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Dear Mr Simcock

### **Arrangements for Handling Heritage Applications Direction 2021**

#### **QUARRY BANK MILL, STONEY LANE, LONGWOOD, HUDDERSFIELD, HD3 4ZW Application No. 2023/91544**

Thank you for your letter of 21 July 2023 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

#### **Summary**

Parkwood Mills is an Integrated Room and Power woollen mill comprising a group of 8 historic stone buildings of considerable character laid out in set around a water and road network. The mill forms a major group of structures within the Longwood Conservation Area. The site expanded during the second half of the 19th century and Mill 5, which dates from 1870, is an impressive edifice which contributes positively to the significance of the historic complex.

The proposal is to demolish Mill 5 and replace it with two rows of 4no. houses. The total loss of the structure will cause substantial harm to the individual historic building, considerable harm to the significance of the historic complex and moderate harm to the significance of the conservation area.

Demolition is proposed on two main grounds, firstly that the structure is unsafe and secondly on viability grounds, asserting that conversion of the building to apartments is not economically viable. It is important to consider both of these statements when assessing the application. The building may have capacity to be converted, however the viability of the new use, in terms of the form and type of the residential units proposed, should be given careful scrutiny by your Authority, if minded to accept the loss of the listed structure. Furthermore, the form, design and detail of any replacement structure should seek to work with the established grain and character of the industrial part of the complex as far as possible.



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We have concerns about the proposal to demolish Mill 5 and urge that your Authority needs to refer to sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Chapters 12 and 16 of the National Planning Policy Framework (NPPF) in reaching your decision.

## Historic England Advice

### Significance

Parkwood Mill is an Integrated Room and Power woollen mill. Dating from the mid-late 19th century, it was built for the firm of John Broadbent and Sons. It is built from coursed local gritstone and has slate roofs. The plain style with little embellishment—some cill bands and dentilled eaves, gives the buildings within the complex a bold robustness. Internally, most of the mills have cast iron columns support massive timber cross beams, the columns having flat faces for power transmission systems. The main buildings of the group are numbered 1 to 8 and they are grade II listed in recognition of their special historic and architectural interest at a national level.

The mill complex stands at the heart of the Longwood Edge conservation area. Associated buildings include the Methodist chapel and the stone built valley-bottom village, mill owner's house and cottages on the hill side. This gives these characterful historic buildings considerable group value.

Mill 5 was built in about 1870, and therefore is one of the later buildings. Its location on the southern edge of the site punctuates the corner entrance to the complex when descending from the hillside above. It is an impressive building which holds architectural interest for its similar design to other structures on the site, reflecting its purpose, with coursed stone, cill bands and dentilled eaves. The only internal survivals of interest are the cast-iron columns and the windows are 20<sup>th</sup> century replacements.

The current condition of the building is poor, internally and externally, however the Structural Report submitted with the application notes that retention and conversion would be 'challenging' rather than not possible. The interiors have been compromised by water ingress and long-term vacancy. Some of the ceilings and floors have collapsed and the structure is supported on the north side by a counterweight scaffold. The deteriorated state of the heritage asset has obscured its architectural interest, however there is no imminent risk of collapse and are not showing any signs of recent movement.

The majority of the other buildings on this have been successfully converted, mainly for residential use. This has given the immediate area a feeling of a having moved on to a new phase. It is therefore unfortunate that the same is not proposed, even in



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some from, through creative adaptation, for Mill 5.

Textile mills symbolise the north's industrial heritage and can drive its future. Repurposed mills offer distinctive and quirky accommodation proven to appeal to occupiers and investors. Mills can be powerhouses for growth in the 21st century. The vacant space they contain could accommodate around 52,000 new homes, or host 280,000 new jobs. At a time when local authorities are struggling to find land to accommodate economic and housing growth, mills provide a ready-made solution.

### **Impact**

The demolition and total loss of Mill 5 would cause substantial harm to the individual historic building, considerable harm to the significance of the historic complex and moderate harm to the significance of the conservation area. Although not as grand as some of the other mill buildings it is one of the main components of the mill and its loss would detract from the overall complex.

