



**Oldham Mills  
Strategy Final**

**November 2021**

# Oldham Mills Strategy 2021

Project undertaken by:



Project commissioned by:



Historic  
England



**Oldham**  
Council



# CONTENTS

Executive Summary	Page 4
1. Introduction	Page 28
2. Historical Development & Evolution of Mills in Oldham	Page 38
3. Needs Analysis	Page 49
4. Landscape	Page 62
5. Significance & Sense of Place	Page 66
6. Housing Potential	Page 78
7. Employment Potential	Page 115
8. Selection of Priority Sites	Page 124
9. Strategy, Policy Recommendations & Action Plan	Page 132

## APPENDICES (IN SEPARATE VOLUME)

Appendix 1	Heritage Assessment Spreadsheet
Appendix 2	Past Sales Values
Appendix 3	Viability Testing
Appendix 4	Economic Assessment Spreadsheet
Appendix 5	High Priority Site Appraisals
Appendix 6	Medium Priority Site Appraisals
Appendix 7	Low Priority Site Appraisals
Appendix 8	Summary of Key Actions
Appendix 9	Consultation Summary





## Executive Summary



## EXECUTIVE SUMMARY

### Background & Purpose of Study

- i. The Oldham Mills Strategy 2021 has been commissioned by Oldham Council and Historic England in order to develop a positive strategy for the sustainable future of the textile mill stock across Oldham.



*View Across Oldham*

- ii. The mill stock forms a fundamental part of Oldham's historic environment and gives the landscape of Oldham a clear distinctive character. However, without a sustainable use many mills fall into disrepair and are ultimately lost, as has been seen across Oldham in recent years. The majority of the mill stock within Oldham does however remain in good condition and is in active use, particularly those mills within established employment areas providing well-utilised premises for a range of employment generating uses. There are however some notable exceptions where mills have stood vacant for a prolonged period and, as a result, have fallen into disrepair and attracted anti-social behaviour. These mills have become blights on local communities and it is important that these sites are

repurposed in order to secure their long term sustainability and deliver positive outcomes for local communities.



*Thornham Mill*

- iii. The mill sites are overwhelmingly located within highly accessible locations within the main urban area and repurposed mill sites can potentially play an important role in accommodating future housing and employment development needs and minimising the release of Green Belt land. However, many of the mills lie within weaker market areas and viability presents a key challenge in terms of the successful regeneration of such sites, with mill redevelopment projects often requiring assistance to overcome market failures.
- iv. The Oldham Mills Strategy therefore identifies the non-listed mills across Oldham which are of particular landscape and heritage value and sets out a robust strategy to ensure their sustainable future, which considers their potential for future development for residential,

employment and other uses. The Mill Strategy also sets out policy recommendations for the conservation of the mill stock based on levels of priority relative to the landscape and heritage value of individual mills. The strategy also sets out a number of key actions to support the LPA in ensuring the sustainable future of the mill stock.

## Needs Analysis

- v. The Mills Strategy sets out an overview of the identified future housing and employment needs across Oldham in order to help inform the wider strategy in relation to the unlisted mill stock.

## Landscape Overview

- vi. The Landscape Overview prepared by Martin Wooley Landscape Architects as a companion document to the Oldham Mills Strategy highlights the contribution that the mill stock makes in defining the distinctive character of Oldham and demonstrates that its landscape character would be irreversibly changed if particular individual mills or clusters of mills were demolished or significantly altered to the extent that the original mill character is permanently lost. The Landscape Overview identifies that 36 of the mills are of high value to Oldham's landscape character. The boom in the cotton spinning industry in the late-19th and early-20th century coupled with advances in construction techniques led to the construction of a number of large scale mills in close proximity to one another around the main built up area of modern day Oldham. The Landscape Overview identifies that the clustering of groups of mills within these areas provide a unique landscape characteristic and give Oldham an exceptionally strong sense of place.



## Significance & Sense of Place

- vii. The Mills Strategy has also sought to establish the heritage significance of each individual mill based on archaeological interest, historic interest and its architectural / aesthetic interest, as well as the contribution of each mill to the sense of place experienced within that area. It has been established that all the subject mills have some degree of heritage significance and provide some contribution to the story of milling in Oldham. However, 14 of the mills have been considerably altered impacting on their character as a mill and thereby significantly reducing any architectural or historic interest that they may possess and these mills are therefore considered to be of low value in heritage terms. The assessment has identified 16 mills that score highly in terms of both historic and architectural interest, with the remaining 34 mills assessed as being of medium value in terms of heritage.

## Housing Potential

- viii. The repurposing of the existing mill stock has the potential to play a role in the delivery of new housing across the Borough, although it is acknowledged that there may be policy, viability and market challenges associated with the delivery of housing on such sites, particularly as the mills are overwhelmingly located within weaker market areas.

- ix. The Mills Strategy therefore outlines the viability issues that may affect the repurposing of the existing mill buildings to help deliver new homes to meet the Council's housing targets in the period to 2037. The assessment outlines some of the inherent issues generally associated with mill conversion schemes and provides a general overview to identify mills that may be viably converted within Oldham and to identify key factors in the conversion of mill buildings within



*Denshaw Vale Works*

the Borough. The scope of the assessment does not include detailed viability assessments of each individual mill and merely seeks to provide an overview based upon a series of assumptions to identify common themes and potential barriers to redevelopment.

- x. The Mills Strategy seeks to provide a general overview of the housing potential of each mill in relation to its locational and physical characteristics, alongside the viability testing. The analysis identifies that viability is a particular challenge on mill schemes and that there are a number of other factors that may make a mill unsuitable for conversion, including surrounding land uses, existing occupiers etc. The strategy identifies, somewhat unsurprisingly, that there is a clear correlation between the housing potential of the mill and the strength of the market area in which it is located.

- xi. The assessment identifies that viability is a key consideration when assessing any proposals affecting the retention of historic mill buildings. The strategy highlights some examples where successful conversions have been undertaken in spite of challenging market conditions and relatively low sales values, however, there are many others that do not progress due to the inherent risks to the developer. A flexible approach toward the

conversion of mills that are deemed worthy of retention should therefore be encouraged with viability information presented on a case by case basis and based on individual assessments of the main planning considerations where viability may also form part of the decision making process.

- xii. Equally, in the areas which benefit from higher sales values, the fact that a particular mill may have housing potential does not necessarily mean that this is the best use, as many of these sites are in active employment use and are of benefit to the communities in which they are situated as a source of employment.
- xiii. In total, the assessment identified that 31 of the 64 mills that were assessed fell into the low category having regard to the range of criteria assessed, 25 into medium and the remaining 8 were assessed as high in terms of housing potential.
- xiv. It should however be acknowledged that no two mills are identical and each mill described within this report 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 this report 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.



## Employment Potential

- xv. The majority of the subject mill stock is located within designated employment areas or within existing industrial / trading estate locations and is currently in active employment generating use providing accommodation for single tenants (e.g. storage and distribution warehouses) or low cost premises for a number of businesses within an individual mill.



*Swan Mill*

- xvi. There are however inevitably some mill buildings within established employment areas that are underutilised, particularly the upper floors, or which may become vacant in the short term, for example at the end of a lease period or due to business failure, which may become more prevalent as the wider economic impacts of COVID-19 become clearer. It is apparent that the existing mill stock can provide low cost premises within established employment areas that could prove attractive to a number of employment sectors to help meet economic needs over the Plan period and beyond.
- xvii. The Mills Strategy therefore seeks to assess the potential for the individual mills to be utilised for employment use. However, given the limitations of the study, this exercise merely seeks to provide a high level overview of the economic potential of each mill based upon a limited range of criteria relating to heritage, condition, suitability, allocation and strategic location, as detailed within Chapter 7. The exercise is not therefore intended to provide a detailed appraisal of the suitability or viability of the conversion of individual mills

to alternative or new economic uses. On this basis, there are instances where a particular mill scores poorly in terms of economic potential even though it is within a well-established employment use and is likely to remain so in the long term as a consequence of the limited range of criteria assessed for the purposes of this study.

- xviii. The assessment of employment potential follows a similar approach to that adopted for housing and, in total, 12 of the 64 mills that were assessed fell into the low category having regard to the range of criteria assessed. However, 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. However, there are other mills identified within this category, which, although currently in employment use, may be better suited to alternative future use as a result of their physical or locational characteristics.
- xix. A total of 25 of the 64 mills fell into the medium category and, again, many of these mills are in active employment use within established industrial estate / designated employment site settings and have therefore secured a viable use appropriate within their wider land use setting and, as such, the continuation of these established uses will overwhelmingly represent the most sustainable option for these mills going forward. The remaining 27 mills were categorised as high in terms of economic potential. These mills are overwhelmingly located within designated employment areas, including those identified as having greatest potential to accommodate identified priority sectors within Amion's SIF Refresh and have easy access to the strategic road network and local workforce.

## Selection of Priority Sites

- xx. 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.
  
- xxi. 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.
  
- xxii. Those mills which are assessed as having comparatively low landscape value and heritage significance are placed within the low priority category. It is anticipated that there will be greater flexibility in how these mills could be re-used or converted and such mills may also have potential for demolition. 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.
  
- xxiii. The assessment identifies that 22 of the mills are classified as high priority. A further 26 mills are classified as medium, with the remaining 16 mills classified as being low priority.



## Strategy, Policy Recommendations & Action Plan

- xxiv. The Mills Strategy ultimately seeks to advise how a sustainable future for the mill stock could be achieved and individual site appraisals have been prepared for each mill including advice on the potential strategy for the individual mills having regard to the assessment of the housing and employment potential of the mills and other site specific constraints and planning considerations that will impact upon the future use of the mill sites, including the local context and surrounding land uses.

### Residential Opportunities

- xxv. The mills are overwhelmingly located in highly accessible locations within the main urban area and the conversion of existing mills to deliver new housing could therefore help meet identified needs for new housing over the Plan period through the use of previously developed land in line with established policy objectives thereby minimising Green Belt release.
- xxvi. However, having regard to the Council's current housing requirements and adopting the aspirational scenario as set out in Oldham's Local Housing Needs Assessment, the analysis identifies a need for less than 50 flats per annum over the Plan period and, accordingly, it is evident that the conversion of the existing mill stock to flats would make a relatively limited contribution to meeting identified housing needs. The mill stock could however potentially help contribute to meeting the identified need for older person's specialist accommodation through the conversion of existing buildings, particularly where such mills occupy highly accessible locations within stronger market areas.

- xxvii. Moreover, the overwhelming majority of the mills assessed as part of the Mills Strategy lie within allocated employment areas or within established unallocated industrial / trading estate settings and are in well-established employment use. Accordingly, the majority of the mills within such settings are evidently unlikely to be suitable for future residential use. A number of the mills are also located within weaker market areas where capital values are lower and a number of the mills, particularly those that have fallen into a state of disrepair, will be subject to significant costs of adaptation that can make them commercially unappealing to deliver new homes.
- xxviii. The overwhelming majority of the identified sites are in established use, as outlined above, and are therefore unlikely to deliver new housing within the short term (0-5 years). However, the following seven mill sites have been identified as potential deliverable housing sites, although this will need to be subject to further detailed assessment:
- Elm Mill;
  - Lily Mills;
  - Greenfield Mills;
  - Jubilee Mill;
  - Jubilee Mill (Fulling);
  - Prince of Wales Mill; and
  - Thornham Mill
- xxix. There are therefore a limited number of mills that represent suitable sites for housing in the short term (i.e. within five years). However, the Mills Strategy has also identified a number of other mill sites that may be suitable for residential use, primarily in the longer term either through the conversion of the existing building or through partial / full demolition and redevelopment schemes and subject to demonstrating that there is no

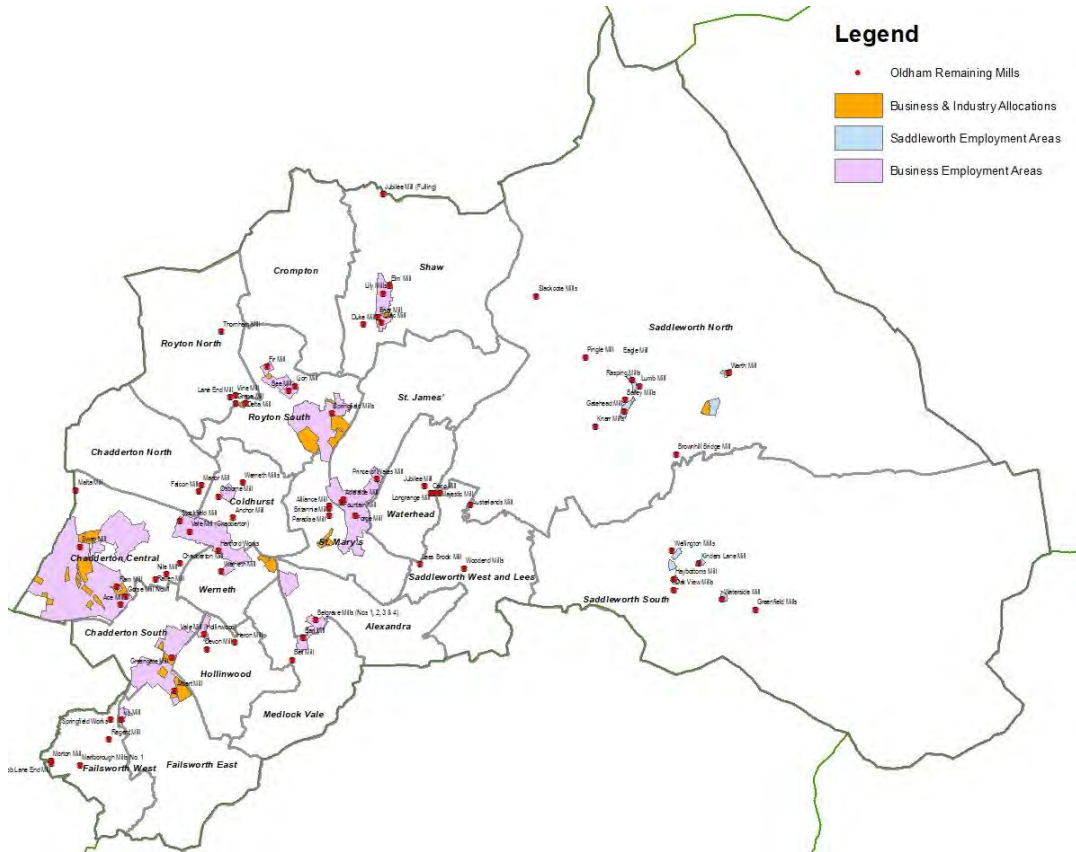
realistic prospect of a continuing employment use and / or existing tenants can be relocated to more appropriate employment sites elsewhere in the Borough to secure wider regeneration benefits through the redevelopment of the site for new housing.

- xxx. The Mills Strategy clearly recognises that there may be policy, market or viability challenges associated with the retention of such buildings for residential conversion and, as such, there may be pressures on individual sites for the demolition of the mill building(s) and the comprehensive redevelopment of the site for new housing. However, this would need to be robustly demonstrated as part of any future proposals involving the loss of such buildings, particularly the identified high and medium priority mills, and that the benefits of the proposed development would outweigh the harm arising from the loss of any original mill elements.
- xxxi. It is also imperative that the LPA recognise the risks associated with bringing such sites 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.

#### Employment Potential

- xxxii. The overwhelming majority of the mills across the Borough are located within existing employment areas and are in well-established employment generating use. These mills have secured an appropriate viable use appropriate within their wider land use setting and, as such, continuation of the existing use will overwhelmingly represent the most sustainable option for those mills going forward. Individual mill buildings / sites could also provide suitable locations to support priority economic sectors within the Borough,

particularly those that are well-related to Manchester and the motorway network within the designated BEAs to the west of the Borough. This could include providing premises and sites for the logistics; manufacturing sub-sectors; digital industries; financial and professional services; as well as the Green Technology Services sector.



*Location of Mills Relative to Designated Employment Areas*

xxxiii. The Mills Strategy therefore recommends that 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 established and emerging key sectors within Oldham through both a positive planning regime and other support mechanisms. This could include the inclusion of mill sites within identified Green Business Districts and providing business rates incentives for the occupation of mills by new and relocating businesses, where appropriate.

- xxxiv. Moreover, a marketing strategy could be developed 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 to accommodate key employment sectors highlighting the potential suitability of mill buildings to accommodate such sectors, competitive rental levels and the strategic advantages offered by Oldham relative to the motorway network.
- xxxv. The Council should also seek to work positively and proactively 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 Team, the Local Enterprise Partnership and Historic England.
- xxxvi. The Mills Strategy also acknowledges that innovative solutions may be required to support the full occupation of individual mills that are currently underutilised, particularly the upper floors of such buildings. This approach could include allowing a broader mix of uses within individual mills, which may not necessarily be fully compliant with established Development Plan policies relating to designated employment areas, such as the provision of residential uses (e.g. flats, older person's accommodation, live / work type units), community or leisure uses in appropriate circumstances where the benefits of securing the active re-use of mill buildings could be seen to outweigh potential conflicts with established Development Plan policies.
- xxxvii. The Mills Strategy acknowledges that, due to the age, scale, format and condition of former mill buildings, it may not be economically viable to secure the repurposing of individual mills to provide modern, fit for purpose employment / commercial floorspace. However, it is



important that this is robustly demonstrated as part of any future proposals involving the loss of such buildings, particularly the identified high and medium priority mills, and that the benefits of the proposed development would outweigh the harm arising from the loss of any original mill elements.

#### Funding Opportunities

- xxxviii. The Mills Strategy highlights that a fundamental issue for the renovation of mills is commercial viability and much of the mill stock within Oldham lies within weaker market areas where capital values are lower and a number of mills, particularly those that have fallen into a state of disrepair, will be subject to significant costs of adaptation that make them commercially unappealing to deliver new uses suited to modern occupiers.
- xxxix. The availability of funding is therefore crucial to the delivery of mill redevelopment schemes, although securing commercial funding can be challenging due to the upfront costs and risk profile of mill conversion schemes, particularly in weaker market areas such as those within Oldham where the majority of the mills are located. The Mills Strategy therefore provides a brief overview of identified funding streams that could potentially be utilised to support the delivery of mill site regeneration schemes, including the Home Building Fund, Levelling Up Fund, Heritage Enterprise, Architectural Heritage Fund, Tax Incremental Funding and Local Authority Funding.

#### Enforcement Action & Associated Measures to Secure Retention of Mill Buildings

- xl. There are notable examples of mills that have stood vacant for a prolonged period and, as a result of inactivity and a lack of general maintenance and upkeep by the landowner, these buildings fall into disrepair and attract anti-social behaviour. These mills have therefore

become blights on local communities and can lead to pressure for the demolition of the buildings, which can ultimately lead to an erosion of local identity and sense of place.

- xli. It is important that early signs of neglect are detected as historic buildings can begin to decline rapidly and become targets for vandalism and the Mill Strategy therefore identifies a number of enforcement measures and other mechanisms to secure the maintenance and retention of mill sites, including S.215 Notices, Community Protection Notices and Article 4 Directions.

#### Policy Recommendations & Summary of Actions

- xlii. The NPPF recognises that heritage assets, which range from sites and buildings of local historic value to those of highest significance (e.g. World Heritage Sites), are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- xliii. Paragraph 190 of the NPPF confirms that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats. 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. The Mill Strategy therefore outlines the following policy recommendation for the conservation of the non-designated mills within the identified high, medium and low levels of priority:

## 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:

<b>High Priority Mills</b>	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)
<b>Medium Priority Mills</b>	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
<b>Low Priority Mills</b>	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.

