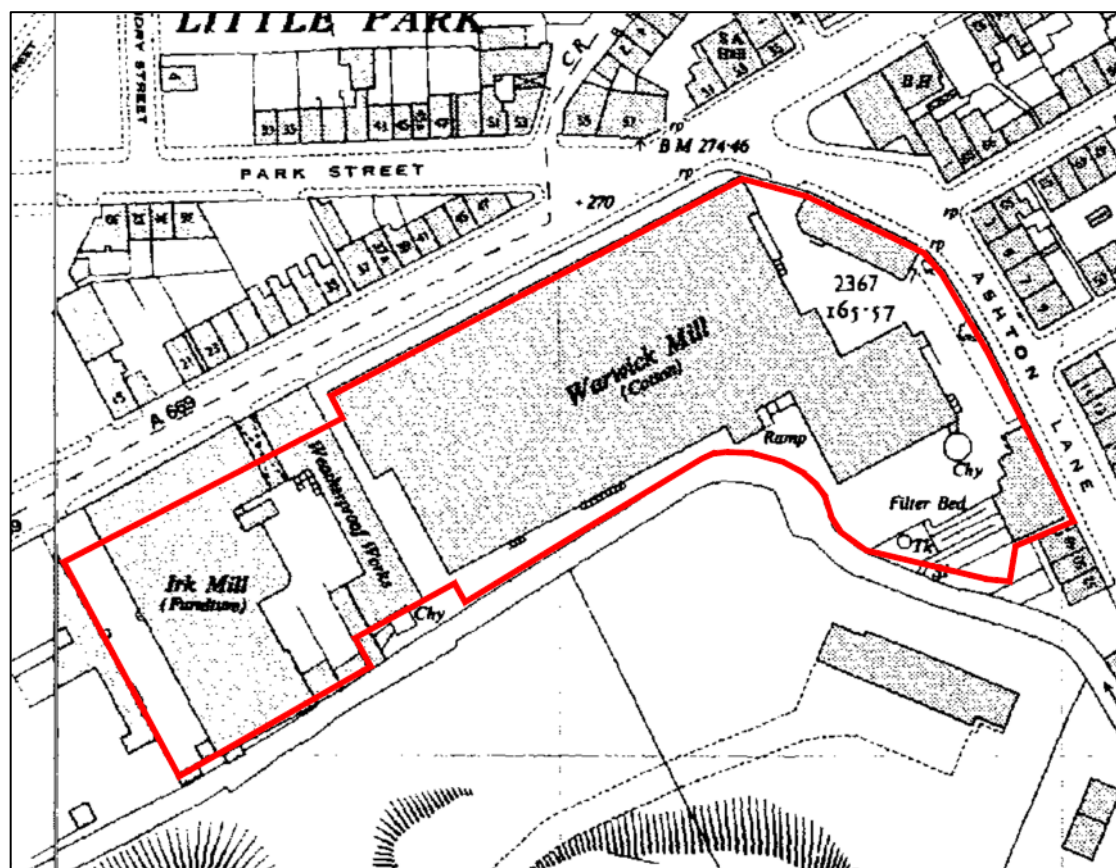


Plate 9: Extract from the Ordnance Survey map of 1955, showing the Site boundary

By the 1950s, the demand for synthetic materials had grown and by at least the 1960s, Warwick Mill was producing '100% Bri-Nylon' suite covers (*Daily Mirror* 15th March 1969). The mill may have also produced car coats (*Heywood Advertiser* 30th August 1968). In 1974, an advertisement stated 'join the big money earners at Middleton's biggest name F Ellis Juveniles, free transport from Heywood and Rochdale, Trainee

Machinists apply to F Ellis Juveniles at Warwick Mill' (*Heywood Advertiser* 12th September 1974). A photograph of the mill, taken in 1972, captures the building when F Ellis Co Ltd occupied the Mill (Plate 10). By 1982, Warwick Mill was noted as an Atco test drive centre, indicating that production of textiles had ceased (*Illustrated London News* 1st April 1982).



Plate 10: Warwick Mill in 1972, courtesy of Manchester Local Image Collection

Shortly after the publication of the Ordnance Survey map of 1969 (Fig. 8), Irk Mill was demolished and had been replaced by an office building named London House by 1978 (Fig. 2). The mill was still operating in 1974, when a newspaper advertisement suggested that 'Maydella Manufacturing Co Ltd' occupied the mill (*Heywood Advertiser* 25th April 1974).

The overall appearance of Warwick Mill changed little throughout its working life with only minor alterations or additions to the mill apart from the demolition of the old engine and boiler house, chimney and water filtration system and the insertion of powered lift systems, all around the 1970s and 1980s (HER 5189.1.0). The rope race has survived with flywheels and drive shafts still present on all floor levels.

4.6 Previous Archaeological Works

In total, three historic building surveys, an archaeological excavation and a desk-based assessment have taken place within a 500m radius of the Site. The historic building surveys have been undertaken at Warwick Mill in 2005 (EGM3644; UMAU 2005), at the Hippodrome in 2007 (EGM3839; UMAU 2007) and Parkfield Mill in 2010

(EGM4515; Matrix Archaeology 2010). An archaeological excavation and watching brief were also undertaken at Parkfield Mill by Matrix Archaeology in 2010 (EGM4547). The fieldwork comprised the excavation and recording of an engine house at the former site of a silk mill dating from the 1850s, and a subsequent watching brief, which provided an opportunity for additional recording within the main mill building and the weaving shed.

A site visit was conducted at Warwick Mill on 13th March 2017 and recorded broken/boarded windows, some vegetation growth and guttering in a poor state of repair (HER 5189.1.0). There were no obvious structural issues, however, the surrounding wall appeared to be leaning.

Several planning applications have been lodged regarding Warwick Mill, one of which resulted in a building survey, carried out in 2005 by UMAU. The most recent application (15/01015/FUL) has an accompanying heritage statement and impact assessment, carried out by Townscape in 2015. GMAAS were consulted and recommended further work by attaching a condition to planning consent (Condition 10). However, no further work appears to have taken place. It has previously been concluded that below-ground archaeological potential at the Site is medium. The former engine and boiler house and chimney remain undeveloped.

5. Gazetteer of Sites

The following gazetteer entries (GE) summarise the sites of potential archaeological interest within the Site (Figure 9). The identification of these non-designated heritage assets is drawn primarily from the map regression analysis.

Gazetteer Entry 01

Site Name	Roman findspot
Designation	No designation
HER Number	2681.1.0
Site Type	Findspot
Period	Roman
NGR	386799 405532
Source	HER
Description	Bronze Antoninianus of Victorinus. AD 268–70. Found near the junction of the River Irk and the Wince Brook on 29 th March 1987. The Roman findspot may be indicative of low-level Roman activity in the area
Assessment	The potential for buried remains associated with Roman activity is very low. Residual finds cannot be discounted.

Gazetteer Entry 02

Site Name	Middleton Hall (site of)
Designation	No designation
HER Number	2439.1.0
Site Type	Middleton Hall
Period	Late Medieval
NGR	387131 405965
Source	HER; OS Maps
Description	Middleton Hall was situated to the south of St Leonard's Church and was the ancient seat of the Assheton family. The original timber and plaster house, pre-dating Henry VII, is said to have been built around two large courts and was protected by a bridge over the moat. A description in 1770, refers to timbers like an upturned ship, suggesting a cruck construction. The hall contained a large stone chimneypiece bearing the date 1587. In the early 19th century, Lord Suffield added a plain brick-built south front. Stained glass windows were removed to Middleton Church prior to the hall's demolition in 1845. There are no visible traces of the hall or the moat. The Hall was 240m to the north of the Site
Assessment	The potential for buried remains associated with Middleton Hall is very low. The Site lies beyond the former hall site.

Gazetteer Entry 03

Site Name	Middleton Hall Park (site of)
Designation	No designation
HER Number	2439.2.0
Site Type	Park
Period	Late Medieval
NGR	387097 405895
Source	HER; OS Maps
Description	Covered c. 6 hectares. Hall with grounds close to river. Some space survived as Little Park. The Site was located within Little Park and was not developed fully until the early 20 th century.
Assessment	The potential for buried remains associated with the former park is low due to the intense development of the Site during the industrial period. Isolated patches of relict soils associated with the former park cannot be discounted.

Gazetteer Entry 04

Site Name	Middleton Deer Park (site of)
Designation	No designation
HER Number	2676.1.0
Site Type	Park
Period	Post-medieval
NGR	386999 405902
Source	HER
Description	Deer park converted into farms. Located 330m north of the Site.
Assessment	The potential for buried remains associated with the former deer park is low.

Gazetteer Entry 05

Site Name	Buildings along Ashton Lane (site of)
Designation	No designation
Site Type	Buildings
Period	18 th century
NGR	387175 405700
Source	Yates' map of 1786; Greenwood's map of 1818; Ordnance Survey map of 1851
Description	Building or buildings first shown on the west side of Ashton Lane on Yates' map of 1786. The same buildings are potentially marked on Greenwood's map of 1818. A total of six buildings were shown on the OS map of 1851, five of which were within the Site boundary. Demolished by 1893.
Assessment	There is some potential for buried structural remains associated with the 18 th -century buildings to survive within the Site, though they have likely been significantly impacted by the construction of Warwick Mill.

