

PLANNING, DESIGN & ACCESS STATEMENT

**PROPOSAL : CONVERSION OF FORMER TEXTILE MILL TO
PROVIDE 34 RESIDENTIAL APARTMENTS INCLUDING
INTERNAL AND EXTERNAL ALTERATIONS AND
ASSOCIATED WORKS**

**ADDRESS : LONDON MILL, ASHBOURNE ROAD, LEEK,
STAFFORDSHIRE,**

APPLICANT : ALFA MOHUHA LTD

DATE : MARCH 2023 JOB No. : 2023-2760

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1.0 INTRODUCTION

This statement is submitted in support of a full planning application and accompanying listed building consent which seeks consent for the conversion of a former textile mill to provide 34 residential apartments including internal and external alterations associated works at London Mill, Ashbourne Road, Leek. The application which has been submitted by Sammons Architectural Ltd on behalf of Alfa Mohuha Ltd is accompanied by the following drawings and technical documents which should be read in conjunction with this statement:

- Drawing number 2023-2760-01A Existing Conditions Ground, First and Second Floor Plans
- Drawing number 2023-2760-02 Existing Conditions Third Roof Void Roof Plans
- Drawing number 2023-2760-03 Existing Conditions Elevations Sheet 1
- Drawing number 2023-2760-04A Existing Conditions Elevations Sheet 2
- Drawing number 2023-2760-05C Planning Proposal Ground, First and Second Floor Plans,
- Drawing number 2023-2760-06B Planning Proposal Third Roof Void Roof Plans
- Drawing number 2023-2760-07B Planning Proposal Elevations Sheet 1
- Drawing number 2023-2760-08B Planning Proposal Elevations Sheet 2
- Drawing number 2023-2760-09 Existing Conditions Block Plan
- Drawing number 2023-2760-10 Planning Proposal Block Plan
- Drawing number 2023-2760-11 Planning Proposal Location Plan
- Structural Survey undertaken by Cheshire Structural Design Services
- Heritage Statement and Heritage Impact Assessment undertaken by Mel Morris Conservation
- Noise Impact Assessment undertaken by Peak Acoustics
- Preliminary Roost Assessment and Site Walkover Survey undertaken by E3P
- Bat Survey undertaken by E3P

This statement analyses the site, the proposals and the policy context within which the proposals are made. Thereafter, it provides justification for approval of the proposed development on the basis that it would provide clear social, economic and environmental benefits. Despite having previously received planning consent the Mill has remained unused and the proposals seek to bring about its successful refurbishment and conversion in order to bring it back into a beneficial use which would safeguard its future. The proposed development would provide new housing within an accessible and sustainable location without adversely impacting upon the character and appearance of the area, harming residential amenity adversely impacting upon highway safety or being detrimental to any established ecological interests. The proposed development therefore accords with the provision of local and national planning policy and should be approved without delay.

2.0 SITE DESCRIPTION

London Mill is a former textile mill built in the mid 19th Century. It is a 4 storey Grade II listed building which is dated 1853. The principal Ashbourne Road frontage is symmetrical with a projecting central section capped by a pediment with two wings of equal length. The wings are divided into 8 bays and the vertically proportioned windows within each bay are of equal size on all floors with the exception of the third floor, where the windows are shorter. Constructed from brick with stone detailing forming cills, quoins and lintels under a hipped slate roof the building is located on the north side of Ashbourne Road approximately 0.5 km to the east of Leek town centre. A low stone capped brick boundary wall separates the building from Ashbourne Road where the original railings have been replaced. Two fire escapes are located on the exterior of the building with the one at the eastern end of the Ashbourne Road frontage being the earlier (circa late C19th and includes ornate Registered in England No 3775545

cast iron balusters and the one on the western elevation being circa early to mid C20th. Internally the first and second floor of the building consist of open floor places punctuated only by a row of slender cast iron columns whilst the third floor comprises of a single open space with an exposed roof structure.

The Mill is surrounded by residential terraced streets to the south and east which contain some other uses, with a development site to the west and employment sites located to the north. The Mill, together with its context, makes a positive contribution towards defining the gateway into Leek town centre. Cross Street Mills (also Grade II) listed is located immediately to the north of London Mill within the same exclave. For the purposes of the development plan London Mill lies within the town's development and within the Leek Conservation Area.