### Proposal - detailed design

The current proposal seeks to achieve 8 units, split into two rows of 4 at an angle across the site. Previous proposals for the site have shown a simple row of 10no. terraces. This appropriately responds to and reflects the established alignment of this and the other mill structures in the complex. Given that viability is being presented as one of the main reasons for the demolition of the building, it is unclear why less units are now being proposed, however, we have not seen the viability information to explain the rationale behind this or the relative values of the new units.

Please note that this advice should be considered if your Authority is satisfied that the financial and market appraisal submitted convincingly demonstrates that town houses are the only viable option for this part of the site.

In terms of the layout of the proposed new development, a simple rectilinear alignment of the new build units would reflect the established alignment of buildings on the mill site. It would also have the benefit of revealing into views the projecting privy/stair tower with taking-in doors on centre of south side of Mill 3.

Turning to the detailed design, we advise that consideration should be given to the following:

- Salvaging and re-using as much historic fabric as possible - particularly the stonework, both the blockwork and details such as the lintels, cills and dentilled eaves
- hipped roofs to echo the form of mill 5
- adding roof terraces to the flat roofed areas of the new build





## Policy

The process of justifying the demolition of historic buildings that are listed because of their special architectural and historic interest is quite rightly a robust test in planning policy terms. This is not only due to the positive contribution listed buildings make to local character and distinctiveness, but also for the embodied carbon they hold which means adapting and converting them is inherently more sustainable than demolition and new build.

The Planning (Listed Buildings and Conservation Areas) Act 1990, section 16 requires 'special regard' to be given to the special architectural and historic interest of a listed building when changes to it are proposed. Section 66 calls for this special regard new development would have on the setting of a listed building, as with the other mill buildings, in this case.

Section 72 of the 1990 Act requires 'special attention' to be given to the desirability of preserving or enhancing the character or appearance of a Conservation Area when development is proposed.

The quality and character of the historic environment as rich as that at Parkwood Mills, calls for the need to address Chapters 12 'Achieving well-designed places' and 16 'Conserving and enhancing the historic environment'.

Para 130 of the NPPF states that planning decisions should ensure that developments:

- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

Para 189 of the NPPF notes that 'Heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.





This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (para 199 of the NPPF) . Para 200 of the NPPF goes on to call for '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'.

Para 202 of the NPPF states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Less than substantial harm does not equate to an acceptable level of harm, should there not be the clear and convincing justification and public benefits to outweigh it.

As noted above, the structural justification for demolition and the deliverability of the proposal are both concerns. Para 204 of the NPPF states that 'Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred'.

We therefore advise that your Authority, if minded to look favourably on the proposal, should consider mechanisms to secure public benefits for the remaining listed buildings on the site. For example, Mills 6 and 7 have such a strong presence and create a sense of enclosure to Grove Street, complementing the setting of the mills on the other side of the road. These listed structures also currently lie vacant. A positive approach for the historic site as a whole, potentially through a phasing agreement, should seek to ensure the deliverability of works across both of these parts of the site in order to ensure that the whole site is positively addressed and re-used.

## **Position**

Historic England supports the creative and adaptive re-use of historic mill buildings. Demolition should be seen as the last resort, subject to clearly convincingly demonstrating that there is no viable way of retaining and adapting the structure.

Financial and viability assessments for the different ways of achieving a future of the site have not been provided as part of the supporting information. For example, the costings for retaining and converting to apartments, partially retaining and extending to convert into town houses or demolition and new build townhouses.

There is a heavy reliance placed in the application demonstrating that demolition is necessary on structural grounds. The most recent Structural Engineer Report has been produced on the basis of a visual external inspection only with no access to the building. This is unsatisfactory in terms of fully understanding the condition of the





building to the extent that demolition is considered the only option. We agree with the report that the retention and conversion of the building would be 'challenging' rather than not possible.

At present, on the basis of the information provided, it is difficult to see how the case has been made for demolition, as required to satisfy the planning policies in the NPPF. There are ways of assessing the condition of the building internally and following our site visit and discussions on site with the applicant, you and your Conservation Officer, we would be happy to provide more details on this to your Authority and the applicant.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 130, 189, 199, 200 and 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

You should also bear in mind 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.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

### **Kerry Babington**

Inspector of Historic Buildings and Areas

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cc:

