

Ref: APP/T4210/W/22/3302543

Bury Metropolitan Borough Council Application no 65844.

Mondi/Holcombe Mill, Bridge St, Ramsbottom, Bury BL0 OBS

We are against the appeal proposals. The Ramsbottom Heritage Society **opposes** this application on the grounds of its harmful impact on the Ramsbottom Conservation area.

Submission and Resubmission of 65844, 2020 and 2022

1. Application 65844 was submitted to Bury Council on 14th Aug 2020, and roundly condemned by Conservation Officer Mark Kilby who declared in his comments of 14th Dec 2020:

‘The proposed house types, design and materials would be incongruous to the character of the conservation area and as such would have a negative impact on its character, appearance and setting.’ [CO 2020 comments, Para 2]

The application was withdrawn after objections from the Environment Agency on the grounds of flood risk.

2. The plan was resubmitted, and made minimal accommodation to Mr Kilby’s conservation objections. Nevertheless, Mr Kilby performed a remarkable *volte face* in his belated comments of 17th May 2022 on the revised submission, concluding that:

‘The revised proposed layout, house types, design and materials of the development for the reasons given would be acceptable with regard to views *in and out of the conservation area.*’ [Our italics] [CO 2022 comments, Para 10]

The spokesman for Eccleston Homes naturally seized upon this statement at the meeting of the Planning Committee on 7th June 2022, and there was no discussion about conservation issues.

The Conservation Case

3. It is our contention that the revised proposal of 2022 only negligibly addressed the conservation objections so damningly marshalled by Mr Kilby in 2020. We therefore ask that the appeal should consider the conservation impact of 65844 as well as the issues of flooding and traffic which were the stated grounds of the Planning Committee’s rejection.

We quote Mr Kilby’s original 14th Dec 2020 objections extensively to form the core of our grounds of appeal. We firmly believe that his objections were insufficiently addressed in the resubmission.

4. First, the Conservation Officer in 2020 had dismissed the mixture of styles as ‘incongruous in the setting of the conservation area’:

‘They appear to be off the peg house types and design which can be seen repeated at the applicants’ completed sites at Christy Brow, Hyde, Garrett Manor, Worsley and Moss Lea Park, Bolton.’ [CO 2020 comments, Para 2]

5. He singled out:

'high front facing piked gables, large dormer windows, bays, asymmetrical sided bays and front facing piked gables.' [CO 2020 comments, Para 3]

6. Despite Mr Kilby's uncompromising 2020 rejection of Ecclestone's 'mixture of architectural styles from elements of Arts and Crafts to inter-war 1930s semi-detached', we note that the new Planning Layout confirms, with the exception of the 12 Clitheroe units, the survival of the self-same off the peg designs. Moreover, the original Floor Plans and Elevations documents also reveal many of the features and materials cited by Mr Kilby as out of character, 'incongruous in the setting of the conservation area':

'Arnside' type – front elevation rendered

'Croft' type – bays, three storeys

'Formby' type – bays

'Haigh' type – rendered side bay

'Hartford' type – rendered front extension/wing

'Willaston' – bay window

'Whalley 2' - rendered front extension/wing

These are a poor fit alongside a 19th Century stone-terraced conservation area.

7. Secondly, the Conservation Officer highlighted in 2020 the inappropriate materials, and we welcome what he has to say in his 17th May 2022 comments about the screen of terraced houses:

'The proposed house types would now be constructed from natural stone and the plots within the conservation area to north and west of the site would have smaller terraced houses at plots 1-3 and 9-13.' [Our italics] [CO 2022 comments, Para 5]

This appears to imply that *all* the houses in the application are now to be of natural stone. Is this true?

8. One difficulty we have faced is the apparent absence of a full set of documents relating to the resubmission. Have the public seen all the relevant documents? Mr Kilby states in his *volte face* comments of 17th May 2022 that:

'Revised plans have been submitted for the layout design, size, mass, scale, palette and materials of the proposed house types.' [CO 2022 comments, Para 5]

9. Yet only the Proposed Site Plan of 23rd June 2021 appears on the public website. Is this what he is referring to? There is no Materials Plan to accompany this new Proposed Site Plan, and the 2020 Materials Plan specified the use of 'Cromwell Reconstituted Stone' for the seven catalogue types listed above [Our Para 6]. Is this still applicable? Are we playing with a full deck of cards?

