

Delegated Cabinet Member Key Decision Report

Decision Maker and Portfolio area:	Councillor Roberts, Cabinet Member for Housing
Date of Decision:	27 January 2022
Subject:	Oldham Mills Strategy
Report Author:	Georgina Brownridge
Ward (s):	All wards

Reason for the decision:

Summary:

To approve and publish the Oldham Mills Strategy (including the Landscape Overview). This will allow the council to use up to date evidence to inform the Local Plan review and publishing this evidence will assist in frontloading consultation and will allow applicants and other people to make use of the strategy.

What are the alternative option(s) to be considered? Please give the reason(s) for recommendation(s):

To not approve and publish the Oldham Mills Strategy (including the Landscape Overview). This will mean that the Local Plan is not supported by up-to-date evidence which helps set a positive strategy for heritage in line with National Planning Policy (NPPF).

Recommendation(s):

To approve and publish the Oldham Mills Strategy (including the Landscape Overview). This will allow the council to use up to date evidence to inform the Local Plan review and publishing this evidence will assist in frontloading consultation and will allow applicants and other people to also make use of the strategy.

Implications:

What are the financial implications?

The Oldham Mills Strategy will be placed on the Council's website supported by some additional communications. There are not expected to be

any additional costs associated with this activity.

(Jamie Kelly)

What are the **procurement** implications?

N/A

*What are the **legal** implications?*

The National Planning Policy Framework requires that the preparation and review of all policies should be underpinned by relevant and up to date evidence, which should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and taking into account relevant market signals. In accordance with the Council's scheme of delegation for Local Plans, approval of reports for inclusion in the Local Plan evidence base is delegated to the Portfolio Member in consultation with the Executive Director. (A Evans)

*What are the **Human Resources** implications?*

N/A

Equality and Diversity Impact Assessment attached or not required because (please give reason)

N/A. This is a technical document setting out a strategy. The Local Plan, which this evidence will inform, will be supported by an Equality and Diversity Impact Assessment.

*What are the **property** implications*

The proposed mills strategy should assist with ensuring that appropriate heritage assets are retained, whilst at the same time encouraging those mills deemed of low priority, to be brought forward for meaningful comprehensive development. (Bryn Cooke)

Risks:

There are no specific risks associated with this report (Mark Stenson)

Co-operative agenda

Approving and publishing the Oldham Mills Strategy will support openness ensuring that residents and developers are able to view evidence early on in the plan making process. The Mills Strategy supports an inclusive economy to set a sustainable future for mills and any employment and housing opportunities that they may offer.

Has the relevant Legal Officer confirmed that the recommendations within this report are lawful and comply with

Yes

the Council's Constitution?

Has the relevant Finance Officer confirmed that any expenditure referred to within this report is consistent with the Council's budget? Yes

Are any of the recommendations within this report contrary to the Policy Framework of the Council? No

Reason why this Is a Key Decision (2) to be significant in terms of its effects on communities living or working in an area comprising two or more Wards or electoral divisions in the area of the local authority.

The Key Decision made as a result of this report will be published within **48 hours** and cannot be actioned until **five working days** have elapsed from the publication date of the decision, i.e. before 24 December 2021, unless exempt from call-in.

This item has been included on the Forward Plan under reference HSG-15-21.

There are no background papers for this report

Report Author Sign-off:	Georgina Brownridge
Date:	05.01.2022

Please list any appendices:-

Appendix number or letter	Description
1	Oldham Mills Strategy
2	Oldham Mills Strategy Appendices
3	Mills Strategy Executive Summary
4	Landscape Overview

Background:

Oldham Council and Historic England commissioned ELG Planning to undertake a Mills Strategy to set out which of the 64 undesignated (unlisted) mills are the highest priority in terms of their historic significance with opportunity to be retained and put to a sustainable use and which mills are of lower priority and may offer potential for alternative redevelopment.

Listed Mills, mills that have been converted (or have consent to be) or demolished are not included within the overall strategy.

