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1 7 APR 2014 FOR THE

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Direct Dial: 0161 2421424 Direct Fax: 0161 2421401

Our ref: L00393013

16 April 2014

Dear Ms Westwood

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

KIRK MILL, MALT KILN BROW, CHIPPING, PRESTON, LANCASHIRE PR3 2GP Application No 3/2014/0226

Thank you for your letter of 31 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 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 asset affected by the proposals.

## **English Heritage Advice**

Kirk 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 19<sup>th</sup> century 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.



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

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All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



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 proposal is for the conversion of Kirk Mill to a hotel and restaurant including repair, demolition of parts of the building and subdivision. We have previously given pre-application advice on the scheme as well as giving advice in March 2014 regarding the complementary planning application (ref: 3/2014/0183) for the mill as well as the redevelopment of the Main Mills complex and outline planning permission for two areas of residential development at The Hive and Malt House Brow, comprising fifty six and four units respectively. We have been consulted on the current listed building consent application for Kirk Mill on the basis of the substantial demolition of parts of a grade II listed building.

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 reuse of the building could be highly beneficial. We therefore support the principle of the scheme. However there are some aspects of the detailed design which have potential to harm the significance of Kirk Mill:

- 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 remaining part of the original Arkwright-type mill from 1785, in contrast to the proposals to remove the 20<sup>th</sup> century 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.

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



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buildings and their setting. 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.

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.

## 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 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

Alice Ullathorne

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cc Adrian Dowd, Conservation Officer, Ribble Valley BC



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