- xliv. The Mills Strategy also outlines the following summary of key actions in relation to the mill stock:

Priority Level	Summary of Key Actions
<p><b>High</b></p>	<ul style="list-style-type: none"> <li>▪ Identification of high priority mills as non-designated heritage assets.</li> <li>▪ Imposition of Article 4 Directions to remove permitted development rights for demolition relating to high priority mills.</li> <li>▪ 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.</li> <li>▪ Oldham Council to update validation checklist to reflect the need for proposals affecting high priority mills to be accompanied by a Heritage Statement.</li> </ul>



	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Building recording to be undertaken in connection with proposals involving the loss of key elements of high priority mill building fabric.</li> </ul>
<b>Medium</b>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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 scheme.</li> <li>▪ Oldham Council to update validation checklist to reflect the need for proposals affecting medium priority mills to be accompanied by a Heritage Statement.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Building recording to be undertaken in connection with proposals involving the loss of key elements of medium priority mill building fabric.</li> </ul>
<b>Low</b>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ Building recording to be undertaken in connection with proposals involving the loss of key elements of low priority mill building fabric, where deemed appropriate.</li> </ul>
<b>General</b>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Prospective designation of identified mill clusters as Conservation Areas.</li> <li>▪ Definition of Visual Buffer Zones around the identified mill clusters.</li> <li>▪ Preparation of View Management Framework to protect key views.</li> </ul>

- 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 established and emerging key employment sectors within Oldham through both a positive planning regime and other support mechanisms.
- 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

	<p>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.</p> <ul style="list-style-type: none"><li>▪ Use of appropriate enforcement powers for any mills which may fall into disrepair.</li></ul>
--	---



# Chapter 1:

# Introduction





# 1. INTRODUCTION

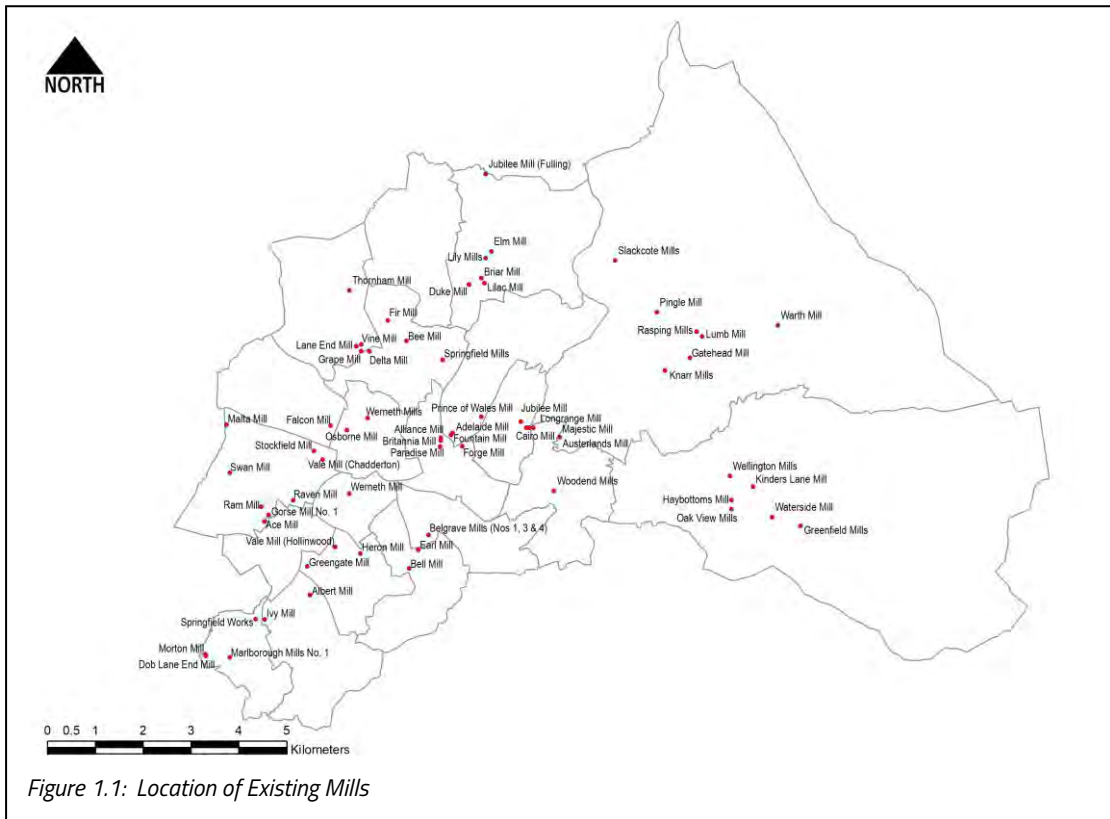
## Background & Purpose of Strategy

- 1.1 ELG Planning have been commissioned by Oldham Council and Historic England to undertake the Oldham Mills Strategy in order to develop a positive strategy for the sustainable future of the textile mill stock across the Borough.
- 1.2 Oldham has a rich industrial heritage and, at the time this study commenced, there were a total of 106 mills across the town. However, of these, 19 non-listed mills have already been converted or have consent for conversion, with a further 9 mills having been demolished or having consent for demolition and 14 are listed, with 3 of the listed mills having already been converted (Shore Mill, Hey Lane Mill & Throstle Nest Mill). The Planning (Listed Buildings and Conservation Areas) Act 1990 recognises that Listed Buildings are of special architectural or historic interest and Local Planning Authorities (LPAs) have a duty to pay special regard to the desirability of preserving a Listed Building, its setting, or any features of special architectural or historic interest which it possesses. In view of the statutory protections in place in relation to Listed Buildings pursuant of the Planning (Listed Buildings and Conservation Areas) Act 1990, the listed mills across Oldham have not been assessed as part of this project.
- 1.3 On this basis, a total of 64 mills have been assessed as part of the Oldham Mills Strategy, as detailed overleaf (Table 1.1).

Table 1.1: Breakdown of Mills

<b>Listed Mills (*Converted Listed Mills)</b>	Anchor Mill	Bailey Mills	Brownhill Bridge Mill
	Chadderton Mill	Devon Mill	Hartford Works
	Lees Brook Mill	Lion Mill	Manor Mill
	Nile Mill	Regent Mill	Shore Mill*
	Hey Lane Mill*	Throstle Nest Mill*	
<b>Converted / Demolished Mills</b>	Hartford Mill	Bell Mill	Harrop Court Mill
	Holden Fold Mills	Maple Mill (No.1)	Ridgefield Mill
	Textile Mill	Windsor Mill	United Mill
	Albion Mill	Alexandra Mill	Bank Mill
	Buckley New Mill	Denshaw Vale Works	Diggle Mill
	Eagle Mill	Lydgate Mill	Royal George Mills
	Spring Meadow Works	Spring Mill	Stone Bottom Mill
	Tame Water Mill	Tunstead Clough Mill	Victoria Mill
	Walk Mill	Wall Hill Mill	Wright Mill
	Victoria Mills		
	<b>Remaining Mills</b>	Ace Mill (Gorse Mill No.2)	Adelaide Mill
Alliance Mill		Austerlands Mill	Bee Mill
Belgrave Mill		Bell Mill (Claremont St)	Briar Mill
Britannia Mill		Cairo Mill	Delta Mill
Dob Lane End Mill		Duke Mill	Earl Mill
Elm Mill (Newby Mill)		Falcon Mill (Weaving Shed)	Fir Mill (Vernon Works)
Forge Mill (Hope Mill)		Fountain Mill	Gatehead Mill
Gorse Mill		Grape Mill	Greenfield Mills
Greengate Mills		Haybottoms Mill	Heron Mill
Ivy Mill		Jubilee Mill	Jubilee (Fulling) Mill
Kinders Lane Mill		Knarr Mill	Lane End Mill
Lilac Mill		Lily Mills	Longrange Mill (Orme Mill)

	Lumb Mill	Majestic Mill (Lower Mill)	Malta Mill
	Marlborough Mill (No.1)	Morton Mill	Oak View Mills
	Osborne Mill	Paradise Mill	Pingle Mill
	Prince of Wales Mill	Ram Mill	Rasping Mills (Valley Mill)
	Raven Mill	Slackcote Mills	Springfield Mills
	Springfield Works	Stockfield Mill	Swan Mill
	Thornham Mill	Vale Mill (Chamber Mill)	Vale Mill
	Vine Mill	Warth Mill	Waterside Mill
	Wellington Mills	Werneth Mill	Werneth Mills
	Woodend Mill		



1.4 The mills form a unique part of Oldham’s landscape and, with the topography of the town, are important when considering views and vistas from higher grounds. It is likely that many

local people associate the mills with the identity of the town, either in a positive way or a negative way. The mills are the foundations of Oldham's heritage and culture and this is reflected by artist's impressions and poems about Oldham and its mills. However, despite being responsible for the growth of Oldham, some mills are likely to attract negative connotations where they fall into disrepair, become vacant or attract anti-social behaviour. Communities are likely to feel the loss of the industrial past, the impact of high unemployment and the adverse effect of vacant or declining sites. Such sites can detract investment and discourage new development.

- 1.5 However, the majority of the mills across Oldham remain in good condition and are in active use, particularly those mills within established employment areas providing well-utilised premises for a range of employment generating uses. There are however some notable exceptions where mills have stood vacant for a prolonged period and, as a result, have fallen into disrepair and attracted anti-social behaviour. These mills have become blights on local communities and it is therefore important that these sites are repurposed in order to secure their long term sustainability and deliver positive outcomes for local communities.
- 1.6 The population of Oldham has grown by around 7.8% since 2001 and a further 8.2% increase is forecast in the period to 2037. The housing requirement for the Borough is a minimum of 693 homes per year utilising the government's standard methodology for calculating local housing need. Places for Everyone (Pfe), formerly '*Greater Manchester's Plan for Homes, Jobs and the Environment – the Greater Manchester Spatial Framework*' (GMSF), proposes a stepped housing requirement for Oldham of 352 homes per year for 2021 to 2025, 680 homes per year for 2025 to 2030 and 868 homes per year for 2030 to 2037. This equates to an average of 680 homes per year or 10,884 homes in total over the plan period (2021-2037). The identified housing need represents a significant increase over the requirement of 289 homes per annum set out within the adopted Local Plan and the Borough's

topography and tight Green Belt boundary represent key challenges to the delivery of the required level of new housing in the period to 2037. A large proportion of the mills lie within the urban area and therefore offer a potential opportunity to deliver new housing through the redevelopment of previously developed land in accessible locations in line with the aims and objectives of the National Planning Policy Framework (NPPF).

- 1.7 There are a range of allocated Business Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) across the Borough to provide for a broad and diverse range of employment generating uses, which will help meet the needs of a changing local economy and provide opportunities for investment for new businesses and existing firms. There are a number of other established industrial / trading estates across the Borough which are not formally allocated for employment use within the adopted Development Plan but which provide low cost employment premises for a range of types of business.
- 1.8 The recent Strategic Investment Framework (SIF) Refresh has assessed the Borough's designated BEAs and SEAs to see how they could accommodate key employment sectors. The sectors identified as being key for Oldham were construction; health and social care; digital industries; business and professional services; manufacturing sub sectors; and logistics. The work concluded that some of the Borough's BEAs and SEAs may not be attractive to any priority sector and some may be attractive to one or two of the sectors. However, the Foxdenton, Hollinwood and Greengate / Broadgate BEAs were singled out for having the greatest potential to attract and accommodate priority sectors. The overwhelming majority of the mills lie within established employment areas and therefore have the potential to meet future employment needs.
- 1.9 Historic England and YouGov have previously canvassed the public for their opinions on the importance of mills and found that 90% of adults in England believe that historic mills are



an important part of the country's heritage, story and character and 85% do not want to see historic mills demolished and replaced. The Oldham Mills Strategy is seeking to develop a positive strategy for the textile mills across the Borough. The project will be underpinned by a robust assessment of the landscape and heritage / townscape value of the individual mills, as well as viability considerations which will be fundamental to the long term sustainability of the mills, to establish which are no longer fit for purpose, which should remain and how the Oldham Council can ensure their sustainable future through an action plan.

- 1.10 The mills are an important resource, however, they need to be managed to ensure a sustainable future in making the best use of the mills going forward. There are pressures for housing growth and for ensuring there is an appropriate, modern and fit for purpose employment land supply across Oldham. The NPPF (Paragraph 120) encourages the re-use of brownfield land and underused buildings and so the mill sites may have potential to accommodate some of this growth, as well as playing an important role to meet employment needs or other uses.
- 1.11 Essentially, the Mills Strategy will identify the non-listed mills which are of particular landscape and heritage value and will set out a robust strategy to ensure their sustainable future, which will consider their potential for future development for residential, employment or other uses.
- 1.12 This outcome will serve several other purposes around economic, social and environmental objectives:
- **Regeneration** – having a clear strategy on mills will help to identify regeneration priorities with regards to Oldham's industrial heritage and help focus Oldham's

identity and vision. It will identify which mills should be retained and which should form part of an action plan to ensure they are conserved and enhanced through their conversion and reuse. It will help clarify which mills are not of significance and could become available as alternative sites for development as opportunities arise.

- **Housing** – a positive strategy for mills will contribute towards meeting Oldham’s Local Housing Need. Mills that form part of the action plan may be converted for housing, contributing towards making efficient use of brownfield land. In addition, unlisted mills that are identified as not being of significance may be able to be cleared for housing, where opportunities arise. The mills strategy will help give certainty to developers.
- **Jobs** – implementation of the strategy will help to provide jobs from construction / conversion related activity to the end use of the mills where employment is secured. Many mills are already in established employment use and often mills have an important role in providing low cost premises for certain employment uses. There could also be opportunities for refurbishing the mills for modern day and fit for purpose employment use. In addition, heritage led regeneration leads to increased spending in the wider area and therefore secondary jobs could result from the enhancement of mills.
- **Funding opportunities** – the action plan will look at available funding opportunities which could be explored to help with the costs and viability of securing a sustainable future for mills.
- **Evidence Base** – the Mills Strategy will form part of the evidence base on heritage and employment land to support the Local Plan and planning applications. It could also be used as part of a wider heritage strategy if this was considered in the future.
- **Landscape** – an important part of the Mills Strategy specific to Oldham, given its topography and Oldham’s Town Centre position on a hill is to understand the landscape contribution of mills and the role they play in important views and vistas

which give Oldham its unique identity and local distinctiveness. The Mills Strategy seeks to identify individual mills and / or clusters that make a highly significant landscape contribution to the character of Oldham and which should be protected and enhanced.

- **Environment** – the effective use of land and buildings helps to minimise the need for development on greenfield land, including the release of Green Belt and Other Protected Open Land (OPOL). It makes environmental sense - reducing the amount of minerals needed for redevelopment through re-use of materials and local fabric which helps reinforce local identity.

## Structure of Strategy

- 1.13 The Mills Strategy is structured as follows:
- 1.14 Section 2 provides a history of the growth in textile mills in Oldham and how this reached its zenith in 1926, followed by a period of decline. This section also considers the architectural character and form of the textile mills and how this was influenced by the advancements in machinery following the industrial revolution.
- 1.15 Section 3 provides a brief overview of the future development needs of the local area over the development plan period.
- 1.16 Section 4 provides an executive summary of the Landscape Overview prepared by Martin Woolley Landscape Architects, which forms a companion report to the wider Mills Strategy.
- 1.17 Section 5 provides an assessment of the significance of each mill based on the archaeological interest, historic interest (which may be illustrative or associative) and its

architectural / aesthetic interest. It also identifies the contribution of each mill to the sense of place experienced within that area.

- 1.18 Section 6 undertakes an assessment of the housing potential of the mill stock.
- 1.19 Section 7 provides an overview of the employment potential of the mill stock.
- 1.20 Section 8 categorises the individual mills as high, medium or low priority based upon the landscape, heritage and housing / employment potential assessments.
- 1.21 Section 9 summarises the findings of the study and outlines key policy recommendations, strategies and action plans.







## **Chapter 2:**

# **Historical Development & Evolution of Mills in Oldham**

## 2. HISTORICAL DEVELOPMENT & EVOLUTION OF MILLS IN OLDHAM

### Introduction

- 2.1 The north-west of England is renowned for its undulating topography with fast flowing rivers and tributaries. The prevailing winds from the west and the south, combined with high annual rainfall and high humidity made the north-west the ideal place for textile manufacture, serving the mills and enabling the finishing of the fabric. Textile mills have been central features of industrial landscapes in northern and western England for over two centuries and, consequently, mills are now perhaps the most characteristic type of historic building in many northern towns, dominating the landscape and urban conurbations. Textile manufacture has been carried out in Lancashire for hundreds of years, however, its development as a commercial industry of any scale is a comparatively recent event during the late 19th and early 20th centuries.
- 2.2 Initially, the production of woollen and linen goods formed the focus of the early Lancashire textile industry with later fustian and silk manufacture, but it was cotton which was to have the most profound impact on the economy, social structure and architecture of the region.



From the late 17th century onwards, the production of woollen goods began to dwindle in Lancashire, and from the mid-18th century, this was largely confined to the eastern part of the county, including the Saddleworth area of Oldham. This period saw the emergence of specialised loomshops which successfully housed small scale production of woollen materials and operated successfully up until the mid-19th century.

- 2.3 In the middle of the 18th century, south-east Lancashire was predominantly an agricultural area of isolated settlements and market towns with, at its centre, the growing town of Manchester. Cloth manufacture had long been an important industry here, but by 1780 there was a considerable demand for textiles, particularly cotton, which led to a marked increase in mill building to meet such demand. The loomshops of the woollen mill enterprise were largely superseded following the adoption of the automated power loom within 19th century textile factories, but on a much more limited scale than cotton, for which there was considerably greater demand.
- 2.4 The technological advancements relating to the development and powering of textile machinery also provided the correct conditions for the dramatic expansion of the cotton industry. The Lancashire coalfields could supply cheap sources of fuel contributing to an ideal set of conditions, materials and transport within this area.
- 2.5 The canal system of water transport played a vital role in the industrial revolution at a time when the road network was not able to transport mass goods from place to place. The UK developed a nationwide canal network, which was instrumental to the success of early textile mills in the north-west, transporting coal to the mills and goods to the port at Liverpool which was completed in 1776. The port and canal system linked Greater Manchester to international trade routes and the sources of raw cotton, which sustained the industry in Oldham.





*Swan Mill*

- 2.6 When steam power became more prevalent in mill operation than waterpower, the local coal reserves of the north were called upon to power the great steam engines which were both impressive feats of engineering and pivotal to the expansion and progress of industry. Mills were able to locate away from the water source of rivers and canals to be fed by purpose-built reservoirs used for water storage.
- 2.7 The Lancashire cotton trade relied heavily upon the slave plantations of the United States during the 19th century, however, following the American Civil War, additional sources of cotton were developed, notably from Egypt and India. Different sources of cotton had different characteristics, some fine and some coarse, which led to different mills spinning different types of yarns and from as early as the 1790s mills were specialising in certain types of yarn with the fineness of yarn referred to as the 'count'. Both Manchester and Bolton specialised in finer yarns, whilst Oldham became known for its coarser production.

- 2.8 Oldham was to become the main centre of cotton spinning in Lancashire and the leading mill town of the world during the two great booms of 1873-5 and 1904-8. The area attracted considerable numbers of migrant workers who sought well paid work during a time of high demand. Oldham has a high level of people of South Asian heritage, particularly those with roots in Pakistan and Bangladesh.
- 2.9 Due to the town's prevalence as an industrial centre and thus a hub for employment, Oldham attracted migrant workers throughout its history including those from elsewhere in England, as well as Scotland, Ireland and parts of Poland. The second boom period of the early 20th century saw the construction of 42 mills in the Oldham district and by the 1920s Oldham had built three times as many mills as neighbouring Bolton but in the service of a fundamentally different industry, concentrating on the courser yarn production. The cotton spinning industry of Oldham had become of national, and potentially of worldwide significance, producing a considerable proportion of the world's cotton. During the mid-20th century there was an attempt to fill the shortfall of workers and revitalise local industries with encouragement of Commonwealth workers from the Caribbean and Indian subcontinent.
- 2.10 Unfortunately, after 1920 Lancashire entered a prolonged depression which was largely unexpected as a precursor of the world economic depression of 1929-32. The year 1926 proved to be a climactic one in the economic history of Lancashire. The last cotton mills were completed in this year in Lancashire, including Elk Mill at Royton and the Holden at Astley Bridge, north of Bolton. This was a year of severe trade depression, accentuated by a major coal dispute and by the general strike. Profits sank and limited companies suffered.
- 2.11 After such a long and prosperous trade, due to the monopoly Oldham held over the world's production of textiles, the steady dismantling of the industry was shifting to the United

States where productive capacity was expanding rapidly. The UK became a net importer of cotton manufactures from 1960, then of textiles in general from 1970 and finally textile machinery from 1984. India subsequently surpassed the US in spindleage in 1972 followed by China in 1977.

## **Architecture & Form of Mills in Oldham**

- 2.12 The architecture and form of mill buildings was influenced by the landscape in which they were located; the type of textile production; the type of machinery used in processing; the internal arrangement of the manufacturing process; and the date at which they were built. Woollen mills are generally located to the east of Oldham in the Saddleworth area, nestled within the valley and served by the River Tame and its tributaries. These are traditionally water powered and many have now been converted to other uses, particularly residential. The larger cotton mills were located in the central and western parts of the district, where initially the canal system was a key source of water power and transportation, but where the larger, flatter areas of land allowed for the construction of much larger mills with the siting of large reservoirs to provide for water storage to drive the later steam powered engines.
- 2.13 By the late 19th century, many of the cotton mills followed a similar form of layout. Machinery was continually improving and subsequently influencing the process and layout / adaptation of mill buildings. Spinning mills for example were usually multi-storey buildings containing several groups of machines in the various elements of textile production. There were three main stages of production - opening, carding and spinning, with each carried out in different parts of the mill. In the 18th century the first stages were undertaken by hand, often in separate buildings, however, after the mid-1790s this became mechanised and took place within the mill itself. Improvements in mill building /

arrangement took place over time in response to improvements in process, some of which created a greater amount of dust from the speed at which the cotton was processed. This led, for example, to the incorporation of a fireproof blowing room with ventilation to extract the cotton dust. The mills were continually evolving and adapting to the new machinery and improving the speed of production, driven of course by the financial incentives of the mill owners and the demand for textiles world wide. The type of machinery and function influenced a mill's external form and internal organisation and, as machines changed in size and complexity, mill architecture developed in response.



*Raven Mill*

- 2.14 Another important influence on mill structures was the development of new methods of construction. The use of steel and concrete in mill building enabled much larger structures to be built and allowed for economies of scale in operating costs, which was, of course, along with demand for materials, the main driver in cotton manufacturing. Steel also improved the fireproofing of mills, which was a major advancement in architectural technology. Despite their construction for economy of scale and a desire for wealth, many textile mills are a distinctive and clearly identifiable class of building. Their architectural



character is attributed to the craftsmen responsible for the construction, the owners, some of which took the opportunity to express their wealth and status through architecture, and to the architects themselves who developed a specialisms in the design of mill buildings. However, mill building was of course largely driven by cost and output.

- 2.15 Oldham's contribution to the technique of mill building began with the Sun Mill in 1860, which was double the width of the new model of mills of the 1830s. The average size of the new mills rose dramatically in the 1870s, 1880s and 1890s. The width of new mills increased by 1905 to fivefold the width of the original Arkwright type mill. In 1884 Oldham had the largest ring mill in the world in the Nile Mill. Ring spinning is a method of spinning fibres to the make the yarn. The ring frame developed from the throstle frame, which in its turn was a descendant of Arkwright's water frame. Ring spinning is a continuous process, unlike mule spinning which uses an intermittent action. Ring frames were smaller and heavier than mules and required more power, so ring-spinning mills tended to be narrower and of fewer storeys compared to their mule equivalents.



*Nile Mill*

2.16 The advancements in construction techniques allowed for larger structures including fireproofing measures, improved cast iron floor beams and concrete floors. Plain brick was generally used, although to the east of the district, due to the geology, the building material primarily used is stone. The most widely used ornamentation was the pilaster with a stone cornice, usually applied to the main corners of the mill and in some cases also used within the ancillary buildings, providing a degree of unity amongst the buildings. Front elevations often had stone parapets. Main entrances were marked with gate piers and tall surrounding walls. Windows in the earlier 19th century mills are smaller and regularly placed, whereas later mills made maximum use of available daylight with much larger windows and a lesser window to wall ratio. Greater ornamentation was reserved for those mills where the owners or architects wanted to show off their building or demonstrate their wealth. Whilst generally following a neo-classical theme, the elaborations were often unique to the freedoms of scale which the mills provided. Features such as double pilasters, stone mouldings, dentilled cornices and round headed windows emphasise the most architecturally important parts of the mills.