3.0 PROPOSAL

This application seeks full planning permission and listed building consent for the conversion of the former textile mill into 34 apartments with associated internal and external works. The proposed one bedroom single person units would be set across the four storeys of the building and there would be no increase in the size and footprint of the existing. The table below provides details of individual floor areas for each of the proposed units.

Ground Floor	Gross Internal Floor Area Sq Mtr	First Floor	Gross Internal Floor Area Sq Mtr
Unit 1	40.6	Unit 8	37.0
Unit 2	38.6	Unit 9	40.6
Unit 3	41.3	Unit 10	38.6
Unit 4	40.6	Unit 11	41.3
Unit 5	37.5	Unit 12	40.6
Unit 6	42.1	Unit 13	37.5
Unit 7	38.8	Unit 14	40.3
Communal Space inc management, post room and metres	156	Unit 15	42.1
		Unit 16	38.8
		Communal Space	72
Second Floor	Gross Internal Floor Area Sq Mtr	Third Floor	Gross Internal Floor Area Sq Mtr
Unit 17	37.0	Unit 26	38.2
Unit 18	40.6	Unit 27	41.5
Unit 19	38.6	Unit 28	39.8
Unit 20	41.3	Unit 29	42.8
Unit 21	40.6	Unit 30	41.5
Unit 22	37.5	Unit 31	38.6
Unit 23	40.3	Unit 32	41.6
Unit 24	42.1	Unit 33	43.4
Unit 25	38.8	Unit 34	39.6
Communal Space	72	Communal Space	72

The application proposes to strip the existing building back to its original fabric, with all later internal partitions, cupboards, sanitaryware, services including sprinkler system etc removed to reveal the basic building, brick walls, timber floors including cast iron columns, timber and slate roof.

The existing walls are to be thermally upgraded and an independent metal wall lining set 10mm away from the existing wall face, fixed at bottom and top to floor structures, which is infilled and lined on the room side with insulation and finished with a plasterboard lining will be formed. The existing

concrete ground floor is to remain insitu and a new asphalt damp roof membrane is to be laid over the surface of the floor with a new suspended timber floor installed above. Upper floors are to remain insitu with the exception of some localised repair works which are required due to water damage.

Floors are to be upgraded both in terms of fire and noise. The roof is to be stripped of all slate, battens, felt and lath and plaster ceiling below, with the remaining timber structure repaired as stated in structural engineers report. The existing rooflights to the front elevation are to be removed. Rooflights to the two ends and rear roof slope are to be replaced with a new double glazed patent glazing system. Once the roof is repaired and new rooflights installed the roof is to be re-roofed using breathable felt, battens and slates removed from the original roof. Solar panels are proposed to the Ashbourne Road roof slope.

The existing cast iron windows to front and both side elevations are to be retained but will need to be refurbished. This will require the casements to be removed to allow the windows to be cleaned, all rust treated, new application of a paint finish before being reglazed using putty. Windows to be finished in black. These windows are all to be fitted with secondary glazing (a minimum of 6mm thick) to provide improved noise and thermal insulation properties. Windows to the rear elevation where insitu are to be replaced, but casements set aside to be used as spares should any of the windows to the other elevations need replacing. New windows are to be powder coated aluminium finished in black with design and details replicating the existing.

The existing goods lift is to be removed and the existing shaft modified to accept a passenger lift. Walls are to be removed and modified as indicated. The new apartments are to be formed within, using metal partition systems lined with insulation to provide both the party walls between flats and the individual rooms within each unit. Services are to be provided to each individual unit by means of riser ducts accessed from the corridor, which will house drains, water supplies, electric supplies, telecoms and ventilation system. The riser ducts are to be ventilated at roof level via lead formed cloaked mini dormers.

Externally the changes comprise of the removal of the external staircase on the western gable of the building with the existing door openings on the ground and first floor reinstated back as windows. A new ramped approach is to be provided via the Ashbourne Road elevation and an existing window is to be enlarged to provide access into the building. Doors to the existing sub station on the eastern gable are to be removed and the opening built up with brickwork to match.

4.0 POLICY

Section 38(6) of the Planning and Compulsory Act 2004 requires proposals to be determined in accordance with the Development Plan taking into consideration any material considerations relevant to the determination of the application.

The National Planning Policy Framework (NPPF) was revised in July 2021. It is the Government's clear intention that the document should be considered as a material consideration and as such carries particular weight where development is not addressed by planning policies in the existing Development Plan.