10. Further, apart again from the 12 'Clitheroe' houses at the North and North West fringes of the site, the Floor Elevations drawings of the original submission indicate a widespread use of breeze block/ rendered walls, painted Polar/Arctic White, with grey concrete roofing tiles.

In the local climate, stains soon appear on such painted rendering, which is why rendering is not allowed in conservation areas.

10. Further, apart from the 12 'Clitheroe' houses at the North and North West fringes of the site, the Floor Plans and Elevations of the original submission indicate a widespread use of breeze block rendered walls, painted Polar/Arctic White, with grey concrete tiles. In the local climate, stains soon appear on such painted rendering.

These are inappropriate, as Mr Kilby states in his 14th Dec 2020 comments, 'in the conservation area and in its setting'. [CO 2020 comments, Para 10]

So how can Mr Kilby consider that the 2022 revised plan, with just a screen of a dozen terrace houses, **'has significantly moved away from the original off the peg scheme . . .'** and that it would now **'respect the character of the historic built form of the setting of the conservation area'**? [CO 2022 comments, Para 5]

11. Thirdly, the Conservation Officer emphasised in his 2020 comments the importance of the impact of the development on 'the setting of the conservation area'. He recommended in that:

'The height of the houses should be limited to two-storeys as three storeys and above would have an over dominant visual impact on the setting of the conservation area.'
[CO 2020 comments, Para 3]

. . . adding in his conclusion that this height limit was necessary:

'to match the vernacular construction of the built form and preserve the special character and distinctiveness of the conservation area.' [CO 2020 comments, Para 10]

12. Yet Ecclestone have blithely ignored this request, retaining two **four-storey** apartment blocks, at the southernmost end of the site, in their resubmitted plan!

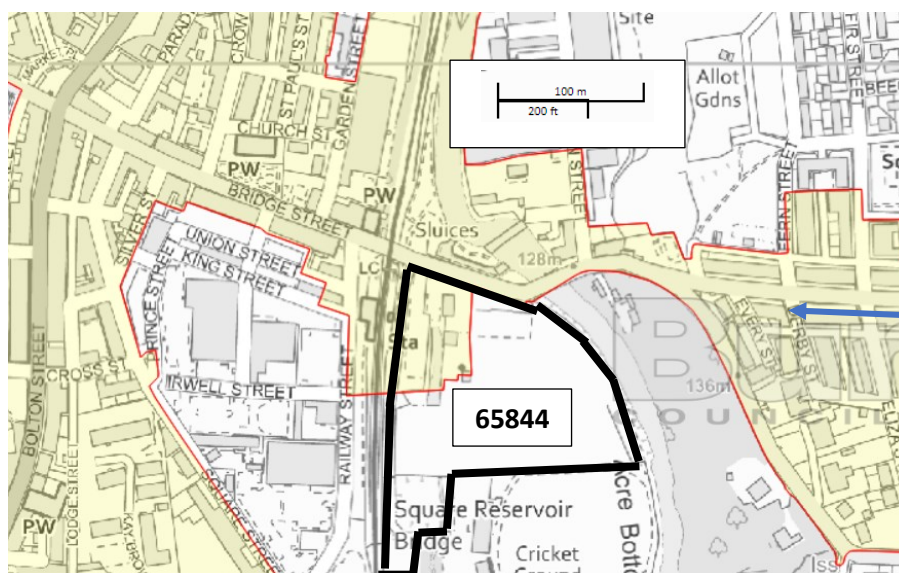


Figure 1 Site 65844 in relation to Ramsbottom town centre

Ramsbottom Conservation Area shaded

13. It is important to recognise that the Ramsbottom Conservation Area straddles, frames and overlooks the 65844 site in a way that is difficult to appreciate without a visit (*Figure 1*). The Mondri Site is in the valley bottom, and clearly visible from most surrounding streets, which

are all elevated, climbing, or paralleling, the valley sides. The site stands at the principal gateway to the town, alongside the main road which connects Ramsbottom with Bury and the motorway. It will therefore be clearly visible from most directions.

14. It is adjacent for 150 meters to the East Lancashire Railway, a heritage steam attraction for around 200,000 visitors a year. The two apartment blocks, each **15 meters long, four-storeys, and 12.3 meters in height** will be within 20 meters of every train as it comes to a stand in Ramsbottom Station, blocking the view eastwards towards the woods, the valley side, and the surrounding moorland. This will be the first sight that these 200,000 visitors get of the town as they arrive by train from Bury.

