



KAM LEI FONG UK LIMITED

WARWICK MILL, MIDDLETON

Tall Buildings Assessment





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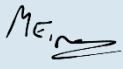
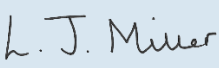
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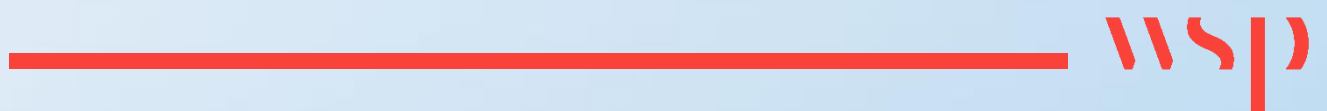
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1

INTRODUCTION



1 INTRODUCTION

- 1.1.1. WSP has prepared this Tall Building Assessment on behalf of Kam Lei Fong UK Limited (the applicant) in respect of the Warwick Mill, Middleton development.
- 1.1.2. The Tall Building Assessment supports a full planning and listed building consent application which was submitted to Rochdale Borough Council (the Local Planning Authority – LPA) in August 2023 for the following development:
“Redevelopment of Warwick Mill comprising repurposing of the existing Warwick Mill 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; improvements to vehicular accesses onto Oldham Road (A669) and Ashton Lane; vehicular and cycle parking; and associated works and infrastructure.”
- 1.1.3. Further supporting material and clarifications in support of the full planning application have been submitted to Rochdale Borough Council since the submission of the application between August 2023 – March 2024.
- 1.1.4. The proposed development will include the erection of a new 10-storey building known as “The Loom” building. The building will replace the existing London House (a six-storey building).
- 1.1.5. Although a Tall Building Assessment is not a validation requirement for the planning application submission, the Conservation Officer’s comments received on the proposals (dated September 2023) requested a Tall Building Assessment, including a Townscape and Visual Impact Assessment, is prepared to support the proposals. The scope of the Assessment has been agreed with the planning officers during the post-submission discussions and it has been prepared to provide comfort to the Council, key stakeholder groups including the Conservation Officer and the general public that a tall building in this location is acceptable and makes a positive contribution to Middleton’s townscape.
- 1.1.6. A tall building has been chosen as an appropriate design response for the Warwick Mill scheme as it enables a commercially viable quantum of well-designed development to be provided. The site remains challenged in viability terms (given the Grade II Listed Warwick Mill) and in order to develop a commercially viable, high quality design, a tall building is proposed.
- 1.1.7. The proposal has assimilated the objectives of enhancing the setting of the Warwick Mill heritage asset, achieving commercial viability and securing a sustainable residential density, whilst arriving at a solution which achieves a positive addition to Middleton’s townscape. It delivers a high-quality scheme that that creates a meaningful contribution to meeting housing needs, and carefully delivers the objectives of Middleton Town Centre, Historic England and local stakeholder groups.
- 1.1.8. Given its prominent location in Middleton Town Centre and the site’s centrality to the wider regeneration aspirations of Middleton, it would be detrimental to the wider plan strategy if this site was unable to be brought forward for development due to viability.
- 1.1.9. This assessment has been produced to assess the proposals against the Tall Buildings: Historic England Advice Note 4 (March 2022), the evaluation criteria set out in the ‘Guidance on Tall Buildings’ document prepared by English Heritage and CABE (June 2007), the Rochdale Core Strategy (2016) and Middleton Town Centre Masterplan 2023.

- 1.1.10. Full details of the proposed development are described in the submitted Design and Access Statement (DAS) prepared by GMA Architecture, presented on the application drawings, and as detailed in the Supporting Planning Statement prepared by WSP. This document should be read in conjunction with these documents, and others, which also form part of the application.

1.2 BACKGROUND

- 1.2.1. The site is currently a vacant listed mill and a vacant/derelict office building which perform very poorly in terms of 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.
- 1.2.2. Warwick Mill is a former cotton mill, which is currently vacant, located approximately 200m south of Middleton Town Centre. It is a Grade II Listed Building design by George Stott of Joseph Stott and Son, completed in 1909. London House is a now derelict six storey modern office building located adjacent to Warwick Mill, with a car park to the rear.
- 1.2.3. The iconic mill will be refurbished and repurposed, with neighbouring land where London House is located redeveloped, to provide new homes, commercial and retail spaces and open space. The proposal will play a vital role in establishing a distinct new development as a flagship project of Rochdale's Spatial Strategy for Middleton. A key part of the scheme is the demolition of the existing building (London House) and the erection of a new 10-storey building, known as "the Loom".
- 1.2.4. The tall building is located Oldham Road, comprising a prominent frontage. 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. South of the site is Wince Brook with residential apartments ranging between 3 and 4 storeys in height backing onto the Brook beyond.
- 1.2.5. Strategically, the site is in a highly sustainable location and has access to a range of public transport modes. A bus stop is located on Oldham Road, approximately three minutes 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.
- 1.2.6. The Grade II Listed Mill is a key physical and cultural landmark within the site boundary and the tall building has been designed and positioned to enhance the heritage asset's setting.
- 1.2.7. The tall building is located outside of, but within 120m of Middleton Conservation Area. There are also a number of Grade II listed buildings within close proximity to the site which are the Church of St Michael and 33, 35 and 37 Middleton Gardens.
- 1.2.8. Overall, the proposal will deliver a range of benefits for the local and wider community, including:
- Refurbishment and repurposing of an iconic Victorian mill;
 - Regeneration of an unsightly site in a key location in Middleton;
 - Creation of 273 high-quality homes;
 - Inclusion of ground floor commercial, leisure and retail use under Use Class E;
 - Provision of open space and improvement to street scene on Oldham Road;
 - New tree planting and landscaping;
 - Creation of jobs throughout the construction phase and during occupation; and

- Generation of increased local spend and council tax revenue.

1.2.9. A Heritage Statement (prepared by Townscape) has been submitted with the application and provides further assessment of the impact of the proposals on the significant of the affected heritage assets. The Tall Building Assessment should be read alongside the Heritage Statement.

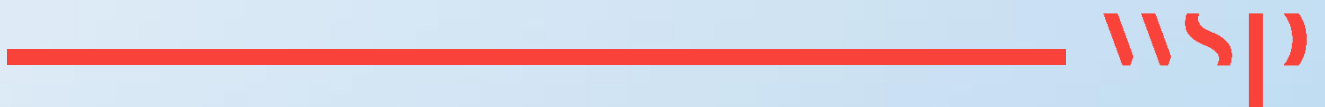
1.3 STRUCTURE OF THE STATEMENT

1.3.1. This Tall Building Statement is structured as follows:

- Section 2: Guidance and Policy Context;
- Section 3: Proposed Development;
- Section 4: Existing Townscape Context;
- Section 5: Townscape and Visual Impact Assessment;
- Section 6: Responding to Local Context; and
- Section 7: Conclusion.

