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Our ref: L00478924

1 2 OCT 2015

7 October 2015

Dear Mr Dowd

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015**

**LAND AT MALT KILN BROW, CHIPPING, LANCASHIRE, PR3 2GP  
Application No 3/2015/0767**

Thank you for your letter of 21 September 2015 notifying Historic England 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.

**Historic England Advice**

This Listed Building Consent is associated with 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. Our remit in this case relates to the substantial demolition of the grade II listed Kirk Mill and the impact the development will have on the character and appearance of the Kirk Mill conservation area.

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



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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. 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. We therefore support the principle of the scheme. However there are aspects of the detailed design which we recommend should be addressed to minimise the harm to 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. It would dominate the only 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. We recommend that the vertical circulation core is reduced to the minimum width against the elevation to minimise the harm caused. For example, if the reception could be incorporated within the single-storey orangery and the stairs could wrap around the lift core (retaining the 32 light window) the floor-plate of the circulation core could be considerably reduced.
- 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. We see no conservation benefit in relating door openings to the original mill elevation which also results in a busy and repetitive design. We recommend a contemporary approach is taken to the architectural language of the orangery. For example, a more asymmetric arrangement using larger glazed openings with a solid wall separating the orangery from the entrance reception, with a simpler roof design, (such as the kitchen extension at [Silverhome, Lake District <http://www.cumbriacrack.com/wp-content/uploads/2013/03/SilverholmeManor.jpeg>](http://www.cumbriacrack.com/wp-content/uploads/2013/03/SilverholmeManor.jpeg)), would help differentiate between historic and modern elements. In this instance greater simplicity is likely to be the key in creating a successful design.

Local planning authorities have special duties with regard to listed buildings under s 16 and s66 of the 1990 Act. In determining planning applications, local planning authorities should also take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; and the desirability of new development making a positive contribution to local character and distinctiveness (NPPF para 131 and 137). In determining this application your local authority will need to balance the harm caused by the proposals



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against the public benefits derived from the scheme, including the public benefit of bringing the mill back into a sustainable use (NPPF para 134).

**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 while minimising 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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