15. We are pleased that the 100m portion of Bridge Street that fronts the northern edge of the site has been rightly treated as the development's window onto the town, hence the siting of the screen of two terraces of quasi-vernacular houses, eight in all. But Road 1 has the same status, but a full 150m of exposure to a dog's dinner of architectural styles – viz Clitheroe terraces, a Haigh house, an Arnside block, four Delamere semis, two more Arnsides, and bringing up a very puzzling rear the two Soviet-style 4 storey Apartment Blocks.

We remain mystified at Mr Kilby's damascene conversion of 2022 to a conclusion that the revised scheme, which *still* retained these two outsized blocks of flats, and such a vista from the station, was suddenly '**acceptable with regard to views in and out of the conservation area**'! [CO 2022 comments, Para 10]

Relevant Planning Policies, National and Local

16. Mr Kilby quotes in his 14th Dec 2020 comments the *National Planning Policy Framework*, Para 200:

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.' [Our italics]

17. Locally, Bury Council has recognised that the Mondri site is central to Ramsbottom. Any redevelopment there will, in our view as an historical society, constitute the biggest change to the townscape since the construction of the railway in 1846. We entirely agree with Policy 4 of Bury's *Conservation Area Appraisal and Management Plan*, which states:

'The development or redevelopment of land outside but on the boundary of the Conservation Area should be carefully controlled to ensure that its character is enhanced and protected, sites affected include the main site of the Mondri Mill.' [Our italics]

18. We have to say that the minor amendment in the 2022 resubmission of a 'screen' of terraced houses of natural stone does little to pay even lip service to these national and local policies. It appears that behind this superficial cover, Ecclestone propose to erect the same ragbag of 60 houses straight out of their catalogue.

19. Better proposals have been made to build only on the southern part of the site where there is less risk of flooding. Some car parking could then be located by the main road and station.

There is a serious shortage of parking in the town, and the *City Valley Rail Link* plan, to introduce a commuter service on the railway of hourly trains, half hourly at peak times, will make this shortage critical.¹

20. As a heritage society, we are concerned that within a few years the 19th Century street pattern will simply become inaccessible to local people as congestion builds up in a search for a parking space. The character of the town will be lost.

Conclusion

21. As a heritage society **we urge you to reject this appeal** so that a plan can emerge that blends seamlessly and imaginatively with the town centre's existing conservation area.

If there are indeed plans and documents not in the public domain (as considered above, Paras 8 and 9) we request that the application be suspended or decision postponed, subject to the latest and actual facts and figures, drawings, revisions etc being put into the public domain, to be reviewed and comments invited before any final decision is made.

But if the appeal is successful, we believe the following conditions should apply:

- a) All the houses to be built of natural stone
- b) All to be roofed with natural slate
- c) Mr Kilby's stricture to be accepted, viz *none* of the 'new build' is higher than two storeys
- d) A public riverside path be created at the north-eastern edge of the site as far as the cricket club
- e) Building C, the old boiler house, at the base of the Chimney, is part of the original 1859 construction and should be retained and restored.
- f) Rather worryingly, two of the three non-designated assets on the site (viz office blocks A and B) have copious and detailed notes on how their integrity will be safeguarded. The third non-designated asset, however is the Chimney, the only remaining monument still standing of the 20 or more mill chimneys that once graced the town centre. Of this there is suspiciously no mention. We strongly urge that a detailed preservation procedure is produced, agreed and published prior to any decision made for or against this appeal. Inconvenient industrial survivals like this have a habit of being assailed by accidents in this area, inexplicably combusting, or falling down, overnight when there are no witnesses.

¹ See this summary of the scheme.



- g) The 200 year-old goit/tail race, hand-dug along the western edge of the site as part of the water-power arrangements of the nearby Square Mill, should be retained and restored.
- h) Finally, we urge that all the westernmost units fronting onto Road 1 are given the same 'window' status as on Bridge Street, together with the two semi-detached units at the north end of Road 1. These should present a uniformly traditional *natural* stone, two-up-two-down row to blend with the rest of the nearby Conservation Area [see above, Paras 14, 15].

John Ireland

Andrew Todd

pp Ramsbottom Heritage Society

14th December 2022