2

GUIDANCE AND POLICY CONTEXT



2 GUIDANCE AND POLICY CONTEXT

- 2.1.1. This section outlines the relevant policy and guidance which should be adhered to when proposing a tall building. They provide guidance on the location, form and appearance of tall buildings in order to ensure the suitability of the building proposed, especially its relationship to the surrounding environment and townscape. Furthermore, principles relating to design, planning and heritage are important matters to be taken on board when assessing the suitability for the tall building.

2.2 HISTORIC ENGLAND'S ADVICE NOTE 4 TALL BUILDINGS (2ND ED) (MARCH 2022)

- 2.2.1. Historic England published the second edition of Historic England Advice Note 4: Tall Buildings on 4 March 2022 which takes into consideration the changes to national planning policy and guidance, as well as recent experience of planning for tall buildings in the historic environment.
- 2.2.2. The guidance outlines that a high-quality scheme would have a positive relationship with the following:
- Topography;
 - Character of place;
 - Heritage assets and their settings;
 - Height and scale of development (immediate, intermediate and town-wide);
 - Urban grain and streetscape;
 - Open spaces;
 - River and waterways;
 - Important views including prospects and panoramas; and
 - The impact on the skyline.
- 2.2.3. Advice Note 4 refers to the NPPF in stating that *“great weight should be given to the asset’s conservation”,* with any harm requiring a *“clear and convincing justification”* (NPPF paragraph 132). Although, it states that *“in assessing this justification, and in weighing any public benefits...local planning authorities will need to pay particular regard to the policies in paragraphs 8 and 9 of the NPPF that state that economic, social and environmental gains are to be sought jointly and simultaneously...to deliver positive improvements in the quality of the built, natural and historic environment”*.
- 2.2.4. Historic England Advice’s outlines the importance of the ensuring the following criteria are considered to inform the design of the proposed tall buildings:
- The response to local context;
 - The impact on the local environment;
 - Architectural quality;
 - Functional design;
 - Sustainable design and construction; and
 - A well-designed inclusive environment.
- 2.2.5. The advice note recognises that *“The development of tall buildings can have positive impacts upon an area, particularly if they are part of a wider regeneration scheme. Equally, there will be sites where the impacts upon the historic environment cannot be overcome or minimised. Such sites may*

be inherently unsuitable for tall buildings due to the harm they would cause to the significance of heritage assets.”

- 2.2.6. In terms of development management, the Design Note states planning applications need to be supported by enough information so that the impacts of the development upon the historic environment can be properly understood (NPPF paragraphs 43 and 194) and dealt with speedily.
- 2.2.7. In addition, the Advice Note emphasises the importance of good design in terms of ensuring a tall building responds positively to the character of the surrounding area and the historic environment to create high quality buildings and places.

2.3 CABE AND ENGLISH HERITAGE (NOW HISTORIC ENGLAND) GUIDANCE ON TALL BUILDINGS (2007)

- 2.3.1. The ‘Guidance on Tall Buildings Document’ published jointly by English Heritage and CABE (July 2007) outlines how proposals for tall buildings should be evaluated. This guidance was endorsed by the Government and is capable of being a material consideration in the determination of planning applications.
- 2.3.2. Both organisations recommend that local planning authorities use it to inform policy making and, if necessary, to evaluate planning applications for tall buildings where the appropriate policies are not yet in place.
- 2.3.3. This Guidance recognises that in the right place tall buildings can make positive contributions to city life and can be excellent works of architecture. Furthermore, the guidance states that tall buildings can serve as beacons of regeneration and stimulate further investment. However, the Guidance also recognises that by virtue of their size and prominence, tall buildings can also harm the qualities that people value about a place.
- 2.3.4. To account for this, the Guidance provides criteria for evaluating planning applications for tall buildings. The criteria are listed below and each criterion is assessed in detail within sections 5 and 6 of the Assessment:
 - Relationship to context;
 - Effect on the historic context;
 - Effect on world heritage sites;
 - Relationship to transport infrastructure;
 - Architectural quality of the building;
 - Sustainable design and construction;
 - Credibility of design;
 - Contribution to public space and facilities;
 - The effect on the local environment;
 - Contribution to permeability; and
 - The provision of a well-designed environment.
- 2.3.5. The guidance states the above criteria are not useful or necessary to define rigorously what is and what is not a tall building. Instead, it is relevant to buildings which are substantially taller than their neighbours and/or which substantially change the skyline.

2.4 NATIONAL PLANNING POLICY FRAMEWORK

- 2.4.1. The NPPF was updated in December 2023 and is a key material consideration in the determination of planning applications.
- 2.4.2. The NPPF seeks to promote sustainable development, in part through the creation of high quality buildings and places, with developments that add to the overall quality of an area, are visually attractive and sympathetic to local character and history, including the surrounding built environment and landscape setting (paragraph 135).
- 2.4.3. There is no specific national policy which relates to Tall Buildings, nevertheless chapter 11 of the NPPF, 'making effective use of land' outlines the need to use previously development land or brownfield land as much as possible in meeting the need for homes and other uses.
- 2.4.4. Paragraph 196 of NPPF also outlines new development should make a positive contribution to the local character and distinctiveness.
- 2.4.5. In terms of heritage, the NPPF seeks to protect and enhance the historic environment outlining great weight should be attached to the conservation of designated heritage assets.
- 2.4.6. It is also recognised that the setting of a heritage asset can contribute to its significance (paragraph 212).
- 2.4.7. NPPF paragraph 123 promotes the effective and efficient use of land whilst safeguarding and improving the environment, taking into account the desirability of maintaining an area's prevailing character and setting and the importance of securing well-designed, active and healthy places.

2.5 PLANNING PRACTICE GUIDANCE

- 2.5.1. Planning Practice Guidance outlines a range of considerations should be taken into account in establishing appropriate densities on a site or in particular an area. This includes accessibility measures such as distance and travel times to key facilities, including public transport stops or hubs.

2.6 LOCAL PLANNING POLICY

Rochdale Borough Council Core Strategy (2016)

- 2.6.1. The Core Strategy does not have a specific policy which relates to Tall Buildings, nevertheless the site is identified within a key area for regeneration and should provide high quality development, especially given it is previously developed land.
- 2.6.2. The Core Strategy identifies Middleton town centre as a priority area for regeneration.
- 2.6.3. Policy SD1 'Delivering sustainable development' confirms planning applications that accord with the policies in the local plan will be approved without delay, unless material considerations indicate otherwise.
- 2.6.4. 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.