The Mills Strategy assessed:

- Needs analysis (housing and employment) (section 3)
- Landscape (section 4 summarises this)
- Heritage significance (section 5)
- Housing potential (section 6)
- Employment potential (section 7)

Section 8 categorises individual mills as high, medium or low priority based upon the landscape, heritage and housing / employment assessments.

Section 9 summarises findings of the study and outlines key policy recommendations.

A separate report feeding into the Mills Strategy is a landscape overview providing an overall analysis of the contribution existing mills make to the landscape character of Oldham using a high, medium and low classification. The landscape overview identified 36 'high' landscape value mills, 21 medium landscape value mills and 19 low landscape value mills (the Landscape Overview also assessed listed mills hence the inclusion of 76 mills in total, as opposed to the 64 mills considered within the main report).

Whilst high value mills are important in defining Oldham's landscape character, of greater significance is the grouping or clusters they form in the landscape. Seven mill clusters have been identified that would benefit from conservation to illustrate Oldham's past and protect the most significant feature of Oldham's landscape character.

The mills have been categorised as high, medium and low priority based upon the assessment of their landscape and heritage value, alongside housing and employment potential considerations, in order to inform the formulation of a positive strategy to support the long-term sustainability of the textile mill stock across Oldham.

The mills assessed as having high landscape value and heritage / townscape value are placed within the high priority category with a clear presumption against their loss or demolition. The mills identified as being of medium priority will remain important to retain and re-use, however, there will be a higher degree of flexibility in their alteration / conversion. It is likely that mills within this category will be less sensitive to alteration than those in the high category and therefore more significant interventions may be deemed acceptable, subject to being weighed in the planning balance.

Those mills which are assessed as having comparatively low landscape value and heritage significance have been placed within the low priority category. It is anticipated that there will be greater flexibility in how these mills could be reused or converted and such mills may also have potential for redevelopment. These sites feature mills which have very

little architectural presence, where they have been altered significantly so that their heritage value is decreased and where the mills may be causing harm to the social and environmental value of the local community.

The following policy approach has been recommended for the different mill categories:

Mill Policy:

The non-designated mill stock forms a fundamental part of Oldham’s historic environment and gives the landscape of the Borough a clear distinctive character thereby contributing to local identity and sense of place. Proposals should retain those elements of the mill stock which contribute to the local identity and sense of place of Oldham and ensure they are appropriately conserved in a manner appropriate to their significance. Development proposals affecting non-designated mills will be assessed having regard to the following order of priority:

High Priority Mills	Ace Mill; Bell Mill; Briar Mill; Cairo Mill; Earl Mill; Falcon Mill; Fir Mill; Gorse Mill No.1; Heron Mill; Ivy Mill; Longrange Mill; Majestic Mill; Malta Mill; Marlborough (No.1) Mill; Osborne Mill; Ram Mill; Rasping Mill; Raven Mill; Slackcote Mill; Swan Mill; Warth Mill; Werneth Mill (Henley Street)
Medium Priority Mills	Adelaide Mill; Albert Mill; Austerlands Mill; Belgrave Mill; Delta Mill; Duke Mill; Elm Mill; Fountain Mill; Gatehead Mill; Grape Mill; Greenfield Mills; Haybottoms Mill; Jubilee Mill; Jubilee Mill (Fulling); Knarr Mill; Lilac Mill; Lily Mill; Lumb Mill; Oak View Mills; Pingle Mill; Stockfield Mill; Thornham Mill; Vale Mill (Chamber Road); Vine Mill; Waterside Mill; Wellington Mill
Low Priority Mills	Alliance Mill; Bee Mill; Britannia Mill; Dob Lane End Mill; Forge Mill; Greengate Mill; Kinders Lane Mill; Lane End Mill; Morton Mill; Paradise Mill; Prince of Wales Mill; Springfield Mill; Springfield Works; Vale Mill (Stockfield Road); Werneth Mill (Manchester Road); Woodend Mill

High Priority Mills

The high priority mills make a clear positive contribution to local character and distinctiveness and are identified as non-designated heritage assets. There will be a clear presumption in favour of the retention of the high priority mills and all associated buildings and structures. Proposals which would remove, harm or undermine the significance of a high priority mill or its contribution to local distinctiveness and sense of place will be permitted only where the benefits of the development would outweigh the harm.