2.17 External boiler houses became prevalent by the middle of the 19th century and in many cases provide a very distinctive element of the mill complex, often the most architecturally ornamented. Engine Houses were often a show piece to demonstrate the significance of the latest feats of engineering so pivotal to the process of the cotton mill. At this time, most mills were constructed close to water courses or canals and it was not until later in the 19th century that reservoirs became a key feature and source of water storage for more dispersed mill sites. Chimneys gradually developed from the attached or internal types to

tapered free standing types of octagonal cross section, often receiving a similar level of embellishment to the engine houses. A key feature of mill recognition is the presence of the name of the mill either to the top of the parapet, tower or chimney. The names stand proud above surrounding development and make their position clearly identifiable in a sea of surrounding similar structures.



*Example of Mill Name Standing Proud Above Surrounding Development*

- 2.18 Other associated buildings included weaving sheds, which began to appear in the early to mid-19th century to accommodate the power loom. Large amounts of natural light were required for weaving and the heavy loom machinery caused vibrations which were better accommodated in single storey extensions rather than risk structural issues with the main mill. Weaving sheds were land intensive and added considerably to construction costs. They were purely utilitarian and often lacked any architectural embellishment, however, in terms of the historical development of mill buildings and complexes, they have considerable historical interest, contributing to the significance of the whole.

## **The Current Situation & Scope of the Project**

- 2.19 Oldham has a considerable number of mill buildings and structures which are remnants of the largely lost age of textile manufacture in the district. Many have been lost, as evidenced within the Landscape Overview, but many remain and their future is often uncertain. By their scale, such buildings can be difficult and costly to maintain and, in most cases, their historic setting has been considerably compromised by clearance and insensitive development within their context.



- 2.20 By nature of their size, many of the mills lend themselves to use as storage and distribution facilities or factories for other purposes. This intensity of use often causes conflicts with neighbouring residential uses, resulting in high volumes of heavy traffic, associated noise, odour and activity.
- 2.21 The Mills Strategy considers the textile mill stock and seeks to provide an overview of landscape value, heritage interest, sense of place and potential for conversion to residential and employment uses. The aim of the study is to establish which mills should be retained within a high priority category, which should be retained but with a greater degree of flexibility, and which could be lost to redevelopment. This study is an overview based primarily on the landscape and visual characteristics / experience of place and does not consider the full significance of each site, as this is beyond the scope of the study. Further exploration in relation to significance and viability will need to be undertaken on a case by case basis as part of subsequent planning applications.







## **Chapter 3:**

# **Needs Analysis**

### 3. NEEDS ANALYSIS

3.1 In developing the overall Oldham Mills Strategy, it is important to have an appreciation of the future development needs of the local area over the Plan period. This needs analysis will feed into the formulation of action plans and strategies for the individual mills (Section 9) to identify the potential contribution that the stock of mills across the administrative area can make to meeting development needs over the Plan period through mill clearance and redevelopment or through the conversion of existing buildings.

#### Housing

3.2 The population of Oldham has grown by around 7.8% since 2001<sup>2</sup> and a further 8.2% increase is forecast in the period to 2037<sup>3</sup>. The National Planning Policy Framework (NPPF) confirms strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The housing requirement for the Borough is a minimum of 693 homes per year utilising the government's standard methodology for calculating local housing need. Places for Everyone (Pfe), formerly 'Greater Manchester's Plan for Homes, Jobs and the Environment – the Greater Manchester Spatial Framework' (GMSF), proposes a stepped housing requirement for Oldham of 352 homes per year for 2021 to 2025, 680 homes per year for 2025 to 2030 and 868 homes per year for 2030 to 2037. This equates to an average of 680 homes per year or 10,884 homes in total over the plan period (2021-2037).

3.3 The Oldham Housing Strategy (2019) identifies that the Borough has a number of housing challenges and has been affected by the poor performance of the local economy. The

<sup>2</sup> Office for National Statistics (June 2019) *2018 mid-year population estimates*: 2001 population = 218,537; 2018 population = 235,623

<sup>3</sup> Office for National Statistic *2018 based sub-national population projections*: 2019 population = 237,112; 2037 population = 256,537

income levels within the Borough are 6% lower than across Greater Manchester as a whole and also 12% lower than the national average. Oldham has a high proportion of properties in lower Council Tax bands and lower home ownership levels compared to both Greater Manchester and nationally. This is attributable to persistent outward migration of more economically active groups and buy-to-let purchases, particularly in the urban area. In particular, there is predicted to be a 7% fall in the number of people living in Oldham aged 20-29 between 2016 and 2026.

- 3.4 The Housing Strategy also identifies that Oldham has the highest proportion of pre-1919 terraced properties in Greater Manchester, which are primarily concentrated within East and West Oldham. These are the parts of the Borough that show the greatest levels of disadvantage and deprivation and the high proportion of terraced properties within these areas is directly linked to the large concentration of mills that developed within these areas in the late-19th and early 20th centuries. The Housing Strategy highlights that levels of overcrowding are high and are a legacy of a historic low supply of new larger family accommodation, with the terraced housing supply absorbing a large proportion of household growth.
- 3.5 The identified housing need represents a significant increase over the requirement of 289 homes per annum set out within the adopted Local Plan and the Borough's topography and tight Green Belt boundary represent key challenges to the delivery of the required level of new housing in the period to 2037. A large proportion of the mills lie within the urban area and therefore offer a potential opportunity to deliver new housing through the redevelopment of previously developed land in accessible locations in line with the aims and objectives of the NPPF. A key aim of the Mills Strategy is therefore to investigate what contribution the existing mill stock can make to the delivery of new housing either through conversion or site clearance and redevelopment.

### Type & Size of New Dwellings

- 3.6 A range of house types will need to be delivered across the Plan period in order to meet the needs of different types of households, including single people, couples, families with children and older people. The Oldham Local Housing Needs Assessment (March 2019) considers the dwelling type and size mix which is appropriate for Oldham over the Plan period informed by household projections and data exploring the relationship between households and dwellings derived from the 2018 Household Survey.
- 3.7 The Local Housing Needs Assessment indicates that there will be a 12.1% increase in the number of households across the Borough in the period to 2037. The assessment outlines the type and size of dwellings that will be required across this period based on a range of scenarios (demographic baseline; aspiration and expectation scenarios) and the table below summarises the outcome of the dwelling type / mix scenario analysis:

Table 3.1: Dwelling Type / Size Requirements to 2037

Dwelling Type / Size	Scenario		
	Demographic Baseline (%)	Aspiration (%)	Expectation (%)
1/2 Bedroom House	15.7	3.4	8.2
3 Bedroom House	35.9	26.7	33.3
4+ Bedroom	10.3	20.3	15.2
1 Bedroom Flat	12.5	0.9	0.6
2 / 3 Bedroom Flat	3.7	4.8	6.3
1 Bedroom Bungalow	4.3	5.9	3.8
2 Bedroom Bungalow	12.7	17.7	11.4
3+ Bedroom Bungalow	4.1	15.2	13.3
Other	0.8	5.1	8.1

Dwelling Type / Size	Scenario		
	Demographic Baseline (%)	Aspiration (%)	Expectation (%)
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Dwelling Type	Demographic Baseline (%)	Aspiration (%)	Expectation (%)
House	61.9	50.4	56.7
Flat	16.2	5.7	6.8
Bungalow	21.1	38.8	28.4
Other	0.7	5.1	8.1
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Number of Bedrooms	Demographic Baseline (%)	Aspiration (%)	Expectation (%)
1	17.2	9.8	8.9
2	31.9	27.4	28.2
3	40.6	42.5	47.6
4	10.3	20.3	15.2
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

3.8 The analysis contained within the Local Housing Needs Assessment concludes that there is a particular need for three and four or more bedroom houses, as well as an increasing proportion of bungalows over the Plan period. However, under the aspiration and expectation scenarios, there is also a marked increase in the need for older persons' specialist accommodation. Having regard to the Council's current housing requirements and adopting the aspirational scenario, the analysis identifies the following dwelling type / mix per annum:

Table 3.2: Dwelling Mix



Dwelling Type / Size	No. of Dwellings	
	Standard Methodology (692 Dwellings per Annum)	Draft Places for Everyone (680 Dwellings per Annum)
1 / 2 Bedroom House	24	23
3 Bedroom House	185	182
4+ Bedroom House	141	138
1 Bedroom Flat	6	6
2 / 3 Bedroom Flat	33	33
1 Bedroom Bungalow	41	40
2 Bedroom Bungalow	123	120
3+ Bedroom Bungalow	105	103
Other	35	35

### Affordable Housing

- 3.9 The Oldham Housing Strategy acknowledges that Oldham's housing is relatively affordable compared with other parts of the North West and nationally. The affordability of housing, subject to providing the right '*housing offer*' and '*place offer*' is therefore identified as a potential opportunity for the Borough in terms of potentially attracting economically active young professionals and families considering settling in Oldham and could also help address the current out-migration of some of these households.
- 3.10 The Household Survey that underpins the Local Housing Needs Assessment found that there are around 19,953 households who live in an affordable (social rented or immediate tenure) property across the Borough, accounting for 21.5% of all occupied dwellings. Of these, 19,400 live in accommodation rented from a housing association and 553 live in intermediate tenure properties, mainly shared ownership. The survey identified that flats / apartments and maisonettes account for 47% of occupied affordable accommodation, 38%

are houses, 14.6% are bungalows and 0.5% of other types of housing. In terms of size, affordable dwellings across Oldham typically have one-bedroom / bedsit (40%), two bedrooms (36%) or three bedrooms (21%), with a further 3% having four or more bedrooms.

- 3.11 The Local Housing Needs Assessment also explores the relative cost of alternative housing options across the Borough and individual districts, which includes affordable and market rent options, open market purchase prices and intermediate tenure options. The analysis indicates that for open market housing at Borough level, the minimum income required is £21,648 (for lower quartile or entry level renting) or £21,600 (for lower quartile or entry-level house prices). The assessment also outlines the relative affordability of alternative tenures at the Borough level, setting out the income and deposit required for different options set against prevailing lower quartile and median earnings. This indicates that only social renting and help to buy is affordable for lower quartile earners. For median income earners, a broader range of tenure options are available including open market renting, lower quartile purchase and a range of intermediate tenure options.
- 3.12 The Local Housing Needs Assessment identifies that there are 10,173 households in affordable housing need across the Borough, which represents 11% of all households. The proportion of households in need is highest in West Oldham (16.2%), East Oldham (14.4%) and Chadderton (13.9%), with the lowest proportions in Shaw and Crompton (5.4%).
- 3.13 The modelling within the Local Housing Needs Assessment suggests that there is an annual net imbalance of 203 affordable dwellings across the Borough and, in terms of the size of affordable housing required, the overall shortfalls are 25.3% one-bedroom, 40.5% two-bedroom, 26.9% three-bedroom and 7.3% four or more bedroom. In order to consider an appropriate affordable housing tenure split, the Local Housing Needs Assessment considers national policy, past trends in delivery and relative affordability of alternative

tenure options. The assessment recommends that the affordable tenure split for the Borough is around 50% social / affordable rented and 50% intermediate tenure.

### Housing for Older People

- 3.14 NPPG confirms that *'the health and lifestyles of older people will differ greatly, as will their housing needs. Strategic policy-making authorities will need to determine in relation to their plan period the needs of people who will be approaching or reaching retirement as well as older people now.'* It continues *'Strategic policy-making authorities will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. Supporting independent living can help to reduce the costs to health and social services and providing more options for older people to move could also free up houses that are under occupied.'*
- 3.15 A major strategic challenge for the Council is to ensure that a range of appropriate housing provision, adaptation and support for the Borough's older population. The number of people across the Borough aged 65 or over is projected to increase from 37,800 in 2018 to 51,300 by 2037.
- 3.16 The Household Survey data that underpins the Local Housing Needs Assessment identifies that approximately 44% of older people live in three or four bedroom houses, 21% in bungalows, 18.7% in smaller houses and 15.1% in flats. The Local Housing Needs Assessment identifies however that there are strong aspirations and expectations towards smaller dwellings (primarily bungalows or level access accommodation) and 'other' property types, including specialist provision.

- 3.17 The needs assessment indicates that the majority of older persons (69.3%) want to continue to live in their current home with support when needed, including assistance with repair / maintenance, gardening, cleaning and other practical tasks. However, the Household Survey also indicates a need to deliver a range of smaller dwellings for older people in the general market and specialist older housing provision. There are currently around 4,718 units of specialist older persons' accommodation including 1,640 units of residential care (C2) units. 65.1% of this provision is provided by a registered provider and 34.9% by a private organisation. The Local Housing Needs Assessment estimates that an additional 1,604 units of specialist older person (C3) and 855 units of residential care (C2) will be required across the Plan period to 2037.

## Employment Needs

- 3.18 The textile mill stock is fundamental to the history and growth of the Borough given the key role it played in the industrial revolution. A number of mills across the Borough continue to provide low cost premises for certain employment uses and provide opportunities to provide modern day and fit for purpose employment premises through refurbishment or redevelopment. The existing mill stock can therefore clearly make a contribution to established economic sectors across Oldham, as well as future requirements in terms of new business start-ups capitalising on agglomeration benefits of wider Greater Manchester sector growth.
- 3.19 The Oldham Local Economic Assessment 2019 (LEA) recognises that Oldham traditionally had a weak skills base as a legacy of generations of manual employment, meaning that Oldham residents have found it disproportionately difficult to enter new growth sectors over recent years. This has made it difficult for Oldham to attract the inward investment it is looking for to improve its own economic base and act as a labour market for the rest of

Greater Manchester. The employment rate across Oldham (66.7%) is the lowest in Greater Manchester and is also lower than the national average (75.2%), with the gap having widened from previous years. The Borough is also a net exporter of labour with a total of 36,340 people commuting out of the Borough each day compared with 29,137 commuting in.

- 3.20 The LEA also identifies that Oldham's Annual Population Survey (APS) Unemployment Rate (4.8%) has consistently been above the Greater Manchester (4.6%) and English averages (4.3%) and have halved since 2013. The Borough also has a large economically inactive population with high rates of long term illness / disability. Median household income in Oldham (£25,000) is lower than across Greater Manchester (£27,198) and Great Britain (£29,869) and Oldham continues to have lower median wages than across Greater Manchester and Great Britain as a whole. This is likely a reflection on the industry mix within Oldham and the relative skill levels of the local workforce.
- 3.21 The LEA highlights that Oldham has the third lowest percentage of pupils leaving school in Greater Manchester with 5 GCSEs. While adult skills in Oldham have improved in recent times, Oldham still has both a higher proportion of residents with no qualifications and fewer residents holding degree level qualifications compared to Greater Manchester, North West and national averages. The LEA identifies that the forecast growth sectors in Greater Manchester are going to be found both in the high skilled occupations and low skilled occupations. It is therefore imperative for Oldham to comprehensively improve its skills base, allowing residents the opportunities to access more skilled and therefore more lucrative new jobs.
- 3.22 The LEA also indicates that Oldham has continued to undergo economic restructuring in recent years but has yet to capitalise on agglomeration benefits from Greater Manchester's

growth. The LEA suggests that movement to a high wage, high growth economy requires the successful continuation of the Invest in Oldham programme, along with a commitment from the Greater Manchester Combined Authority to review and prioritise investment sites and business infrastructure in northern Greater Manchester.

- 3.23 The LEA identifies that, as part of the restructuring of the economy, the largest growth has been in the education, motor trades, public administration and transport / warehousing sectors, which represents growth in low skilled employment sectors. Employment within the retail and manufacturing sectors has decreased, with health representing Oldham's largest employment sector. High value and growth sectors are under-represented within the Borough and the public sector retrenchment has been a particular challenge, although the local labour market is responding with mild growth in private sector jobs. Employment growth is forecast at 7.9% over the next 20 years (0.37% annually) and Oldham's employment forecasts highlight that the construction, business services and health sectors will see significant growth, whilst manufacturing and jobs within the public sector will continue to decrease.
- 3.24 The LEA identifies that Oldham has a total of 7,295 businesses (an increase of 1,000 since 2015), employing 90,000 people, which is an increase of 9,000 new jobs since 2015. Whilst most businesses across Oldham are small to medium enterprises (SMEs), there are higher proportions of microbusinesses than elsewhere, which is offset by a decline in small businesses. The LEA also identifies that nearly 30% of all jobs across the Borough are provided by a few large employers. Business start-up rates across the Borough are increasing, although remain below the Greater Manchester and national averages and levels of self-employment remain low, which may be attributable to low levels of entrepreneurialism.



- 3.25 The LEA confirms that Oldham's economy generated £4.1 billion during 2018, providing around 6.3% of the total GVA generated across Greater Manchester. GVA per head is the fifth lowest within the region and the LEA suggests that productivity in the Borough needs to be a focus for the next phase.
- 3.26 The first Oldham Strategic Investment Framework (SIF) was published in 2016 to set out the Council's economic and investment ambitions, vision and objectives over a four year period. In 2019, Amion reviewed the priority economic sectors for Oldham and assessed the Borough's designated Business and Employment Areas and Saddleworth Employment Areas (BEAs and SEAs) as part of a SIF Refresh to see how they could accommodate the identified sectors. The sectors identified as being key for Oldham were:
- Construction;
  - Health and Social Care;
  - Digital Industries;
  - Business and Professional Services;
  - Manufacturing sub sectors; and
  - Logistics
- 3.27 The work concluded that some of the Borough's BEAs and SEAs may not be attractive to any priority sector and some may be attractive to one or two of the sectors. However, three of the BEAs were singled out for having the greatest potential to attract and accommodate priority sectors. They were:

- Foxdenton;
- Hollinwood; and
- Greengate / Broadgate

3.28 The adjacent map shows the mills lying within the BEAs identified as having the greatest potential to accommodate priority sectors.

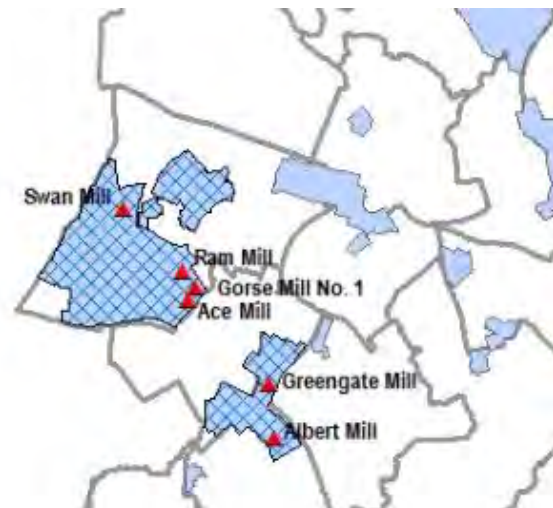


Figure 3.1: Mills within Priority Sector BEAs



## **Chapter 4:**

## **Landscape**

## 4. LANDSCAPE

- 4.1 The Landscape Overview prepared by Martin Woolley Landscape Architects (MWLA) is a separate companion report to the Oldham Mills Strategy. It sets out the landscape context and assesses the value and contribution that the textile mills make in defining the distinctive character of Oldham.



*View Across Oldham*

- 4.2 The overview broadly follows the spirit of the Guidelines for Landscape and Visual Impact Assessment – Third Edition (GLVIA3) and uses GIS mapping to show the location and distribution of the remaining mills compared to those present in 1907, and goes on to describe the Oldham landscape character through reference to geology and landform; national and local landscape character areas and their relative sensitivity; designated Conservation Areas and the extent of existing Green Belt.
- 4.3 The overview studies the contribution existing mills make to Oldham’s landscape character by considering the effects on physical character, quality of the landscape, and the change to views if an existing mill, or group of mills, were no longer present in the landscape. ‘Reverse montage’ techniques show how different views of existing mills could irreversibly



change Oldham's landscape character if a particular mill or group of mills were demolished or significantly altered to the extent that the original mill character is permanently lost.



Figure 4.1: Reverse Montage (Regent Mill)

- 4.4 The landscape value assigned to each mill is objectively assessed and includes a degree of subjective professional judgement. The assessment takes account of overall scale and form, the presence of mill chimneys and water towers; the extent and rhythm of windows, building fenestration, colour and texture; and the proximity to Conservation Areas and the Green Belt. The nature of views from public viewpoints is assessed and considers the extent and degree of inter-visibility between mills, the significance of groups of mills, and their overall importance in contributing to the distinctive landscape character of Oldham.
- 4.5 The report findings show there are 14 Listed mills in Oldham, 10 occurring in areas of 'Low' landscape sensitivity; 21 converted mills predominantly in 'Moderate-High' and 'High'

areas of landscape sensitivity; and 8 mills have been recently demolished in predominantly 'Low' landscape sensitivity areas. Of the mills assessed, 36 are considered to be of 'High' value to Oldham's landscape character, with 21 mills of 'Medium' value, and 19 mills of 'Low' value<sup>4</sup>.

- 4.6 The Landscape Overview concludes that many of the mills occur in clusters that provide a unique landscape characteristic and give Oldham an exceptionally strong sense of place. The mill clusters are considered to be of potentially national significance, since they represent the pinnacle of the UK cotton spinning industry and should be regarded as perhaps a valuable asset for this and future generations marking Oldham's place in history and potentially worthy of designation as Conservation Areas.



---

<sup>4</sup> 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





## Chapter 5:

# Significance & Sense of Place

## 5. SIGNIFICANCE & SENSE OF PLACE

### Methodology for Assessment

5.1 Significance is defined in the NPPF (Annex 2) as *'the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'* Sense of place has been defined as *'the contribution of the mill to the character of the area.'* The sense of place created by historic mills, their associated buildings, the rows of surrounding terraced housing and the landmark features of tall chimneys and towers contribute to views in and around the mill setting. The overall contribution to the landscape is considerable and elements of this former relationship contribute to the current sense of place experienced in the setting of mill structures. The Mills Strategy aims to establish the significance of each mill based on the:

- Archaeological Interest;
- Historic Interest (which may be illustrative or associative); and
- Architectural / Aesthetic Interest.

