

DC Admin

From:
Sent: 07 June 2026 11:37
To: Victor Grayson; DC Admin
Subject: Planning reference: 2026/90232 New Mills, Marsden

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I wish my comments to remain anonymous and my address private.

I wish to express strong support for the application proposals. Bringing development forward on this site, with all its complexities, is very difficult, yet it absolutely has to happen. It is such a central and key site in the village and it is imperative that the council does all it can to support this development and ensure it maximises the regeneration of the wider village centre to breathe in new life, vitality and viability. This development is key to the future sustainability of the village, and this is a one-time opportunity to make it work.

It is a shame that the proposals have been borne out of an inward facing mindset, without recognising from the outset the contribution that this site could make to the wider placemaking of the village. Heritage is key to defining identity and forming placemaking. I am pleased that more of the heritage assets are now being retained to aid in this placemaking, but more success will flow through from the details if of a high quality. Whilst significant steps have been made to integrate the site into the wider village context and movement patterns, it is important that the Council ensures that the delivery of the scheme realises its full potential. Ensuring full completion of the scheme, delivering high quality public realm and spaces, the use of high quality material throughout, ensuring natural surveillance, delivering parking to benefit shared trips with existing businesses on Peel Street and delivering the bridge link to Warehouse Hill are therefore imperative.

I am concerned that the application, in not including all future phases in outline, will not enable full delivery of the scheme and will create an incohesive, piecemeal development, potentially with different owners/ developers, which will not maximise the site's true potential or deliver the best outcomes for the village. Further, there are legal and practical aspects to be considered with the approach taken. The council should ensure quality will be maintained and delivery ensured through a well-considered set of planning conditions, though without the full scheme being included in the current application, the ability to control future phases will be limited. NPPF paragraph 217 states that local planning authorities should not permit the loss in whole or part of a heritage asset without taking reasonable steps to ensure new development will proceed after the loss has occurred. Without the full scheme being included in this application, the council cannot control the delivery of future phases and this would conflict with the NPPF.

The submitted scheme is a significant improvement over that which secured the levelling up funding, with a greater amount of retention of the heritage assets. The mill, and its owning family, is integral to

the history of the village and this should be marked and celebrated through the development. The mill is also a key landmark building in the village both in the street scenes from Brougham Road and Warehouse Hill, and from wider views from the surrounding areas and distant hills.

It is regrettable that so much of the western mill, and especially the wages office, is to be demolished, as its scale and mass contributes significantly to its presence, but this loss is essential for the scheme to work and I agree that the public benefits outweigh the heritage harm. It is very disappointing however to see that there is no specific significance or impact assessment of the exterior or interior of the wages building, or its specific contribution to the street scene and townscape of Brougham Road and the conservation area. As a heritage professional, I consider that the Heritage Assessment is lacking in detail, with significance only being attributed by the age of the various buildings and the impact considered on the site as a whole, rather than constituent elements of it, as it should be. There is no analysis about how the site, and its various buildings functioned, or about the architectural contribution or technological merit of each building, or the key features of each building that contribute to their significance. There are bay windows, arched windows and other architectural details in buildings to be demolished, for example. The etched glass windows in the wages office are not mentioned, and I would like to see these retained. There may be other features and elements which should also be retained. I would like a condition attaching, not only for a full recording survey of the buildings being undertaken prior to development commencing, but for a full photographic itinerary document to be produced cataloguing every architectural and historic feature (including windows, columns, signs, attached equipment etc) with an assessment for each to be made on whether it is to be restored in situ, reused elsewhere on the site, retained in storage on the site or removed from the site. Such itineraries are commonplace in projects such as this.

The high-level link bridges are a feature which I would like to see replicated with replacements if possible. The central courtyard between the two mills, leading down to the river has an intimate feel and the landscaping in this area in particular should ensure that this heritage atmosphere is retained with the use of appropriate heritage materials.

In relation to public benefits, it cannot be concluded, as the Heritage Assessment states, that the demolition of the wages office is mitigated by saving other buildings; in other words some harm is mitigated by deciding not to inflict greater harm. That conclusion is illogical since harm is still caused.

The optimum viable use test is only introduced in the conclusion to the Heritage Assessment. This is a key policy test, yet it is not explained or considered in detail in the Heritage Assessment and is only fleetingly referenced in the conclusion.

Similarly, I feel that the stated public benefits of the scheme are weak and that in reality many more significant public benefits have the potential to be realised. In summary therefore, despite my misgivings regarding the quality of the Heritage Assessment, I consider that the total of the public benefits would lead me to the same conclusion that the heritage harm is outweighed.

I welcome the new building additions as well as the treatment of the new west mill elevation, which creates a clear distinction between old and new and allows, together with the landscaping scheme by Planit, the building to be read as a truncation. I do think that the newly exposed ground floor of the east mill, with a solid stone wall, is a poor treatment of the facade with no activity or interest. This will be a key elevation upon entering the site and so should have window openings or other architectural relief. I hope that this can be given further thought prior to determination of the application or for this to be conditioned for future consideration prior to the mill being developed internally.

Similarly, the Brougham Road gable at the site entrance is also poor, with a solid stone wall and poor landscaping design. It is regrettable that both the wages office and the facade to the east of the site entrance are to be demolished. The demolition of the Brougham Road elevation has not been justified in the application, yet it has some nice architectural detailing which is a shame to lose. The gable and resultant open landscaped area could be used for a more appealing gateway feature. Again, I would like a condition attached in relation to further detailed consideration of this.

I would like to see the Brougham Road frontage windows along the pavement conditioned to be visually permeable to add interest to the street.

In respect of the basement gym which forms a future phase, this should be available to the public; by not providing general access this is a lost opportunity. The village does not have a commercial gym and needs one to support the health and wellbeing of the community. I suspect the fact that it's stated as being a residents' only gym is because of potential traffic generation and parking constraints, so a solution and acceptable parking strategy needs to be found to resolve this. (As a side note, the Planning Statement describes the gym as Class E(d) use, but if it's residents only, this would fall under Use Class C3).

In advance of the full completion of the site, I have concerns about practical elements of the operation of the proposals, such as relating to overlooking and natural surveillance and fire tender access. Until the mills are occupied by a residential use, there will be no overlooking of the site in the evening and as such it could attract anti-social behaviour, particularly in the car park and public realm spaces. This could put the high-quality landscaping works at the site entrance at risk of abuse. If the west and east mill buildings are to be fenced off in advance of them being occupied, it should be ensured that fire tender access is still possible, otherwise this could put the buildings at risk.

I have noticed discrepancies between some of the drawings, documents and the CGI's. For example, the proposals for a pocket park near the car park ramp, whether there is public access to the north of the west mill and the height of the walls around the western car park. Whilst a pocket park is welcomed, I have concerns about the amount of sunlight to this space, and therefore its attractiveness, so this should be considered further. Linked to this is the height of the walls around the car park and views into and out of it. The perimeter walls should be as low as possible to provide natural light and the feeling of openness. I would also prefer to see railings to the river edge, rather than walls, consistent with the approach in other areas of the village.

In summary, this is a very exciting development and a fantastic opportunity for the village, which is much needed for the village centre to remain competitive and viable, and as such it should be given the council's full support. The council should work with the developer to ensure its benefits are maximised by developing planning conditions to sufficiently control the quality and delivery of the development, whilst always keeping an eye on the vulnerability of the scheme due to viability. The council should further work to identify additional funding streams to promote the delivery of the full proposals to ensure full delivery of its potential benefits.