

PLANNING STATEMENT

**PARTIAL DEMOLITION, REBUILDING AND ALTERATIONS TO LISTED MILL TO
FORM 38 APARTMENTS TOGETHER WITH 25 NEW APARTMENTS AND 64
NEW DWELLINGHOUSES**

AT

WESTWOOD MILL, LOWESTWOOD LANE, HUDDERSFIELD

WESTWOOD WILSON LTD

PROJECT ARCHITECTS:

MICHAEL WILSON RESTORATIONS

IN COMBINATION WITH

PRIME MERIDIAN LIMITED

MALCOLM SIZER PLANNING LIMITED

February 2020

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PLANNING STATEMENT.

Partial demolition, rebuilding and alterations to listed mill to form 38 apartments together with 25 new apartments and 64 new dwellinghouses at

Westwood Mill, Lowestwood Lane, Huddersfield.

Westwood Wilson Ltd.

1.0 INTRODUCTION

1.1 This statement is submitted as part of applications which seek full planning permission and listed building consent for the above.

1.2 Essentially the proposal seeks approval for:

- the restoration of derelict former mill buildings which are grade II* listed to form 38 No. apartments
- 25 No. new build apartments; and
- 64 No. new dwelling houses.

1.3 The new apartments and dwelling houses are required as enabling development to fund the restoration of the mill buildings.

2.0 SUBMISSION DOCUMENTS

2.1 BOTH PLANNING AND LISTED BUILDING CONSENT APPLICATIONS:

- Planning Statement
- Application form
- Ownership Certificate
- Application Drawings – see schedule at Appendix 1
- Heritage Statement
- Design and Access Statement
- Public Open Forum Report

2.2 PLANNING APPLICATION.

- Flood Risk Assessment –
- Clive Onions - Flood Risk Assessment 31 January 2020 Revision V9
- Edenvale Young - Modelling Report 28 June 2016 reference EVY 0456 Revision F
- Edenvale Young - Updated Masterplan Modelling with Addendum January 2020 reference EVY 0822 Revision E
- Clive Onions - Sustainable Drainage Report –31 January 2020 Revision V4
- Ecological Assessment all Brooks Ecological
- Tree Survey Report AR-3976-01 February 2020
- Ecological Impact Assessment Report 17 February 2020 Reference R3976-05.1
- Preliminary Ecological Appraisal Report March 2016 Reference R2506-01

- Updating Preliminary Ecological Appraisal Report 2 August 2019 Reference P-3976-01
- Riparian Mammal Report October 2019 Reference R-3976-01
- Bat Emergence Survey November 2019 Reference R-3976-02
- Interim Bat Activity November 2019 Reference R-3976-03
- Biodiversity Management Plan and Public Open Space Strategy 22 January 2020 Reference R3976-04.3
- Transport all Sanderson Associates
- Transport Assessment 27 February 2020 - Reference 10821-001-04
- Transport Assessment Addendum 21 February 2019 reference 10821-003-01
- Travel Plan 7 February 2019 reference – 10821-002-02
- Lighting Assessment – Deltasimons project number – 0438.01
- Health Impact Assessment – Malcolm Sizer Planning Ltd. February 2020

2.3 Also submitted is a PRIVATE AND CONFIDENTIAL Enabling Development Viability Appraisal (reference 161RYG00 and dated 7 October 2019) prepared by Cushman and Wakefield.

3.0 THE APPLICANT/DEVELOPER

3.1 Forming part of the application documents at Appendix 3 is a resume of projects successfully undertaken by Mike Wilson, Principal of Westwood Wilson Ltd., the applicant.

3.2 Also submitted are statements setting out his commitment to quality and restoration at Appendix 4.

4.0 GENERAL DESCRIPTION

4.1 The mill is in a derelict state and continues to deteriorate. A Building at Risk Notice has been served by the Council.

4.2 The mill itself comprises a number of sections which are separately listed as Grade II* with Group Value.

4.3 Immediately to the west is the mill dam, also Grade II*. It was drained some years ago and its bed has a thick cover of vegetation.

4.4 The application site fronts onto Lowestwood Lane and lies between the Huddersfield Narrow Canal and its towpath to the north and the River Colne to the south. The site essentially terminates at its western end just past where the inflow to the leat serving the mill dam leaves the river.

