



By Email

15/5/21

For the attention of Mr Adam Walker

Your Ref: 2021/62/90584/W

Dear Mr Walker,

Re: Brookes Mill, Armitage Road, Armitage Bridge, Huddersfield

Thank you for consulting the Georgian Group on the application for listed building consent at Brookes Mill, Armitage Bridge. The application proposes to change the use of Building 29 into a Wellbeing Centre, resulting in the partial demolition of the historic building. The Georgian Group objects to the current proposals.

Brookes Mill was developed from c.1816, and according to *The Buildings of England: Yorkshire West Riding: Sheffield and the South*, it is the best surviving example of an early integrated woollen mill in the Huddersfield area. The Brooke family, after which the Mill is named, moved to Armitage Bridge in the second decade of the nineteenth-century, building a mill complex on a new site and using water power of the River Holme. Prominent among the early buildings is a long five storied range c.1830, providing hand-spinning and hand-loom weaving shops, identified as Building 29 within the applicant's documents. The mill complex lies within the Armitage Bridge Conservation Area, and contributes significantly to the character of the conservation area.

The proposed scheme would result in the demolition of the three upper floors of Building 29. The partial demolition of the building will substantially alter one of the earliest buildings within the site, diminishing its prominence. The reduction in height would have a detrimental impact on the site as a whole, as well as impacting the character of the conservation area. Reducing the height of the building would cause harm to the listed building, and as a result we object to the current proposals.

The accompanying Structural report states that there is structural instability on the upper floors, which is cost prohibitive to remedy. The Georgian Group would support Historic England's position of partial strengthening and mothballing of the upper floors, and represents a more pragmatic alternative to demolition.

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The Heritage Statement (p.13) provided states that Building 29 is '*located within the curtilage of the clock tower and contributes to the setting giving a sense of enclosure to the tower*'. The reduction in height of the building would also have a detrimental impact on the setting of the grade II listed tower.

The applicant has not demonstrated that the partial demolition of Building 29 is essential to the redevelopment of the site. Since textile production at the mill site ceased in 1987, some of the building s have been repurposed, whilst other less significance additions have been cleared. The proposed re-use of Building 29 should be part of a masterplan for the site, one that could address the issues of the complex as a whole, and not individual buildings within the site.

Paragraph 192 of the NPPF asks local authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets, putting them to viable uses consistent with their conservation

The proposed works have not been appropriately justified as set out in NPPF p194. Paragraph 194 of Chapter 16 (conserving and enhancing the historic environment) of the National Planning Policy Framework 2019 states: '*Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification*'.

NPPF p200. states that local authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset should be treated favourably.

In line with Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in assessing the proposals, special regard should be given to the desirability of preserving the listed building, its setting and any of its features of special architectural or historic interest, and under section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.



We would urge the applicant to withdraw this application until such time as they can address the issues highlighted within this letter. If the applicant is unwilling to do so, then listed building consent should be refused.

Yours sincerely,

Gareth Roberts BSc, DipTp, MSc Architectural Conservation
Conservation Adviser