- 2.6.5. 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.
- 2.6.6. 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.
- 2.6.7. Policy SO4 'Promoting a greener environment' promotes ensuring development is energy efficient and contributes to carbon reduction, maximising green open areas and biodiversity.
- 2.6.8. Policy SO5 'Improving accessibility and delivering sustainable transport' highlights development should be directed to the most accessible locations.
- 2.6.9. 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.
- 2.6.10. 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.
- 2.6.11. Policy P1, 'Improving image', requires high quality design for all new development to ensure new development improves the image of the borough.

MIDDLETON TOWN CENTRE MASTERPLAN (FEBURARY 2023)

- 2.6.12. 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.
- 2.6.13. 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.
- 2.6.14. 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.
- 2.6.15. The Masterplan recognises that a major opportunity lies in bringing historic assets such as Warwick Mill back to life through redevelopment.
- 2.6.16. 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.'

- 2.6.17. Warwick Mill and London House are identified as specific development opportunity 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.

PLACES FOR EVERYONE DRAFT JOINT DEVELOPMENT PUBLICATION PLAN (2021)

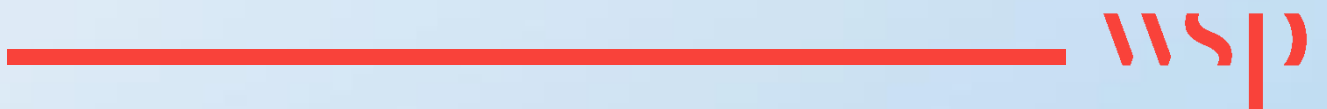
- 2.6.18. The Places for Everyone Joint Development Plan Document (PfE) 2020-2037 underwent a publication stage (July, 2021). Examination in public took place 2022-2023, and the Inspectors' report was published in February 2024.
- 2.6.19. Once adopted, PfE will place a greater focus on developing Greater 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.

2.7 TOWNSCAPE AND VISUAL ASSESSMENT METHODOLOGY

- 2.7.1. The adopted method of the Townscape and Visual Assessment (TVIA) (included in Section 5) has been devised to address the specific effects likely to result from a development of the scale, nature and location of the proposed development.
- 2.7.2. The methodology draws upon the following established best practice guidelines:
- Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (Landscape Institute) (LI) and Institute of Environmental and Management & Assessment (IEMA), 2013;
 - Landscape Character Assessment: Guidance for England and Scotland (Countryside Agency and Scottish Natural Heritage, 2002); and
 - Historic England - Setting of Heritage Assessments in December 2017 (Historic Environment Good Practice in Planning Note 3, Second Edition).
- 2.7.3. Historic England updated its guidance on the Setting of Heritage Assessments in December 2017 (Historic Environment Good Practice in Planning Note 3, Second Edition). The revised guidance outlines for a more discursive approach to Visual Impact Assessments and a reduced reliance on technical assessment. In particular, the guidance states that *"technical analysis of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out what matters and why in terms of the heritage significance and setting of the assets, affected, together with the effects of the development upon them"*.
- 2.7.4. Photographs for the representative key viewpoints have been produced (in liaison with the LPA's conservation officer and Historic England), in compliance with the following:
- Advice Note 01/11: Photography and photomontage in landscape and visual impact assessment (Landscape Institute, 2011).
- 2.7.5. Although the above publications refer to 'landscape', the European Landscape Convention's definition of landscape confirms that it includes the landscapes of villages, towns and cities, i.e. townscapes. Therefore, 'townscape' as defined as the landscape within the built-up area, including the buildings and the relationship between them.

3

THE PROPOSED DEVELOPMENT



3 THE PROPOSED DEVELOPMENT

- 3.1.1. The proposal for Warwick Mill is to redevelop a high-profile previously developed site at a key gateway site in Middleton town centre. The ambition is to deliver a new urban neighbourhood as a flagship project of Middleton Town Centre Masterplan.
- 3.1.2. The application is submitted in full and seeks full planning and listed building consent for a mixed-use residential-led scheme. The description of development seeks the following:
- “Redevelopment of Warwick Mill comprising repurposing of the existing Warwick Mill 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; improvements to vehicular accesses onto Oldham Road (A669) and Ashton Lane; vehicular and cycle parking; and associated works and infrastructure.”*
- 3.1.3. The tall building will comprise the erection of a new 10-storey residential tower known as ‘The Loom’ building. The building will replace the existing London House (which is six commercial storeys) and will be located to the west of the site, fronting Oldham Road.
- 3.1.4. The Loom comprises a strong and active frontage along Oldham Road, extending to a height of 10 storeys. It will comprise 146 units, encompassing a mix of one and two-bed apartments in addition to 130 sqm of commercial floorspace.
- 3.1.5. 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.
- 3.1.6. 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.
- 3.1.7. 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.
- 3.1.8. 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.
- 3.1.9. In summary, the proposed development will also comprise:
- 273 apartments (through new build, conversion and extension), providing a mix of one and two-bed apartments and duplex townhouses;
 - Ground floor small-scale commercial uses (Use Class E) associated with the creation of a new urban neighbourhood, with inherent flexibility to assist with marketing of the spaces to prospective occupiers;
 - Restaurant area including riverside decking and riverside footpath;
 - High quality public realm and civic space fronting Oldham Road and adjacent to the Brook;

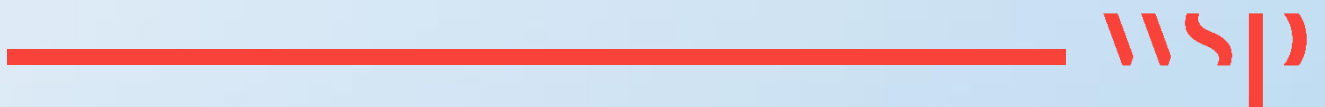
- New landscaping, shared amenity space and enhanced pedestrian accessibility; and
- Car parking, servicing and associated development.

3.2 PRE-APPLICATION FEEDBACK

- 3.2.1. Given the prominence of the site, the scale of development, and the Council's aspirations within the Middleton Town Centre Masterplan, the applicants have undertaken extensive pre-application discussions.
- 3.2.2. 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. Historic England's response is provided at **Appendix A**.