Medium Priority Mills

There will be a general presumption in favour of the retention of medium priority mills and associated buildings and structures. The alteration, extension or demolition of any buildings contributing to the landscape or heritage interest will require clear justification in relation to the significance and setting of the asset.

Low Priority Mills

The identified low priority mills are generally considerably altered and make a limited contribution to local distinctiveness and sense of place. Development proposals involving the comprehensive redevelopment of low priority mills will be supported in principle subject to compliance with other policies of the Local Plan.

Mill Clusters

The clustering of particular groups of mills provide a unique character to the local landscape and give Oldham an exceptionally strong sense of place and local distinctiveness. The key mill clusters are as follows:

- Cluster 1 – Elm Mill, Lily Mill, Briar Mill, Lilac Mill and Duke Mill;
- Cluster 2 – Lion Mill, Fir Mill & Thornham Mill;
- Cluster 3 – Majestic Mill, Cairo Mill and Longrange Mill;
- Cluster 4 – Manor Mill, Werneth Mill, Osborne Mill, Anchor Mill, Stockfield Mill and Hartford Works;
- Cluster 5 – Chadderton Mill, Nile Mill, Raven Mill, Ace Mill, Gorse Mill and Ram Mill;
- Cluster 6 – Vale Mill, Devon Mill, Heron Mill, Earl Mill and Bell Mill; and
- Cluster 7 – Ivy Mill, Regent Mill and Marlborough Mill.

There will be a clear presumption in favour of the retention of the mills and all associated buildings and structures contained within the identified Mill Clusters. There will also be a general presumption against development that unacceptably detracts from important views of the identified Mill Clusters by virtue of its height, location, bulk or design.

At this stage this is a recommended policy approach, and it will be for the council to determine through the Local Plan review if this policy is embedded into the Local Plan as recommended or whether any further alternations are needed.

In addition, it is noted that since the commission some mills have since had planning permission for demolition (subject to legal agreement) and redevelopment (Lily and Elm) or have been demolished (Fir / Vernon). The strategy has assessed the mills as they were at the point of commission. The council will need to consider how the policy takes account of these (for example removing Fir Mill from the policy).

The Mills Strategy is a high-level document and some clear caveats have been included to highlight that no two mills are identical, and each mill described within the strategy has unique features by way of location, construction, form etc. Consequently, when valuing and assessing the viability of an individual mill for whatever purpose, it is essential to take into account market conditions prevailing at the date of assessment, location, individual physical characteristics, structural condition, tenure, planning restraints (if any) covenants and all other relevant factors. The appraisals and strategies contained within the Mills Strategy are, therefore, to be taken solely as a guide and each mill should be assessed individually on its own merits and on the market conditions at the time when decisions are

being made about its future. Potential for housing may also be high where it is clear that a redevelopment or partial redevelopment of a site is a more realistic prospect.

Similarly, with employment the Mills Strategy states that it is important to reiterate that this exercise is intended to provide a high-level overview of the economic potential of each mill based upon a limited range of criteria and does not provide a detailed appraisal of the suitability or viability of the conversion of individual mills to alternative or new economic uses.

Regarding mills with a low employment potential score, it is noted that a number of the mills in question provide low-cost employment units for local businesses within established trading estate settings and, as such, are likely to remain in such use over the medium to long term.

The Mill Strategy sets out a number of actions and recommendations for the council to consider going forward. These are set out below.

Priority Level	Summary of Key Actions
High	<ul style="list-style-type: none"> • Identification of high priority mills as non-designated heritage assets. • Imposition of Article 4 Directions to remove permitted development rights for demolition relating to high priority mills. • Planning applications relating to high priority mills to be accompanied by detailed Heritage Statements to provide clear justification for the approach adopted and should also consider how social significance of the mills could be incorporated into the scheme. • Oldham Council to update validation checklist to reflect the need for proposals affecting high priority mills to be accompanied by a Heritage Statement. • Proposals involving the full demolition or partial loss of important mill elements will need to be supported by robust evidence including detailed viability assessments and evidence of marketing to demonstrate the re-use of the mill for alternative uses is not viable. • Building recording to be undertaken in connection with proposals involving the loss of key elements of high priority mill building fabric.
Medium	<ul style="list-style-type: none"> • Supporting text to the future Mill Policy to be incorporated to confirm that medium priority mills could be considered as non-designated heritage assets on a case by case basis as, for example, planning applications come forward for their redevelopment based upon their relative heritage and landscape value. • Imposition of Article 4 Directions to remove permitted development rights for demolition relating to medium priority mills identified as being of high landscape or heritage value or lying within an identified Mill Cluster. • Planning applications relating to medium priority mills to be accompanied by detailed Heritage Statements to provide clear justification for the approach adopted and should also consider how social significance of the mills could be incorporated into the

	<p>scheme.</p> <ul style="list-style-type: none"> • Oldham Council to update validation checklist to reflect the need for proposals affecting medium priority mills to be accompanied by a Heritage Statement. • The alteration, extension or demolition of any buildings contributing to the landscape or heritage interest will require clear justification in relation to the significance and setting of the asset. • Building recording to be undertaken in connection with proposals involving the loss of key elements of medium priority mill building fabric.
Low	<ul style="list-style-type: none"> • Supporting text to the future Mill Policy to confirm that low priority mills could be considered as non-designated heritage assets on a case by case basis as, for example, planning applications come forward for their redevelopment based upon their relative heritage and landscape value. • Development proposals involving the comprehensive redevelopment of low priority mills to be supported in principle subject to compliance with other policies of the Local Plan. • Building recording to be undertaken in connection with proposals involving the loss of key elements of low priority mill building fabric, where deemed appropriate.
General	<ul style="list-style-type: none"> • The LPA need to remain proactive in identifying potential funding streams that remain available to support landowners, developers and other parties seeking to bring forward mill conversion schemes. • Prospective designation of identified mill clusters as Conservation Areas. • Definition of Visual Buffer Zones around the identified mill clusters. • Preparation of View Management Framework to protect key views. • Development of a Mill Streetscape Project to improve the setting of individual mills. • Early engagement with mill owners and other key stakeholders in relation to individual mills that may become partly or fully vacant in the future to develop individual mill-specific strategies to support the active re-use of the building in question, which could involve input from representatives of the Council's Business & Housing Teams, the Local Enterprise Partnership and Historic England. • It is imperative that the LPA recognise the risks associated with bringing residential mill conversion schemes forward, particularly large-scale mill sites, and adopt a progressive and supportive policy framework and decision-making approach to support such proposals. This could include relaxing affordable housing contributions and other planning obligations, which can significantly impact on the delivery of such schemes subject to appropriate viability testing. • A supportive environment should be developed in order to maximise the contribution that suitable mill sites within appropriate and attractive locations can make to supporting

	<p>established and emerging key employment sectors within Oldham through both a positive planning regime and other support mechanisms.</p> <ul style="list-style-type: none">• Development of a marketing strategy collaboratively between bodies including Oldham Council, the Local Enterprise Partnership, mill owners, local business groups and other key stakeholders to promote the existing mill stock for employment and residential use to the development sector. Such a strategy would need to highlight the potential suitability of mill buildings to accommodate such uses, affordable rental / land values and the strategic advantages offered by Oldham relative to the motorway network and the wider Greater Manchester region.• Use of appropriate enforcement powers for any mills which may fall into disrepair.
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Proposals:

To approve and publish the Oldham Mills Strategy (including the Landscape Overview). This will allow the council to use up to date evidence to inform the Local Plan review and publishing this evidence will assist in frontloading consultation and will allow applicants and other people to make use of the strategy.

Conclusions:

To approve and publish the Oldham Mills Strategy (including the Landscape Overview). This will allow the council to use up to date evidence to inform the Local Plan review and publishing this evidence will assist in frontloading consultation and will allow applicants and other people to make use of the strategy.

Signed:  _____

Date: 12 January 2022

Emma Barton, Director of Economy