5.2 It also identifies the contribution of each mill to the sense of place experienced within that area. Sense of place takes account of:

- The Setting of the Heritage Asset;
- The Experience of the Asset; and
- The Communal Value Attributed to it.

- 5.3 Scores have been assigned to each criterion ranging from -5 to +5 to ensure consistency of approach throughout the report.

#### Archaeological Interest

- 5.4 The Buildings at Risk (BAR) survey (GMAAS, 2016) attributed a high, medium, or low score to each mill in relation to archaeological potential. Further comment was made within the BAR survey in relation to presence of power system features within the site. This Mills Strategy uses the high, medium and low categorisation from the BAR survey, however, the overall heritage value score does not include archaeological potential as this study focuses upon the visual contribution mills have to the landscape and sense of place in Oldham. When included within the scoring matrix, the archaeological potential element skewed the figures in an adverse way which was not reflective of the contribution to landscape.

#### Historical Interest

- 5.5 Each of the mills has a degree of historical interest as they all relate to a period in history which contributed to the story and evolution of the textile industry in Oldham and scores range from -5 for those mills assessed as being of negligible beneficial historic interest up to 5 for those of outstanding beneficial interest.

<b>Historical Interest</b>	<b>Negligible beneficial</b> - of little interest with no associative or notable illustrative value.	-5
	<b>Minor beneficial</b> - some illustrative and / or associative value.	-2.5
	<b>Moderate beneficial</b> - greater illustrative and / or associative value.	0

	<b>Substantial beneficial</b> - higher illustrative and / or associative value.	2.5
	<b>Outstanding beneficial</b> - unique illustrative and / or associative value.	5

### Architectural Interest

- 5.6 Each of the mills has a degree of architectural interest as they have commonality between them. A minus score is only applied when the original purpose of the building has been obscured or entirely disguised in so far that the mill is no longer recognisable as an historic mill structure.

<b>Architectural Interest</b>	<b>Substantial adverse</b> – planning permission for demolition.	-5 to -4
	<b>Moderate adverse</b> - low height and completely altered / unrecognisable as a mill structure (e.g. entirely clad in modern materials).	-3
	<b>Minor adverse</b> – low height and much altered with limited recognisable features.	-2
	<b>Negligible adverse</b> – Of little architectural interest or slightly altered which lowers its visual interest as a heritage building.	-1
	<b>Neutral</b> - of no architectural presence and / or much altered.	0
	<b>Negligible beneficial</b> - of little architectural presence, disjointed arrangement.	1
	<b>Minor beneficial</b> - of some architectural presence with simple detailing.	2
	<b>Moderate beneficial</b> - of greater architectural presence may have extant chimney and/or engine house and detailing of interest.	3

	<b>Substantial beneficial</b> - of higher architectural presence with extant chimney and engine house, architectural detailing of greater interest.	4
	<b>Outstanding beneficial</b> - of outstanding architectural presence and interest with full height chimney and extant original layout.	5

### Setting

- 5.7 The setting of each mill is impacted by surrounding development or activity. The setting can vary from green agricultural surroundings, village locations, purpose built terraced housing or commercial and industrial activity. Despite changes in setting, the original context is often discernible, however, an unchanged setting could be highly valued. The scoring for setting has been determined on the level of survival and relationship with its historic context.

<b>Setting</b>	<b>Considerable adverse</b> – No buildings present on site. Redeveloped site with no historic context or setting.	-5
	<b>Substantial adverse</b> - High adverse effect of surrounding development eradicating any experience of setting.	-4
	<b>Moderate adverse</b> – Greater adverse effect of surrounding buildings on setting of heritage asset or on wider area.	-3
	<b>Minor adverse</b> - adverse effect of surrounding buildings on setting of heritage asset or on wider area.	-2
	<b>Negligible adverse</b> – Having a slight adverse effect on the setting of the heritage asset or wider area.	-1
	<b>Neutral</b> - surrounded by other buildings and/or activity or barely perceptible as a mill building.	0

	<b>Negligible beneficial</b> - little relationship with surrounding structures / features; lack of prominence. Any group value is diminished by other factors.	1
	<b>Minor beneficial</b> - Some relationship with surrounding structures and/or associated housing; lack of prominence; poor condition; adverse effects; may have group value but diminished by other factors.	2
	<b>Moderate beneficial</b> - greater relationship with surrounding structures / associated housing; raised position; visual integrity; chimney; may have group value but diminished by other factors.	3
	<b>Substantial beneficial</b> - higher relationship with surrounding structures / associated housing; adjacent to watercourse / canal and / or group value with other structures / mills.	4
	<b>Outstanding beneficial</b> - unique example of landscape / visual and historic relationship; unaltered original setting.	5

### Experience

- 5.8 Sense of place includes how people experience their locality, whether buildings are subsumed within surrounding developments and have no impact on an individual's experience, or whether they are active and well used sites which are of key character to the locality, such as a mill beside the footpath of the canal. Group value is a key component of experience and the collective character contributes to sense of place. The criteria for assessment of sense of place has been developed through consultation with key stakeholders and the scores are a result of assessment on site by ELG Heritage as opposed to the local community.



<b>Experience</b>	<b>Considerable adverse</b> – Demolished site.	-5
	<b>Substantial adverse</b> - High adverse effect of surrounding development eradicating any experience or sense of place.	-4
	<b>Moderate adverse</b> – Greater adverse effect of surroundings buildings on experience of or sense of place.	-3
	<b>Minor adverse</b> - adverse effect on experience of locality.	-2
	<b>Negligible adverse</b> – Having slight adverse effect on experience of area. Building may be subsumed within surrounding development with no positive experience of note.	-1
	<b>Neutral</b> – Surrounded by other buildings or activity/barely perceptible within the experience of the area.	0
	<b>Negligible beneficial</b> – Little impact on the experience of place. May be on the edge of built form; under used; declining condition. Not key to experience of area.	1
	<b>Minor beneficial</b> – Has some contribution to a positive experience of place. May be in active use, some positive experience of note.	2
	<b>Moderate beneficial</b> – Contributes a greater amount to the experience of place. May be active, well used and maintained; key to character of locality; intervisibility/group value without other sites.	3
	<b>Substantial beneficial</b> – Higher level of contribution to experience of place. May be active, well used and maintained; key to character of locality; group value; canal path/waterside accessible experience; characteristic of local vernacular.	4
<b>Outstanding beneficial</b> - considerable positive experience of particular value.	5	

### Communal Value

- 5.9 Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. A positive value is attributed where the site contributes to the setting of the surrounding area visually and where there is a benefit from it being within active use, providing employment opportunities or services to the local area or an experience of place. Where a site was in use until relatively recently there may also be a positive association with that building as a source of employment / active part of the area. A negative value is provided where the presence of the building is having an adverse effect on community experience of the asset. For example, the building may be unoccupied, falling into a state of disrepair, and / or attracting anti-social behaviour. Its decline may also be symbolic of a low-income area, contributing to further erosion of value attributed to the site by the local community. It may also be the case that the building is simply hidden within the landscape, where there is little communal experience or interaction. The communal values are assumptions based on the research, knowledge and experience of the surveyor.

<b>Communal Value</b>	<b>Considerable adverse</b> – planning permission for demolition/demolished.	-5
	<b>Substantial adverse</b> - High adverse effect on communal values.	-4
	<b>Moderate adverse</b> – Greater adverse effect on communal values.	-3
	<b>Minor adverse</b> – adverse effect on communal values.	-2
	<b>Negligible adverse</b> – Slight adverse condition. Negative communal values.	-1
	<b>Neutral</b> – no communal value.	0

	<b>Negligible beneficial</b> – little/limited associations with former use but limited/unlikely.	1
	<b>Minor beneficial</b> – some associations with former use. Element of group value.	2
	<b>Moderate beneficial</b> – greater associations with former use. Visual relationship with terraced housing. In active/positive use.	3
	<b>Substantial beneficial</b> – higher level of association/contribution to community/shopping/leisure (e.g. canal side)/key local employer. Positive experience.	4
	<b>Outstanding beneficial</b> – considerable positive communal value.	5

## Summary of Key Findings

- 5.10 The assessment of the individual mills in terms of their heritage value and contribution to sense of place is contained at Appendix 1 and it has been established that all mills in Oldham have a degree of heritage value. This means that there are a limited number of minus scores attributed to the mills for this part of the study, as most have some degree of significance and provide some contribution to the wider story of milling in the District.
- 5.11 Sense of place scores are determined through a combination of assessment based on setting, experience and communal value. The significance score takes into account the historical and architectural interests of the mill site. The sense of place score takes into account the setting, experience and communal interest of the mill site. The heritage significance and sense of place score is then averaged to produce the overall heritage score of high, medium or low. A score of above 2.0 defines high heritage value. Scores between 0 and 2.0 result in medium heritage value; and a score lower than 0.0 equals low heritage value.

### High Value

- 5.12 The mills in this category scored highly in terms of both historic and architectural interest. All of these mills have a good relationship with the surrounding / associated buildings or terraced housing nearby and feature a tower and / or chimney / engine house and generally have some degree of architectural embellishment, setting them apart from the many other mills which do not retain or display quite the same level of special interest. Equally, those located adjacent to the canals score highly in terms of sense of place and tend to be of architectural interest too, again, setting them apart from others in terms of connection to the historic landscape and contribution to the wider sense of place. Mills scoring high for significance and sense of place are:

<b>High Value Mills</b>	Adelaide Mill; Bell Mill (Claremont Street); Cairo Mill; Earl Mill; Falcon Mill (Weaving Shed); Gorse Mill; Heron Mill; Ivy Mill; Longrange Mill; Malta Mill; Majestic Mill; Marlborough Mill (No. 1); Rasping Mill; Raven Mill; Swan Mill; Werneth Mill (Henley Street).
-------------------------	---

### Medium Value

- 5.13 There are a greater number of mills which fall into the medium categorisation. These mills may have a relatively high score for significance, but a low sense of place score, resulting in a lower overall score. Equally they may have a group value with other similar surrounding mills contributing to a high sense of place, however, the significance may be more average in value. Mills in the medium category are:

<b>Medium Value Mills</b>	Ace Mill; Albert Mills; Austerlands Mill; Belgrave Mill; Briar Mill; Delta Mill; Duke Mill; Elm Mill; Fir Mill; Fountain Mill; Gatehead Mill; Grape Mill; Greenfield Mills; Haybottoms Mill; Jubilee Mill; Jubilee (Fulling) Mill; Kinders Lane Mill; Knarr Mill; Lilac Mill; Lily Mills; Lumb Mill; Oak View Mills; Osborne Mill; Pingle Mill; Prince of Wales Mill; Ram Mill; Slackcote Mills; Stockfield Mill; Thornham Mill; Vale Mill (Chamber Road); Vine Mill; Warth Mill; Waterside Mill; Wellington Mills.
---------------------------	---

### Low Value

- 5.14 Mills within the low category are generally considerably altered and their settings have been considerably altered too. Bee Mill for example has been lowered substantially in height and had a modern metal profile roof placed on top, which has altered its character as a mill reducing its historical and architectural interest. Dob Lane End Mill is a single storey structure which has been entirely clad in metal sheeting, eradicating its interpretation as a former historic mill structure. Mills in the low category for significance and sense of place are:

<b>Low Value Mills</b>	Alliance Mill; Bee Mill; Britannia Mill; Dob Lane End Mill; Forge Mill; Greengate Mill; Lane End Mill; Morton Mill; Paradise Mill; Springfield Mills; Springfield Works; Vale Mill (Stockfield Road); Werneth Mill (Manchester Road); and Woodend Mill.
------------------------	---

## Final Summary

- 5.15 There are 14 listed mills which have not been assessed as part of the Mill Strategy as their heritage value has been determined by their designation as a heritage asset. They have not been subject of further assessment as the future management of these assets will be achieved in accordance with the requirements of the NPPF, local planning policy and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 5.16 Unlisted buildings with a score of above 2.0 are considered to have high significance, as well as high sense of place attributes, which warrant inclusion within the high category. A total of 16 subject mills are included within the high category; 34 within medium and the 14 assessed mills are placed within the low category.
- 5.17 Inclusion within the high, medium or low categories for heritage does not automatically assume an overall categorisation as such within the wider study. This study also considers the landscape value of each mill, as well as their housing and economic potential. The overall categorisation of the individual mills following consideration of each assessment criteria is contained within Section 8 of the report.





## Chapter 6:

# Housing Potential



## 6. HOUSING POTENTIAL

### Introduction

6.1 The repurposing of the existing textile mill stock across Oldham has the potential to play an important role in the delivery of new homes and jobs across the Borough and in helping to minimise Green Belt release. However, many of the mills are located within weaker market areas where capital values are lower and a number of the mills, particularly those that have fallen into a state of disrepair, will be subject to significant costs of adaptation that can make them commercially unappealing to deliver new homes and employment floorspace.

6.2 In order to formulate a strategy to secure the sustainable future of the existing mill stock, it is crucial to understand the viability issues that may affect the repurposing of the existing mill buildings to help deliver new homes to meet the Council's housing targets in the period to 2037. The report has focused on the delivery of new housing through the conversion or, where appropriate, redevelopment of mill sites, however, there are a number of mills that are in an existing employment

use and are situated within designated employment areas. Many of these mills are not

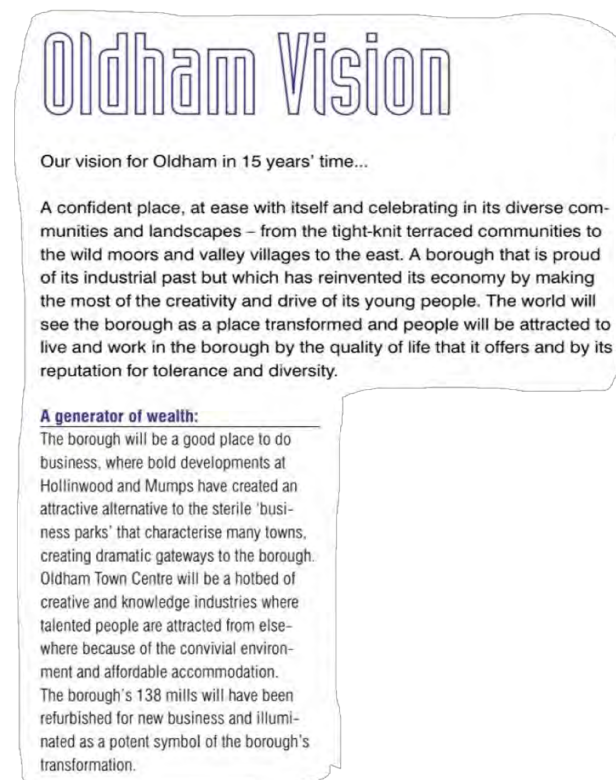


Figure 6.1: 'Oldham Beyond' Report Extract

suitable for conversion to residential use for this reason. The fact that a number of the mills are in employment use is perhaps not a surprise given the nature of the buildings and the Vision set out in the '*Oldham Beyond*' Report by URBED, Comedia, S333, King Sturge and WSP (April 2004), which envisaged that by 2019 '*the Borough's 138 mills will have been refurbished for new business and illuminated as a potent symbol of the Borough's transformation.*'

- 6.3 This assessment of viability is intended as a general overview to identify mills that might be viably converted and to identify key factors in the conversion of mill buildings within Oldham. An individual viability appraisal has not been undertaken with respect to each mill, rather the methodology, which is explained later in the report, creates an overview based on a series of assumptions and looks for common themes to help to identify barriers to redevelopment. The work includes a review of a number of mills that have since been converted or demolished in recent years to help inform the overall conclusions. In relation to viability, each proposal will need to be judged on its own merits when planning applications are submitted.
- 6.4 Much of this section of the report refers to mills within certain viability areas (VA's). The reasoning behind establishing these areas is explained later, but these areas are representative of the sales values that are likely to be achieved within each of the respective wards based on background information that has been provided and are not site specific.



## Inherent Problems with Mill Conversions

### Background

- 6.5 Prior to moving onto the assessment, there are some inherent problems with the conversion of historic mills, that ought to be acknowledged first. The majority of the larger textile mills across Oldham are situated in more deprived urban areas where sales values are weaker. This, coupled with the relatively high cost of conversions alongside a number of other factors, makes the viability of the conversion of mills marginal on many sites. Some of the key factors are considered in more detail below.

### Low Gross to Net Ratio

- 6.6 Many conversions, due to the large footplate of the mills themselves, would require the creation of a central atrium within the building to provide outlook, circulation space and daylight into units. In addition, due to the fact that many mills have limited curtilage, ground floor areas often need to be given over to parking areas for cars, bikes and communal areas. As a result, the gross to net ratio (i.e. the amount of sellable space) is reduced compared to a use that can maximise the whole floorplate. The adjacent image illustrates a conversion in Preston showing



*Conversion Scheme in Preston*

the large atrium that has been cut into the original mill to accommodate the residential development.

#### Condition

- 6.7 Many mills have experienced years of decline, which generally means that already high conversion costs are increased as a result of the poor condition of the buildings themselves.

#### Land Ownership

- 6.8 Some of the feedback from developer stakeholder meetings, as well as other anecdotal evidence, suggests that many landowners are not adopting a land value of the mills based on an existing use value plus a modest premium, as one would normally expect. This has meant that, while there may be a viable conversion scheme on paper, the landowner aspirations on land value have led to a scheme that cannot ultimately be delivered.
- 6.9 A further concern highlighted from those with experience of mill conversions is that some landowners seem unwilling to invest in the buildings, preferring instead to let them fall into a state of disrepair so that sites can ultimately be redeveloped. In this respect, a mill strategy has a key role to play in making sure that landowners are well aware of the Council's intentions with respect to whether they will seek to retain the buildings and use the necessary measures to force through repairs and maintenance of the buildings.

#### Heritage Challenges

- 6.10 Some mills are listed or are deemed non-designated heritage assets. It is acknowledged that this can bring benefits in terms of a heritage premium on sales values, however, there

are often increased conversion costs if, for example, windows need to match an original material or if internal columns need to remain exposed. There is also a requirement to renovate many areas of the mills that aren't themselves directly generating revenue to the developer. As a result, the build cost for historic mills is generally higher and the risks are generally greater.

#### Building Regulations / Guarantee Requirements

- 6.11 Bringing mill buildings up to modern standards is often made difficult by existing floors and wall specifications, which cause issues for achieving thermal values, fire separation and sound levels between residential properties. All these measures have an inflationary effect on build costs.

#### Developer Risk

- 6.12 Mill conversions have higher risk profiles than standard residential development. Build costs are less certain and, given the nature of the product (primarily apartments), they are generally more difficult to sell and, in larger mills, involve a very high level of investment. This is the reason why many developers would be looking for a pre-sale if they were going to take on a mill conversion. The risk profile could prove a major deterrent if the units need to be sold on the open market and this could take many years. Due to the nature of the mills, it is not possible to look at a phased development in many cases so the risk can be further increased to the developer.



### Buildings Viewed in Isolation

- 6.13 Many mill buildings have become isolated from their surrounding area and original curtilage has been lost. This can cause difficulties for conversion, as many developers will look to change the desirability of a wider area to boost sales values. This is possible on large scale redevelopments but not possible for some isolated mills. Limited curtilage also causes practical issues during construction and in terms of the delivery of amenities to residents.

### Impact of COVID-19

- 6.14 The global pandemic will undoubtedly have an impact on attitude towards risk. To date, the Government have done a good job of supporting the housing market and demand appears to be relatively good in the general housing market. However, the impact may well last a significant period and ultimately have a substantial impact on not just housing but also the labour market and the way the employment market evolves in the future. There may, of course, be opportunities as a result of these changes, but the attitude towards risk is most likely to result in fewer conversion schemes being privately funded.

## **Physical Constraints V's Housing Potential**

### Introduction

- 6.15 In line with the brief, the first part of the appraisals looks at the physical characteristics of each of the mills and assesses these characteristics against the housing potential of those mills to establish their scope to be repurposed to deliver new homes from a commercial viability perspective. The initial appraisal looks at the mills in terms of their ability to be converted, although it is acknowledged that, in circumstances where the mills perform

poorly in relation to heritage and landscape quality, then it may be preferable to seek a comprehensive redevelopment of those buildings. The housing potential assesses the locational characteristics of the sites in terms of their suitability for a residential use.

- 6.16 The assessment of physical characteristics and constraints includes an assessment of the heritage significance of each of the mills, along with their condition and any other relevant planning constraints. These are outlined in greater detail within the individual site appraisals of each mill (Appendices 5, 6 & 7). Each element of the identified physical characteristics is scored from -5 to +5. With respect to the physical constraints, landscape significance is not deemed to constrain the ability for the mill to be converted, although, again, it will influence the recommendations of the wider study.
- 6.17 To ensure consistency across all of the assessments in this report, we have given values in relation to each of the respective inputs, which are explained in more detail below. An average (physical constraints) rating of each of the mills is then set against the economic or housing potential of each mill and is represented in graphical form. This gives a broad overview of the potential for conversion into housing and starts to identify some key factors which determine the viability for conversion or otherwise.
- 6.18 All mills have been assessed, including those demolished (or with consent to demolish) and those which are already converted in order to benchmark the findings of the appraisal against what has happened in practice. Generally speaking, those mills scoring the highest on the blended score of the x and y axis will be the most viable.
- 6.19 We acknowledge that this type of assessment does not recognise the heritage premium that might be expected to be achieved through the redevelopment of a listed mill or a mill with higher heritage value. The results of the findings in viability are therefore focused on

non-listed mills, as those which are listed are afforded greater protection by virtue of local and national planning policy.

- 6.20 A blended score is arrived at by adding together the two axes with any mills scoring over and including +2 going into the higher group, with scores of 2 down to 0 being in the medium group, and any mills scoring less than 0 going into the lower group.