4

EXISTING TOWNSCAPE CONTEXT



4 EXISTING TOWNSCAPE CONTEXT

HISTORIC CONTEXT

- 4.1.1. Like many regional towns the main growth of the Middleton occurred with the Industrial Revolution, when large scale textile manufacture was introduced to the town, taking advantage of its geography. In addition, the town was granted Royal Charter to hold a weekly market and three annual summer fairs in 1791, setting Middleton on course to become as a centre for commerce for the next 200 years.
- 4.1.2. The growth of Middleton's industry was quite contained and subsequently, beyond the compact town centre its character is quite suburban. Alkrington Garden Village was built in the early 1900's to the south and in the 20th century Langley was built as one of Manchester's overspill council estates in a typical suburban style. The result is a significant amount of green infrastructure and open space around the town centre, including Jubilee Park and the cemetery to the north and Alkrington Woods to the south.
- 4.1.3. The area surrounding the site includes many designated and non-designated heritage assets, reflecting the importance of Middleton as a textile manufacturing and processing centre during the late seventeenth century, eighteenth century, nineteenth century and into the twentieth century, including its particular association weaving wool and the cotton industry.
- 4.1.4. Middleton lies where Wince Brook joins the River Irk, once the site of two other mills, both now disappeared, as have the tightly planned narrow streets of mill workers' housing that occupied the area opposite where there is now a Tesco and a large car park.
- 4.1.5. Middleton has two conservation areas: The Town Centre Conservation Area; and the smaller Manchester Old Road Conservation Area.
- 4.1.6. Outside of the conservation areas a notable building is the Grade II listed Warwick Mill, which dominates the town's skyline to the south and serves as a reminder of Middleton's industrial past.

BUILDING HEIGHTS

- 4.1.7. The townscape context surrounding the site incorporates a range of building types, primarily comprising residential, leisure, infrastructure, commercial and offices with varying densities and heights.
- 4.1.8. The scale of the existing buildings surrounding the site vary slightly, ranging from three storey residential dwellings off Whitecroft Meadow, to the south of the site, to a 26m high listed church (St Michaels CE), situated to the east. The adjacent office building across Oldham Road is three commercial storeys with the job centre building spanning two storeys.
- 4.1.9. A number of buildings stand out in the townscape when approaching the site from the north and east (i.e. travelling southwards down Assheton Way). This includes large scale modern developments, most notably the Middleton Shopping Centre, Tesco Extra, Regent House and Middleton Arena which stand out predominantly in the skyline but are considered not tall.
- 4.1.10. Warwick Mill is the tallest structure in Middleton. The volume of Warwick Mill is a strong presence in the town even though it sits on the edge of the main centre.

HERITAGE ASSETS

- 4.1.11. A summary of the characteristics of the heritage assets situated on and within close proximity to the site are listed below. The Heritage Impact Assessment (prepared by Townscape) assesses all affected heritage assets in detail.

Warwick Mill

- 4.1.12. The heritage asset is Grade II Listed and was constructed between 1907 and 1909 and is situated within the site, central to the development proposals. It is a large rectangular five-storey building, built of red engineering brick in English Garden Wall Bond. It consists of 40 x 14 bays with an engine house and pump house. It had a main staircase and water tower with the name of the mill 'Warwick' incorporated in white glazed brick in four elevations of the tower. The tower is balance by brick pilasters with pierced parapets at each of the other three corners of the mil.
- 4.1.13. The 4 x l-bay engine-house has semi-circular-arched stone-dressed openings with archivolt and tripartite keystones as well as stone bands, corner pilasters and a coped parapet above a stone cornice. The engine has been removed but glazed wall tiling remains.
- 4.1.14. The proposed development may have an impact upon the listed building's setting and its heritage significance.

Church of St Michael

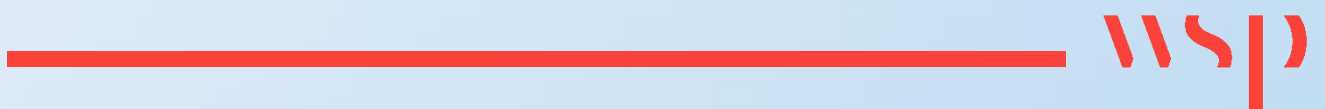
- 4.1.15. The heritage asset is Grade II listed and sits approximately 310 meters to the site's eastern boundary. The church as constructed in 1902 followed by the addition of a side chapel (in 1926) and tower (in 1930).
- 4.1.16. The church sits on an elevated site and is constructed of Snecked stone with a clay tile roof. It has been designed in an early Gothic Revival, Perpendicular style.
- 4.1.17. The proposed development may have a (slight) impact on its wider setting.

33, 35 and 37 Middleton Gardens

- 4.1.18. The heritage asset is Grade II listed and comprises a row of three shops, located approximately 220m north of the site. Constructed in 1908, the properties are brick with glazed tile decoration and reinforced concrete flat roof. Since their construction the properties have had replacement shop fronts and No. 33 has been painted. They are of a unique architectural design given the use of the tiled panels and the early use of a reinforced concrete flat roof.
- 4.1.19. The proposed development may have a very minimal impact on its wider setting.

5

TOWNSCAPE AND VISUAL IMPACT ASSESSMENT



5 TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

- 5.1.1. A Townscape and Visual Impact Assessment (TVIA) is included below.
- 5.1.2. This section includes the Townscape and Visual Impact Assessment (TVIA) of the report and describes the character of the area surrounding the development site and assesses its relative historic and architectural importance.
- 5.1.3. The TVIA examines the impact the Proposed Development will have on the townscape of Middleton immediately surrounding the Proposed Development.
- 5.1.4. Historic England's Advice Note 4 states that applications need to deliver architectural quality which also includes, impact on streetscape and near views, impact on cityscape and distant views, and impact on the skyline. The guidance also outlines that proposals should have a positive relationship with the character of place.
- 5.1.5. Two criteria in the 'Guidance on Tall Buildings Document' are 'Relationship to Context' and 'The Effect on the Historic Environment'. The assessment against these two criteria is provided within the townscape and visual impact assessment (TVIA) below. It includes consideration of three key views of the proposals from representative viewpoints providing a 360 degree analysis from the local area.
- 5.1.6. Taking the relevant policy and guidance into account (outlined in Section 2) the following TVIA is presented as a text discussion comprising an assessment of the extent of the change to the settings of the identified heritage assets as a result of the proposed development, the impact of that change, and whether any such changes could be considered to amount to either 'harm' or 'substantial harm' within the terms set out by the NPPF.

5.2 KEY VIEWPOINTS

Figure 5-1 - Location of agreed viewpoints



- 5.2.1. A total of three key views were selected and agreed in collaboration with Rochdale Borough Council's conservation officer, as well as discussed with the other local authority officers and Historic England. They represent a range of close up and wider views from key points around the site. The locations of the viewpoints are identified on **Figure 5.1**. Photos of the existing viewpoints are also provided at **Appendix B**.

View A: View looking east from Oldham Road

- 5.2.2. This view is taken from the Oldham Road, Warick Mill sits centrally, the mill dominates the street scene when approaching from the west, is a local landmark and of unquestionable prominence.
- 5.2.3. Associated buildings such as London House are subservient in both its weak presence, inappropriate material use and construction. Indeed, the weakness of London House exacerbates the prominence of Warwick Mill. This is an important view and provides a strong heritage significance.
- 5.2.4. The proposed tall building will sit in the foreground of Warwick Mill when approaching the site from the west, along Oldham Road.