4.5 It is considered that all the land as defined falls within the definition of previously developed or brownfield land as set out in Annex 2 of the National Planning Policy Framework.

4.6 A small 'island' of wooded land further to the west between the canal towpath and the River Colne is also in the applicant's ownership but outside the application site.

4.7 Within the application site, but currently outside the applicant's ownership, is a small parcel of land forming the 'Titanic pond' (settling pond which is a Site of Scientific Interest) and adjoining land including an access road over which a permanent right of way exists. (An draft agreement has been reached to purchase this land bringing direct control over the landscaping enhancement proposed and the overhaul and rehabilitation of this prominent pond adjacent to Lowestwood Lane.)

4.8 The site lies within the Llnthwaite Conservation Area.

5.0 KEY LOCAL PLAN POLICIES

5.1 The development plan comprises the Kirklees Local Plan adopted in February 2019.

5.2 As shown on the Proposals Map which forms part of the Local Plan the mill buildings and land immediately to the east and south are shown without notation.

5.3 All the land within the application site as well as the island to the west is within the Green Belt.

6.0 PLANNING HISTORY

6.1 On 7 October 2005 the Council granted planning permission (2005/62/90818/W1) and listed building consent (2005/65/90819/W1) for partial demolition, conversion of redundant mill building and new build to form 108 apartments with ancillary facilities (listed building within a conservation area). Of particular note in the Officers Report is reference to the site's part Green Belt designation (and the need for very special circumstances to exist), potential flooding issues, no formal public open space, repair of the former mill pond, no affordable housing requirement. To quote from the Report, *'The problem is that the development is on the very edge of profitability hence the need for enabling development... on balance it was considered that the introduction of affordable housing would cause more harm to the green belt than could be gained. Similar arguments were applied to the provision of education funds.'* Finally, *'There are controversial elements to the proposals, development in the green belt being primary but these have been satisfactorily addressed. The benefits from the proposals FAR OUTWEIGH (my emphasis) the problems'*.

6.2 The fact that a scheme which it was hoped would be viable in 2005 but is clearly not today is particularly because the ongoing effects of the market correction from the 2008 financial crash are still being felt and because the view is taken by local agents that the market for apartments

in Linthwaite is extremely limited. Houses have a much greater chance of viability.

6.3 On 7 June 2012 Kirklees Council accepted that the 2005 planning permission and listed building consent remain valid (subject to the development complying with all conditions imposed therein) because lawful commencement of development had taken place before the expiry of the permissions.

6.4 Subsequently various alternative proposals have been considered because it was clear that the approved scheme was unviable.

6.5 On 1 June 2016 the Council issued a screening opinion that a formal Environmental Impact Assessment is unlikely to be required. It is considered that a slight increase in the number of units to 127 should not be seen as material and as such no Environmental Impact Assessment should be required.

6.6 Over the past few months, given the recovery in the residential market, the applicant has come to the view that, with significant enabling development, restoration of the listed mill buildings is financially viable.

6.7 Accordingly, considerable informal discussion took place with Council Officers and other stakeholders. This led to advice that given the complexity of the issues around flood risk, heritage and green belt considerations, an in principle presentation should be made to a meeting of the Council's Strategic Planning Committee.

6.8 Accordingly a request for pre- application advice was submitted which was the subject of a report to the meeting of the committee on 5 July 2018 (application 2018/20130) (attached at Appendix 5).

6.9 Attached at Appendix 6 is the response received following committee consideration. It includes that Members were generally supportive of the principal (sic) of very special circumstances existing for securing restoration of the existing Grade II* Listed Buildings through some enabling development within the Green Belt.

6.10 The response from Members of the Strategic Planning Committee was sufficiently positive for the applicant to continue with informal discussions with a view to submissions which are now the subject of these applications.

7.0 INFORMAL CONSIDERATION BY THE COUNCIL'S STRATEGIC PLANNING COMMITTEE

The following main issues were identified by Officers in their report to the meeting of the Strategic Planning Committee on 5 July 2018 (attached at Appendix 5).