Gazetteer Entry 06

Site Name	Irk Mill (formerly Park Mill) (site of)
Designation	No designation
HER Number	2345.1.0
Site Type	Mill
Period	19 th century
NGR	387028 405629
Source	HER; OS Maps
Description	Irk Mill, Oldham Road, was of four storeys, dark-red brick, with plain rectangular window openings and a two-aisled roof. The mill was first shown on the 1893 map. The mill was demolished in the 1970s and replaced by an office building, named London House.
Assessment	There is the potential for buried structural remains associated with the mill to survive within the Site.

Gazetteer Entry 07

Site Name	Irk Mill Power Systems (site of)
Designation	No designation
HER Number	2345.1.0
Site Type	Engine house
Period	19 th century
NGR	387060 405628; 387038 405609
Source	HER; OS Maps
Description	Potential engine or boiler houses that powered Irk Mill.
Assessment	There is the potential for buried structural remains associated with the mills engine and boiler house to survive within the Site.

Gazetteer Entry 08

Site Name	Warwick Mill
Designation	Grade II listed building
HER Number	5189.1.0
Site Type	Structure
Period	Edwardian
NGR	387111 405678
Source	HER; OS Maps
Description	Cotton mill. 1907. By G. Stott of J. Stott and Sons. Red brick with internal cast-iron frame. Total of 40x14 bays with 5 storeys (and basement) and an engine house attached at rear. Continuous sill band to first and fourth floors, machicolated eaves frieze and stepped brick detail above fourth-floor windows. Other windows are set between plain brick pilasters; all frames have been replaced. The water tower rises two stages above the stone-coped parapet having 3 windows with tripartite keystones which are keyed into a stone band, the name of the mill in white glazed tiles on the upper stage, an eaves cornice, and a brick parapet in front of a steep pyramidal roof with iron crowning. The front railings incorporate Art Nouveau motifs.
Assessment	Grade II listed building within the Site, which will be retained within the development.

Gazetteer Entry 09

Site Name	Warwick Mill Power Systems (site of)
Designation	Grade II Listed Building
HER Number	5189.1.0
Site Type	Engine House
Period	Edwardian
NGR	387167 405668
Source	HER; OS Maps
Description	Warwick Mill engine and boiler house and chimney to the rear of the mill. Demolished during the second half of the 20 th century. The Site of the engine house remains undeveloped.
Assessment	The engine and boiler house and chimney have the potential to survive as <i>in-situ</i> buried remains within the Site.

6. Significance

6.1 The Policy Context of Heritage Assets

The archaeological resource of an area can encompass a range of assets, including below-ground remains, earthworks, and standing buildings and other structures. Some of these remains may have statutory protection, such as Scheduled Monuments or listed buildings. Others do not, but may nevertheless be of archaeological significance. Under both national and local planning policy, as outlined below, both statutory and non-statutory remains are to be considered within the planning process.

The NPPF sets out the Government's planning policy and framework for England, and how these are expected to be implemented. The NPPF places particular emphasis on assessing the development proposals in line with an up-to-date local plan. Consequently, the Rochdale Metropolitan Borough Unitary Development Plan (2006) was consulted with particular reference to policies G/BE/9, BE/10-19. In determining applications, local planning authorities must be able to understand the significance of any heritage assets affected by a proposed development in order to assess its impact. This enables the conservation of 'heritage assets in a manner suitable to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations' (*op cit*, para 17), or else they can be recorded 'and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (*op cit*, Section 12.141).

6.2 Assessment Methodology and Significance Criteria

An accepted methodology for assessing archaeological significance is the Secretary of State's criteria for the scheduling of ancient monuments, outlined in Annex 1 of *Scheduled Monuments: identifying, protecting, conserving and investigating nationally important archaeological sites under the Ancient Monuments and Archaeological Areas Act 1979* (DCMS March 2010). These criteria have all been utilised in this assessment and are listed below:

- Period
- Rarity
- Documentation
- Group Value
- Survival/Condition
- Fragility/Vulnerability
- Diversity
- Potential

6.3 *Baseline Significance Conditions*

6.3.1 *Period*

No prehistoric or Roman activity is known to have taken place within the Site, and the potential for such remains is considered to be very low. The Site may have lay within the former grounds of Middleton Hall Park during the medieval/post-medieval period as suggested by the placename Little Park. The west side of Ashton Lane had been developed by the late 18th century and these same buildings may have been captured on the OS map of 1851. The remainder of the Site was undeveloped, until Irk Mills was erected at the west end of the Site in the late 19th century. In 1907, the last parcel of undeveloped land within the Site was purchased and became Warwick Mills. The development of substantial industrial structures has likely removed buried remains associated with earlier periods and therefore, the Site may not be considered significant due to period.

6.3.2 *Rarity*

Research on and recording of the archaeological remains of the agricultural industry has been extensive since 2006. Such research is focused primarily on the standing structures of the agricultural industry. Despite extensive research, there are still some gaps in the knowledge of rural settlements, particularly regarding change and development of farms in response to industrialisation. Remains associated with the buildings (GE05) erected on the west side of Ashton Lane by the late 18th century, would not be considered significant due to rarity.

Similarly, textile spinning blocks, and weaving sheds have seen some significant studies since the early 2000s. The footprints of the potential engine houses at Irk Mill (GE07) and Warwick Mill (GE09) may not be considered significant due to rarity.

6.3.3 *Documentation*

The historical development of the Site from the late 18th century can be traced reasonably well from cartographic and other primary sources. Further documentary research would undoubtedly furnish additional evidence, although this is unlikely to alter the outline and conclusions presented in this assessment.

6.3.4 *Group Value*

The potential archaeological remains of the demolished engine and boiler house and chimney at Warwick Mill share a group association with the standing remains of Warwick Mill and therefore hold group value. The buried remains of Irk Mill may also share a group association with the standing remains of Warwick Mill and therefore hold group value.

6.3.5 *Survival / Condition*

The survival, extent and condition of any below-ground archaeological remains within the Site is presently unknown. The construction of Irk Mill and Warwick Mill will have undoubtedly impacted the survival of earlier below-ground remains within the Site. Much of the former footprint of Irk Mill remains undeveloped as does the former engine and boiler house and chimney at Warwick Mill.

6.3.6 Fragility/Vulnerability

Any buried archaeological remains, should they be present and survive *in-situ*, are vulnerable to damage or destruction during any earth-moving works associated with the proposed development.

6.3.7 Diversity

The heritage assets within the Site are associated with the late medieval/post-medieval period and industrial periods. Therefore, the Site may not be considered significant due to diversity.

6.4.8 Potential

The Site may have lay within Middleton Hall Park, which is believed to have extended towards the River Irk. Placenames such as Little Park refer to elements of the former parkland. The survival of below-ground remains associated with Middleton Hall Park has the potential to address several of the research aims listed in the current Archaeological Research Framework (<https://researchframeworks.org/nwrf/>):

LM05: How can we recreate the medieval land-use patterns within townships?

LM06: How can the impact of landholding and lordship be identified by wider landscape studies?

PM16: What was the relationship of country houses to local rural villages?

PM19: How can the study of leisure landscaping inform our understanding of the changing landscape in this period?

Ind08: To what extent were post-medieval geometric garden landscapes swept away by post-1750 landscaping?

Below-ground remains pertaining to the former parkland will have been significantly impacted by the construction of Irk Mill and Warwick Mill, though isolated pockets of relict soils may survive within the Site. Therefore, there is low potential for the Site to address the potential research aims listed above.

Small cottages or former farmsteads occupied the west side of Ashton Lane from at least the late 18th century until the second half of the 19th century. The survival of below-ground structural remains associated with the former cottage or farmsteads has the potential to address several research agendas listed in the Archaeological Research Framework (<https://researchframeworks.org/nwrf/sample-page/post-medieval/>):

PM15: How well recorded and understood are farming landscapes, field patterns, distributions of buildings and building types?

Ind05: How well understood is change and development of the agrarian landscape in response to industrialisation and enclosure?

Ind09: How does the nature of rural settlement change during this period?

Ind17: How can we enhance our understanding of the rural poor?

Ind18: How can we identify the impact of industrialisation on rural dwellings?

The footprints of the former buildings lay along the Ashton Lane frontage, which has partly been built over by an engine house and single-storey office building associated with the mill. Therefore, there is low potential for the Site to address the potential research aims listed above.

Park Mill (later known as Irk Mill) was constructed within the Site at some point during the second half of the 19th century and was demolished during the 1970s. Warwick Mill was built in 1907 and is currently designated as a Grade II listed building. The original engine and boiler house and chimney at Warwick Mills were demolished in the 1970s and 1980s. The research agendas listed in the *Archaeological Research Framework for North West England* (<https://researchframeworks.org/nwrf/industrial/#section59>) aim to address innovations in technology and production within industrial sites:

Ind55: What is the evidence for the development of power production?

Ind58: How have industrial buildings adapted to new technology and processes?

The site of the power systems at Irk Mill and Warwick Mill have not been redeveloped. Therefore, there is high potential for the engine houses to survive *in-situ* as buried structural remains within the Site and there is high potential for the Site to address the above research aims.