View B: View looking south from Barton Road

- 5.2.5. This viewpoint is taken from Middleton Town Centre looking towards Warwick Mill across a supermarket car park.
- 5.2.6. The Mill forms a large backdrop to town centre views with surface carparking in the foreground.

View C: View looking west from the roundabout on the corner of Assheton Way and Oldham Road

- 5.2.7. This view is taken from the roundabout, on the corner of Assheton Way and Oldham Road. Warick Mill sits centrally, the mill dominates the street scene when approaching from the east, is a local landmark and of unquestionable prominence.
- 5.2.8. Associated buildings such as London House are subservient in both its weak presence, inappropriate material use and construction. Indeed, the weakness of London House to the rear exacerbates the prominence of Warwick Mill. This is an important view and provides a strong heritage significance.
- 5.2.9. The proposed tall building will to the rear of Warwick Mill when approaching the site from the east.

5.3 ASSESSMENT

- 5.3.1. The predicted visual impact of the proposed development on the principle viewpoints is described in detail below. Computer Generated Images (CGIs) of the proposed development are provided at **Appendix C**.
- 5.3.2. As recommended by the revised Historic England guidelines, the TVIA is supported by a tabulated matrix identifying the scale of the impact incurred by the proposed development upon the setting of each identified designated heritage assets and the significance of the effect of the change which may be adverse or beneficial.
- 5.3.3. In accordance with Historic England guidance, the TVIA Matrix is provided at **Table 5.1**.

View 1: View looking east from Oldham Road

- 5.3.4. In the proposed view, the existing London House has been demolished and redeveloped with a larger building footprint which comprises a tall building at a height of 10 storeys (it must be noted that residential storeys have lower floor to ceiling heights than commercial storeys which it replaces). Warwick Mill has been refurbished in addition to the new Loom podium which connects and provides a walkway between Warwick Mill and the Loom building.
- 5.3.5. As the proposed view shows, the new frontage of the Loom onto Oldham Road is set back and orientated to the west of the site, i.e. away from the listed Warwick Mill. The proposed development strengthens the ribbon/linear development along Oldham Road and forms a secure boundary, in doing so reinforcing the overall spatial quality of the area.
- 5.3.6. This view shows the proposed Loom building is taller in height than the existing London House albeit the design provides a sympathetic architectural vision to enhance the existing site, while retaining simple construction techniques. There will also be no demonstrable changes to the skyline that will impact on any heritage assets.
- 5.3.7. The proposed appearance of the development creates a context design which sits comfortably with the surrounding whilst also respecting and enhancing the views and setting of neighbouring properties including Warwick Mill.
- 5.3.8. In summary, the proposal result in a new urban form that better reveals the significance of the heritage assets, specifically Warwick Mill. With the removal of a derelict eyesore building and improving the visual quality with appropriate architecture, it is considered that the impact in heritage terms upon the settings of the identified heritage assets would be major beneficial.

View 2: View looking south from Barton Road

- 5.3.9. In the proposed view, as with View 1, the existing London House has been demolished and redeveloped with a larger footprint, which comprises a tall building at a height of 10 storeys. The Loom podium can also be seen from this view, connecting Warwick Mill to the Loom building.
- 5.3.10. Warwick Mill and the Loom building have a strong presence in the skyline. The development of the Loom provides a degree of grandeur to complement Warwick Mill.
- 5.3.11. This view illustrates scale of the proposed development at the Loom is in keeping with the scale and mass of Warwick Mill. The reordering of the existing site, its appearance with an increase in development mass particularly to Oldham Road, will form a positive impact on the otherwise gap site on the roadside directly adjacent Warwick Mill.
- 5.3.12. The stepping up in height of the Loom on the site's western boundary (on the right hand side of the view), complements and mirrors the height of the Warwick Mill tower on the opposite side of the site providing symmetry in the design. As outlined above for view 1, the massing of the Loom building has been designed in a stepped and L-Shape approach to open up and enhance the views of Warwick Mill whilst protecting it's setting.

View 3: View looking west from the roundabout on the corner of Assheton Way and Oldham Road

- 5.3.13. Warwick Mill dominates this view when approaching from the west. This view reveals how the Loom building will be set back and that it has been designed to ensure the scale and massing does not appear over-bearing or dominant in the skyline against the backdrop of Warwick Mill.

- 5.3.14. The additional storey added onto Warwick Mill is shown slightly in this view, albeit are set back from the parapet of the Mill building to avoid any potentially harmful visual impact upon the setting of the listed building.
- 5.3.15. Overall, the impact in heritage terms of the proposed development will have on the site as a whole and Warwick Mill, including it's setting is expected to be major beneficial.

5.4 SUMMARY

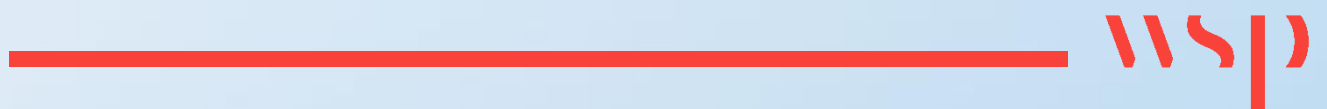
- 5.4.1. The TVIA above comprises a text discussion of the impact identified on designated heritage assets. As recommended in the revised Historic England guidance on the Settings of Historic Buildings (referenced above), this is supported by the following tabulated matrix.

Table 5-1 – Tabulated matrix of impacts of proposed development upon significance of setting

Designated Heritage Asset	Listing Grade	Significance of setting	Scale of impact	Significance of the effect of change, or overall impact
Warwick Mill	Grade II	High	Major change	Major beneficial
Church of St Michael	Grade II	Low	Negligible	Neutral
33, 35 and 37 Middleton Gardens	Grade II	Low	Negligible	Neutral

6

DESIGN AND ARCHITECTURAL QUALITY



6 DESIGN AND ARCHITECTURAL QUALITY

- 6.1.1. A number of the criteria outlined in the 'Guidance on Tall Buildings Document' relate to the design and architectural quality of the building, including its scale, form, massing, silhouette, materials and relationship to other structures. This section discusses the following criteria in detail:
- The architectural quality of the building;
 - Sustainable design and construction;
 - Credibility of design (technically and financially);
 - Contribution to public space and facilities;
 - Contribution to permeability of the site and the wider area; and
 - The provision of a well-designed environment.