7.1 Principle and Impact on Heritage Assets.

At Sections 5.1 to 5.11 Officers state that:

- a) *“The Grade II* listing indicates that the assets are particularly important and are of more than special interest and account for just 5.8% of listings nationally.” (5.1)*
- b) *“The site also lies within Linthwaite Conservation Area. Within this document the site is highlighted as a collection of buildings at risk and development of it should ‘preserve or enhance the wider Conservation Area.’ “(5.3)*
- c) *“The NPPF states ‘Local Planning Authorities should assess whether the benefits of a proposal for enabling development which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset outweigh the disbenefits of departing from these policies’ ” (5.3)*
- d) *“The proposed development involves the erection of approximately 63 dwellings in the Green Belt (final number subject to viability). This would represent an inappropriate form of development and very special circumstances would need to be found to justify the development in the Green Belt. The main benefits and very special circumstances the applicant would put forward at application stage are likely to constitute the enabling works to bring the listed buildings back into viable use”. (5.4)*
- e) *“It is important therefore that any subsequent planning application is accompanied by a Heritage Statement and viability information to demonstrate that the extent of the extensions and new build are justifiable on the basis that the works would secure the optimum viable use of the existing mill.” (5.6)*
- f) *“Historic England ... are particularly welcoming of the significant reduction in surface parking to the east of the mill as this would open up views and create a sense of enclosure around the communal green space. (5.8)*
- g) *“Officers are generally supportive of the design ethos and feel that the contemporary housing element is a particularly interesting part of the proposal” (5.9)*
- h) *“... in terms of the Green Belt officers are generally satisfied that the encroachment has been reduced through the pre- application process but still consider that the proposed layout includes three detached dwellings in the Green Belt which are proposed on the edge of the site and away from the main area of the proposed development. Officers wish to see the extent of encroachment into the Green Belt further reduced where possible.” (5.10)*
- i) *“... the proposed housing to the east and close to the mill complex responds more sympathetically to the historic mill than the extant planning permission (ref. 2005/90818) (5.11)*

7.2 Flood Risk. At sections 5.12 to 5.18 and in the update to that report at Appendix 7 Officers state that:

- a) *“The current Environmental Agency Flood Risk Map shows the majority of the mill site to be partly in Flood Zone 3 and Flood Zone 2 so at high a medium risk of flooding respectively.” (5.12)*
- b) *“The Applicant has undertaken an independent Flood Risk Assessment and has consulted separately with the Environmental Agency. According to the applicant, the modeling that has been carried out shows that much less of the site is*

- flooded in the 1:100 year +50% and 1:1000 year events than is shown on the Environmental Agency flood mapping.” (5.13)
- c) “The applicant has submitted information which shows that each of the dwellings would be positioned above the 1:1000 year event flooding level and there would be an emergency escape route away from the site and flood area.” (5.17).
 - d) “Subject to additional flood risk information and further consultation with the Lead Local Flood Authority and the Environment Agency the proposed development appears to have had regard to the significant flood risk issues within the site.” (5.18)
 - e) The Officers’ Update includes: “If it cannot be demonstrated that the proposed residential development avoids Flood Zone 3b (functional floodplain) then the application should not be accepted... depending on the remodeled Flood Zones both exception tests and sequential tests may apply.”

7.3 Trees/ Ecology. At section 5.19 Officers state that “A full tree survey would be required along with a full ecological assessment with mitigation measures incorporated into the final proposal.”

7.4 Highways. At Section 5.20 Officers state that “Highways DM have assessed the submission and raise no objection in principle subject to any subsequent application including a Transport Assessment...”

7.5 Infrastructure. At section 5.21 off the Officers’ Report it is noted that “Whilst the proposal would generate a requirement to deliver affordable housing and an education contribution via a S106 agreement, the nature of the enabling development means that no S106 is proposed.”