<b>Overall Categorisation</b>	<b>Categorisation Score Thresholds</b>
Low	< 0
Medium	0 – 2.0
High	>2.0

## Physical Characteristics (x-axis)

### Heritage Significance

- 6.21 Heritage significance has been graded as a potential challenge, as conversion costs tend to increase depending on such matters. The score generally follows the building's listing and whether it is within or adjacent to a conservation area. The individual assessment of each mill is then also used to identify any non-designated heritage assets. The score for this element ranges from -2 for Grade II listed buildings; 0 for those mills situated in Conservation Areas and 5 for all other mills. The only exception to this scoring relates to the Grade II\* Shore Mill which is already converted but receives a score of -5.

### Condition

- 6.22 The score relative to the condition of the building follows the previous Building at Risk Assessment (undertaken by the University of Salford, 2017), unless there have been material changes since the earlier assessment based on observations from our own fieldwork or any other relevant sources of information. Those mills deemed to be in very good condition have been given a score of 5; (very good); 2.5 (good condition); (fair condition) 0; (poor condition) -2.5; and (very poor) -5.

### Suitability for Residential Use

- 6.23 The suitability for a residential use score relates to the nature of the building, including the footprint, orientation, layout, location and other planning considerations (flood risk, noise, etc.). This assessment has also been prepared following a session with commercial developers (Mandale) who are experienced with converting listed and non-listed mills across the North of England. The scale of the mill, particularly its floorplate, can have a major impact on the developable area or gross to net ratio, which dictates the amount of the existing floorspace that can be converted into a residential scheme compared to its existing floorplate. A score of 5 would represent a mill that is very suitable for a residential conversion, 2.5 for a mill that is suitable, 0 for neither, -2.5 for unsuitable and a score of -5 would be a mill that is totally unsuitable for a residential conversion.

### Scale / Investment Model

- 6.24 One of the unique features of mill buildings is their sheer scale. This element of the physical constraints assessment acknowledges the likely need to seek an alternative investment

model when developers are looking at large scale investment in mill buildings. Consequently, as acknowledged in the viability testing, there are greater risks associated with the redevelopment of larger mills and alternative investment models often need to be looked at, whether that be a Private Rented Sector Model (PRS) or a discounted sale model. Both will mean that the Gross Development Value (GDV) that can be achieved is lower than that one would expect for a straightforward retail disposal.

- 6.25 We have therefore included a criterion which recognises the physical constraint associated with the size of the mill itself. Those mills under 50 units are deemed more suitable for an open market model whereas larger mills have a greater risk profile. We have considered, based on experience and developer input, that the larger mills would require at least an element of discounted sale. The scoring for this element is therefore lower (i.e. a greater constraint) for the larger mills than the smaller mills. The smallest mills have been given a score of 5 with scores of 2.5; 0; -2.5 and -5 to reflect the scale of the buildings and, as a result, the likely investment / funding model. This assessment only relates to those mills that are deemed capable of conversion.

#### Blended Score

- 6.26 The blended score is not weighted. It is an average of the four inputs which have been identified as the main physical constraints when assessing the potential for converting mills into housing.

## Housing Potential (Y-Axis)

### Value Areas

6.27 We have broadly followed the emerging 3 Dragons approach contained within the Strategic Viability Assessment for the draft GMSF (now Places for Everyone) in relation to the adoption of value areas, which will ensure a consistent approach going forward. However, in undertaking the viability review, we have not followed the value areas set out within the 3 Dragons assessment verbatim. The reasons for this are as follows:

- As part of the assessment of the value areas, we have tracked the assumptions made in previous reports, namely the Affordable Housing Economic Viability Assessment (2010) and the Economic Viability Assessment undertaken by PBA in 2014. Both reports identified three main areas with the highest value to the east of the authority area, the median to the north and the lowest around the town centre.
- The emerging viability information continues to set Saddleworth South in the highest value area, however, Saddleworth North falls into the second lowest value area. It is believed that this may be a result of the lack of recent sales information for the Saddleworth North Area.

6.28 We have therefore regraded Saddleworth North as Value Area 2 (VA2) and moved Saddleworth South into this same area, both representing the highest value areas of the authority. These alterations are based on previous evidence base documents and on the other information we have available, namely the sales values for the converted mills and other apartments in those areas. Our benchmarking suggests that sales values in Saddleworth North are in fact marginally higher than Saddleworth South, showing average



sales values in the mills of £3,240 per square metre (psqm) and £3,222 psqm for apartments, with Saddleworth South displaying a slightly lower level at £3,022 psqm for converted mills and £2,893 psqm for all apartments. Details of past sales information is contained in Appendix 2. The figures would suggest that Value Area 2 would be a better fit for both Saddleworth North and South.

6.29 In addition to the above, the information from previous conversions adds further weight to the argument that both Saddleworth South and North are achieving higher values, given that the conversions of mills that have been undertaken within the Borough to date are almost exclusively within these two areas. Of the converted mills, 19 out the 22 are within either Saddleworth North or South.

6.30 The illustration below shows the evolution of the assumptions adopted about viability from various reports and shows the approach that ELG Planning have adopted in undertaking the viability testing.

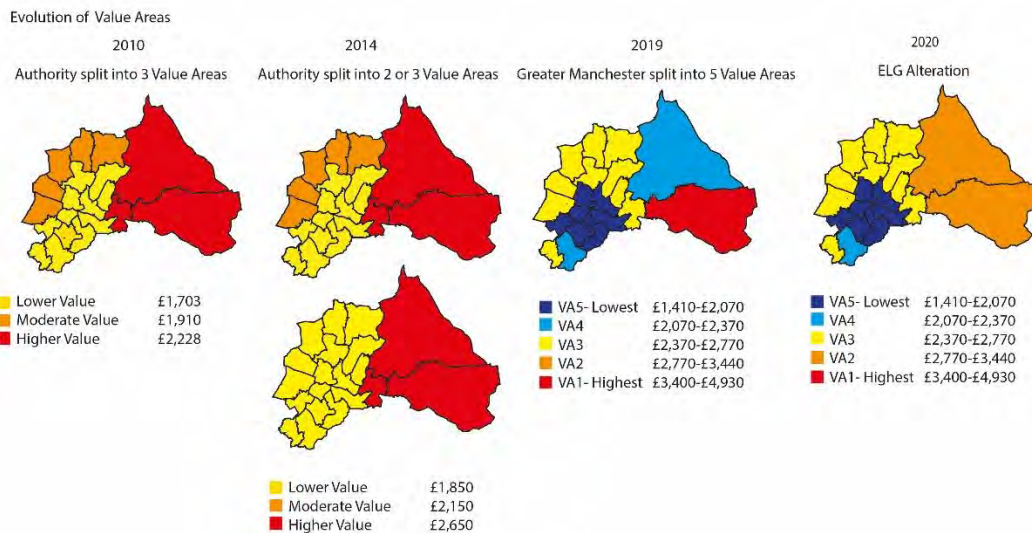


Figure 6.1: Viability Testing Model

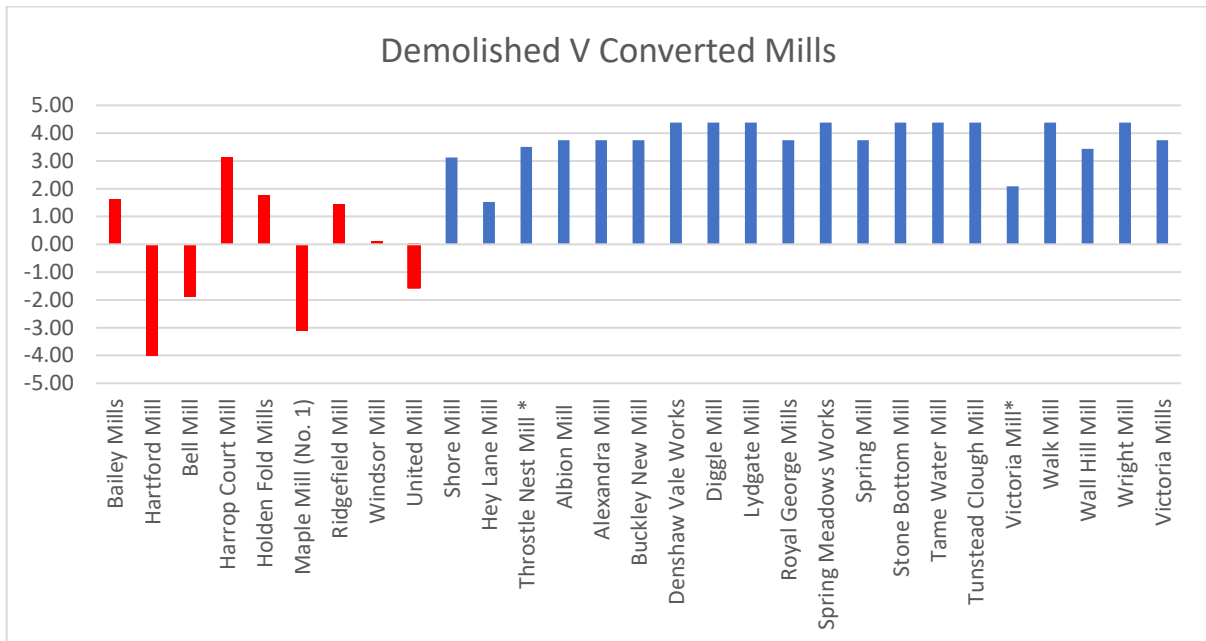
- 6.31 The illustration above demonstrates how the viability of the various wards has been assessed in the past, with the most recent work undertaken across the Greater Manchester area by 3 Dragons. The assumptions / findings have been accepted with the exception of the amendment in relation to the Saddleworth North and South wards. We assume for Saddleworth North the difference is caused by a relatively low level of new housing being built in the Ward in recent years. Saddleworth South ward has moved down to VA2 as this is more reflective of our own findings. Grouping the two (Saddleworth North & South) retains a more consistent approach with previous studies which are referred to above.
- 6.32 In relation to the scoring, given that there are four value areas, the highest score of 5 is given to those mills that are situated in the highest value area. All those mills within Value Area 2 receive a score of +5. Mills within Value Area 3, which contains 55% of all the mills, have been given a score of 1.67 with mills in Value Area 4 scoring a -1.67 and those in Value Area 5 a score of -5. Given the importance of sales values to the relative viability of a conversion, the methodology allows a high degree of weighting to the likely end sales values. Information gathered in relation to the mills either converted or lost strongly suggests that the location of the mill has been a key factor in recent years and we would expect that to remain the case.
- 6.33 Housing potential is measured by the likely end sales values in the area where the mill is situated. The weighting towards the sales values reflects the fact that the sales values adopted are almost doubled between the lower value area and the highest, whereas conversion costs are likely to vary more moderately at around 25% difference in cost between the mills with the best gross to net ratio, in good condition and with larger curtilage compared to those which perform less well against the conversion cost criteria.

6.34 The graph contained below shows the non-listed mills that have been converted and the mills that have been lost plotted against the methodology adopted. One can see that there is clearly an indication that mills with a higher blended score are more likely to have been converted with the



Buckley New Mill (Example of Converted Mill)

majority having a blended score of over 2. Of the mills that we know to have been demolished or have consent to demolish only 1 scores above 2 on the blended score and a number have negative values. This indicates that a negative value in the results may well result in pressure to demolish the mill. The red bars represent the mills demolished or with consent to demolish and the blue those that have been converted.



## Key Findings – Housing Potential

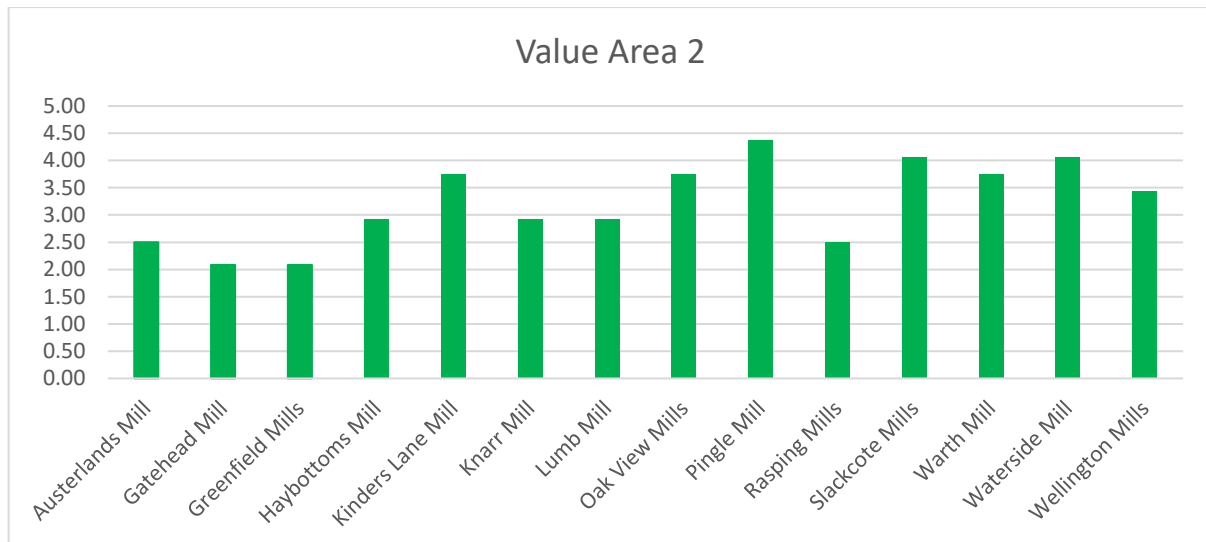
### Value Area 2: Saddleworth North & South

6.35 As one would expect, the mills in this sub-area are shown to be more likely to be viable, with the viability scoring giving many of the mills positive scores on the x and y axes. The results of the assessment for these mills is similar to the location of a number of the converted mills already identified with 13 of the 14 mills having a blended score of over 2.0 indicating higher potential for conversion to residential.



6.36 The majority of the mills within this sub-area are smaller scale mills and have a very different character to the larger format textile mills to the west of the authority. Added to the increased final sales values, this is another of the key reasons why a number of these mills are likely to be viable for conversion or redevelopment. Historically, the majority of the mills (19 of 22 assessed) converted in recent years come from this sub-area.

6.37 One reason to explain why a number of these mills haven't been converted relates to the fact that many are in an active employment use. Of the 14 remaining mills, 8 are in designated employment areas with a further 4 unallocated but in employment use. The green bars in the chart contained overleaf signify those mills that score high overall for housing potential.

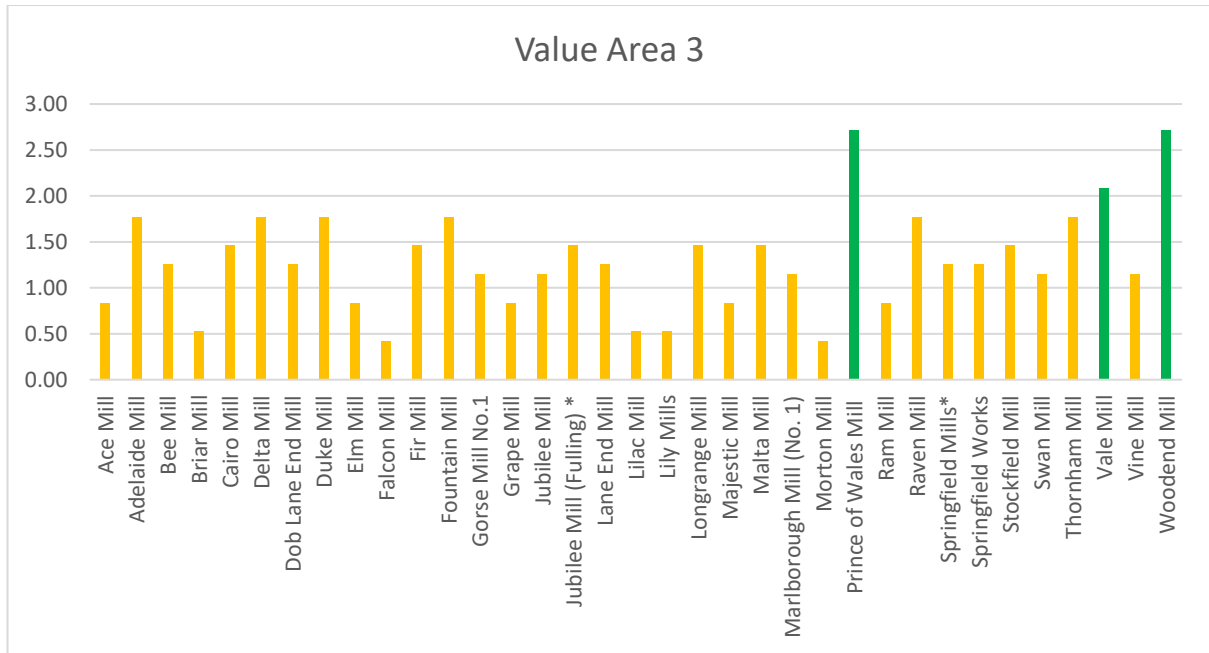


Value Area 3: Chadderton Central, Chadderton North, Royton North, Royton South, Crompton, Shaw, St James, Waterhead, Failsworth West, Saddleworth West & Lees

6.38 This sub-area has the largest number of mills in the study area at around 55% of the 64 mills subject to assessment. Of the recent conversions recorded, 2 of the 22 were in this sub-area suggesting that, while marginal, it may be possible to convert some of the mills without substantial external funding.



6.39 30 of the 35 mills in the sub-area are in employment use with 15 of those within designated Business Employment Areas (BEA). This leaves relatively few that are either vacant or suitable for alternative uses.



6.40 The viability scoring of the mills plotted on the chart shows a consistent set of results. The majority of the mills fall within the medium range (amber bars) with the remainder going in the high category (green bars).

Value Area 4: Failsworth East

6.41 There are only 2 mills (Albert Mills & Ivy Mills) in this sub-area, both of which lie within designated Business Employment Areas (BEA). One of the mills is judged to have medium potential and the other low.



Value Area 5: Coldhurst, Alexander, St. Marys, Werneth, Chadderton South, Hollinwood, Medlock Vale

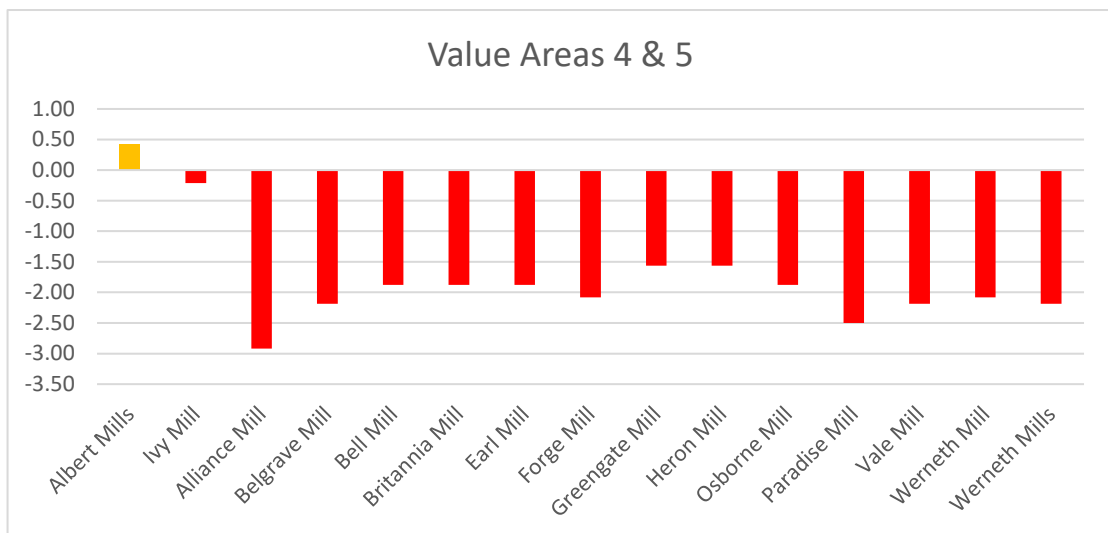
6.42 This is the sub-area with the lowest end sales values. Of the mills assessed, 9 of the 13 are in employment use, of which 4 are situated within BEAs. The viability scoring chart shows that the housing potential is greatly impacted by the low end sales values in this area along with the scale of a number





of the mills. It is therefore not a surprise that the majority of the mills that have been lost in recent times were situated within this sub-area.

- 6.43 The chart contained below illustrates that, within Value Areas 4 & 5, Albert Mill falls within the medium range (amber bar), with the remaining mills within this value area in the low category (red bars).



### Viability Testing (Residential Conversion)

- 6.44 To cross reference with the housing potential assessment scoring above, we have set out a broad appraisal methodology to test viability for conversion to housing, which is based on a set of assumptions. These are not detailed individual viability appraisals, but a general overview of the potential viability of each mill, making a series of broader assumptions about numerous elements such as build costs, gross to net ratio, method of disposal, sales values etc. This exercise seeks to identify lessons to be learnt from those schemes where conversion of mill buildings has already taken place and those which have led to demolition.

6.45 Appendix 3 contains the results of the viability testing for each mill in line with the methodology set out below. A number of case studies have also been produced to identify a number of mills which may represent viable residential conversions. The methodology is intended to give a broad overview of the potential for residential conversion of each mill with the results considered alongside the viability scoring. Viability testing has only been undertaken on those mills which are deemed to be convertible. There are a number of mills, particularly to the east of the Borough which are low level and, while they may make viable redevelopments, are not suitable for a conversion of the actual mill buildings.

#### Viability Testing Methodology

6.46 Below we have set out the methodology of the viability testing, which is intended as a high level sense check, which sits alongside the housing potential assessment scoring. The approach is only applied to those mills that could be converted rather than those that may require a different approach to redevelopment.

#### *Assumed Sales Values*

6.47 This has been calculated on the basis of the evidence available contained within the 3 Dragons viability information with some amendments made. The figures are largely based on the value area that has been adopted for each mill, as well as the immediate surroundings, which will influence the likely sales values. On most occasions, the lower of the values suggested in the 3 Dragons report have been adopted, although there are some schemes where a heritage premium has been applied. No amendment has been made in this figure for the impact of Covid 19 on sales values and estimates were made in 2020.

### *Size of Mill*

- 6.48 This is the gross figure. This figure would be used to calculate the Existing Use Value (EUV) where a value per square foot / square metre is applied.

