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Planning and Regulation
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16th May 2016

Dear Sirs,

Re: Planning application 13/00719/FUL

**Residential development of 26 dwellings to include the conversion of the weaving shed and boiler house, together with the retention of the chimney and the demolition of the brick weaving shed and the brick textile mill
(Resubmission of application 12/D55312)**

Case Officer: Paul Ambrose

Following two site visits, emailed and face-to-face conversations with local residents and a review of documents pertaining to the planning application we would like to present several points, and concerns.

Initially, we would wish to draw attention to the Civic Trust's letter of 17th May 2012 prepared by Iain Spencer-Gerrard in response to a prior application and, in particular, these paragraphs which continue to represent the opinion of the Civic Trust:

We are impressed with the relative quality of this proposal as an architectural concept and in another setting would regard it favourably as a valuable attempt to introduce some modern design into the area. The site is however in a conservation area and only a small one at that; in addition it is within the green belt (as acknowledged) and a part of the Hollingworth Lake Country Park (not acknowledged). The number of units proposed and the 'modern' styling atop the only remaining piece of the mill would be an overwhelmingly strong statement in comparison to the existing conservation area houses which tend to be loosely scattered along the road. We find it is unsympathetic to the area and shows little concern to 'fit in' to what is already there. For instance the appearance of the mill would reflect its industrial heritage better if it remained a single storey structure with a glazed roof as was the case latterly.

Because of this and other points made subsequently we feel obliged to object to the application in its present form....

We have no problem with some redevelopment of the mill as it affords an unpleasant appearance in its present condition and is potentially dangerous. The proposal however seems to reduce the mill to just the outer walls of the weaving shed, the remainder being demolished, and we would question the benefit to the area of this, particularly when the so-called 'enabling' development of an adjacent housing estate is so large. The number of houses and apartments proposed is greater than the total of those already there; if we were of a cynical turn of mind we would wonder if the mill 'preservation' was being used as an excuse in order to allow the building of the houses and not the other way round. An acceptable number of housing units would reasonably be only five or six in order to preserve the pleasantly scattered layout which exists at present.....

The desire to develop a contemporary vernacular language is understood, but any design described as contemporary should reflect the designs of the age which it is contemporary to. To some extent this has been applied but in a conservation area the proposed buildings, where new, should follow the local vernacular architecture more closely, built of local stone and roofed with slate, the windows reflecting the shapes of those in adjacent buildings. This is what would be required if conforming to the Littleborough Town Design Statement which appears to be noticeable by the absence of any reference to it, let alone following its requirements. While not advocating a slavish repetition of local design it is appropriate in a conservation area of such distinction that close attention be paid to this approach.....

Considerable emphasis is placed upon the archeologically significance of the mill (and the adjacent upper mill) and it is suggested that they are important parts of the conservation area as a whole. It may well be that this originally was an industrial village of the 19th century but it has not been so for the last forty or fifty years and most certainly wasn't one when the conservation area was created in 1982. The upper mill was 'running on empty' then and the lower mill was no longer producing anything and was already in a poor condition and suffering progressive deterioration. Rakewood was then and still is a small rural community and these proposals will disturb this relative tranquillity in an unacceptable way. It may be claimed that the archaeological significance of the original industrial village status should be given some consideration but in view of the amount of mill to be retained we suggest that it has not.....

.....While the arrangement of the houses, in the main, around a courtyard is desirable, one thing which seems to be clear is that the discrete parking areas would be overwhelmed by the number of cars generated by such a development; it would be expected that family houses of this value and size would attract people likely to have two or more cars per household. The likelihood is that cars would fill the courtyard, destroying any pleasant views into it that might exist, and spill over into Rakewood Road which is virtually a single-track road and inadequate to carry even the traffic presently using it, particularly when there is an event at the nearby club. There is a real danger that this development would exacerbate a problem already existing: we understand that when a rugby match is being played cars are parked in every available space including the roadway; there is nowhere for coaches above a certain size to turn around and it is not unknown for a coach to have to reverse the whole length of Rakewood Road. In such conditions emergency vehicles could find it impossible to attend the scene. Any 'improvement' to Rakewood Road however would be likely to destroy its rural appearance and should be strongly resisted.....