7.6 Officers Conclusion Officers conclude their report by noting that:

- a) “The proposal would constitute inappropriate development in the Green Belt. The NPPF tells us that we should apply substantial weight to any harm.” (6.1)
- b) “There would be harm to the Green Belt because of the nature of the scheme. There would be further erosion of the Green Belt to the openness.” (6.1)
- c) “There would be conflict with the five purposes of including land in the Green Belt.” (6.1)
- d) “All these aspects are elements of harm and any subsequent planning application should fully consider the potential harm to the Green Belt and would need to demonstrate very special circumstances.” (6.1)
- e) “The existing Grade II* assets are in a significant state of disrepair.” (6.2)
- f) “Their successful restoration would be significantly beneficial and would potentially offer significant public benefits.” (6.2)
- g) “... Any subsequent planning application should clarify whether the enabling development is necessary and include detailed viability information.” (6.2)
- h) “In drawing both Green Belt and heritage policies together as part of the planning balance, any subsequent planning application will need to demonstrate that harm to the Green Belt and any other harm is clearly outweighed by other

considerations (such as enabling the restoration of the Grade II assets) as to amount to the very special circumstances needed to justify the proposed development.” (6.4)*

- i) *“It is understood that enabling development to restore the listed buildings is likely to impact upon the policy requirements requiring contributions towards infrastructure such as education, affordable housing, highways and public open space unless they are deemed of fundamental importance when weighed in the planning balance. This is accordance with the provisions of the NPPF. No S106 agreement is proposed to cover these infrastructure requirements but this should be weighed against the significant public benefits afforded to the restoration of the heritage assets.” (6.5)*

8.0 RECENT DISCUSSIONS

8.1 Following the generally supportive response from members of the Strategic Planning Committee further discussions have taken place with Council officers and particularly with Historic England Officers in respect of the listed building and conservation area impacts of the proposal.

8.2 Attached at Appendix 8 is a letter dated 26 October 2018 from Historic England setting out their main comments. Additional supporting information is requested (which is now included within the application plans) but the overall conclusion is set out as follows: *“Next steps- The proposals are now at a stage where the majority of our previous comments and concerns have been addressed. We consider the scheme has the potential to create a real sense of place which combines the historic character of the mill buildings in their landscape setting with simple contemporary new development.”*

8.3 The Council’s Group Leader (Conservation and Design) has indicated that he is *“... very much in agreement with the (Historic England) advice...”*

9.0 THE APPLICATIONS

9.1 As noted at paragraph 6.1 above, planning permission and listed building consent were granted on applications (2005/90818 and 819) which included restoration of the bulk of the mill buildings to form 37No. apartments with additional apartments in new blocks.

9.2 Notwithstanding the extant planning and listed building consents in respect of the conversion of Blocks A – D of the mill to be restored, this application seeks both planning permission and listed building consent for all the scheme as now proposed.

9.3 So far as Blocks A – D are concerned it is now proposed to incorporate 38No. rather than the 37No. apartments approved in 2005, the extra apartment to replace the previously proposed swimming pool. Also, because of deterioration of the structure, the amount of rebuilding

necessary is considerably greater than was approved and necessary in 2005.

9.4 The application also proposes demolition of the non-listed sections of the existing mill, 25No. new apartments and 64No. new dwellinghouses.

9.5 Planning permission and listed building consent are of course sought for the remainder of the scheme shown on the application drawings i.e. the new apartment block comprising 25No. units in Blocks E – G together with the 64 new dwellinghouses (Blocks H – K).

9.6 Application drawings are listed at Appendix 1.

9.7 Submission documents submitted in support of the application are listed at Section 2 of this Statement.

9.8 The submission documents have been prepared on the basis of the Council's validation requirements, and having regard to the Local Plan and the National Planning Policy Framework.

9.9 Further, guidance has been given by Council Officers as to matters to be addressed in the submission.

10.0 ISSUES.

10.1 Before dealing with the key issue of principle and impact on heritage assets as identified by Officers in their report to the Strategic Planning Committee on 5 July 2018 and set out at Section 7.1 of this Statement, I deal with other main issues identified by them in their report followed by other matters addressed as advised in informal discussions with Council Officers.

10.2 MAIN ISSUES

Flood Risk – submitted as part of the applications are modeling reports prepared by Edenvale Young and Flood Risk Assessment and Sustainable Drainage Reports prepared by Clive Onions.

10.3 These reports fully address the issues and safeguards identified by Officers as requiring information.

10.4 In an email from the Council Officer dealing at the time it is stated that *“If the planning and listed building consent applications are submitted with a viability appraisal that supports a conservation deficit case (i.e. that the quantum of new development is necessary to bridge the funding gap between the cost of repairs and the end value of the building) then in terms of sequential test it would be reasonable to argue that the search area can only be the site itself”*. This is the argument put forward given that no other land is owned by the applicants.

- 10.5 The email continues *'In terms of the exceptions test, assuming that the EA can be satisfied through the flood modeling work that the site no longer falls within the floodzone 3a then the exceptions test may be applied. Essentially there are two parts to the test, the first being to show that the development will provide wider sustainability benefits to the community that outweigh the flood risk and secondly that the development will be safe for its lifetime without increasing flood risk elsewhere. The opportunity to secure a viable alternative beneficial use for the grade 2* listed building that is identified as being at risk could form part of the wider community benefit argument'*. Again this is the case.
- 10.6 Trees/Ecology A comprehensive set of reports has been prepared by Brooks Ecological which set out base line information, addresses the ecological impact of the proposals and sets out proposals for enhancement to ensure a positive outcome in the ecological balance.
- 10.7 Further survey work to be undertaken in Spring and Summer 2020 has been commissioned as identified in the Ecological Impact Assessment. Findings and recommendations will be submitted as soon as available.
- 10.8 Proposals for public access to the site and provision of facilities are detailed, opening up the site to which no public access is currently available.
- 10.9 The Tree Report does not survey trees on the island site, which lies within the applicant's ownership but outside the application site. Nor does it report on trees within that part of the application site in 3rd party ownership as shown on plan 538.02/PLA01.C.
- 10.10 In non surveyed areas it is envisaged that works of general maintenance and enhancement will be undertaken for the enjoyment of residents and members of the public.
- 10.11 Highways A Transport Assessment prepared by Sandersons is submitted which shows that the proposals can be satisfactorily accommodated on the local road network. A Travel Plan is also submitted.
- 10.12 Infrastructure Officers in their report to the Strategic Planning Committee noted that the proposal generates a requirement to deliver affordable housing and education contributions via a S106 agreement. However, as noted by Officers the nature of the enabling development means that no affordable housing or education contribution is proposed.
- 10.13 The confidential report prepared by Cushman and Wakefield analyses the scheme's viability and sets out the financial case for the amount of enabling development proposed. It shows there is no scope for contributions.
- 10.14 To require provision would mean that additional enabling development to meet the increased cost of undertaking the development

would result in ever more encroachment into the Green Belt and further reduce its openness.

10.15 OTHER ISSUES

Lighting – The Lighting Impact Assessment prepared by Deltasimons sets out that so long as lighting is designed and specified as set out in their report then it will fall in line with relevant professional guidance.

10.16 Community Consultation – The submitted Public Open Forum Report sets out the details of the engagement with members of the public and local councilors. It notes that feedback was very positive and enthusiastic in having the work started and the valley improved.

10.17 Impact on Health – The submitted Health Impact Assessment sets out measures to be taken to protect and improve the health and wellbeing of residents and the wider community.

10.18 Crime – Informal discussions have taken place with the Designing Out Crime Officer at West Yorkshire Police whose detailed comments will be given careful consideration as the finer details of the proposal are prepared.

10.19 Contamination Pre-application advice was that the site includes potentially contaminated land. Conditions are recommended to be attached to the grant of planning permission including requiring a Phase 1 Report (KMC Pollution and Noise Control response WK-201805977-14.04.2018)

10.20 KEY ISSUE – PRINCIPLE AND IMPACT ON HERITAGE ASSETS – As noted previously Officers identified the issue of principle and impact on heritage assets as the key considerations in the consideration of these applications.

10.21 The submitted Heritage and Design and Access Statements set out how the details of the proposals have been developed.

10.22 Though it is considered that the developments will pose no flood risk to occupants during the lifetime of the development it has been necessary throughout much of the site to design houses and flats at such level and with accommodation so arranged as to ensure there is appropriate protection against flooding.

10.23 This has clearly imposed constraints on the built form of the new enabling development and its relationship to the historic mill buildings.