### *Gross to Net Ratio*

- 6.49 This is the amount of saleable floorspace that is likely to be achieved as a result of the conversion. Larger mills with wide footprints are likely to have much lower gross to net ratios. One of the case studies set out later in this section (Mutual Mills, Rochdale) had a net to gross ratio of just 40% given the need to provide parking on the ground floor and atriums within each mill building. This is a relatively extreme example but one that had a fairly considerable impact on viability given that the existing use value is based on existing floorspace which often needs to be removed, as illustrated in the image contained below.

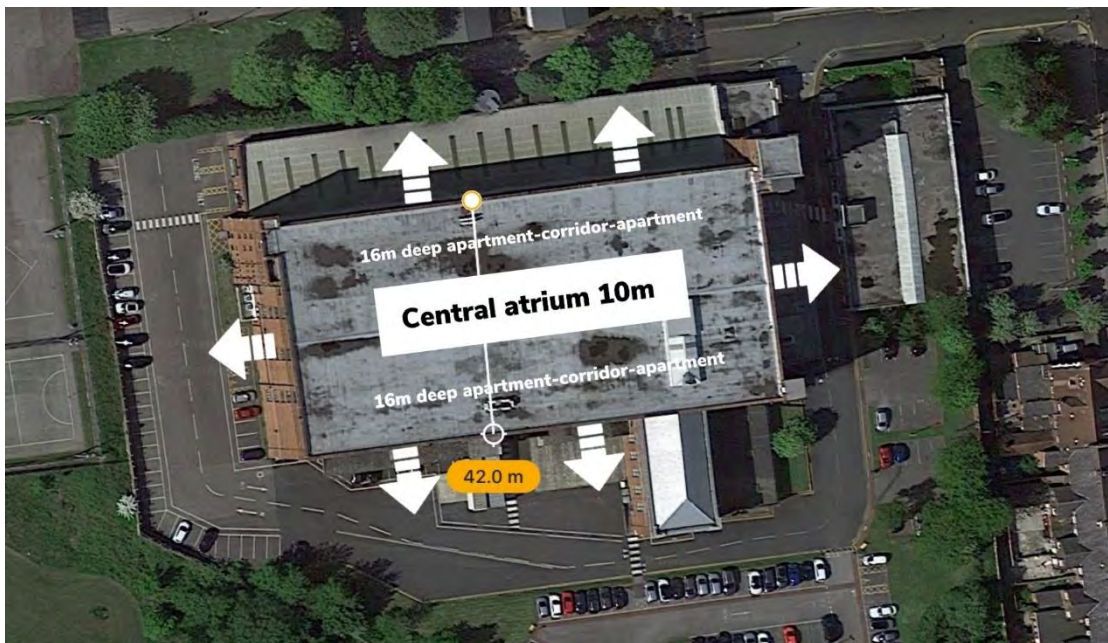


Figure 6.2: Illustration of Gross to Net Ratio

*Net Developable Area*

- 6.50 This is the figure of the amount of the scheme that is likely to be converted into saleable floorspace and excludes communal areas such as stairs, corridors, parking and atriums.

*Number of Units*

- 6.51 This is a calculation of the capacity of the scheme to give an understanding of the potential delivery of housing within Oldham through mill conversions. The good practice example in the Historic England report at Cotton Works, Bolton suggests an average unit size of 70 sq.m but we believe that this has been calculated by dividing the gross area by the number of units delivered and fails to take account of circulation / communal spaces etc. We have therefore adopted a blended size of 1 and 2 bedroom units based on the national minimum space standards of 55 sq.m per apartment. This assumes a 50/50 split of 1 and 2 beds and, whilst this is a fairly crude approach, it nonetheless provides a reasonable high level view of likely capacity. The figure is also consistent with the Mutual Mills case study.

*Establishing a Benchmark Land Value*

- 6.52 Again, no individual survey can be done in relation to each and every mill within the constraints of the brief. The benchmark land value has therefore been established using certain standardised inputs based on assumptions about market rents and expected levels of occupancy . These inputs allow an estimate of annual income based on existing uses and have been multiplied by the yield to give an Existing Use Value (EUV).
- 6.53 Once an estimate for the EUV is established, we have then assumed a landowner premium of 20%. Given that any existing use is generally generating an income, the landowner

premium needs to be enough for the landowner to see value in disposing of the asset. As set out in Planning Practice Guidance, *'the premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements.'* A figure of 20% has been assumed. This figure is one which has been accepted at appeal as an appropriate level for a brownfield site.

### *Construction Costs*

- 6.54 Construction costs are estimated based on recent examples, feedback from the consultation exercise and BCIS figures (Q2 2020). It excludes any planning gain in the form of affordable housing, CIL or other Section 106 contributions. Construction costs will be influenced by the condition of the building, heritage constraints and any other abnormals. We have assumed a rate of between £1,300 psqm and £1,900 psqm. Additional costs which have been accounted for are professional fees at 7% of construction costs, finance at 6% of development costs and sales / legal and marketing costs at 3% of GDV. The assumed conversion costs relate to the heritage status of the building (i.e. whether it is listed) and also the condition of the building currently. BCIS figures suggest that prices for conversions are currently at £1,532 in Oldham, although our assumptions are a little lower based on recent mill examples.
- 6.55 It should however be acknowledged that the conversion costs utilised for the purposes of the assessment are a high level estimate to inform the wider viability testing exercise. It is clear that

calculations will therefore be required to be undertaken by any party seeking to redevelop

#### *Gross Development Value (GDV)*

- 6.56 The GDV figure is the value of the whole scheme once the apartments have been sold. In the spreadsheet (Appendix 3), we have adopted a simplified approach to give a general picture of the viability of the conversion of the mills for residential use, which is effectively the net developable area.

#### *Affordable Housing Requirement*

- 6.57 Affordable housing is currently sought at 7.5% of GDV. It should be noted that Vacant Building Credit may be applied to mill conversions meeting the criteria, which would reduce the level of affordable housing contribution required.
- 6.58 National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace. On this basis, in relation to those mills that are vacant, there is already an incentive built into government policy which would generally remove the requirement for affordable housing. The interpretation by most authorities is that the whole building needs to be vacant. The guidance in NPPG explains that:



*Where there is an overall increase in floorspace in the proposed development, the local planning authority should calculate the amount of affordable housing contributions required from the development as set out in their Local Plan. A 'credit' should then be applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use or demolished as part of the scheme and deducted from the overall affordable housing contribution calculation. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided.*

*The existing floorspace of a vacant building should be credited against the floorspace of the new development. For example, where a building with a gross floorspace of 8,000 square metre building is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought.'*

- 6.59 The implications of Vacant Building Credit will need to be investigated on a case-by-case basis given the complexities involved.

#### *Developer Profit*

- 6.60 The NPPF advocates a development profit of between 15-20% of the Gross Development Value. Given the amount of upfront investment and risk associated with a Mill conversion compared to a standard new build, we have therefore adopted a figure of 28% to assess a scheme that would be sold on the open market. This reflects the increased risk associated with the development of these types of projects and reflects a rate that the developer is likely to have to demonstrate in order to get finance for the project. For a pre-sold scheme,

we have assumed a much lower level of developer profit at 15% to reflect the reduced level of risk compared to an open market sale for a pre-sale agreement into a Private Rented Sector (PRS) or similar model.

#### *Viability*

- 6.61 This column within the spreadsheet (Appendix 3) summarises at a high level whether the conversion of each mill is likely to be viable for residential use. It is a calculation of the development costs (i.e. the land value, blended construction costs and developers profit) against the Gross Development Value (GDV). A further calculation is made looking at an investment model whereby the developer has an agreement for the sale of the units into what is often a PRS type model. This second assessment reflects the more likely scenario when it comes to mill conversions given the risks and quantum of development. This assessment assumes the same land value and construction costs but reduces the developer profit to 15% given the reduced level of risk compared to retail sales, but also applies a discount against the bulk sales reflective of how this type of transaction is likely to work. The discount of 25% is applied to the GDV figure for retail sales. Again, this is a broad indication of whether a scheme is likely to be viable as a conversion.
- 6.62 The methodology therefore tests two main scenarios; open market sales and a PRS / pre-sale model. Within the latter we have run a scenario where there is no affordable housing required, this may be the case where Vacant Building Credit can be applied or where the Council is applying a flexible approach due to the other planning benefits of seeing a mill redeveloped.
- 6.63 In terms of the assessment, in relation to the financial viability, the project has been assessed as low, where none of the scenarios are able to show a viable scheme or at least

a marginal scheme (profit levels of between 4-28%). Those schemes with a scenario within the marginal band have been awarded a medium and those showing potential profit of over 28% for an open market sale or over 15% of a pre-sold model are shown as high.

<b>Overall Assessment</b>	<b>Categorisation of Viability for Retail Scheme</b>
No	< 10%
Marginal	10% to 28%
Yes	>28%

<b>Overall Assessment</b>	<b>Categorisation of Viability for Pre-sold Scheme</b>
No	< 4%
Marginal	5% to 15%
Yes	>15%

- 6.64 As an exercise to test the methodology, those mill sites that have been converted and / or demolished have also been assessed in a similar way.

#### *Planning Gain*

- 6.65 No figures have been included for planning gain at this stage, other than the policy requirement for the contribution of 7.5% of the GDV towards affordable housing.

### **Case Studies**

- 6.66 As part of the assessment, we have also looked at four case studies, which provide 'real world' examples of some of the pitfalls associated with mill conversions, schemes that have been delivered with relatively low capital value / sales value and the mechanisms that may be needed to help deliver such schemes.
- 6.67 One of the mills, Martins Mill, is an unlisted mill that was on the brink of demolition in Halifax, which has now been converted into residential apartments. The second is Mutual Mills in Rochdale where two large listed textile mills have received planning consent but have proven unviable to progress for a series of reasons. The third mill is Weir Mill, a listed mill in Stockport for which consent was sought and subsequently withdrawn. We now understand that a revised application has recently been approved. The final mill is another recent conversion of a largely derelict mill in central Bolton known as Merchants Place.
- 6.68 Those mills identified in the case studies have been reviewed by a developer with experience of converting mill buildings in West Yorkshire and the North West.

#### Case Study 1: Martin's Mill, Halifax

- 6.69 This comparative scheme relates to a completed mill conversion scheme in Halifax, which involved a non-listed building in an exceptionally poor state of repair when acquired by the developer. This building now has a new lease of life as apartments, with the scheme having been sold to an



at a relatively low price given the condition of the building and there were no onerous planning contributions that would have otherwise affected viability.

- 6.70 Martins Mill was completed in approximately 9 months, delivering a gross to net ratio of 54% with build costs of £1,250 psqm and sales values of £1,700 psqm. The Historic England Report '*Engines of Prosperity: New Uses for Old Mills*' reports that, in order for a residential scheme to be viable, the capital value / sales value needs to reach at least £2,153psqm (£200 psqft). However, the values achieved at Martins Mill were well below the level acknowledged in the Historic England guidance and illustrates that schemes can be delivered when sales values are lower but also that the Local Authority needs to be realistic about contributions and the land owner about price in order for this to happen.

#### Case Study 2: Mutual Mill, Rochdale

- 6.71 The second case study involves Mutual Mill in Rochdale, which was a much larger conversion scheme proposed to a pair of Grade II listed mills. This scheme was approved (subject to signing a Section 106) and, accordingly, accurate proposed build costs and sales values etc. are available.



6.72 Given the nature of the build, the gross to net ratio was low, which was exacerbated by planning requirements on parking, as well as other elements that increased build costs. Ultimately, the scheme was demonstrated to be unviable due to the land owners unwillingness to compromise on the purchase price, along with rigid application of planning policy with respect to Section 106 contributions. Sales values remained in dispute between the Local Planning Authority and the applicant, as the authority's advisors would not accept the delivery mechanism, using a pre-sale agreement, which, in turn, meant that the sales values needed to be subject to a discount from open market value. This large format mill is a good example to apply to many of the mills in Oldham, as they have similar footprints and serves to illustrate some of the pitfalls in terms of viability of large scale mill conversions.

### Case Study 3: Weir Mill, Stockport



6.73 The third case study relates to a scheme in Stockport, which would see a listed building converted into a predominantly residential scheme. The appraisal that accompanies this application has been prepared by Cushman & Wakefield. Build



costs are substantially higher than the Martins Mill and Mutual Mill schemes and the appraisal suggests that the scheme cannot make any planning gain contributions and that it requires a £7 million grant in order to be viable. Sales values are higher than the earlier case studies at £3,024 per square metre, which is reflective of the higher values in Stockport compared to Rochdale and indeed Oldham. It is understood that, having initially been withdrawn, a revised scheme has recently obtained planning approval.

#### Case Study 4: Merchant's Place, Bolton

6.74 The final case study relates to a scheme in central Bolton. At the time of writing, this scheme was nearing completion. This scheme is a good example of what can be achieved even where the end sales values are low. This scheme benefited from Vacant Building Credit (VBC) and



therefore did not have to provide affordable housing. In addition, the Local Planning

Authority took a pragmatic approach to public realm improvements allowing them to be incorporated into the scheme, rather than relying on third party land or funding. The result is that a long standing vacant, non listed building has been converted into 59 apartments with some limited new build. The scheme incorporates some interesting design features including a large mural on the rear elevation and corten steel entrance features. The floorplate of the mills have allowed a good gross to net ratio.



## Key Findings - Viability Testing

6.75 A number of the mills across the Borough have already been either converted to residential use or been granted consent for demolition. To identify trends, even those mills that have been converted or demolished have been assessed against some of the criteria used in the viability testing. Based on what has happened in practice, one can identify a clear correlation between physical constraints and viability of those converted versus those that have been demolished, as shown in the adjacent table.

Converted	Demolished
High	Medium
Medium	Low
High	Low
High	High
High	Medium
High	Low
High	Medium
High	Medium
High	Low
High	
High	
High	
High	
High	
High	
High	
High	
High	
High	
High	

Table 6.1: Viability Testing Score Comparison (Converted vs. Demolished Mills)

6.76 Of those Mills converted to residential use, 18 of the 20 are in Value Area 2, which represents the strongest area for end sales

values. The mills that have already been converted are therefore all in relatively high sales value areas. What is also notable is the relative scale of the mills that have been converted is relatively small and that all but one were said to be of good condition (although this may reflect the fact that they have been converted already). These mills are located to the east of the Borough and tend to comprise smaller woollen mills, which were traditionally water powered owing to their location nestled within valleys and served by rivers or their tributaries. Three of the converted mills are listed and eight in conservation areas. This suggests that the heritage constraints are not as great a factor as the end sales values or even the scale of the mills.

6.77 Of those that have been demolished or have consent for demolition, all are either in fair / poor or very bad condition, tend to be larger in scale and the majority are situated in Value Areas 3, 4 and 5. Against the viability testing, which it is acknowledged is based on some standardised assumptions, six of the sites scored low and three medium.

### **Overall Assessment**

6.78 In categorising each of the mills into higher, medium or lower category for housing potential, account has been taken of the findings from the housing potential assessment scoring, which looks at the physical characteristics versus the housing potential, and also the viability testing which uses a series of standardised inputs to test the potential viability of the conversion of each of the mills (NB: this is not a financial viability assessment of each of the mills but is based on a broader methodology).

6.79 The overall assessment of housing potential gives a score for each of the mills within the study in relation to the locational and physical characteristics of the mills (i.e. Housing Potential Score), which is then combined with the results of the viability testing where undertaken to provide an overall rating of high, medium or low. Viability is challenging on many mill schemes and there are a number of other factors that may make the mill unsuitable for conversion to housing, such as the surrounding uses, existing occupiers etc. One of the key factors identified by the review of the mills now successfully converted is their location and scale. Unsurprisingly, there is a clear correlation between the housing potential of the mill and the value area within which each mill is situated. The image contained overleaf demonstrates all of the mills in the lower value areas (Value Areas 4 & 5) score poorly in relation to their housing potential, as viability has had a negative impact

on the scoring against these mills where sales values make conversion schemes look very challenging.

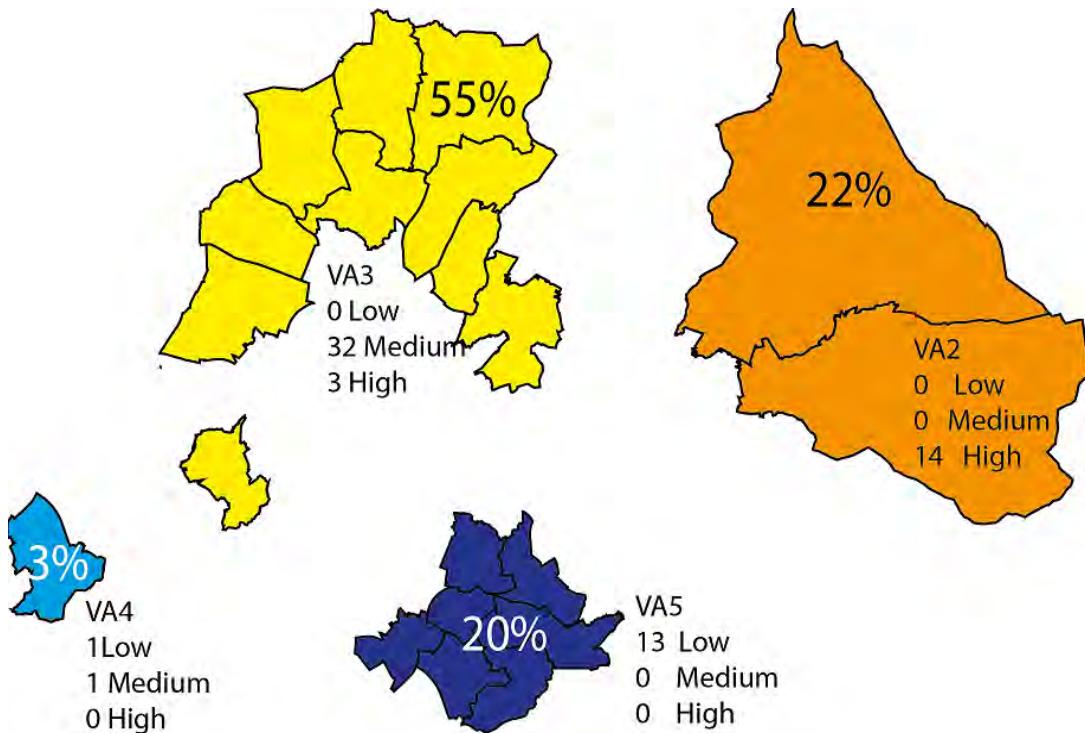


Figure 6.3: Overall Assessment of Mills Within Each Value Area

6.80 Clearly viability is a key consideration when assessing any proposals affecting the retention of historic mill buildings. We have highlighted some examples where successful conversions have been undertaken in spite of challenging market conditions and relatively low sales values, however, there are many others that do not progress due to the inherent risks to the developer. A flexible approach toward the conversion of mills that are deemed worthy of retention should therefore be encouraged with viability information presented on a case by case basis and based on individual assessments of the main planning considerations where viability may also form part of the decision making process.

6.81 Equally, in the areas which benefit from higher sales values, the fact that a particular mill may have housing potential does not necessarily mean that this is the best use, as many of



these sites are in active employment use and are of benefit to the communities in which they are situated as a source of employment.

- 6.82 In total, 31 of the 64 mills that were assessed fell into the low category having regard to the range of criteria assessed:

<b>Low Category</b>	Albert Mills, Alliance Mill, Belgrave Mill, Bell Mill, Briar Mill, Britannia Mill, Cairo Mill, Earl Mill, Elm Mill, Falcon Mill, Forge Mill, Grape Mill, Greengate Mill, Heron Mill, Ivy Mill, Jubilee Mill (Fulling), Lilac Mill, Lily Mills, Longrange Mill, Majestic Mill, Malta Mill, Osborne Mill, Paradise Mill, Ram Mill, Raven Mill, Stockfield Mill, Thornham Mill, Vale Mill (Stockfield Road), Vine Mill, Werneth Mill, Werneth Mills.
---------------------	---

- 6.83 Following the assessment, 25 of the 64 mills fell into the medium category:

<b>Medium Category</b>	Ace Mill, Adelaide Mill, Bee Mill, Delta Mill, Dob Lane End Mill, Duke Mill Fir Mill, Fountain Mill, Gorse Mill, No.1 Jubilee Mill Lane End Mill, Marlborough Mill (No. 1), Morton Mill, Oak View Mills, Pingle Mill, Prince of Wales Mill, Slackcote Mills, Springfield Mills, Springfield Works, Swan Mill, Vale Mill (Chamber Road), Warth Mill, Waterside Mill, Wellington Mills, Woodend Mill.
------------------------	---

- 6.84 The remaining 8 mills subject of assessment were categorised as high in terms of housing potential for conversion or partial redevelopment:



**High Category**

Austerlands Mill, Greenfield Mills, Gatehead Mill, Haybottoms Mill, Kinders Lane Mill, Knarr Mill, Lumb Mill, Rasping Mills

6.85 It should however be acknowledged should that no two mills are identical, and each mill described within this report 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 this report 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.





## **Chapter 7:**

# **Employment Potential**



## 7. EMPLOYMENT POTENTIAL

### Introduction

7.1 The mills across Oldham provide ubiquitous reminders of the growth of the town during the industrial revolution as the main cotton spinning centre in Lancashire and the overwhelming majority of the mills remain in employment use in the present day, although they have been repurposed following the decline of the cotton spinning industry.



*Bell Mill (Currently in Use as Textile Factory by Turner Bianca)*

7.2 The adopted Oldham Local Plan designates a number of Business Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) to provide for a broad and diverse range of employment generating uses, which will help meet the needs of a changing local economy and provide opportunities for investment for new businesses and existing firms.

7.3 There are a number of other established industrial / trading estates across the Borough which are not formally designated for employment use within the adopted Development Plan but which provide low cost employment premises for a range of types of business.

7.4 The majority of the mill stock is located within designated employment areas or within existing industrial / trading estate locations and is currently in active employment generating use providing accommodation for single tenants (e.g. storage and distribution warehouses) or low cost premises for a number of businesses within an individual mill.