The NPPF confirms that at the heart of the guidance is a presumption in favour of sustainable development and that for decision making this means approving development proposals that accord with the Development Plan without delay unless material considerations indicate otherwise. It goes on to seek to significantly boost the supply of new housing throughout the country and sets out requirements for Local Authorities to maintain a five year deliverable supply of housing at all times.

It also sets out guidance inter alia in respect of making effective use of previously developed land, securing high quality design and assessing impacts on highway safety. The content of this document has been taken into account in the preparation of this application and the most relevant sections of the NPPF are considered to be:-

- 1 Introduction paragraphs 1-14
- 2 Achieving sustainable development
- 4 Decision making
- 5 Delivering a sufficient supply of homes
- 9 Promoting sustainable transport
- 11 Making effective use of land
- 12 Achieving well designed places
- 16 Conserving and enhancing the historic environment

The Development Plan for the Staffordshire Moorlands comprises of Local Plan which was adopted in September 2020. The main policies of relevance to the determination of this application are as follows:-

SS1 (Development Principles); SS2 (Settlement Hierarchy), SS3 (Future Provision and Distribution of Development); SS5 (Leek Area Strategy); SD1 (Sustainable Use of Resources); H1 (New Housing Development); DC1 (Design Considerations); DC2 (The Historic Environment); DC3 (Landscape and Settlement Setting); NE1 (Biodiversity and Geological Resources); C1 (Creating Sustainable Communities) and T1 (Development and Sustainable Transport). For the sake of brevity these policies are not quoted in full but they are referred to where appropriate in the following section.

4.5 In terms of Supplementary Planning Guidance Council's adopted Design Guide and Space About Dwellings publications are also important in the consideration of this application.

5.0 ASSESSMENT

5.1 As set out above this is a combined application which seeks planning permission and listed building consent for the redevelopment and conversion of the former textile mill building to provide 34 single person one bedroom apartments with associated internal and external works. The key issues are considered to be:

- The Principle of development
- The impact upon the listed building, its setting and the Conservation Area;
- Residential amenity
- Highway safety
- Biodiversity

Principle of development

In its general approach the Council expects the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands. When considering development proposals the Council will in accordance with policy SS1 take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. This means that planning applications that accord with the policies in Local Plan shall be approved without delay, unless material considerations indicate otherwise.

London Mill is a prominent Grade II Listed Building which has been empty for some considerable time. The current application seeks to regenerate and convert the building into 34 single person

one bedroom apartments. Both national and local planning policies positively encourage the bringing back of heritage assets such as this into viable uses consistent with their conservation. Para 190 of the NPPF says that LPA's should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance (para 189).

The adopted Masterplan for Leek shows the site to be part of a larger area known as the Eastern Mill Quarter where positive support and encouragement is given to refurbishing and regenerating this important historic area, much of which remains intact, in a mix of uses. The Masterplan recognises that there are a number of mills in this area, including London Mill which are vacant, disused and deteriorating and detracting from the areas potential to act as a key and attractive gateway into the town centre from the East. London Mill is a prominent landmark building which helps to define this gateway. It is at risk through neglect and decay and it is against this policy background that the application is acceptable in principle subject to consideration of more detailed matters below.

The impact upon the listed building and Leek conservation area

The application is supported by a Heritage Statement and Impact Assessment which has been undertaken by Mel Morris Conservation and a structural report undertaken by Cheshire Structural Design Services. Whilst it is not the intention to repeat the contents of those reports here the structural report confirms that the application building is structurally sound and capable of conversion to domestic apartments.

The Heritage Impact Assessment confirms that the evidential value of London Mill is low due to the fact that internally beyond the structure the structure, the envelope and the stair cases little has survived.

London Mill does however make an important townscape contribution to this area of Leek and to the character and appearance of the Conservation Area. Its aesthetic value is high as its exterior provides a formal pedimented composition of some architectural merit. It has retained most of its external historic features (multi pane steel windows, north lights and other architectural details) and internally the open floor plates interrupted only by a central spine of cast iron columns are a defining feature. Together with the neighbouring York Mill, Cross Street Mills and associated terraced housing it provides a distinctive feature of the area. The significance of the Mill derives from this townscape contribution and also from its historical association with the silk industry in Leek and its association with one of the town's dominant silk and textile companies, Brough, Nicholson and Hall Limited.

The key change proposed in the application is the subdivision of the interior space to small individual spaces which would form individual single person one bedrooomed apartments. This will have an impact on the significance of the listed building as it removes the evidence of the large floor plates and the visibility of the floor to ceiling volumes. As such the building will no longer be readable and understandable internally as a former silk factory. On the fourth floor (attic level) the open character of the trusses will be retained in the apartments.