10.24 In that context discussions have been held with Council and Historic England officers.

10.25 The starting point has been that the greatest financial return is achieved with houses rather than flats as approved in 2005. Accordingly, the scheme evolved from a starting point of securing housing as far as possible between the retained mill buildings and Lowestwood Lane whilst securing an open aspect as seen from the Lane.

- 10.26 That area is where development is concentrated in the 2005 scheme.
- 10.27 The proposed housing to the west of the mill buildings overlooking the (to be) restored mill pond has been concentrated and kept to a minimum but sufficient to provide the balance to make viable the restoration of the listed mill buildings and mill pond.
- 10.28 In this respect it should be noted that the 3No. detached houses of concern to the planners when considering the pre- application submission have now been removed.
- 10.29 Of course, the scheme submitted involves considerable incursion of development into the Green Belt contrary to national and local policy.
- 10.30 That is inevitable if a viable scheme for restoration of the listed buildings is to be achieved.
- 10.31 Policy requires that very special circumstances are shown to justify the harm of inappropriate development in the Green Belt.
- 10.32 Paragraph 202 of the NPPF requires that local planning authorities should assess whether the benefits of a proposal for enabling development which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset outweigh the disbenefits of departing from those policies.
- 10.33 In assessing the merit of the argument for enabling development English Heritage (now Historic England) published 'Enabling Development and the Conservation of Significant Places' (September 2008). It is considered that the proposals should be assessed in respect of the seven criteria set out at page 5 of that publication, and if the criteria are met, considerable weight should be given in assessing the planning balance.
- 10.34 The criteria are set out at Appendix 9 of this Statement. Dealing with each in turn, the proposals –
- Criteria a) will not materially harm the heritage values of the mill complex, the conservation area or their setting;
 - Criteria b) being under one management regime would avoid detrimental fragmentation of management;
 - Criteria c) will secure the long-term future of the mill and its continued use for a sympathetic and its only viable use.
 - Criteria d) are necessary to resolve problems arising from the critical condition of the mill, rather than the circumstances of the present owner, or the purchase price paid;
 - Criteria e) are necessary as no subsidy or funding is available from any source;
 - Criteria f) with the Viability Report have demonstrated that the amount of enabling development is the minimum necessary to secure the future of the mill and

that its form minimizes harm to other public interests, especially national and local Green Belt policy;

- Criteria g) the public benefit of securing the future of the mill, through enabling development decisively outweigh the disbenefits of breaching other public policies, especially regarding protection of the Green Belt.

10.35 On the basis that the scheme of enabling development is justified, the document sets out that planning permission should only be granted on a full rather than an outline application (as now submitted); the achievement of the heritage objective is securely and enforceably linked to it (relevant conditions and requirements under any S106 Obligation will be met); 'the place concerned is repaired to an agreed standard as early as possible' (requirements that the mill is restored to a wind and watertight condition before new development is undertaken are anticipated and agreed); and 'the planning authority closely monitors implementation' (this is anticipated).

10.36 Other benefits include the opening up of what is at present a site with no public access, the provision of much needed dwellinghouses and apartments and the overall visual benefit to the wider community that the development will achieve.

10.37 That additional housing on an unallocated site should be seen in the context of the failure to deliver the Government's housing completion target over recent years and the requirement on the Council to be able to show not just a five year supply but also a 20% buffer.

11.0 CONCLUSION

11.1 It has been most frustrating for my client in that since 2005 a viable scheme to restore the listed buildings and mill dam has been out of reach.

11.2 An improving housing market has now prompted a reassessment such that at the margins of viability the scheme now submitted is felt to be achievable.

11.3 The proposed clearly raises issues in terms of its impact on the Green Belt. However through detailed informal discussions with both Council Officers and Historic England a scheme has been arrived at which restores the mill buildings, respects those buildings in terms of the layout and detailed design of the new houses and flats and which, as far as possible, limits incursion into the Green Belt.

11.4 Having carefully balanced often conflicting technical and policy requirements it is felt that the scheme now proposed is the most appropriate which is financially achievable and will secure the restoration and long term future of this historic mill complex.

11.5 To secure planning permission and listed building consent and to see the development completed will be the realisation of a long held dream

Malcolm Sizer.

Malcolm Sizer Planning Ltd.

February 2020.