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To:

FAO: Paul Ambrose
Planning and Regulation
Number One Riverside
Smith Street
Rochdale
OL16 1XU

13th May 2016

Re: Planning application 16/00396/FUL

“Conversion of existing mill at the site entrance along Hare Hill Road into 4 dwellings and 6 apartments including demolition of other existing industrial buildings together with the erection of 27 new dwellings and associated site works.”

Case Officer: Paul Ambrose

N.B. The following has been prepared by Peter Hook (Chairman – Littleborough Civic Trust) on behalf of the signature organisations and is the result of collaborative discussions between these organisations facilitated by Littleborough Civic Trust. We will also be grateful for your confirmation of receipt of this letter.

Dear Sirs,

The mill complex, located within the Littleborough Town Centre Conservation Area remains locally significant in terms of its social history and, in particular, the significant part it played in the economic and social development of Littleborough and the local Co-operative Societies. The Mill also has a substantial presence on Hare Hill Road and on the periphery of Hare Hill Park.

It is acknowledged that a significant majority of the buildings on the Hare Hill Mill site have unfortunately been allowed to fall into such a state of disrepair that they are, to all intents and purposes, unrecoverable. Also, over the years, little regard has been shown by the various owners for the historic significance of many of the buildings and, as a result, many have been so badly treated that little remains of their original structures. With these in mind, it is unlikely that the site would be taken over by another commercial enterprise nor would it be financially viable to restore the buildings.

With all these constraints in mind, we have some serious concerns and issues arising from the planning application that we feel should be addressed prior it being granted in a, hopefully, modified form.

We have concerns regarding the existence of toxic waste on the site:

It is safe to say that the site is not locally renowned for the safe handling of the highly toxic materials used therein¹. This is something that residents on Hare Hill Road will easily attest to having been evacuated several times over the years because of the spillage of highly toxic materials at the site. Indeed, several people who have worked at the site over the years have talked to us about their concerns regarding the safety of the site and in particular the area marked on 19th century maps as “lodges”². This is a local term used to describe small reservoirs at least one of which, we are told, was regularly used to dispose of quantities of toluene and naphtha both of which, as you will be aware, are highly toxic.

With this in mind, we are particularly concerned about part of paragraph 3.1 in the Environmental Sustainability Statement:

Ecology reports and Phase 1 Site Investigation and have been carried out on the site. WCL will follow the recommended remediation measures outlined in the reports.

The demolition of the existing buildings will be subject to planning approval and following this a phase 2 site investigation will be undertaken.

We would ask that a more rigorous examination of the existing site is undertaken prior to demolition (or, indeed, any work being undertaken on the site), to reduce the risk of the accidental release of toxic chemicals next to a public park, in close proximity to a children’s playground and a home for elderly people in need of care, and within a moderately densely populated area.

Naturally this would have to be followed by a further Site Investigation following demolition of the existing buildings. Whilst we accept that this will increase the costs it is, we strongly feel, essential to the safe re-development of the site.

We have concerns regarding the presence of bats on the site:

We note that, so far, only a daytime bat survey has been conducted and, equally, it was not possible to access all parts of the site and, in particular, the tower.

We also note that in paragraph 4.4 of the Bat Survey, a further examination of the site was recommended:

In order to determine the presence or absence of bats, further survey work is required. A minimum of two bat activity surveys will be required, to be carried out between April and August. These should include a dusk (emergence) survey and a dawn (re-entry) survey. The surveys need to be undertaken in suitable weather conditions and suitable temperatures.

Local residents whose houses back onto the site have reported the regular comings and goings of bats from various parts of the site including the tower.

With the reports from local residents, we believe that this moves the site into the “high potential for roosting bats” category. As such, we would recommend that, in accordance with best practice, at least three Exit and Entry Surveys be undertaken between May and September 2016/7 and spread over the survey season and in accordance with recommended criteria. This is assuming that Pre-start check of any trees that have not been assessed during the Phase 1 Habitat survey are assessed before removal. If bats are found to be roosting within any trees,

¹ Something that we are sure would be verified by Rochdale Fire Service

² A term that may have unfortunately been misinterpreted by the applicants

buildings or other habitats to be impacted by the anticipated works, a mitigation licence should be sought from Natural England.

We have concerns regarding the loss of the archaeological and social history of the site:

The mill, in its various incarnations, has played a significant role in the development of the local community (as is recognised in the “Heritage Statement”). We expect that, before demolition commences, it is appropriate that the conditions within the planning permission should require that applicants provide sufficient funding, resources and a mutually agreeable timescale³ for the following to be undertaken by a collaboration between the Co-operatives History Group, Littleborough’s Historical and Archaeological Society and Littleborough’s Civic Trust with assistance from appropriate support where necessary:

A significant extension of the Heritage Statement to provide a full and detailed archaeological survey of the buildings to incorporate full documentation of the existing buildings and their chronology in a way that can be used to inform future generations.

A full “3D” graphic documentation⁴ of the significant parts of the building’s archaeology as highlighted in the above survey.

Funding for an oral history project that captures the remaining social history pertaining to the site and its context in Littleborough’s development.

The results of this would be held in trust by The Co-operatives History Group and provide the background to the applicant’s intention to place images of the Mill at the entrance to the development.

We are pleased to note the intention to preserve the offices and warehouse façade facing onto Hare Hill Road. This part of the building has a significant impact upon the street scheme and, perhaps more importantly, provides closure to the road vista when approaching the Town centre and consequently encourages vehicles to slow down as they also reach the 20 mph sign. Equally, we are pleased to note that “...the materials palette of the new dwellings accords with the tradition and characteristics of the surrounding area...”⁵ Whilst we were disappointed to note that we can find no reference to the Littleborough Town Design Statement, and assuming that they are applied to all buildings on the site and are in line with the expectations of the Town Design Statement, these aspects reflect the spirit and intention of this document. We would wish to see that any granting of planning permission strongly emphasises these aspects and their application to all buildings on the site.

The proposed development has both positive and negative implications for Hare Hill Park as a community asset. It would be beneficial if the Plot numbers 26 to 37 could front onto the Park rather than as at present with their backs to the Park. This would introduce an element of informal surveillance to the Park and enhance the view of the development from the Park.

We would expect that the conditions applied to granting planning permission strongly emphasise that no part of the park will be damaged by the proposed works nor, at any time will any part of the park have restricted public access whether prior to, during or subsequent to the intended work. We would also strongly suggest that any granting of planning permission for the site should also be conditional upon the applicant providing sufficient funding to support The Friends of Hare Hill Park in the protection and development of the Park as a community asset with an emphasis, if appropriate, on providing additional parking facilities.

³ We would expect this to be no more than 4 months from the time of agreement and after the new toxicity report’s completion

⁴ Such as those produced by companies such as www.watergrove.co.uk

⁵ Heritage Statement 9.3

Finally, we have concerns regarding the increasing pressure of the proposal on local facilities such as schools, health services, congestion and car parking, and we would like to be assured that RMBC are considering the implications of the Hare Hill Road development alongside other recent approvals for in excess of 300 new housing units in the Littleborough area with developments in St James Place, the former Akso Site, New Road and Newall Street.

This document is presented by Peter Hook, Chairman of Littleborough Civic Trust



on behalf of:

Littleborough Civic Trust

The Co-operatives History Group

Littleborough History and Archaeological Society

The Friends of Hare Hill Park

The Pennines Business and Tourism Forum

Littleborough Neighbourhood Forum

The Friends of Hare Hill House