Whilst the internal subdivision of the building is unfortunate this harm needs to be weighed against the balance of finding a suitable and viable re-use for the building without which it will continue to stagnate and decline. A previous planning permission in 2016 which granted consent to convert the building into 21 managed workspace was unimplemented on the basis of it being economically unviable. That permission did however accept subdivision of the internal open space of the building albeit on a less intensive basis.

The main changes proposed are therefore the subdivision of internal space, provision of suspended ceilings, removal and restoration of windows, thermal upgrading to walls and roof, replacement roof including insertion of patent glazing system and rooflights to Ashbourne Road elevation, removal of existing fire escape on western gable and reinstatement of windows, upgrading of external fire escape on Ashbourne Road elevation, alterations to boundary wall with Ashbourne Road to form ramped entrance and insertion of doorway in side elevation of existing entrance.

The specific design policy of the LP Policy DC1 also states that all development should be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance.

The above guidance is reflected in the NPPF which confirms that the Government attaches great importance to the design of the built environment. It furthermore states that good design is a key aspect of sustainable development; is indivisible from good planning; and should contribute positively to making places better for people. Developments should function well and establish a strong sense of place creating attractive and comfortable places to live, work and visit. Proposals should also optimise the potential of the site to accommodate development and respond to local character and history including local materials and the use of good architecture and appropriate landscaping. Developments should also create safe and accessible environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion.

The proposed scheme is considered to be respectful of and sensitive to the architectural and special interests of this Grade II listed building and its setting within the town's conservation area. Furthermore, many of the proposed changes such as the provision of a ramped entrance, new side entrance, upgrading of windows, railings and removal of external staircase formed part of the approved scheme in 2016 and have therefore previously been considered and accepted by the council.

Whilst the Leek Mills Strategy undertaken in 2003 identified London Mill as being one of the best for potential to convert to employment uses the simple fact is that there is no demand for such use is not viable as evidenced by the fact that a previous planning consent for work units was unimplemented. The use of the building for residential purposes is considered to be the most viable and represents the best option for safeguarding the future use of this important and prominent grade II listed building.

The impact on residential amenity

Local Plan policy H1 states that all new dwellings must be of sufficient size to provide satisfactory levels of amenity for future occupiers of the dwellings whilst respecting the privacy and amenity of occupiers of existing dwellings. Policy DC1 states that all development should protect the amenity of the area, including the creation of healthy active environments and residential amenity, in terms of satisfactory daylight, visual impact, sunlight, outlook, privacy, soft landscaping as well as noise, odour and light pollution.

Although there are a number of residential properties in close proximity to the application site, notably on Well Street and Ashbourne Road, none of these will be unduly affected by the proposal in terms of overlooking or loss of privacy. This is because of separation distances and angles of sight.

In terms of amenity of the occupiers of the proposed units a noise survey was undertaken by Peak Acoustics (March 2023). This confirms that with a suitable glazing and ventilation scheme internal noise levels within the proposed units would remain within acceptable levels. Furthermore, all proposed units meet the minimum standards set out in the Nationally Described Space Standards. In conclusion therefore it is considered that the proposal would not be prejudicial to the reasonable enjoyment of the existing or proposed occupiers and the proposal complies with Local Plan policy HC1 and DC1 in this regard.

Highways

Paragraph 110 of the NPPF states that development should provide a safe and suitable access for all users with paragraph 111 stating that development should only be prevented or refused on transport grounds where there would be an unacceptable impact on highway safety or the residual cumulative impacts of development are severe. This guidance is reflected in policy DC1 which requires, amongst other matters, for development to provide for a safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use.

The application building has a very limited curtilage which means that there is no opportunity to provide any off road parking provision for the scheme. Notwithstanding this the application site benefits from a sustainable town centre location and is within easy walking distance to the numerous shops, facilities and services and employment opportunities on offer. In addition it is well served by public transport being a short distance from the town's bus station and numerous public car parks and easily accessible by a range of alternative transport modes.

Whilst the previous application to convert the application building into B1 use (SMD/2016/0113 & SMD/2016/0116) highlighted the lack of parking as regrettable it accepted that it was not uncommon for town centre buildings to be without land. It went on to confirm that the lack of on site parking was not fatal to the scheme given the significance of this listed building and the importance of finding a new viable use for it. It is considered that notwithstanding the fact that this application now seeks a residential use of the application building the same conclusion can be drawn. In conclusion therefore it is not considered that the proposed use would adversely affect highway safety and that the application proposal complies with adopted local and national planning policies in this regard.