6.5 Significance of Below-Ground Archaeological Remains

It can be concluded from the information gained from the desk-based research that the Site is of archaeological interest and has potential to contain buried remains associated with the industrial period.

Using the above criteria, the Site most likely contains non-statutory remains of high local significance. Remains associated with the former Middleton Hall Park (GE03), 18th-century cottages (GE05) and the engine houses at Irk Mill (GE07) and Warwick Mill (GE09) would be of local significance.

7. Impact of Development

7.1 Development Proposals

The proposed development will include the conversion of the Grade II listed cotton and spinning mill into several new residential apartments with commercial units and restaurants at ground floor level and associated landscaping and parking facilities. An extension will be added to the west of Warwick Mills, which will provide further apartments, with plant rooms, parking and commercial units at ground floor level. The delivery of these proposals will necessitate earth-moving works that have potential to damage or remove any below-ground archaeological remains (Figure 10).

7.2 Impact of Development on Below-Ground Remains

The assessment has taken into consideration the effect of the proposal on non-designated heritage assets (i.e. the below-ground remains), in line with Paragraph 203 of the NPPF.

This assessment has demonstrated that the Site has the potential to retain buried remains dating from the late mediaeval/post-medieval and industrial period. Any such remains that do exist within the Site are likely to be of local significance and, without a programme of mitigation, the scheme could damage or destroy these remains.

8. Further Investigation

8.1 Heritage Assets

The NPPF makes clear that where the loss of the whole or a material part of a non-designated heritage asset's significance is justified by a development, the developer should be required to record that asset and advance understanding of its significance, and to make this evidence publicly accessible.

The assessment has demonstrated that there is high potential for the buried remains of power systems associated with Irk Mill (GE07) and Warwick Mill (GE09). Buried remains associated with Middleton Hall Park (GE03) and 18th-century buildings (GE05) have some potential to survive within the Site.

8.2 Further Investigation

Any ground-breaking works associated with the proposed development have the potential to remove any buried archaeological remains. Therefore, it may be anticipated that archaeological investigation via a programme of archaeological evaluation trial trenching or a strip and record evaluation may be required to establish the presence or absence of buried archaeological remains and, if present, their extent and significance.

Should significant archaeological remains be encountered during the archaeological evaluation, further excavation may be required to offset the harm of the development to the buried archaeological resource, in line with the guidance provided by the National Planning Policy Framework. The scope and extent of any such further investigation will be determined by the Greater Manchester Archaeological Advisory Service in their capacity as archaeological advisor to the Rochdale Borough Council.

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Appendix 1: Figures

- Figure 1: Site location map
- Figure 2: Site boundary superimposed onto modern mapping
- Figure 3: Site boundary superimposed onto the Ordnance Survey 1:1056 Town Plan of 1851
- Figure 4: Site Boundary Superimposed onto the Ordnance Survey 1:2500 County Series Map of 1893
- Figure 5: Site Boundary Superimposed onto the Ordnance Survey 1:2500 County Series Map of 1909
- Figure 6: Site Boundary Superimposed onto the Ordnance Survey 1:2500 County Series Map of 1922
- Figure 7: Site Boundary Superimposed onto the Ordnance Survey 1:2500 National Grid Map of 1955
- Figure 8: Site Boundary Superimposed onto the Ordnance Survey 1:2500 National Grid Map of 1969
- Figure 9: Gazetteer sites superimposed onto modern mapping
- Figure 10: Areas of Archaeology Potential superimposed onto modern mapping

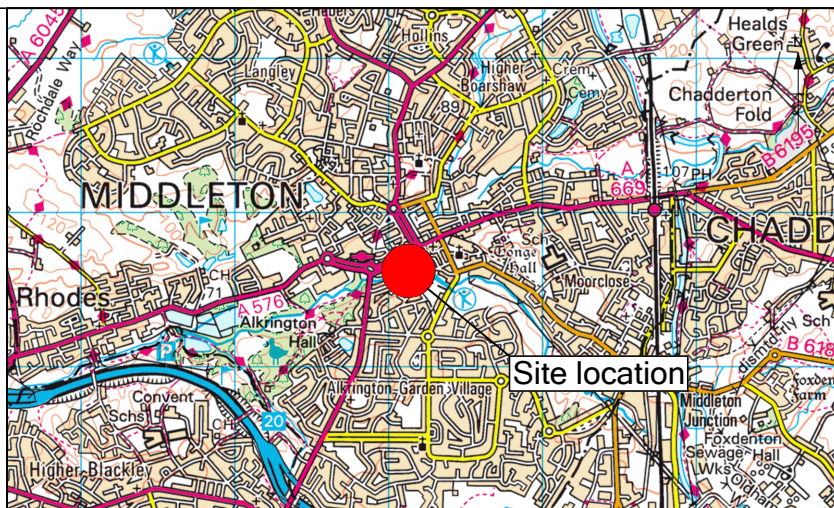


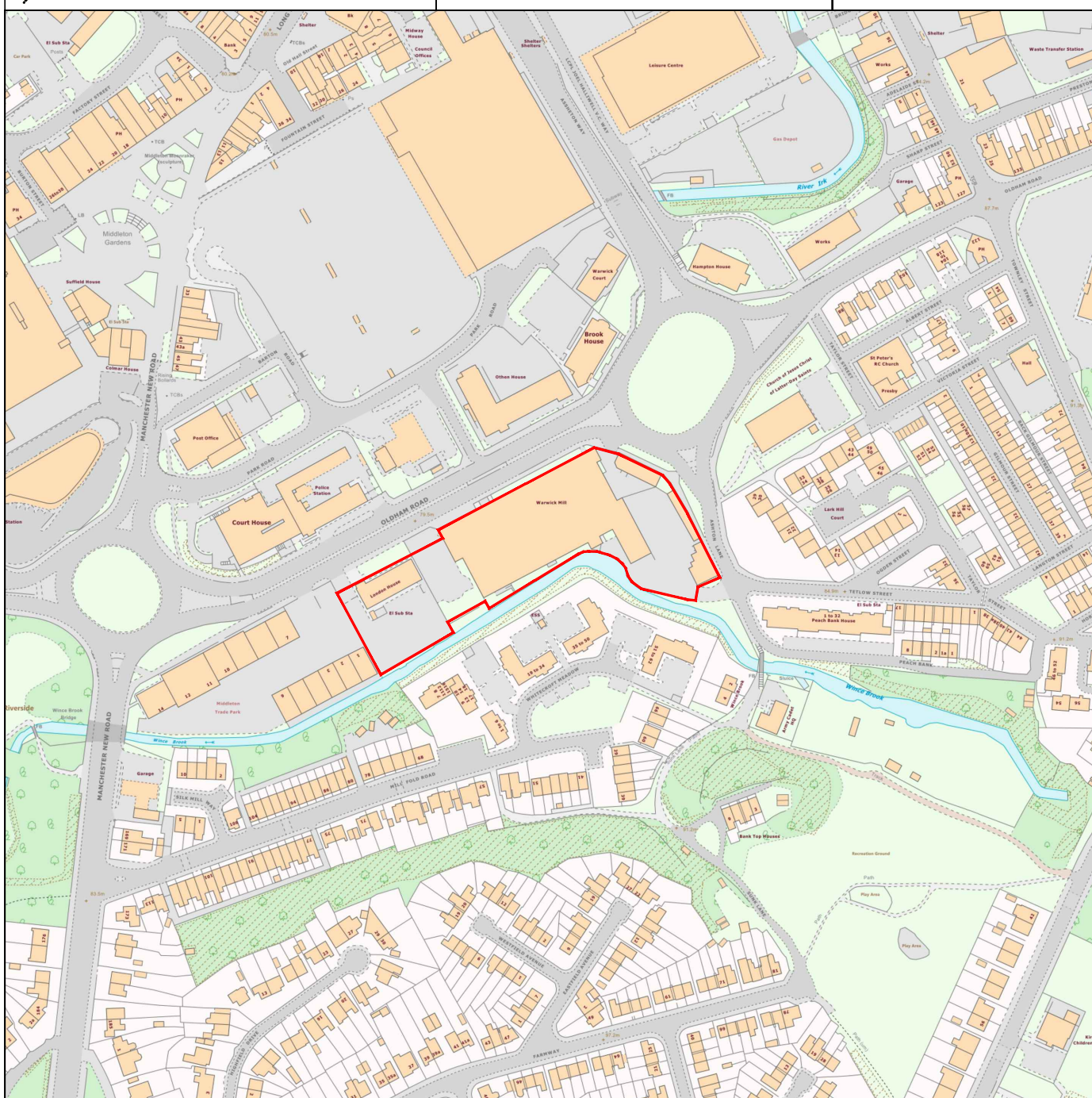
Figure 1:

Site Location

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387000

387100

387200

405800

405800

405700

405700

405600

405600



Figure 2:

Site Boundary Superimposed onto Modern Mapping

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Key:

 Site Boundary

**SALFORD
ARCHAEOLOGY**

0

50 m

Scale at A4 1:1250

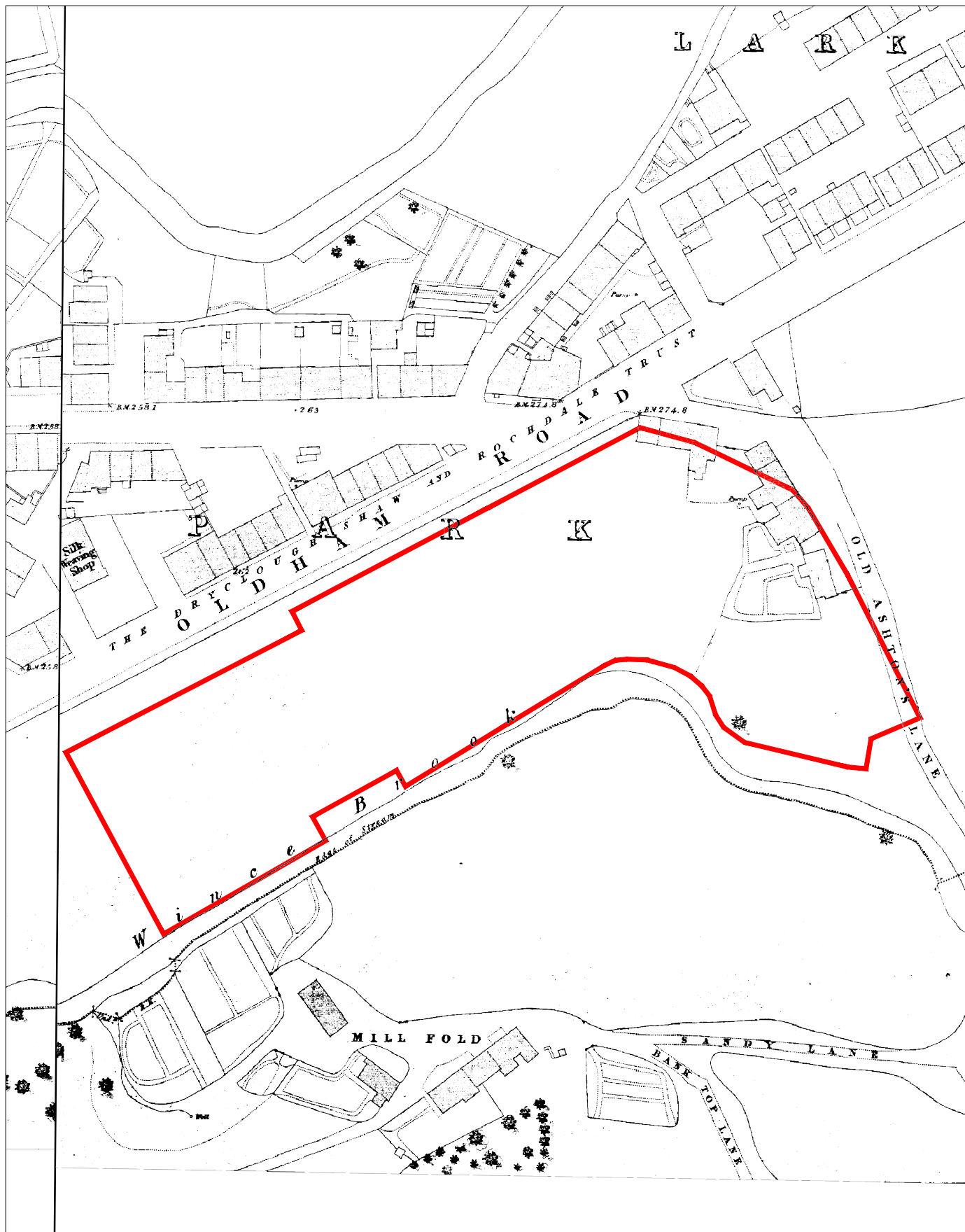


Figure 3:

Site Boundary Superimposed onto the 1:1056 Town Plan of 1851

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Key:

— Site Boundary



**SALFORD
ARCHAEOLOGY**

0 50 m
Scale at A4 1:1250

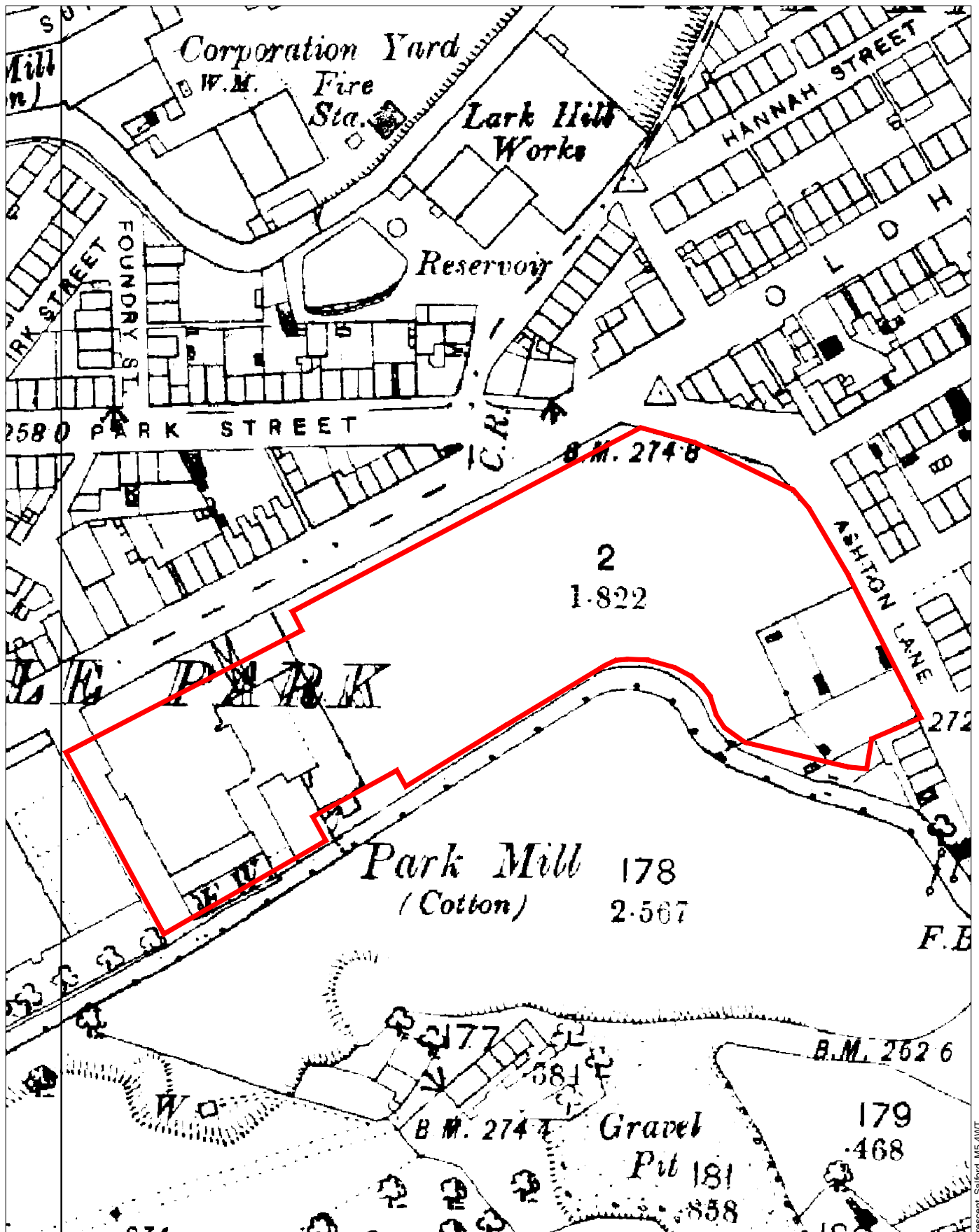


Figure 4:
Site Boundary Superimposed onto the 1:2500 County Series Map of 1893

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Key:

— Site Boundary



**SALFORD
ARCHAEOLOGY**

0 50 m



Scale at A4 1:1250



Figure 5:

Site Boundary Superimposed onto the 1:2500 County Series Map of 1909

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Key:

— Site Boundary



**SALFORD
ARCHAEOLOGY**

0 50 m
Scale at A4 1:1250



Figure 6:

Site Boundary Superimposed onto the 1:2500 County Series Map of 1922

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Key:

— Site Boundary



**SALFORD
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0 50 m
Scale at A4 1:1250

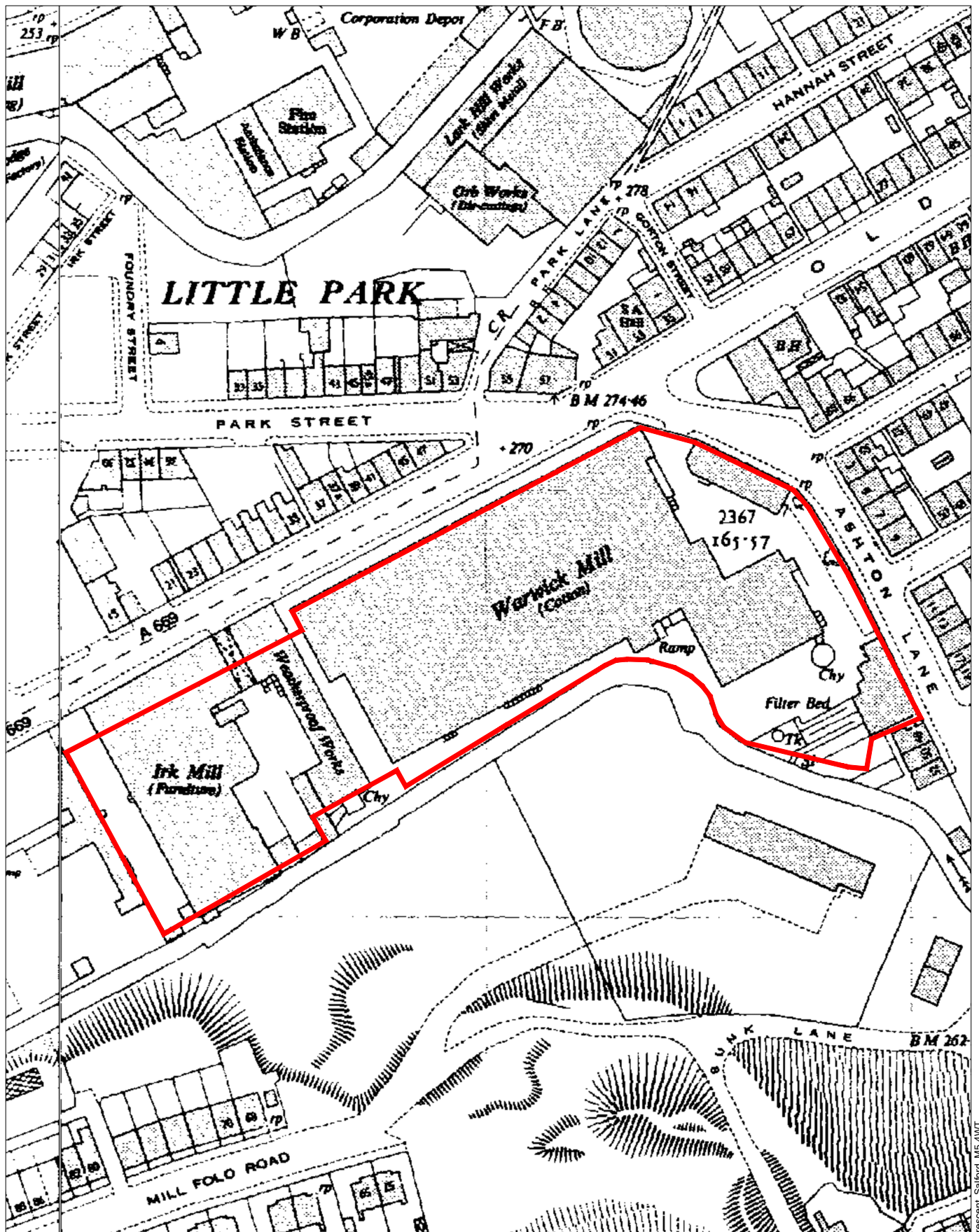


Figure 7:

Site Boundary Superimposed onto the 1:2500 National Grid Map of 1955

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Key:

— Site Boundary



**SALFORD
ARCHAEOLOGY**

0 50 m
Scale at A4 1:1250

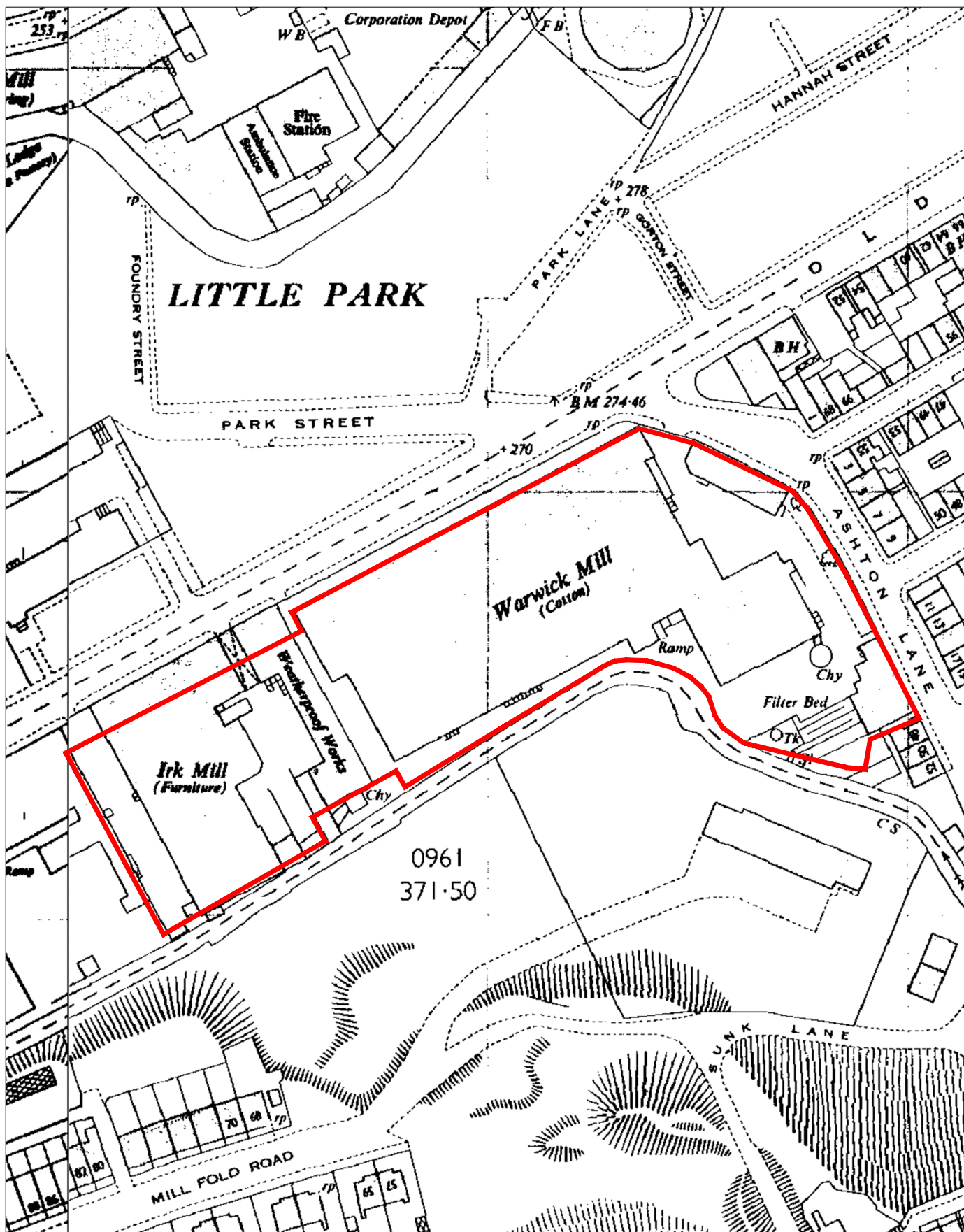


Figure 8:

Site Boundary Superimposed onto the 1:2500 National Grid Map of 1969

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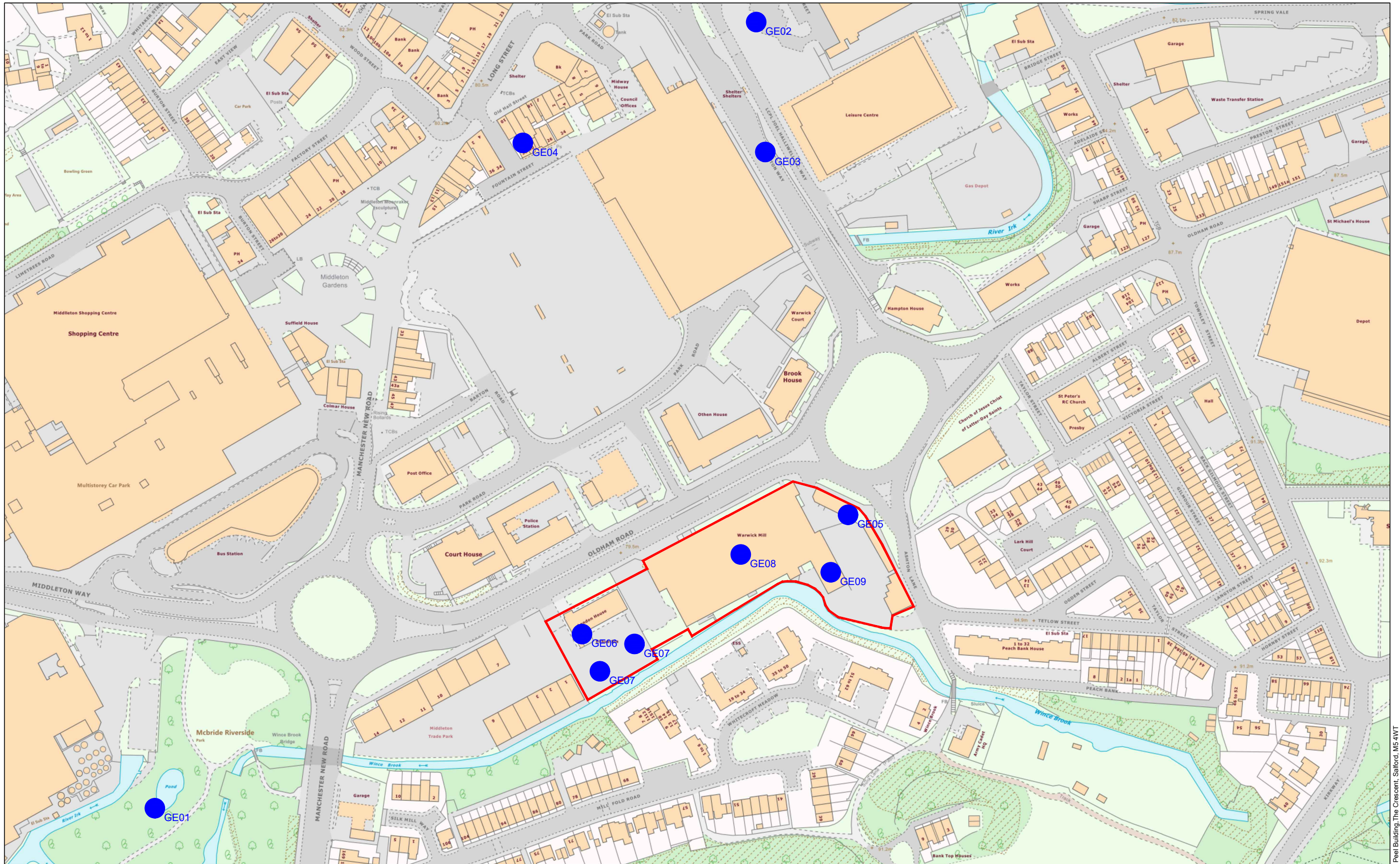
Key:

— Site Boundary



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0 50 m
Scale at A4 1:1250



**SALFORD
ARCHAEOLOGY**

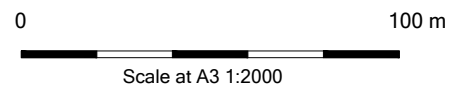


Figure 9:
Gazetteer Entries Superimposed onto Modern Mapping
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Key:
[Red outline] Site Boundary
[Blue dot] Gazetteer Entries



Figure 10:

Areas of Archaeological Potential Superimposed onto Modern Mapping

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Key:

- Site Boundary
- Archaeological Potential

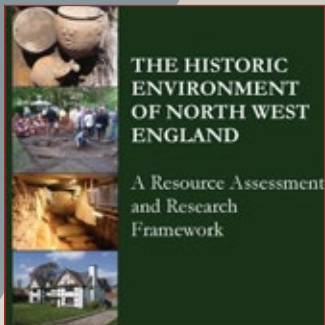


SALFORD
ARCHAEOLOGY

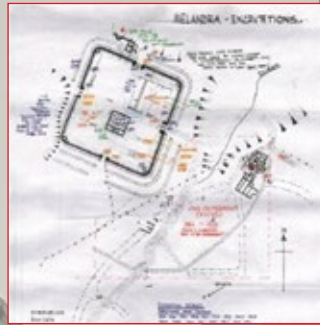
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CONSULTANCY



DESK-BASED ASSESSMENTS



WATCHING BRIEF & EVALUATION



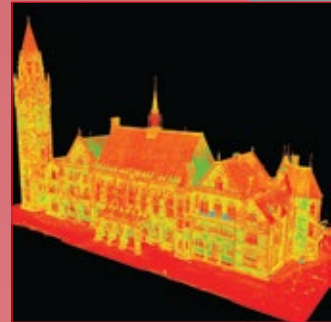
EXCAVATION



BUILDING SURVEY



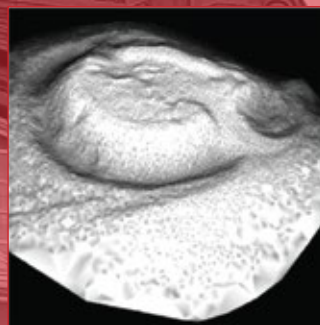
3D LASER SCANNING



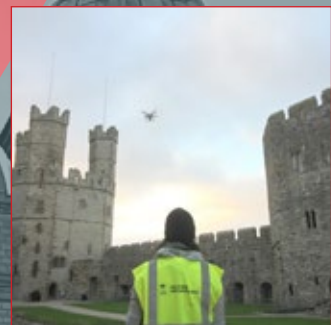
COMMUNITY INVOLVEMENT



LANDSCAPE SURVEYS



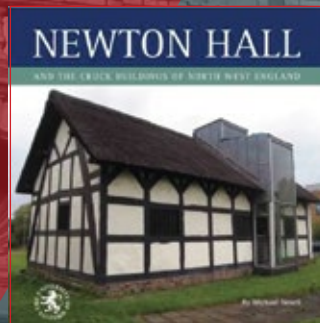
DRONE SURVEYS



WORKSHOPS & VOCATIONAL TRAINING



RESEARCH PUBLICATIONS

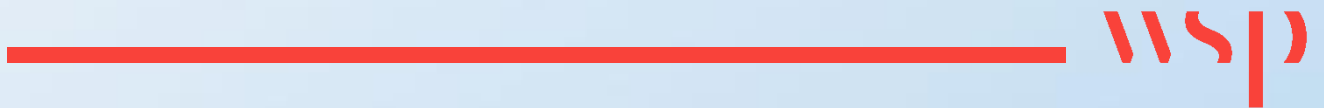


SEMINARS, DAYSCHOOLS CPD EVENTS



Appendix C

GREATER MANCHESTER ECOLOGY UNIT CORRESPONDANCE



Miller, Laura

From: Derek Richardson <derek.richardson@tameside.gov.uk>
Sent: 25 October 2021 08:06
To: Ryan Grant
Subject: Warwick Mill, Middleton - Bat Surveys

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Ryan

Warwick Mill – Bats

Government guidance advises that surveys for protected species should not be left to conditions, unless exceptional circumstances apply.

I would consider that exceptional circumstances could be applied in this case, and Conditions appended to any approval granted to the development proposals to enable updated bats surveys to be carried out. This is because -

- There have been previous, relatively recent bat surveys of the buildings (2015-16). These surveys indicated that the building complex may support a small roost of a common bat species, most probably day roosts (non-breeding roosts). Mitigation plans for avoidance of harm to bats were previously agreed as part of previous permissions and these plans are still relevant.
- The condition of the buildings with regard to bats has deteriorated since 2016 – the buildings, and the surrounding habitat, have not improved for bats.
- The status of bat populations in the area has not changed since 2015-16.
- The Mill building will not be demolished; rather, it will be converted. This will provide an opportunity to retain, or recreate, bat roosting potential within the existing structures.
- This is a very large, tall and complex building with health and safety concerns. Comprehensive surveys to accurately identify bat roosting locations will not be possible. Surveys may not therefore be conclusive.

I would recommend that –

- The applicant is advised to proceed on the basis that the buildings do support a known bat roost. Mitigation plans for possible disturbance to bats should be updated and made available to the LPA before deciding the application.
- A Condition should be placed on any permission which may be granted to the scheme requiring updated surveys to be carried out before any works commence. The mitigation plans may need to be amended based on the results of the updated surveys.

If these measures are in place, I would conclude that the conservation status of bats would be capable of being conserved, if permission were to be granted to the development.

Yours sincerely
Derek Richardson

Derek Richardson

Principal Ecologist
Planning
Planning and Transportation
Place

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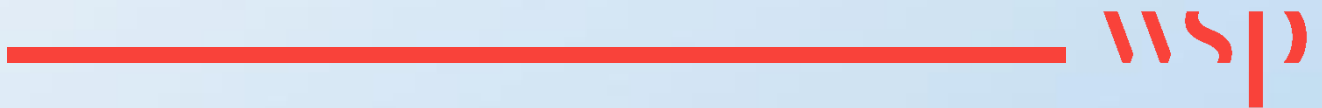
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Appendix D

A PHASE 1 (HAZARD IDENTIFICATION AND ASSESSMENT) DESK STUDY





8 First Street
Manchester
M15 4RP

wsp.com



Ryan Grant
Rochdale Borough Council
Floor 3, Number One Riverside
Smith Street
Rochdale
OL16 1XU

Your ref: 22/00104/SO

Our ref: 70084210

6 July 2023

CONFIDENTIAL

Dear Ryan

Update to EIA Screening Opinion for Warwick Mill, Oldham Road, Middleton, M24 1AZ.

We write to you with regards to our previously issued EIA Screening Opinion for the above site.

In January 2022 on behalf of Kam Lei Fong UK Limited, we submitted an EIA Screening Opinion (Ref. 22/00104/SO) for the following:

'Request for EIA Screening Opinion in relation to the proposed demolition of London House, residential development of up to 285 dwellings and up to 6,500 square metres of floorspace with associated car parking, new vehicular and pedestrian access, public realm, landscaping and associated works' at Warwick Mill Oldham Road, Middleton, M24 1AZ'.

The screening opinion was submitted because the emerging scheme at the time exceeded the thresholds set out at Schedule 10(b) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 which require urban development projects exceeding 150 dwellings to be screened.