6.2 ARCHITECTURAL QUALITY

- 6.2.1. With regard to architectural quality of the Proposed Development, Historic England's Advice Note states:
- 'Consideration can be given to whether a distinctive landmark design or a restrained architectural response is more appropriate in terms of the likely impact on the historic environment. High-quality architecture involves designing a tall building 'in the round' so it is coherent from all directions taking account of a building's scale, form, massing, proportions, silhouette, façade materials and detailed surface design. It is important to note that not all tall buildings can be landmarks, and not all landmarks need to be tall buildings.'*
- 6.2.2. The proposed development's scale and height has been defined by the need to maximise the site and create a dynamic and interesting collection of buildings on this strategically important site.
- 6.2.3. The Design and Access Statement submitted with the application demonstrates a clear understanding of the site and its context, in particular how the design has developed to respond to the constraints and opportunities presented by the surroundings and those inherent within the buildings to be refurbished.
- 6.2.4. This includes a series of key principles which have informed the design development. They include:
- 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; and
 - 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 metal infill panels will be a similar colour to the Mills brick façade to again assist in providing an integrated street scape. The residential units are a mixture of one and two bedroom apartments with full ventilation systems acknowledging noise and pollution levels currently experienced along Oldham Road.

6.2.5. The approach to massing has been carefully considered. The Loom Building's height and massing responds to its prominent location on Oldham Road, reinforcing local character and distinctiveness, making a significant contribution to the character of the place.

6.2.6. On this basis, the proposals have considered Advice Note 4.

6.3 SUSTAINABLE DESIGN AND CONSTRUCTION

6.3.1. Advice Note 4 sets out that tall buildings should:

“Provide opportunities to enhance the appearance of an area and reduce harm to the historic environment through the re-development or retrofit of a tall building can be explored. Considerations may include different massing options; improvements to the base of the building and public realm; using durable high-quality materials; and whole life carbon costs.”

6.3.2. The Energy Statement accompanying the application sets out the Energy and Sustainability strategy for the proposed development and assesses measures to reduce the carbon emissions of the proposed residential development.

6.3.3. The Energy Statement (by Ingine) outlines every opportunity has been taken where practical to improve thermal performance taking into account the Grade II Listing status.

6.3.4. The Loom Building will comply with the new Approved Document L 2021 (SD-L 2021) Building Regulations and will provide for a 10% reduction in carbon emissions.

6.3.5. The carbon reductions will be achieved through 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).

6.3.6. 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.

6.4 CREDIBILITY OF DESIGN

6.4.1. The application proposals have been led by an experienced developer and a wide-ranging and experienced design team who are familiar with the issues associated with developing high quality buildings in town centre locations, especially the heritage constraints. They also have a track record and capability to deliver projects of exceptional quality, which has been recognised through schemes winning awards.

6.4.2. This includes WSP receiving the 'Heritage and Culture' RTPi North West Regional Award for Planning Excellence in 2018.

6.4.3. The design has developed to respond to the constraints and opportunities presented by the surroundings and those inherent within the buildings to be refurbished. The design team recognises the high profile nature of the site and the fact that it is one of the flagship schemes within the Middleton Town Centre Masterplan area being progressed by Rochdale.

6.4.4. Extensive pre-application discussions have taken place with Council officers, including the Conservation Officer and Historic England through a series of meetings dating back to spring 2021. The feedback received has been invaluable and has positively shaped the proposed scheme which fits squarely with the ambitions of the Middleton Town Centre Masterplan.

- 6.4.5. A significant amount of time has been spent developing the proposals and carefully costing the design throughout, with the aim of ensuring that the scheme submitted as part of the planning application will be the scheme that is constructed and delivered.

6.5 CONTRIBUTION TO PUBLIC SPACE AND FACILITIES

- 6.5.1. The public realm and landscape proposals for the development have been designed to provide modern, multifunctional and interactive spaces where residents and locals can socialise during the day. The proposed landscape plan is provided at **Appendix D**.
- 6.5.2. Substantial hard and soft landscaping will be provided within the curtilage of the site as illustrated on the landscaping plans. This includes:
- Loom Podiums – these will feature 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.
 - Loom Roof – A 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 and 4th floor terraces – 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 and the 4th floor terraces will feature four quiet gathering areas with raised planting beds.
 - Restaurant Area, Riverside Decking and Riverside Footpath – These areas will provide a 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.
- 6.5.3. The delivery of the tall building provides the additional viability in the overall development scheme to provide high quality landscaping and public realm features. The landscape proposals will transform the site from its harsh urban, built-up appearance to soften and green the development.
- 6.5.4. Furthermore, the landscaped areas will be vibrant and add character to the development and local area. 'Hotspot' spaces will be created in addition to the provision of a range of seating opportunities allowing the public to both socialise and rest. Large areas of paving and decking adjacent to the future restaurant and retail opportunities will further promote users to activity utilise the different spaces available.

6.6 CONTRIBUTION TO PERMEABILITY OF THE SITE AND THE WIDER AREA

- 6.6.1. The site is sustainably located on Oldham Road and in locational terms, it provides an excellent opportunity for residential led mixed use development. It has good accessibility to services and facilities locally and is in close proximity to bus services on Oldham Road and Mills Hill railway station. The scheme encourages sustainable transport and provides a high-quality built environment which is accessible to the community.
- 6.6.2. The proposed development will open up the site with access provided through the ground floor of Warwick Mill onto Oldham Road. The proposal prioritises 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.

- 6.6.3. Overall, 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.

6.7 THE PROVISION OF A WELL DESIGNED ENVIRONMENT

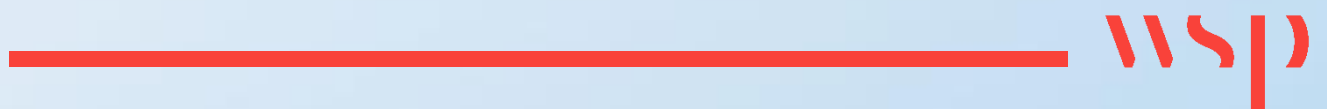
- 6.7.1. Historic England's Advice Note states that:

"The way tall buildings are experienced at ground level is an important consideration as tall buildings can have a significant impact on the historic streetscape and public realm. In some cases, redevelopments may create opportunities to enhance elements of the significance of heritage assets by opening lost views or revealing historic street patterns."

- 6.7.2. Advice Note 4 sets out that "Well-designed tall buildings provide an inclusive environment, both internally and externally, taking opportunities to offer improved permeability, accessibility and, where appropriate, the opening up or effective closure of views to improve the legibility of the wider townscape."
- 6.7.3. Section 12 of the NPPF sets out the need for developments to be inclusive and accessible for existing and future users.
- 6.7.4. The Proposed Development includes a high-quality design and finish across the scheme. A mix of both one and two bed apartments, duplex units and flexible commercial units are proposed to ensure the development provides a wide range for potential occupants and to help foster a mixed community within the Proposed Development.
- 6.7.5. The materials proposed for both the proposed new buildings and the renovation of the existing buildings will be of a high quality and sympathetic to the heritage assets. The Loom 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.
- 6.7.6. The development has been considered in response to the opportunities and constraints presented by the site, namely the heritage assets. The proposals establish a dialogue and relationship with the site and surrounding heritage assets through their form, materiality and character.