Biodiversity

In August 2022, E3P conducted a Preliminary Roost Assessment and Site Walkover at the site. The site was found to comprise of a single building with hardstanding, tall ruderal and scattered trees. The application building was assessed as having moderate bat roosting potential and the upper floors of the building contained active feral pigeon nests. The application building was found to comprise multiple gaps within the soffits, missing and damaged brickwork and mortar externally. Internally features included crevices between the brickwork and gaps within the plasterboard ceiling and the loft void. The external and internal roosting features on the application building were assessed as providing suitable roosting opportunities for a larger number of crevice dwelling bats and it was therefore suggested that further survey work was undertaken.

A further Bat Survey undertaken by E3P (November 2022) is therefore also submitted in support of the application. Dusk emergence survey and dawn re-entry survey show that a low number of common pipistrelle bats were identified foraging and commuting over the site. No bats were observed emerging from the mill during the nocturnal bat surveys and no activity was recorded in relation to the potential roosting features on the building. No further surveys or a Natural England bat licence are required for the conversion of the building to proceed.

Recommendations to minimise disturbance to bats which feed and commute onsite and breeding birds as well as possible ways of enhancing the site have been suggested. Such mitigation measures can be secured by way of an appropriately worded condition and in doing so the development will meet the requirements of policy NE1 of the Local Plan and paragraph 180 of the NPPF.

6.0 CONCLUSION

This application should be considered in the context of the presumption in favour of sustainable development as confirmed by the National Planning Policy Framework. The proposed development

is acceptable in principle as the site is located within the development boundary for Leek and in a sustainable location with good access to the services, facilities and employment opportunities provided within the village via a range of transport modes.

The proposal entails the sensitive reuse and conversion of the former Grade II textile Mill which is worthy in physical, architectural and character terms for conversion.

The proposal would also make a modest contribution to housing land supply in accordance with policy SS1 and SS8 of the Local Plan and the NPPF. The proposal is acceptable in relation to the character and appearance of the area, highway safety and residential amenity.

In addition the economic and social benefits which the development would bring in terms of its contribution to housing land supply, new homes bonus, jobs in construction and the construction industry supply chain and spending in local shops would also attract weight in favour of the proposal.

The proposed development therefore accords with the provisions of policies SS1, SS2, SS5, DC1, DC2, DC3, H1, NE1 and T1 of the Staffordshire Moorlands Core Strategy and guidance contained within the NPPF. For these reasons it is therefore considered that the proposal is capable of being supported by the Council.

7.0 DESIGN & ACCESS STATEMENT

USE

The application proposes the refurbishment and conversion of the former textile building into residential use which is considered to be appropriate having regard to the application building and its surroundings.

AMOUNT

The application building would be converted to provide 34 single person one bedroomed apartments. This amount of development is considered to comply with the Council's Space About Dwellings Standards and is in keeping with the density of existing development in this built up location.

LAYOUT

The layout of the development will be as shown on the submitted site layout plan. The proposed conversion would be contained within the shell of the existing grade II Listed Building.

SCALE

The proposed development would be carried out entirely within the shell of the existing building. The main alterations are internal and relate to the subdivision of the existing spaces across the four floors to provide individual units. Externally alterations are limited to the removal of one of the external staircases, alterations to the boundary wall frontage to provide a ramped access, reinstatement of windows and the provision of a new access on the side elevation of the Ashbourne Road entrance.

LANDSCAPING

The application building virtually covers all of the application site with very limited external space remaining. Landscaping works will therefore be limited to the creation of a new paved access ramp to provide principal access to the Ashbourne Road elevation and the provision of a hard landscaped area on the northern side of the building to provide secondary access to a bin store and service entrance.

APPEARANCE

The character and appearance of the application building will be conserved and enhanced as part of the proposals.

ACCESS

The principal access to the building will be via a ramped access off Ashbourne Road whilst a secondary access will be provided to the northern (rear) elevation of the building off Well Street.

The site is within easy walking and cycling distance of the town centre which has a wide range of services and facilities. Public transport links are easily accessible to the neighbouring towns of Buxton and Ashbourne and other parts of the Staffordshire Moorlands as well as the neighbouring city of Stoke on Trent.