The submitted report considered potential impacts and the likelihood of significant environmental effects arising from the proposed development, it accorded with the Regulations and had regard to relevant PPG. The following potential impacts were considered in the screening request:

- Air Quality;
- Archaeology;
- Ecology;
- Flood Risk;
- Ground Conditions;
- Heritage;
- Noise and Disturbance;
- Townscape and Visual Impact; and
- Transport and Highways.

Consultee responses were received from archaeology and ecology (February 2022). They deemed that the proposals would not need to be subject to EIA.



Since the submission of the EIA Screening request in January 2022 and over the last 18 months there have been minor amendments to the design and quantum of development. We are now preparing to submit a full planning application later this summer.

The revised scheme still falls within the same parameters assessed under the January 2022 EIA Screening request and therefore the following parameters are still applicable:

- The demolition of London House;
- The change of use, conversion and rooftop extension of the existing mill to mixed-use facilities including residential and commercial uses;
- A maximum of 285 apartments;
- A maximum of 6,500 flexible commercial floorspace (Use Class E);
- Maximum height of six storeys for Warwick Mill; and
- The erection of a new building (known as the Loom) which will be a maximum of ten storeys in height.

Given that the proposals are still in line with the EIA Screening request submitted in January 2022 the conclusions reach in the January 2022 report and consultee responses received to date still remain valid.

A new EIA screening request is not required and the current request can still be considered. Overall, it is concluded that there will be no significant environmental effects such that the proposed development should constitute EIA development. Therefore, the preparation of an Environmental Statement is not required in support of this application.

We trust that this is all in order and you are able to issue an EIA Screening Opinion concluding the development is not EIA development as soon as possible.

If you need any further information in the meantime please do not hesitate to get in touch.

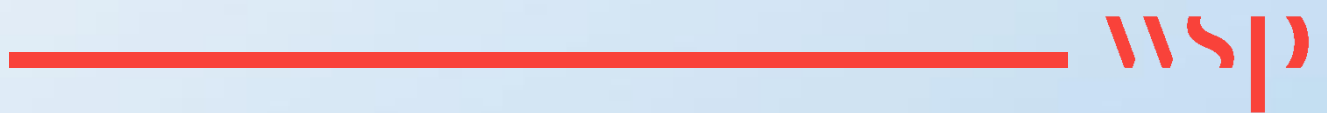
Yours sincerely,

A handwritten signature in black ink that reads 'L. J. Miller'. The signature is written in a cursive, slightly informal style.

Laura Miller
Principal Planner MRTPI

Appendix C

HISTORIC ENGLAND COMMENTS





Historic England

Mr Jason Kennedy
Townscape: Chartered Town Planning &
Heritage Consultant Ltd
Unit 1 Carnforth Station
Carnforth
Lancashire
LA5 9TR

Direct Dial: 0161 2421442

Our ref: PA01168385

29 November 2021

Dear Mr Kennedy

Pre-application Advice

WARWICK MILL, MIDDLETON, ROCHDALE, M24 1AZ

Having assessed the documents sent in your email of 8th November 2021, please see below Historic England's comments on the proposals. We hope that these will be beneficial to you in developing the proposed scheme.

Summary

Historic England is pleased to see a pre-application being brought forward which seeks to find a long-term use for Warwick Mill, by securing its conversion to residential accommodation. This would not only secure the future of an important historic building, but would also have an environmental benefit, by making best use of the existing building stock to meet the need for new housing.

However, we have concerns over elements of the proposals, including the proposed open atrium, and we therefore recommend that the applicant considers how the conversion of the building could be viably achieved in a more sensitive manner. There is also a considerable degree of additional detail that we would expect to see provided at application stage, in order to be able to fully assess the impact of the works on the listed building. We therefore encourage the applicant to consider further pre-application discussion, once they have this additional information.

Advice

Significance

Warwick Mill is an imposing red brick building, occupying a dominant position on Oldham in Middleton. This prominence derives partly from its sheer scale, as it is five storeys high and forty bays wide, with a deep floorplate. This is emphasised by the water tower, sited at the corner of the building, which rises two storeys above the



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parapet of the mill, and is emblazoned with the word 'Warwick', picked out in glazed white brick.

The mill is also of considerable historic interest, and provides evidence not just of the evolution of Middleton as a settlement, but also of the evolution of mill construction and technology by the early twentieth century. More widely, it is a good example of the later phase of mill construction in Greater Manchester. This wider group of mills are of exceptional significance when considered together, as they have shaped the area's history, character and appearance. More specifically it is also one of a number of mills constructed across Greater Manchester by the company of J. Stott and Sons, and exhibits many of the later advancements in mill construction (including the use of cast iron frames and the triple brick-arch fireproof system) that characterises their mill buildings.

Warwick Mill is therefore of considerable historic and architectural interest. The mill, and its associated Art Nouveau style railings, are accordingly listed at grade II.

Impact

The underlying principle of the proposals seeks to provide the mill with a viable new use, and this is something of which Historic England is highly supportive. This will not only secure its ongoing maintenance, but will also encourage people to interact with the building, and provide opportunities for them to better appreciate its special historic and architectural interest. Furthermore, the conversion and reuse of existing buildings, particularly those of the scale and mass of mills, has other considerable benefits, including from a climate change perspective, as it makes best use of the embodied carbon in the existing building.

However, any new use will need to be compatible with the significance of the listed building, and we would have concerns with any proposals that diminished or removed this significance. We would therefore highlight a number of areas of the proposals that require further consideration or justification.

i) Atrium

The most significant intervention within the proposals will be the creation of a central atrium space within the building, which will create a central open void from the ground floor all the way through the building. In order to achieve this, it will be necessary to remove historic floors, brick arches and elements of the cast iron frame. This causes considerable concerns, as the substantial loss of historic fabric will have a considerably negative impact on the evidence the building provides of later mill construction and technology. It will also considerably alter the internal configuration of the building, and in doing so will diminish the ability to appreciate its characteristic and significant internal form. This will not only detrimentally affect its architectural





character, but will also reduce the understanding of its historic form and function. This element of the proposals would therefore harm the significance of the listed building.

It is understood why the applicant has sought to carry out these works, as the hugely deep floor plan of the building means that the centre of the floorplate will not get much natural light in any configuration of internal spaces. It also allows for the creation of the vertical circulation needed to create the multiple floors of apartments. However, while some targeted opening up may be justified in order to create a new stair and lift core, it is not clear why the centre needs to be opened up wholesale. We would, as an example, highlight the conversion of the Cotton Works on Blackburn Road in Bolton as a conversion of a similar plan mill, that was converted without the need to create an internal open void. In this instance an internal atrium area was created on each level, allowing for the retention of the floors and associated constructional elements.

If the applicant believes that this is central to their proposed scheme then we would require further information, setting out the benefits it brings, or the need to which an open atrium specifically responds. This should also seek to show why less intrusive solutions do not viably meet these requirements.

ii) Roof top apartments

The atrium is proposed to be lit from above by a glazed section of the roof, and the applicant also seeks to utilise the roof to create additional apartment accommodation. This would be set back, and the applicant is confident that this can be achieved without it being visible in the wider views of the mill. We would not inherently object to this element of the proposals, but we would need considerably more information before we are able to offer a detailed judgement.

In particular we would expect to see structural drawings submitted showing how the rooftop apartments are to be accommodated, supported by a structural report compiled by a relevant qualified professional with experience of historic buildings. We would also want to see detailed drawings showing the form, size, design and finish of the new apartments, as the current drawings provide this at a scale which is too great to be able to offer a detailed assessment. Finally, we would need to see properly accredited visualisations of the proposals, taken from viewpoints within the closer and wider vicinity of the mill, to corroborate the applicant's supposition that the apartments can be created in a non-intrusive manner.

If the apartments are assessed to be required from a viability perspective, this will also need to be clearly demonstrated in a supporting viability report, which should be produced by a professional with experience working with historic buildings.





iii) New entrance

The proposals also involve the expansion of the existing entrance within the north elevation, to create one which is more prominent. Its creation would require the loss of two bays of brickwork, and therefore result in an isolated loss of historic fabric, and a minor interruption into the regularity of the apertures on this elevation.

However, the harm caused is identified to be minimal, and it is understood why a more legible entrance is required for the proposed new use. Historic England therefore has no objection to the principle of this element. However, given that the entrance will be an intentional visual focal point, it is going to be necessary that it is of a form, design and materiality that complements the architectural character of the listed building. We would therefore want to see the design for this element of the proposals illustrated in detail, in order that we can understand how it will appear in practice.

iv) Replacement windows

The proposals also seek the complete replacement of the existing windows across the building. This is not a course of action of which Historic England is generally supportive, as the fenestration makes a considerable contribution to the architectural character of the building, and their removal would result in the considerable loss of historic fabric. It is however noted that the applicant has indicated that the windows are in a poor condition, and that this is the catalyst to propose their removal.

This is an understandable justification, but we would need to be robustly convinced that less intrusive solutions, such as repair in situ or partial replacement, were not viable. This would need to form part of the evidence base supporting any application, and should be based on a sound understanding of not just the condition of the windows, but also their age and relative significance.

v) Other works

The proposals also seek to carry out a wide range of other associated works, including the removal of the existing telecommunications paraphernalia, general repairs to the building, the removal of an external staircase and the creation of external floodlighting to the tower. These could all have a positive impact on the significance of the listed building. However, it is expected that considerably greater detail would be provided in relation to these elements to support any application, including method statements and detailed sectional drawings as appropriate.