..... We also feel it is inappropriate to invoke some former mill structure, which hasn't existed for a long time, in order to explain the second storey proposed for the weaving shed. We feel

that this alters the appearance of the conservation area beyond reason; there is nothing in Littleborough that we can recall looking anything like this.

Once again, because of these and other points made below we feel obliged to continue our objection to the application in its present form. In particular:

We are concerned about the visual impact of the proposed development on both the Conservation Area and Hollingworth Lake Country Park:

On page 24 of the Planning Statement, it is noted “The concept of a compact scheme nestling the majority of the housing behind the existing mill is a central theme of the design.”

“Site Elevation NW” clearly demonstrates that the proposed retention of the mill wall, rather than enabling the majority of buildings to “nestle” behind it, is simply to enable the larger houses to be lifted into a position where they will dominate the skyline and have an increased “saleable” vista across Hollingworth Lake Country Park. Equally, visitors to the area will be, from some considerable distance away, faced with a view of buildings which, in no way, can be described as sympathetic to the landscape and heritage of the area. Nor, even with the most vivid imagination, can it be described as blending in to or complimenting the Conservation Area. Equally, it shows a blatant disregard of the Littleborough Town Design Statement.

We are concerned that there is no provision for affordable housing in the scheme:

The cost of retaining the walls of the weaving shed, chimney and “Boiler House” are given as the reason for not including any affordable housing as part of the scheme. If a thorough archaeological study and documentation of the area is undertaken (see below) and with sympathetic housing design of a significantly lower density on the site, we believe that the loss of the walls and “boiler house” may well enhance the attraction of the area rather than, as at present, detract from it. This would also have the benefit of enabling the designers to include affordable housing which is much needed in Littleborough.

We have serious concerns that little or no reference is made to the rear of the site.

In order to construct the “Courtyard” space it will be necessary to significantly raise the level of the land to the rear of the proposed development. This land is, for most of the year, effectively marshland and, because of the permanent presence of water is one of the areas identified as a suitable habitat for the Great Crested Newt.

However, our concerns go further than this. During the floods of Christmas 2015, this area of land, which stretches back some 400 metres or more, held back a significant amount of water flowing down from the hills behind the site and towards Hollingworth Lake. The two photographs below were both taken in December 2015 and give some indication of how much water this area of land is capable of retaining and which otherwise may well have continued downstream towards Littleborough.



We would strongly suggest that prior to any planning permission being granted, the Environment Agency should be engaged to assess the significance of this area and the likely impact of the infill necessary to undertake the proposed buildings on the water management system in this part of the valley.

We are concerned about the need to accurately document the archaeological significance of the site:

It is proposed that a significant amount of the site is demolished as part of the development. With this in mind, we highly recommend that, prior to consent being given to the planning application, a detailed field archaeological survey is conducted of the whole site by an independent agency. As is alluded to in the “Heritage Statement”, the buildings and their environs are of heritage interest and this should be thoroughly documented prior to any demolition.

We would also note that it is extremely unlikely that what is described as the “Boiler House” ever fulfilled that function.

We have serious concerns arising from the Ecological Appraisal:

We note that this is offered as a “Preliminary Appraisal”.

4.2.3.3 Notes that there is “high potential” for roosting bats in several areas of the building. It is stated that this could not be confirmed as access to the building is restricted. However, we note that other aspects of the application contain considerable photographic evidence from inside these very areas indicating that access is not as restricted as may have been presumed. We also note that 4.2.3.4 suggests that some areas of the site indicate “high suitability” for the existence of crested newts.

Local residents will attest to bats roosting within the buildings and therefore we would strongly suggest that the recommendation for a more thorough bat and reptile survey are undertaken before any decision is made.

With this in mind, we would highly recommend that the conditions outlined in the Ecological Appraisal Recommendations with regards to bats (page 19) are carried out in full and over the timescales recommended. We believe that this is of particular importance as we are given to understand that the owner appears to have already begun to destroy some potential woodland habitats.

Equally, we believe that the recommendations concerning the identification and protection of any habitats potentially inhabited by Great Crested Newts are thoroughly examined in accordance with best practice (page 21). This is of particular importance as the proposed planning application will require the destruction of some potential habitats at the rear of the site.

Yours sincerely,



Peter Hook
(Chairman – Littleborough civic Trust)