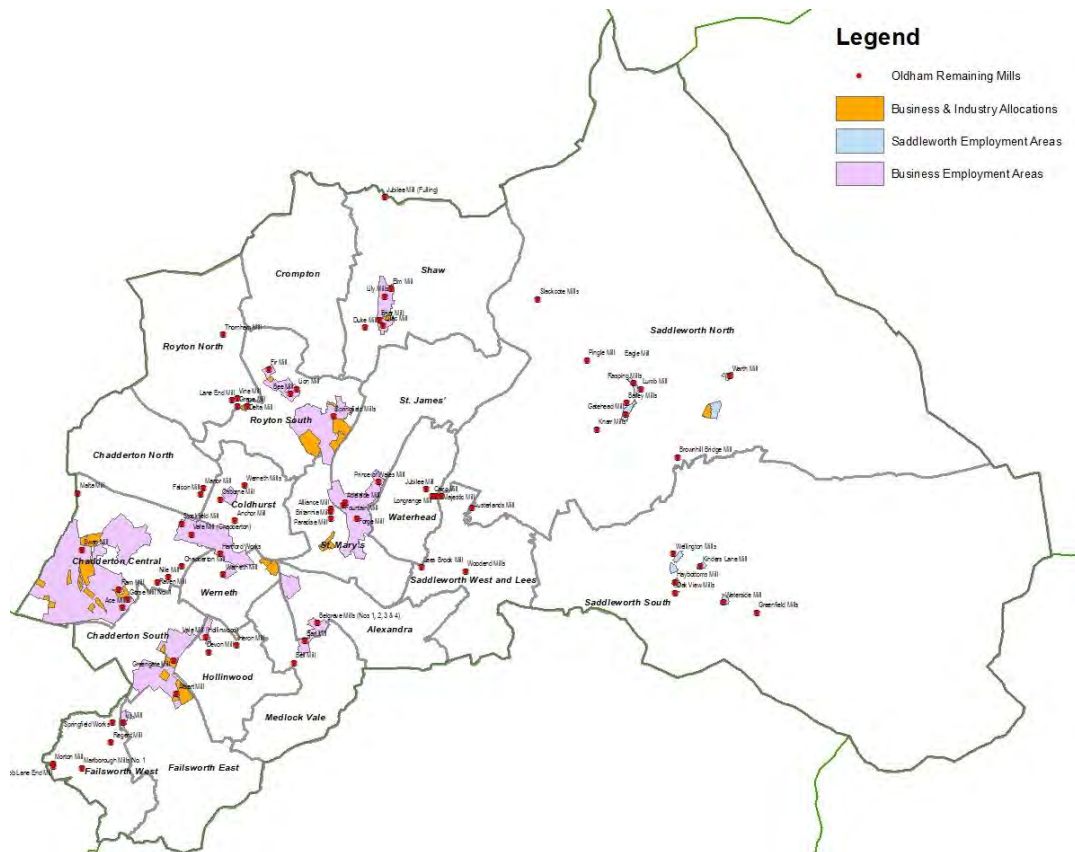


Figure 7.1: Location of Mills Relative to Designated Employment Areas

7.5 There are however inevitably some mill buildings within established employment areas that are underutilised, particularly the upper floors, or which may become vacant in the short term, for example at the end of a lease period or due to business failure, which may become more prevalent as the wider economic impacts of COVID-19 become clearer. It is apparent that the existing mill stock can provide low cost premises within established employment areas that could prove attractive to a number of employment sectors to help meet economic needs over the Plan period and beyond.

- 7.6 This section of the Mills Strategy therefore seeks to assess the potential for the individual mills to be utilised for employment use. However, given the limitations of the study, it should be acknowledged that this exercise merely seeks to provide a high level overview of the economic potential of each mill based upon a limited range of criteria relating to heritage, condition, suitability, allocation and strategic location, as detailed below. It is not therefore intended to provide a detailed appraisal of the suitability or viability of the conversion of individual mills to alternative or new economic uses. On this basis, it should be noted that there may be instances where a particular mill scores poorly in terms of economic potential even though it is within a well-established employment use and is likely to remain so in the long term as a consequence of the limited range of criteria assessed for the purposes of this study.
- 7.7 The assessment follows a similar approach to that adopted in relation to housing potential (Chapter 6) with values assigned to each of the inputs, which are explained in further detail below. An average '*Physical Constraints*' rating of each mill is set against the '*Economic Potential*' to give an overall score, which will provide a broad indication of the potential for the re-use of the individual mill for employment purposes.



Figure 7.2: Physical Constraints & Economic Potential

## Physical Constraints

### Heritage Considerations and Condition

- 7.8 The scores attributed to the individual mills in respect of heritage and condition reflect those utilised within the assessment of housing potential for consistency.

### Suitability for Employment Uses and Site Context

- 7.9 The suitability for employment use score considers the site specific constraints and opportunities that may impact upon the suitability of an individual mill for employment use, primarily focusing on general suitability for industrial and storage and distribution uses (Use Class B2 / B8) reflective of the fact that by virtue of their size, many mills lend themselves to use as storage and distribution facilities or factories for other purposes. It is however acknowledged that former mills can be successfully repurposed to other employment generating uses, however, for the purposes of this high level assessment, the scoring is focussed on adaptability to B2 / B8 use.
- 7.10 This assessment therefore considers factors including the scale of the mill, level of curtilage space, suitability of access and surrounding road network and space available for the manoeuvring of HGVs and service vehicles. A score of 5 would indicate that the mill is highly suitable for such use, whereas a score of -5 would indicate that a mill is totally unsuitable for such purposes.



### Blended Score

- 7.11 The blended score is not weighted. It is an average of the three sections which collectively make up the physical constraints. The blended score for each mill gives the numerical value for the x-axis for each mill.

## **Economic Potential**

### Allocation

- 7.12 The allocation score is reflective of any specific land use designations affecting the individual mills with scores ranging from +5 to -5. A score of 5 was given to any mills which are situated within BEAs and SEAs identified within Amion's SIF Refresh Report as having the greatest potential to attract and accommodate priority sectors, namely Hollinwood, Foxdenton and Greengate / Broadgate. A score of 1.67 was given to any mills which were located within any other allocated BEAs or SEAs. A score of -1.67 has been attributed to any mills not subject to any specific land use designation but which are in either an established employment area or other predominantly mixed use or commercial area. A score of -5 was given to any mills not in an allocated employment area and where employment uses would not be complementary to surrounding land uses giving rise to potential amenity concerns, for example, mills located within predominantly residential areas.

### Strategic Location

- 7.13 Oldham has a good level of accessibility to the strategic road network and access to Manchester, particularly to the west of the Borough, which is likely to prove attractive to a

range of employment sectors. In order to attribute a strategic location score to each mill, the Borough was divided into three areas - high, medium and low as illustrated below, which received scores of 5, 0 and -5, respectively.

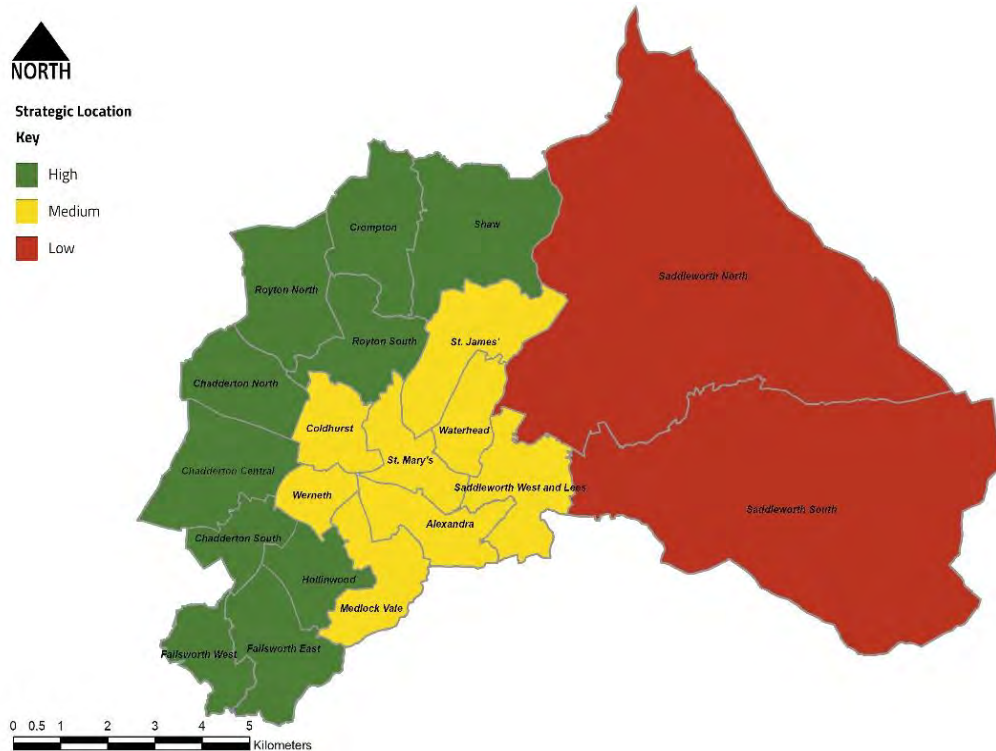


Figure 7.2: Strategic Location Classification

- 7.14 The wards identified in the 'high' strategic location area are considered to have the strongest linkages to the strategic road network and the local workforce, whereas those within the 'low' strategic location area are the more isolated rural wards to the east of the administrative area.

## Findings

- 7.15 Following the assessment of the 64 mills against the criteria outlined above, each mill was given an overall blended score, which was the average of the x-axis (Physical Constraints)

score and the y-axis (Economic Potential) score. In order to give an indicative illustration of the suitability of each mill for employment re-use, the following scoring system was devised, which would then allow each mill to be categorised as high, medium and low to ensure consistency with the approach adopted to the assessment of heritage and landscape value, as well as housing potential. 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.

<b>Overall Categorisation</b>	<b>Categorisation Score Thresholds</b>
Low	< 0
Medium	0 – 2.0
High	>2.0

7.16 In total, 12 of the 64 mills that were assessed fell into the low category having regard to the range of criteria assessed. However, 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. However, there are other mills identified within this category, which, although currently in employment use, may be better suited to alternative future use as a result of their physical or locational characteristics.

<b>Low Category</b>	Alliance Mill, Austerlands Mill, Britannia Mill, Gatehead Mill, Greenfield Mills, Jubilee Mill, Knarr Mill, Pingle Mill, Rasping Mills, Slackcote Mills, Wellington Mills, Woodend Mill
---------------------	---

7.17 Following the assessment, 25 of the 64 mills fell into the medium category and, again, many of these mills are in active employment use within established industrial estate / allocated employment site settings and have therefore secured a viable use appropriate within their wider land use setting and, as such, the continuation of these established uses will overwhelmingly represent the most sustainable option for these mills going forward. However, such matters are considered in more detail within Chapter 9 and the individual site appraisals appended to this document.

<b>Medium Category</b>	Adelaide Mill, Bell Mill, Cairo Mill, Falcon Mill, Forge Mill, Fountain Mill, Grape Mill, Haybottoms Mill, Jubilee (Fulling) Mill, Kinders Lane Mill, Longrange Mill, Lumb Mill, Majestic Mill, Morton Mill, Oak View Mills, Osborne Mill, Paradise Mill, Prince of Wales Mill, Springfield Works, Thornham Mill, Vine Mill, Warth Mill, Waterside Mill, Werneth Mill, Werneth Mills
------------------------	--

7.18 Of the 64 mills that were assessed, 27 were categorised as high in terms of economic potential. These mills are overwhelmingly located within allocated employment areas, including those identified as having greatest potential to accommodate identified priority sectors within Amion’s SIF Refresh and have easy access to the strategic road network and local workforce.

<b>High Category</b>	Ace Mill, Albert Mill, Bee Mill, Belgrave Mills, Briar Mill, Delta Mill, Dob Lane End Mill, Duke Mill, Earl Mill, Elm Mill, Fir Mill, Gorse Mill (No.1), Greengate Mill, Heron Mill, Ivy Mill, Lane End Mill, Lilac Mill, Lily Mills, Malta Mill, Marlborough Mill (No.1), Ram Mill, Raven Mill, Springfield Mills, Stockfield Mill, Swan Mill, Vale Mill (Chamber Road), Vale Mill (Stockfield Road)
----------------------	---





## Chapter 8:

## Selection of Priority Sites

## 8. SELECTION OF PRIORITY SITES

- 8.1 The assessment of the landscape and heritage value of the individual mills, alongside the housing and employment potential considerations, will inform the formulation of a positive strategy to support the long term sustainability of the textile mill stock across Oldham.
- 8.2 The 64 mills subject to assessment will be categorised as high, medium and low priority with policy recommendations made to address each level of priority. The categorisation of the individual mills as high, medium or low priority will be primarily influenced by the heritage and landscape value of the mill to identify those where there should be a clear presumption for their retention in view of their contribution to the local distinctiveness, sense of place and landscape character of Oldham and those that may be less sensitive to alteration and potentially demolition.
- 8.3 The mills assessed as having high landscape value and heritage / townscape value will be placed within the high priority category with a clear presumption against their loss or demolition.
- 8.4 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.
- 8.5 Those mills which are assessed as having comparatively low landscape value and heritage significance will be placed within the low priority category. It is anticipated that there will be greater flexibility in how these mills could be re-used or converted and such mills may also have potential for demolition. 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.

- 8.6 Section 9 of the report provides details of strategies / action plans for the mill stock, which outline the benefits / opportunities, constraints, possible adaptation solutions (such as new access), design recommendations, financial opportunities / investment funds / subsidies, planning policy, links to regeneration strategies, potential delivery partners, marketing and enforcement for each mill, as appropriate with more detailed strategies provided for those mills identified as being in greatest need of short term interventions.
- 8.7 The first step in formulating the overall strategy is therefore to attribute the individual mills to either the high, medium or low categories. The initial project brief included a total of 106 textile mills across the Borough. However, of these, 19 non-listed mills have already been converted or have consent for conversion, with a further 9 mills having been demolished or having consent for demolition and 14 are listed, with 3 of the listed mills having already been converted (Shore Mill, Hey Lane Mill & Throstle Nest Mill) at the time of the commission. This leaves a remaining 64 mills to be categorised high, medium or low priority, as detailed within Table 8.1.

Table 8.1 – Breakdown of Mills

<b>Listed Mills (*Converted Listed Mills)</b>	Anchor Mill	Bailey Mills	Brownhill Bridge Mill
	Chadderton Mill	Devon Mill	Hartford Works
	Leesbrook Mill	Lion Mill	Manor Mill
	Nile Mill	Regent Mill	Shore Mill*
	Hey Lane Mill*	Throstle Nest Mill*	
<b>Converted / Demolished Mills</b>	Hartford Mill	Bell Mill	Harrop Court Mill
	Holden Fold Mills	Maple Mill (No.1)	Ridgefield Mill

	Textile Mill	Windsor Mill	United Mill
	Albion Mill	Alexandra Mill	Bank Mill
	Buckley New Mill	Denshaw Vale Works	Diggle Mill
	Eagle Mill	Lydgate Mill	Royal George Mills
	Spring Meadow Works	Spring Mill	Stone Bottom Mill
	Tame Water Mill	Tunstead Clough Mill	Victoria Mill
	Walk Mill	Wall Hill Mill	Wright Mill
	Victoria Mills		
<b>Remaining Mills</b>	Ace Mill (Gorse Mill No. 2)	Adelaide Mill	Albert Mills
	Alliance Mill	Austerlands Mill	Bee Mill
	Belgrave Mill	Bell Mill (Claremont St)	Briar Mill
	Britannia Mill	Cairo Mill	Delta Mill
	Dob Lane End Mill	Duke Mill	Earl Mill
	Elm Mill (Newby Mill)	Falcon Mill (Weaving Shed)	Fir Mill (Vernon Works)
	Forge Mill (Hope Mill)	Fountain Mill	Gatehead Mill
	Gorse Mill	Grape Mill	Greenfield Mills
	Greengate Mills	Haybottoms Mill	Heron Mill
	Ivy Mill	Jubilee Mill	Jubilee (Fulling) Mill
	Kinders Lane Mill	Knarr Mill	Lane End Mill
	Lilac Mill	Lily Mills	Longrange Mill (Orme Mill)
	Lumb Mill	Majestic Mill (Lower Mill)	Malta Mill
	Marlborough Mill (No.1)	Morton Mill	Oak View Mills
	Osborne Mill	Paradise Mill	Pingle Mill
	Prince of Wales Mill	Ram Mill	Rasping Mills (Valley Mills)
	Raven Mill	Slackcote Mills	Springfield Mills
	Springfield Works	Stockfield Mill	Swan Mill
	Thornham Mill	Vale Mill (Chamber Road)	Vale Mill
	Vine Mill	Warth Mill	Waterside Mill

	Wellington Mills	Werneth Mill (Manchester Road)	Werneth Mills
	Woodend Mill		

- 8.8 The individual landscape, heritage and housing / employment potential assessments for each mill have been reviewed and each mill has been scored as high, medium or low against each assessment criteria. The results have been tabulated and the individual mills have been given an overall categorisation of high, medium or low having regard to their scoring across all four assessment criteria (i.e. heritage, landscape, housing potential, employment potential). However, the assessment principally seeks to identify which mills, by virtue of their heritage and / or landscape value, make a positive contribution to Oldham's unique identity and local distinctiveness and should therefore be protected and enhanced.
- 8.9 It is recognised that viability is a key factor in the repurposing of mill buildings for residential and employment uses and the Mills Strategy therefore sets out a broad overview of the potential for conversion of the individual mills to residential and employment uses, which is factored into the overall categorisation of each individual mill as high, medium or low priority. However, the first stage of the assessment is to identify those mills that make the greatest contribution to the local distinctiveness, sense of place and landscape character of Oldham and, as such, the landscape and heritage assessments are given greater weight in the overall categorisation of the individual mills as high, medium or low priority, particularly as detailed, site specific viability appraisals of each individual mill are beyond the scope of this project.
- 8.10 On this basis, a mill that scores 'high' against landscape and heritage will generally be given a 'high' score overall irrespective of the outcome of the assessment on housing and employment potential. This would indicate that there should be a clear presumption in favour of the retention of the mill in question by virtue of its landscape and heritage value

and any future proposal seeking the loss of such a mill should be accompanied by robust evidence, including detailed, site specific viability appraisals and marketing information to demonstrate that there is no realistic prospect of the mill being repurposed for viable alternative uses.

8.11 In terms of the overall scoring there are circumstances where an individual mill score may, for example, be high on landscape and medium on heritage. However, the medium score bracket for heritage value ranges from between 0 and 2.0, which is then taken into account in formulating an overall score. By way of example, for any mills scoring within the upper range of medium (i.e. >1.5), the overall score will generally be given as high (i.e. the mill will score high for landscape and will be an 'upper' medium for heritage value).

8.12 The overall scoring for each mill is therefore set out below within Table 8.2:

Table 8.2: Overall Scoring

Mill	Landscape	Heritage	Housing Potential	Employment Potential	Overall
Ace Mill	High	Medium	Medium	High	High
Adelaide Mill	Medium	High	Medium	Medium	Medium
Albert Mill	Medium	Medium	Low	High	Medium
Alliance Mill	Low	Low	Low	Low	Low
Austerlands Mill	Medium	Medium	High	Low	Medium
Bee Mill	Low	Low	Medium	High	Low
Belgrave Mill	Medium	Medium	Low	High	Medium
Bell Mill	High	High	Low	Medium	High
Briar Mill	High	Medium	Low	High	High
Britannia Mill	Low	Low	Low	Low	Low
Cairo Mill	High	High	Low	Medium	High
Delta Mill	Medium	Medium	Medium	High	Medium
Dob Lane End	Low	Low	Medium	High	Low
Duke Mill	Medium	Medium	Medium	High	Medium
Earl Mill	High	High	Low	High	High
Elm Mill	High	Medium	Low	High	Medium
Falcon Mill	Medium	High	Low	Medium	High
Fir Mill	High	Medium	Medium	High	High
Forge Mill	Low	Low	Low	Medium	Low

Mill	Landscape	Heritage	Housing Potential	Employment Potential	Overall
Fountain Mill	Low	Medium	Medium	Medium	Medium
Gatehead Mill	Medium	Medium	High	Low	Medium
Gorse Mill No. 1	High	High	Medium	High	High
Grape Mill	Medium	Medium	Low	Medium	Medium
Greenfield Mills	Medium	Medium	High	Low	Medium
Greengate Mill	Low	Low	Low	High	Low
Haybottoms Mill	Medium	Medium	High	Medium	Medium
Heron Mill	High	High	Low	High	High
Ivy Mill	High	High	Low	High	High
Jubilee Mill	Medium	Medium	Medium	Low	Medium
Jubilee Mill (Fulling)	Medium	Medium	Low	Medium	Medium
Kinders Lane Mill	Low	Medium	High	Medium	Low
Knarr Mill	Medium	Medium	High	Low	Medium
Lane End Mill	Low	Low	Medium	High	Low
Lilac Mill	High	Medium	Low	High	Medium
Lily Mill	High	Medium	Low	High	Medium
Longrange Mill	High	High	Low	Medium	High
Lumb Mill	Medium	Medium	High	Medium	Medium
Majestic Mill	High	High	Low	Medium	High
Malta Mill	High	High	Low	High	High
Marlborough (No. 1) Mill	High	High	Medium	High	High
Morton Mill	Low	Low	Medium	Medium	Low
Oak View Mills	Medium	Medium	Medium	Medium	Medium
Osborne Mill	High	Medium	Low	Medium	High
Paradise Mill	Low	Low	Low	Medium	Low
Pingle Mill	Medium	Medium	Medium	Low	Medium
Prince of Wales Mill	Low	Medium	Medium	Medium	Low
Ram Mill	High	Medium	Low	High	High
Rasping Mill	High	High	High	Low	High
Raven Mill	High	High	Low	High	High
Slackcote Mill	High	Medium	Medium	Low	High
Springfield Mill	Low	Low	Medium	High	Low
Springfield Works	Low	Low	Medium	Medium	Low
Stockfield Mill	High	Medium	Low	High	Medium
Swan Mill	High	High	Medium	High	High
Thornham Mill	High	Medium	Low	Medium	Medium
Vale Mill, Chamber Road	High	Medium	Low	High	Medium

Mill	Landscape	Heritage	Housing Potential	Employment Potential	Overall
Vale Mill, Stockfield Road	Low	Low	Medium	High	Low
Vine Mill	Medium	Medium	Low	Medium	Medium
Warth Mill	High	Medium	Medium	Medium	High
Waterside Mill	Medium	Medium	Medium	Medium	Medium
Wellington Mill	Medium	Medium	Medium	Low	Medium
Werneth Mill, Manchester Road	Low	Low	Low	Medium	Low
Werneth Mill, Henley Street	High	High	Low	Medium	High
Woodend Mill	Low	Low	Medium	Low	Low

8.13 The assessment identifies that 22 of the mills are classified as high priority. A further 26 mills are classified as medium, with the remaining 16 mills classified as being low priority.