We note with particular positivity the proposals to retain and restore the rope race and to carry out public realm improvements. Both of these have the potential to bring considerable benefits to the scheme, and we welcome their inclusion in the proposals. Again, however, we would expect to see the exact details of how these works are to



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be achieved submitted to support any application.

vi) Proposed new building on the site of London House

More widely, the masterplan also seeks to demolish the adjacent London House, and to erect a new building of eight or nine storeys. The exact details of this proposals have not been provided as part of this pre-application submission. Historic England has no concerns with the principle of demolishing the existing building, which is not of historic or architectural interest, and can see the potential benefits of redeveloping the whole site holistically.

However, the current building does have a subservient relationship with the mill, something which allows the mill's striking prominence to be appreciated and enjoyed. The proposals for an eight or nine storey building therefore raise some concerns, if they lead to the creation of a distracting and competing new building. The applicant will therefore need to demonstrate that they have considered this relationship when designing the new building, and show clearly how the scale and massing they propose can be sensitively integrated on the site.

Next Steps

Historic England is therefore supportive of the principle of converting the building to a new use. However, there are a number of areas of the proposals which raise concerns, most notably the creation of an open atrium. In relation to these elements we would want to see revisions, or further strong justification. We would also expect to see any application supported by considerably greater detail, in order that we can fully assess the impact of elements such as the revised entrance or the proposed rooftop apartments.

We therefore recommend that further pre-application discussions would be beneficial. This would allow us to aid the applicant in creating a scheme which will secure the viable use of the mill, in a sensitive manner. This can be arranged through our Extended Pre-application service, details of which can be found on our website at www.historicengland.org.uk/eas <<http://www.historicengland.org.uk/eas>>. If you would like to discuss this option further, please do contact me.

Yours sincerely

Richard Broadhead
Inspector of Historic Buildings and Areas
E-mail: Richard.Broadhead@HistoricEngland.org.uk

WARWICK MILL, MIDDLETON, ROCHDALE, M24 1AZ **Pre-application Advice**



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Historic England

List of information on which the above advice is based

Warwick Mill HIA Oct. 2021

WM EM 010 Site Plan Lower Ground Floor

WM EM 011- Site Plan Upper Ground Floor

WM EH-101 Lower Ground Floor

WM EH- 102 Upper Ground Floor

WM EH- 103-105 Upper Floors

WM EH- 106 4th Floor

WM EH-201 Elevations and Sections

WM EH-202 Elevations and Sections

WM EH-203 Elevations and Sections

WM EH-204 Elevations and Sections

WM EH- 301 North Elevation

WM EH- 3032 South Elevation

WM EH- 303 East Elevation

WM EH- 304 West Elevation



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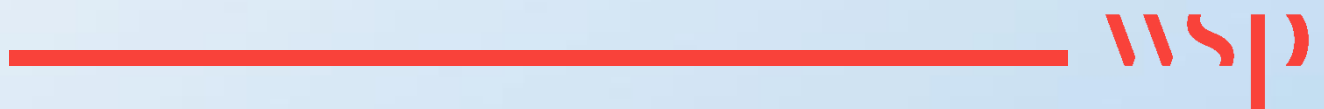
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Appendix D

NATIONAL PLANNING POLICY FRAMEWORK



NATIONAL PLANNING POLICY FRAMEWORK (JULY 2021)

ACHIEVING SUSTAINABLE DEVELOPMENT

Sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs (paragraph 7). The planning system has three overarching objectives in achieving sustainable development: economic, social and environmental (paragraph 8).

Planning should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).

At the heart of the NPPF is the ‘presumption in favour of sustainable development’ (“the presumption”) set out at paragraph 11, which establishes the planning principles in pursuing sustainable development in a positive way.

For decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay (paragraph 11c).

DELIVERING A SUFFICIENT SUPPLY OF HOMES

Paragraph 60 makes clear to support the Government’s objective of significantly boosting the supply of homes, a sufficient amount and variety of land should come forward where it is needed, addressing the needs of groups with specific housing requirements and that land with permission is developed without unnecessary delay.

Paragraph 62 recommends the size, type and tenure of housing needed for different groups in the community should be recognised, including affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.

Paragraph 65 aims for at least 10% of the homes on major housing developments to be made available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

Paragraph 74 states local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old (unless these strategic policies have been reviewed and found not to require updating).

ENSURING THE VITALITY OF TOWN CENTRES

Paragraph 87 states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations.

It goes on to say in paragraph 88 that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.

PROMOTING HEALTHY AND SAFE COMMUNITIES

Paragraph 92 aims to achieve healthy, inclusive and safe places which promote social interaction (e.g. through street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods and active street frontages). Developments should be safe and accessible (e.g. through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas). They should also enable and support healthy lifestyles (e.g. through the provision of safe and accessible green infrastructure, sports facilities, local shops and layouts that encourage walking and cycling).

Paragraph 98 identifies access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities and can deliver wide benefits for nature and support efforts to address climate change.

Paragraph 100 suggests protecting and enhancing public rights of way and access, including taking opportunities to provide better facilities for users (e.g. by adding links to existing rights of way networks).

PROMOTING SUSTAINABLE TRANSPORT

Paragraph 104 requires transport issues to be considered from the earliest stages of development proposals, so that the potential impacts on transport networks can be addressed; opportunities from existing or proposed transport infrastructure, technology and usage are realised; opportunities to promote walking, cycling and public transport use are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

Paragraph 105 recommends significant development should be focused on locations which are or can be made sustainable. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas and this should be taken into account.

Paragraph 110 states in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location; that safe and suitable access to the site can be achieved for all users and any; that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree.

Paragraph 111 makes clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 112 highlights applications should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; address the needs of people with disabilities and reduced mobility; create places that are safe, secure and attractive; allow for efficient delivery of goods and access by service and emergency vehicles; and be designed to enable charging of plug-in and other ultra-low emission vehicles.

Paragraph 113 requires all developments that generate significant amounts of movement to provide a travel plan be supported by a transport statement or assessment, so that the likely impacts of the proposal can be assessed.

MAKING EFFECTIVE USE OF LAND

Paragraph 119 promotes an effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 122 states decisions need to reflect changes in the demand for land and be informed by regular reviews of land allocated for development in plans and of land availability.

Paragraph 124 supports development that makes efficient use of land, taking into account the identified need for different types of housing and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services as well as their potential for further improvement and scope to promote sustainable travel modes that limit future car use; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed, attractive and healthy places.

Paragraph 125 makes clear where there is an existing or anticipated shortage of land for meeting identified housing needs, homes should not be built at low densities and ensure developments make optimal use of the potential of each site. Authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

ACHIEVING WELL DESIGNED PLACES

Paragraph 126 states the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 130 ensures that developments will function well and add to the quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish or maintain a strong sense of place; accommodate and sustain an appropriate amount and mix of development including greenspace and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and wellbeing.

MEETING THE CHALLENGE OF CLIMATE CHANGE, FLOODING AND COASTAL CHANGE

Paragraph 154 requires new development to avoid increased vulnerability to the range of impacts arising from climate change and help reduce greenhouse gas emissions.

Paragraph 157 expects new development to comply with local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Paragraph 158 recognises that even small-scale projects for renewable or low carbon energy can provide a valuable contribution to cutting greenhouse gas emissions.

Paragraph 159 states inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.

Paragraph 167 ensures that flood risk is not increased elsewhere and requires development to be supported by a site-specific flood-risk assessment.



Paragraph 169 expects major developments to incorporate sustainable drainage systems (“SuDS”), unless there is clear evidence they would be inappropriate.

CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT

Paragraph 174 requires the contribution and enhancement of the local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; recognising the intrinsic character and beauty of the countryside and wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, trees and woodland; minimising impacts on and provide net gains for biodiversity; and preventing new development being subject to unacceptable levels of soil, air, water or noise pollution or land stability.

Paragraph 183 ensures a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.

Paragraph 185 expects new development is appropriate for its location, taking account the likely effects of pollution on health, living conditions and the natural environment.

Paragraph 186 encourages opportunities to improve air quality or mitigate impacts, such as through traffic and travel management, and green infrastructure provision and enhancement.

CONSERVING AND ENHANCING THE HISTORIC ENVIRONMENT

Paragraph 189 recognises that heritage assets range from sites and buildings of local historic value to those of the highest significance. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Paragraph 194 requires applicants 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 proposed on their significance. Where a site includes or has the potential to include heritage assets with archaeological interest, developers should submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 195 requires local planning authorities to identify and assess the particular significance of any heritage asset (or its setting) when considering the impact of a proposal to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 197 requires account to be taken of the positive contribution that conservation of heritage assets can make to sustainable communities and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 198 states where applications remove or alter a historic statue, plaque, memorial or monument, regard should be had to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

Paragraph 199 states 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.

Paragraph 200 requires 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 201 makes clear that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, consent should be refused, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Paragraph 202 states 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.

Paragraph 205 requires developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.

Paragraph 206 encourages looking for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.



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