7

EFFECTS ON THE LOCAL ENVIRONMENT



7 EFFECTS ON THE LOCAL ENVIRONMENT

- 7.1.1. One of the criteria for evaluating tall building proposals as outlined in the 'Guidance on Tall Buildings Document' is the effect the building has on the local environment. This includes overshadowing, the environment and amenity of existing uses in the vicinity of the building.

7.2 ECOLOGY

- 7.2.1. 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.
- 7.2.2. 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.
- 7.2.3. Overall, whilst the ecology work undertaken to date has been concluded that the development may affect a number of ecological receptors (either in a beneficial or adverse manner) it has been concluded that 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.
- 7.2.4. 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.
- 7.2.5. 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.

7.3 TV RECEPTION

- 7.3.1. The proposed development is expected to have a neutral effect on the reception of television and radio broadcast services for residents and is therefore not expected to affect TV reception any more so than the current existing built development.
- 7.3.2. Overall, no adverse impacts are expected to be identified for the reception of any television or radio broadcast network. Therefore, no interference is expected for any television or radio service and subsequently, no pre or post-construction mitigation measures would be required.

7.4 DAYLIGHT AND SUNLIGHT

- 7.4.1. The design concept of The Loom Building has taken into account the future occupiers of the mill by designing the 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.

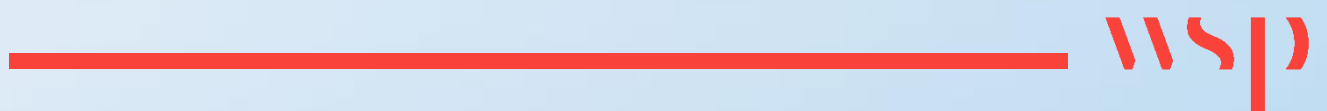
- 7.4.2. The landscaping has also been carefully considered and integrated within the layout to ensure the protection of the amenity of the area for future occupants in terms of daylight, sunlight, privacy and soft landscaping.
- 7.4.3. Overall, the impact of the proposed development on the neighbouring daylight and sunlight amenity in addition to the users of the proposed development is considered to be appropriate and acceptable. This is in accordance with national planning policy (NPPF, paragraph 135) and Core Strategy Policy DM1 which seeks to ensure proposed developments do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy.

7.5 NOISE

- 7.5.1. A Noise Assessment (prepared by Sandy Brown) accompanies the application. It is in accordance with BS4142, local and national planning policy and guidance. It assesses 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.
- 7.5.2. 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 Borough Council 'Adopted Core Strategy' dated October 2016.
- 7.5.3. Based on the assessment work undertaken to date it is anticipated that noise emissions from required mechanical 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.
- 7.5.4. As such, the proposed development will not result in any significant adverse effects in terms of noise and disturbance.

8

CONCLUSIONS



8 CONCLUSIONS

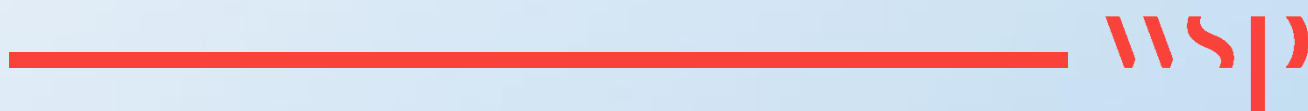
- 8.1.1. This Tall Building Statement supports the proposed Warwick Mill development which comprises the redevelopment of a high-profile previously developed site at a key gateway location into Middleton town centre. The proposal will play a vital role in establishing a distinct new urban development as a flagship project of the Middleton Town Centre Masterplan.
- 8.1.2. The tall building will comprise the erection of a new 10-storey residential tower known as the 'Loom' building. The building will replace the existing London House (which is a commercial six-storey building) and will be located on the eastern side of the site, fronting Oldham Road.
- 8.1.3. The proposals, including the proposed tall building, have been prepared by the applicant, in addition to extensive consultation with Rochdale Borough Council, and a range of stakeholders including Historic England.
- 8.1.4. A tall building has been chosen as an appropriate design solution for the proposals as it enables a higher quantum of development to be provided on the site. The site is highly sustainable but remains challenged in viability terms and in order to develop a viable high quality development scheme a tall building is proposed to ensure the development is best balanced in heritage, design and viability grounds.
- 8.1.5. The proposal has assimilated the competing factors of heritage, viability and residential density to arrive at a solution which achieves an acceptable level of heritage impact. It delivers a high quality scheme that creates a meaningful contribution to meeting housing needs and capitalising on regeneration of the area, whilst meeting the aspirations of the Council and key stakeholders such as Historic England.
- 8.1.6. A tall building of high quality is proposed, which will add to dramatic views and vistas, as a feature of Middleton's existing historic environment. Furthermore, it is in accordance with the Middleton Town Centre Masterplan which outlines development should be of a high standard of design and contribute to the renewal and environmental improvement of the area, with particular attention being given to the creation of landmark buildings and features on the prominent Warwick Mill site.
- 8.1.7. The TVIA has demonstrated the impact identified on designated heritage assets as a result of the proposed development and tall building is beneficial. This includes a major beneficial effect on the significance of the Grade II Warwick Mill.
- 8.1.8. Given the site's prominent location in the town centre and centrality to the Council's wider town centre regeneration aspirations, it would be determinantal to the wider plan strategy if this site was unable to be brought forward for development due to viability. The Warwick Mill development will play a key part of the regeneration for the local area, especially in terms of connectivity and high quality public open space.
- 8.1.9. The site is well placed to house a tall building within a new neighbourhood, in a strategic location, adjacent to a mix of existing uses. The residential-led development will benefit from the range of amenities including high quality public realm and landscaping which will contribute to the creation of a distinctive sense of place.
- 8.1.10. 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.

- 8.1.11. The tall building will be of the highest quality, whilst enhancing the character and appearance Warwick Mill. Furthermore, it will assist with the creation of a dynamic new townscape with a degree of grandeur appropriate to the identity of Middleton.
- 8.1.12. The proposed tall building is in accordance with, and positively contributes to, the aims of planning policy at a national and local level. It also accords with guidance on Tall Buildings and a tall building in this location is entirely appropriate.

