



ENGLISH HERITAGE
NORTH WEST OFFICE

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Our ref: P00387650

APR 2014

FOR THE
ATTENTION OF SW

4 April 2014

Dear Ms Westwood

**Notifications under Circular 01/2001, Circular 08/2009 &
T&CP (Development Management Procedure) Order 2010**

**LAND AT, MALT KILN BROW, CHIPPING, LANCASHIRE, PR3 2GP
Application No 3/2014/0183**

Thank you for your letter of 18 March 2014 notifying English Heritage of the above application.

Summary

The initiative to regenerate and re-use Kirk Mill and the adjoining Main Mills complex is welcome and has potential to secure a long term use for a listed building which is vacant and clearly at risk of further deterioration. We support the proposed use and the principle of converting the Mill, however we recommend that several aspects of the scheme, outlined below, are given further consideration and that amended proposals are brought forward to avoid harming the significance of the heritage assets affected by the proposals.

English Heritage Advice

The above application relates to five parcels of land in and around the village of Chipping in Ribble Valley. Four of the development sites are located on the northern edge of the settlement, within the Kirk Mills Conservation area and its immediate setting.

This is a hybrid application and seeks detailed consent for the conversion of Kirk Mill into a hotel and the redevelopment of the Main Mills complex for a series of uses including a spa, hotel, kids club, a trail head centre and seven holiday cottages. The



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application also seeks outline planning permission for two areas of residential development at The Hive and Malt House Brow, comprising fifty six and four units respectively.

The proposals have potential to affect the significance of several designated heritage assets, particularly Kirk Mill and the related conservation area. The mill was developed in several phases from 1785 and is considered, in the applicant's comprehensive Heritage Assessment, to be a rare survival of a largely intact water-powered mill in Lancashire. The southern front elevation is the only surviving part of the original Arkwright-type mill and is assessed as being of high significance in the Heritage Assessment. Later phases replaced much of the original mill, however each phase is legible in the floor plan and elevations and adds to the understanding of the mill as it was expanded and remodelled. The power source evolved during the early phases with a succession of larger water wheels being accommodated, and an early C19th phase possibly being associated with the installation of a steam engine. The engine house is expressed on the southern elevation with a 32 light window which is assessed as having high significance.

The mill is located in a narrow steep sided valley, cut into the surrounding rolling agricultural land. The landform has strongly influenced the settlement pattern with a clear distinction between the small cluster of mill buildings confined to the narrow valley and the farmstead, known as Old Hive, in an isolated position in the farmland to the west. Immediately north of the mill is the mill pond and race which make a highly significant contribution to the character and appearance of the industrial settlement.

The principle of re-using Kirk Mill is clearly welcome. The vacant and, to an extent, derelict condition of the mill dominates the conservation area and the constructive re-use of the building could be highly beneficial. Similarly the redevelopment of the vacant Main Mill complex, which overshadows the conservation area as a whole, with a contextual bespoke design could significantly enhance the character and appearance of the area. The introduction of a mix of complementary uses should have potential to regenerate the site and benefit the settings of both the Kirk Mill and Chipping Conservation Areas.

We therefore support the principle of the scheme. However there are several aspects of the detailed design which have potential to harm the significance of key heritage assets:

- The proposed three storey glazed circulation space to the south elevation of Kirk Mill would obscure key elements of the elevation, including the two storey 32-light window to the engine house, which is assessed as having high significance in the applicant's Heritage Assessment. It would dominate the only



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remaining part of the original Arkwright-type mill from 1785, in contrast to the proposals to remove the C20th dust extraction tower which would clearly enhance the elevation. Although mitigation is offered in the form of the glazed elevations to the proposed addition, the scheme would have a significant impact on one of the most significant aspects of the listed building.

- The proposed orangery would extend the full length of the ground floor of the original south elevation, obscuring parts of the building and adopting an architectural approach and materiality that have potential to confuse the historic phases of the building.
- The proposed room plan will subdivide the large open floor plan to the mill to create the cellular form required for the hotel rooms. This will be mitigated to an extent by the central corridor that will extend the full length of the existing open space and allow a sense of the original scale of the interior.
- Malt House Brow forms a spur connecting the narrow valley with the rolling area of land associated with the Old Hive farmstead. It provides a clear area of separation between the industrial hamlet of Kirk Mill, confined to the valley, and the more dispersed agricultural pattern of development of the surrounding landscape. In this context the proposed self build plots would blur the distinction between the contrasting settlement patterns and undermine the setting of the conservation area and mill. The Supplementary Planning Statement (paragraph 6.38) states that in considering the Landscape Assessment and Heritage Statement the proposals clearly demonstrate that there will be no material harm to the significance of the assets or their setting. However the applicant's landscape assessment considers the potential impact of the four self build plots as being 'medium adverse', though with mitigation the impact is reduced to low adverse. Mitigation is referred to in terms of landscaping, positioning of the plots and detailed design. However the current application is in outline, the parameter plan is limited in scope and insufficient information has been provided to justify the conclusions of the Supplementary Planning Statement.
- The steep pitch and dominant roof form to the proposed spa hotel on the Main Mills site could have potential to overwhelm the domestic scale of the existing cottages that form part of the context for the mill. The local planning authority (LPA) should ensure that the proposed roofscape will sustain and enhance the character and appearance of the conservation area. The photomontage images provide only a wire-line assessment of the impact of the scheme and we recommend that fully rendered images are requested to illustrate the potential visual impact of the proposals. Precise view points should be agreed with the LPA, however a view from just south-east of the junction of Church Raike and



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Malt Kiln Brow towards Kirk Mill could be helpful in this respect.

In determining applications LPAs should give great weight to the conservation of heritage assets. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to the desirability of preserving listed buildings and their setting while Section 72 requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. From a planning policy perspective the application incorporates a thorough heritage assessment (NPPF 128) which should enable the LPA to understand the impacts of the scheme on the significance of the relevant heritage assets (NPPF 129). While the scheme undoubtedly has potential to resolve a fundamental regeneration challenge within the Kirk Mill Conservation Area the NPPF requires LPAs to consider the desirability of sustaining and enhancing significance. Further, the NPPF also requires opportunities to be sought for new development to enhance or better reveal the significance of heritage assets (NPPF 137).

In this context our view is that further consideration should be given to the above harmful impacts in order to fully integrate the proposed developed with the heritage assets that would be affected. We therefore recommend that the above issues area addressed and that the current application is amended. Solutions could involve:

- The redesign of the south wing of Kirk Mill, which is to be taken down and reconstructed, to house the circulation core, rather than the glass box approach.
- The repositioning of the orangery to project out from the west wing, rather than the original 1785 frontage, this could also have the benefit of retaining a more generous space in front of the mill, a space currently attributed high value on the heritage assessment.
- Removing the Malt House Brow self build units from the application. The Supplementary Planning Statement refers to a viability report as part of the justification for the proposed quantum of development. The four self build units represent a very small proportion of the total development. However, there could be potential for increasing the intensity of development on the Main Mill site. For example, could the large surface car park be broken up by locating the kids zone building in that area, additionally could the positioning of the space building be adjusted, creating space for further residential units in this part of the site?

Recommendation

We recommend that amended proposals are brought forward to address the above points to enable the regeneration of the application site to be achieved without causing



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harm to the designated heritage assets affected by the proposals.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely

Graeme Ives
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cc



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