Appendix A

HISTORIC ENGLAND'S RESPONSE





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



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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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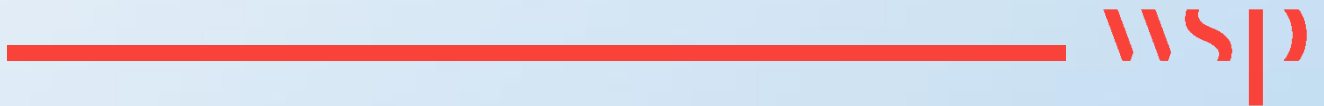
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Appendix B

PHOTOS OF THE EXISTING VIEWPOINTS



VIEW A - LOOKING EAST FROM OLDHAM ROAD



VIEW B - LOOKING SOUTH FROM BARTON ROAD

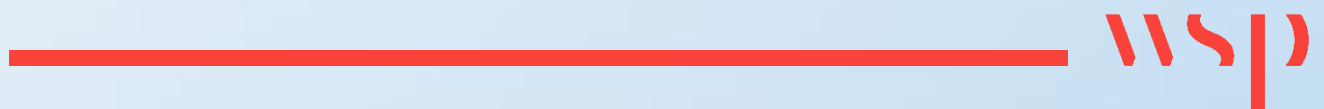


VIEW C - LOOKING WEST FROM THE ROUNDABOUT ON THE CORNER OF ASSHETON WAY AND OLDHAM ROAD



Appendix C

CGI VISUALS OF PROPOSED DEVELOPMENT



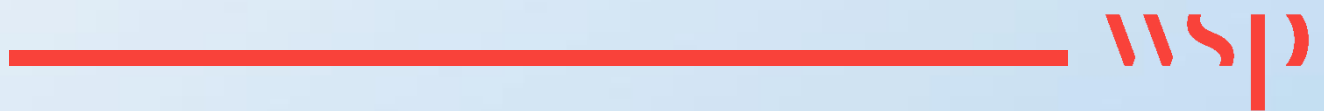




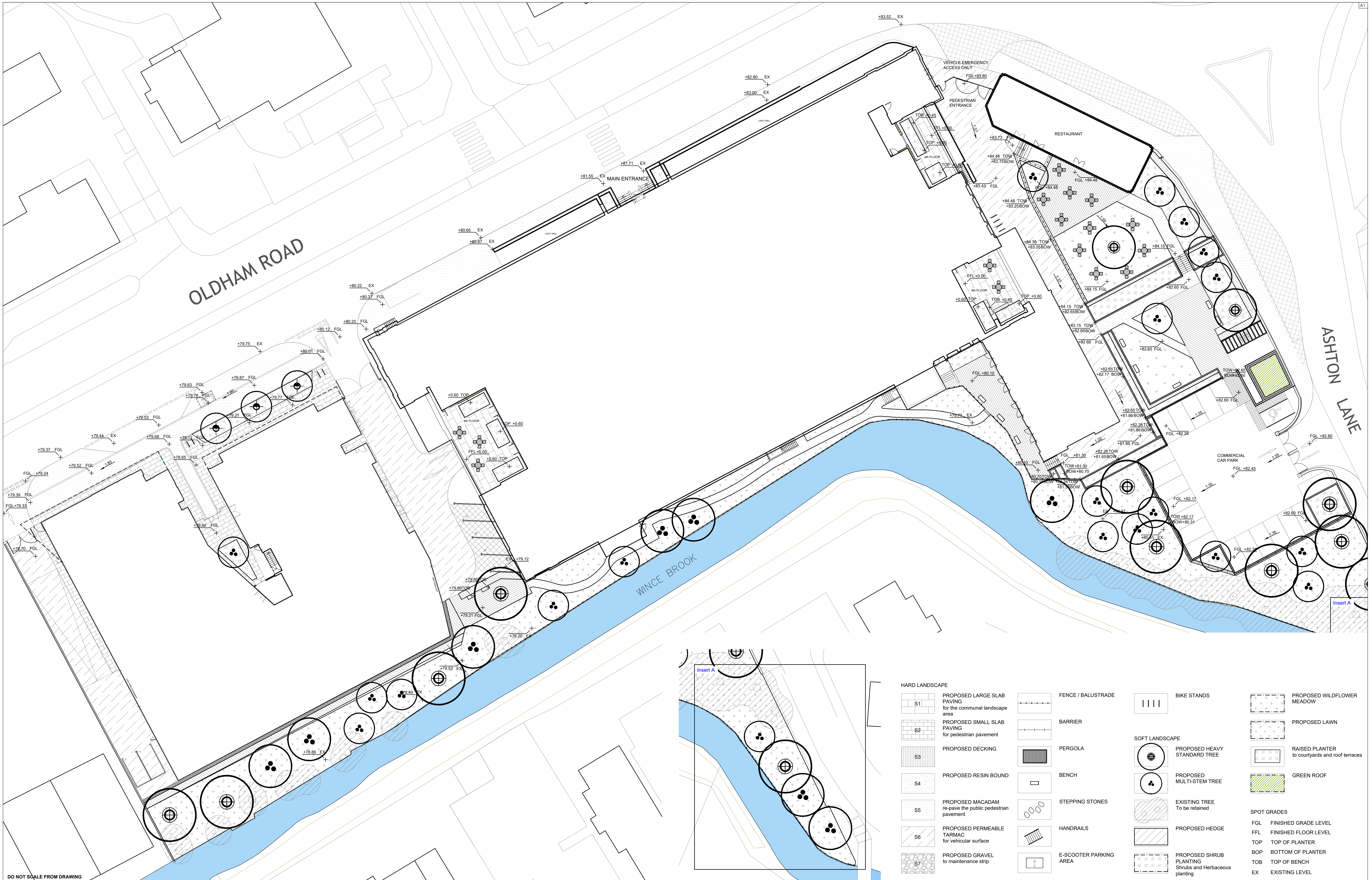


Appendix D

PROPOSED LANDSCAPE PLAN



		Place Design + Planning Ltd 16 West Barnes Lane London, SW20 0BU, UK	
Design + Planning		+44 208944 1940 +44 2089441117	
scale	1:250	at	A1
date	27/10/2021		
drawn by	CHC		ch by GH
draw no.	907 PL 002		rev no. P01



DO NOT SCALE FROM DRAWING

Drawing Information
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PLEASE NOTE: Figured dimensions take precedent over scale, do not scale from drawings.

Inform Place Design + Planning Ltd of any discrepancies before works commence on site.

All dimensions to be checked on site

SIGNIFICANT HEALTH, SAFETY & ENVIRONMENTAL INFORMATION RELATING TO CDM

HEALTH:

SAFETY:

ENVIRONMENTAL:

IT IS ASSUMED ALL WORKS WILL BE CARRIED OUT BY A COMPETANT CONTRACTOR WORKING, WHERE APPROPRIATE, TO AN AGREED METHOD STATEMENT

No.	Revision	date	by	checked
P00.	First Issue.	12/07/23	CHC	GH
P01.	Minor amendments.	21/07/23	CHC	GH

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Project Title
Warwick Mill

Drawing Title
**Landscape General Arrangement -
Ground floor & 4th floor**

Project Stage
Stage 3

PLACE
Design + Planning

scale 1:250 at A1 date 27/10/2021
drawn by CHC checked by GH
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