## **Chapter 9:**

# **Strategy, Policy Recommendations & Action Plan**

## 9. STRATEGY, POLICY RECOMMENDATIONS & ACTION PLAN

### Landscape & Heritage Value – Key Findings

- 9.1 The mills across Oldham provide clear symbols of the industrial heritage of the town and help define the distinctive character of the Borough. The prevalence of large scale mills and their distribution across the Borough ensures that they are permanent and ubiquitous reminders of the importance of the town as the main cotton spinning centre in Lancashire thereby helping to define local identity and a clear sense of place.
- 9.2 The Landscape Overview prepared by Martin Woolley Landscape Architects reaffirms the contribution that the mill stock makes in defining the distinctive character of Oldham and demonstrates that its landscape character would be irreversibly changed if particular individual mills or clusters of mills were demolished or significantly altered to the extent that the original mill character is permanently lost. The Landscape Overview identifies that 36 of the subject mills are of high value to Oldham’s landscape character. The boom in the cotton spinning industry in the late-19th and early-20th century coupled with advances in construction techniques led to the construction of a number of large scale mills in close proximity to one another around the main built up area of modern day Oldham. The Landscape Overview identifies that the clustering of groups of mills within these areas provide a unique landscape characteristic and give Oldham an exceptionally strong sense of place.

- 9.3 The Mills Strategy has also sought to establish the heritage significance of each individual mill based on archaeological interest, historic interest and its architectural / aesthetic interest, as well as the contribution of each mill to the sense of place experienced within that area. It has been established that all the subject mills have some degree of heritage significance and provide some contribution to the story of milling in Oldham. However, 14 of the mills have been considerably altered impacting on their character as a mill and thereby significantly reducing any architectural or historic interest that they may possess and these mills are therefore considered to be of low value in heritage terms. The assessment has identified 16 mills that score highly in terms of both historic and architectural interest, with the remaining mills assessed as being of medium value in terms of heritage.
- 9.4 The mill stock therefore forms a fundamental part of Oldham's historic environment and give the landscape of Oldham a clear distinctive character. However, without a sustainable use many mills fall into disrepair and are ultimately lost, as has been seen across Oldham in recent years. The majority of the mill stock within Oldham does however remain in good condition and is in active use, particularly those mills within established employment areas providing well-utilised premises for a range of employment generating uses. There are however some notable exceptions where mills have stood vacant for a prolonged period and, as a result, have fallen into disrepair and attracted anti-social behaviour. These mills have therefore become blights on local communities and it is therefore important that these sites are repurposed in order to secure their long term sustainability and deliver positive outcomes for local communities.
- 9.5 Mill sites are overwhelmingly located within highly accessible locations within the main urban area and repurposed mill sites can potentially play an important role in accommodating future housing and employment development needs and minimising the

release of Green Belt land. However, viability will be key to the successful regeneration of such sites with mill redevelopment projects often requiring assistance to overcome market failures. The evidence also suggests that a permissive policy approach and realistic expectations from LPAs in relation to planning obligations, as well as realistic expectations in terms of land values from landowners is required in order to support the delivery of such schemes. This section of the study therefore seeks to outline how a sustainable future for the mill stock could be secured. A summary of recommended actions is contained within Paragraph 9.90 and Appendix 8.

## **A Sustainable Future for the Mill Stock**

- 9.6 The Mill Strategy has considered the potential repurposing of the subject mill sites for housing and employment uses and individual action plans / site appraisals have been prepared for each of the mills and are contained within Appendix 5 (High Priority Mills), Appendix 6 (Medium Priority Mills) and Appendix 7 (Low Priority Mills). The site appraisals include advice on the potential strategy for the individual mills to secure their sustainable future having regard to the assessment of the housing and employment potential of the individual mills and other site specific constraints and planning considerations that will impact upon the future use of the mill sites, including the local context and surrounding land uses.

### Residential Opportunities

- 9.7 The current housing requirement for the Borough is a minimum of 693 homes per year utilising the government's standard methodology for calculating local housing need. Places for Everyone (PfE), formerly 'Greater Manchester's Plan for Homes, Jobs and the Environment – the Greater Manchester Spatial Framework' (GMSF), proposes a stepped housing



requirement for Oldham of 352 homes per year for 2021 to 2025, 680 homes per year for 2025 to 2030 and 868 homes per year for 2030 to 2037. This equates to an average of 680 homes per year or 10,884 homes in total over the plan period (2021-2037).

- 9.8 The Local Housing Needs Assessment identifies a particular need for 3-4 bedroom houses over the Plan period, as well as an increasing proportion of bungalows. The Local Housing Needs Assessment also highlights a marked increase in the need for older person's specialist accommodation under the expectation and aspiration scenarios. However, having regard to the Council's current housing requirements and adopting the aspirational scenario, the analysis identifies a need for less than 50 flats per annum over the Plan period and, accordingly, it is evident that the conversion of the existing mill stock to flats would make a relatively limited contribution to meeting identified housing needs. The mill stock could however potentially help contribute to meeting the need for older person's specialist accommodation through the conversion of existing buildings, particularly where such mills occupy highly accessible locations within stronger market areas.
- 9.9 The site assessment work has established that the overwhelming majority of the mills assessed as part of the Mills Strategy lie within allocated employment areas or within established unallocated industrial / trading estate settings. Accordingly, the majority of the mills within such settings are evidently unlikely to be suitable for future residential use.
- 9.10 The mills located within existing employment areas help support the local economy providing employment premises for a range of employment-generating uses that are appropriate within allocated employment areas and within other established industrial / trading estate locations. It is therefore evident that mills within such locations that are currently within or were last in use for employment generating purposes should be retained in such use unless it can be demonstrated that there is no realistic prospect of a continuing

employment generating use or where the redevelopment of the site in isolation or in conjunction with neighbouring sites and premises would deliver wider regeneration and community benefits in line with established policy objectives.

- 9.11 A number of the mills are also located within weaker market areas where capital values are lower and a number of the mills, particularly those that have fallen into a state of disrepair, will be subject to significant costs of adaptation that can make them commercially unappealing to deliver new homes.
- 9.12 The overwhelming majority of the identified sites are in established use and are therefore unlikely to deliver new housing in the short term (0-5 years). However, as detailed within the individual site appraisals, the following seven mill sites currently stand vacant and are considered to represent appropriate locations for new housing development in principle:

*Elm Mill & Lily Mills*

- 9.13 Elm Mill and Lily Mills lie within Shaw and currently form part of a Business Employment Area allocation. On this basis, any proposals that come forward for the refurbishment / repurposing of the buildings for employment use should be viewed as being acceptable in principle.
- 9.14 However, the landowners have indicated that the occupiers of the respective buildings have now vacated leaving a large, vacant brownfield site within Shaw, with limited interest from potential commercial occupiers. It is considered that, subject to demonstrating compliance with established loss of employment land policies, the site would represent an appropriate location for new housing in principle.



- 9.15 Elm Mill and Lily Mills have been identified as being of high landscape value and as part of a key mill cluster and, as such, there should be a clear presumption for the retention of the existing buildings. The landowner has indicated that the retention of this mill for housing would be challenging in policy, market, and viability terms. However, this would need to be robustly demonstrated as part of any future application seeking the loss of the existing buildings<sup>5</sup>.

### *Greenfield Mills*

- 9.16 Greenfield Mills are identified as a major developed site in the Green Belt in the adopted Local Plan. The site has been vacant since circa 2001 and subsequently some of the building on site have deteriorated. The site also has relatively poor accessibility to services due to its rural location.



*Greenfield Mills*

- 9.17 However, Greenfield Mills forms part of a draft mixed-use allocation within the Places for Everyone Publication Draft (August 2021) which will deliver new residential development as well as a range of commercial, leisure and retail facilities. It is apparent that the original built elements of the mills should be retained as far as possible as part of the comprehensive redevelopment of the site and converted for residential uses or an appropriate range of commercial and leisure uses to support the sustainability of the new residential community to be created as part of the development of the wider site.

<sup>5</sup> Following the original assessment, an outline planning application for the redevelopment of the site to deliver upto 400 dwellings facilitated by the demolition of the mills has been granted subject to the completion of a S.106 Agreement (LPA Ref.

- 9.18 It is also considered that any future applications should be accompanied by a Heritage Statement to provide clear justification for the approach adopted and should also consider how social significance of the mills could be incorporated into the scheme. A building recording exercise should also be undertaken for any elements of the mill grouping to be lost as part of any future redevelopment proposals.

#### *Jubilee Mill*

- 9.19 Jubilee Mill is not subject to any specific land use or environmental designations within the adopted Development Plan. The mill currently stands vacant and occupies a relatively accessible location within the main urban area.
- 9.20 The surrounding land uses are predominantly residential with the exception of a number of small industrial units to the east. It is considered that the site would be suitable for residential use in principle, with a general presumption for the retention of the existing mill building given its assessment as being of medium value in both landscape and heritage terms. However, it is apparent that viability is likely to present a key challenge in relation to the residential conversion of Jubilee Mill and, as such, a progressive and supportive policy framework and decision-making approach will be needed to support any such proposal, including relaxing affordable housing contributions and other planning obligations. There may also be a requirement to access funding support to secure the delivery of a residential conversion scheme on the site.

#### *Jubilee Mill (Fulling)*

- 9.21 Jubilee Mill (Fulling) lies within the Green Belt and stands vacant with the remaining mill buildings in a dilapidated state.

- 9.22 The site was subject to a recent planning application for demolition of the existing mill buildings to enable the erection of 11 No. dwellings, which was refused on 4<sup>th</sup> September 2021 on highway grounds. It is however considered that the residential development of the site may be appropriate in principle subject to compliance with established Green Belt policy requirements and subject to satisfactorily addressing the highways issues.
- 9.23 The mill has been identified as being of medium value in both landscape and heritage terms and, as such, there should be a general presumption for the retention of the key elements of the existing mill buildings. However, it is acknowledged that, given the dilapidated condition of the existing buildings, this may not be feasible. Nevertheless, this should be robustly demonstrating as part of any on-going or future planning application involving the loss of the existing buildings and building recording should be undertaken where any loss is seen to be justified.

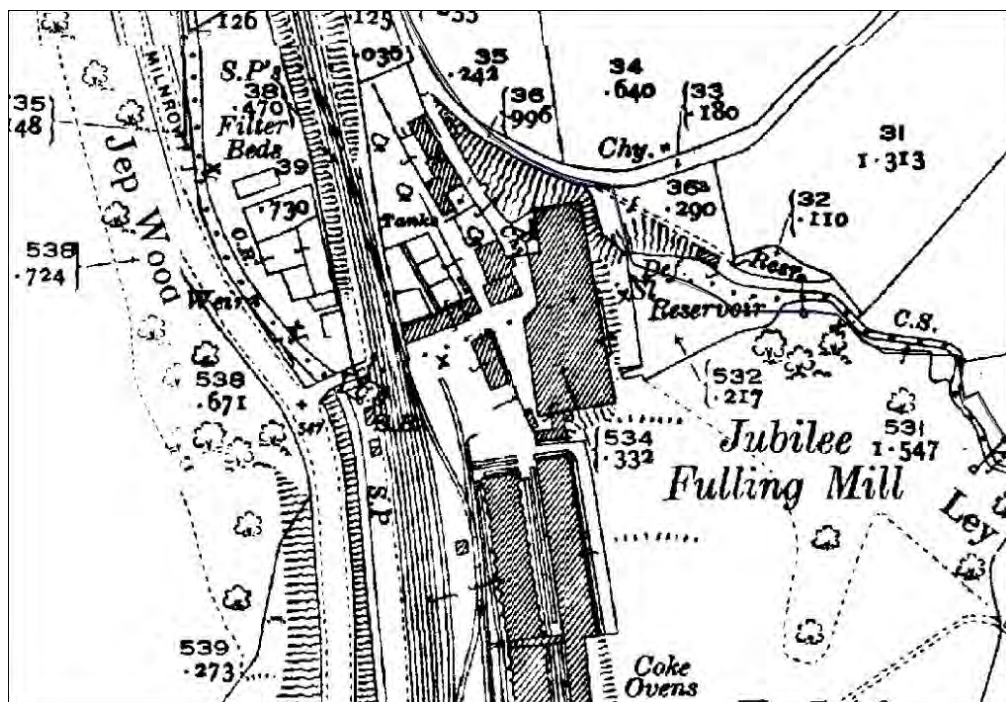


Figure 7.1: Jubilee Mill (Fulling) Historic Map

*Prince of Wales Mill*

9.24 The Prince of Wales Mill is not designated for a specific land use purpose within the adopted Development Plan and occupies a highly accessible location within the main urban area. Planning permission has previously been granted for the residential conversion of the building, although this consent has not been implemented and it is recognised that viability is likely to be a particular challenge in this location.



*Prince of Wales Mill*

*Thornham Mill*

9.25 Thornham Mill occupies a prominent location adjacent to the A671 within a predominantly residential area towards the north of the settlement of Royton. The mill buildings have stood vacant for a prolonged period and, coupled with limited maintenance during this period, have fallen into a state of disrepair and are having a significant adverse impact on the visual amenity of the area and the wider local community. The site occupies an accessible location within the main urban area and therefore represents an entirely appropriate location for new housing in principle.



*Thornham Mill*

9.26 Thornham Mill has been identified as being of high value in landscape terms and medium value in relation to heritage. The site is also identified as forming part of an identified key mill cluster and there should be a clear presumption in favour of the retention of the mill in this context. However, it is apparent that viability is likely to present a key challenge in relation to the residential conversion of Thornham Mill and, as such, a progressive and supportive policy framework and decision-making approach is likely to be needed to support any such proposal, including relaxing affordable housing contributions and other planning obligations. There may also be a requirement to access funding support to secure the delivery of a residential conversion scheme on the site. It is clear the early engagement between the LPA and landowner would be advisable to discuss opportunities to support the retention of the building and its repurposing for long term, viable use.



*Wellington Mill*

- 9.27 Wellington Mill forms part of a mixed-use allocation within the Development Plan, although the site is currently vacant.
- 9.28 The site occupies an entirely acceptable location for residential use in principle and, based on the housing potential assessment that has been undertaken, it is considered that the residential conversion of the building is a realistic option, which could involve conversion to specialist older person's accommodation in view of the accessible location of the site within a strong market area. However, a progressive and supportive policy framework and decision-making approach may be required to support any such proposal, including relaxing affordable housing contributions and other planning obligations.

*Wellington Mill*



9.29 There are therefore a limited number of mills that are considered to represent suitable sites for housing in the short term (i.e. within five years). However, the assessment has also identified that the following sites may be suitable for residential use, primarily in the medium to longer term (i.e. beyond five years) either through the conversion of the existing building or redevelopment and subject to demonstrating that there is no realistic prospect of a continuing employment use and / or existing tenants can be relocated to more appropriate employment sites elsewhere in the Borough to secure wider regeneration benefits through the redevelopment of the site for new housing:

**Table 9.1: Longer Term Prospective Housing Sites**

Mill	Total Overall Score
Alliance Mill	Low
Austerlands Mill	Medium
Bell Mill	High
Britannia Mill	Low
Cairo Mill	High
Delta Mill	Medium
Duke Mill	Medium
Fir Mill	High
Gatehead Mill	Medium
Grape Mill	Medium
Haybottoms Mill	Medium
Heron Mill	High
Kinders Lane Mill	Low
Knarr Mill	Medium
Lane End Mill	Low
Longrange Mill	High
Lumb Mill	Medium
Majestic Mill	High
Marlborough (No. 1) Mill	High
Oak View Mills	Medium
Paradise Mill	Low
Pingle Mill	Medium
Rasping Mill	High
Raven Mill	High
Slackcote Mill	High

Mill	Total Overall Score
Springfield Works	Low
Vine Mill	Medium
Warth Mill	High
Waterside Mill	Medium
Werneth Mill (Henley Street)	High
Woodend Mill	Low

- 9.30 The overwhelming majority of the sites outlined within Table 9.1 are within designated employment areas and / or within established employment use and the expectation therefore is that these sites will be retained in such use for at least the short to medium term (i.e. 0-10 years).
- 9.31 However, residential use has been identified as a potential alternative future use for the sites in question in the event that the established employment use ceases, particularly where such sites lie to the edge of established employment areas or form part of small industrial / trading estate settings within a predominantly residential setting. The majority of the mills identified in Table 9.1 have been assessed as being high or medium priority overall and, as such, there should be a presumption in favour of the retention of the mill buildings as part of any future proposals. It is acknowledged that there may be policy, market or viability challenges associated with the retention of such buildings, however, this would need to be robustly demonstrated as part of any future proposals involving the loss of such buildings and that the benefits of the proposed development would outweigh the harm arising from the loss of any original mill elements.
- 9.32 Whilst the sites identified above are considered to represent appropriate locations for new housing in principle in either the short or longer term, it is imperative that the LPA recognise the risks associated with bringing such sites 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

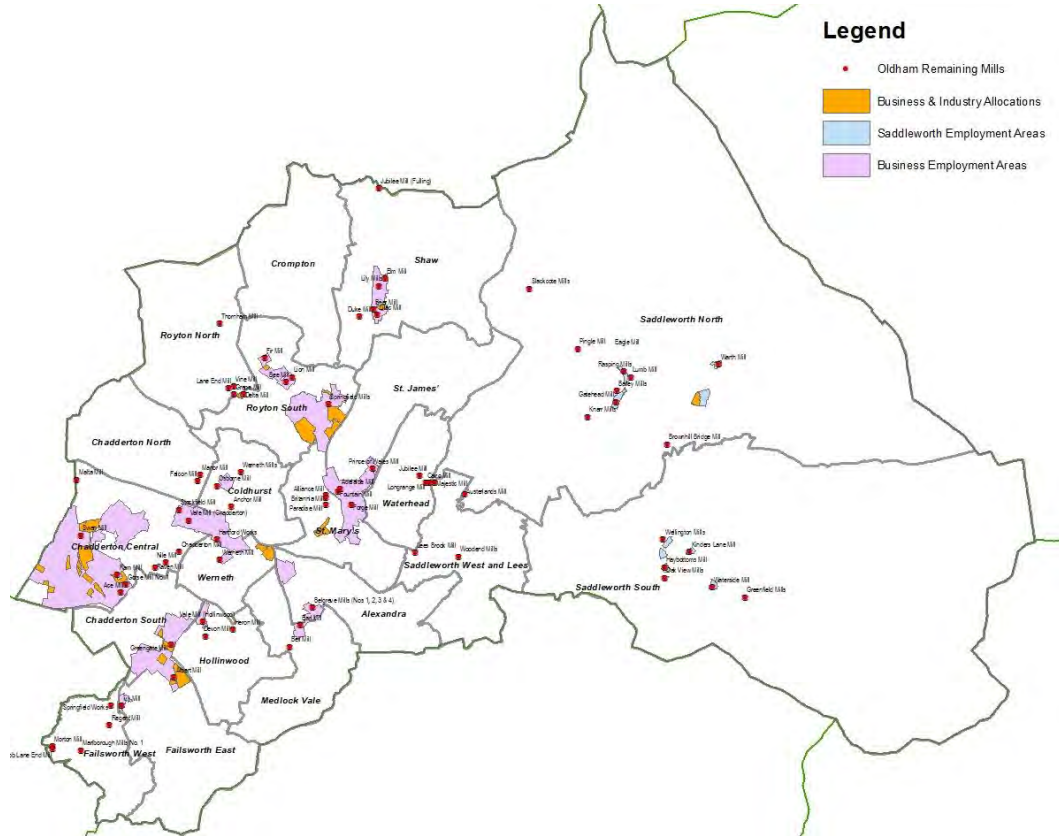
other planning obligations, which can significantly impact on the delivery of such schemes subject to appropriate viability testing.

9.33 Moreover, feedback received following stakeholder meetings with developers, as well as anecdotal evidence from other stakeholders, has identified that unrealistic landowner aspirations on land value can often mean that a residential conversion scheme that appears viable based upon a viability appraisal cannot ultimately be delivered. It is therefore recommended that the LPA actively engage with individual land owners and agents where such issues may be in play, which will also provide an opportunity to set out the LPA's approach in relation to the building in question, such as that the demolition of the building will not be supported where it is of landscape and heritage value and that appropriate remedial enforcement action will be taken against owners as necessary to ensure that such buildings do not fall into a state of disrepair as a result of neglect and lack of maintenance. This approach would also allow early positive discussions to take place between landowners and the LPA as to how a viable, long term use for a particular mill could be secured and to identify any site specific constraints and opportunities that would need to be addressed. This could also involve input from Oldham Council's Business & Housing Teams to establish what forms of grants and funding options may be available.

9.34 However, even with a supportive policy approach and realistic landowner aspirations, it is apparent that some mill schemes will require further financial support to support the delivery of new uses to secure the sustainable future of the mills, as detailed later within this section.

Employment Potential

9.35 The majority of the subject mills stock are located within designated employment areas or within existing industrial / trading estate locations. The image and table contained overleaf identifies the mills located within designated employment areas:



<b>Priority Sector BEAs</b>	Swan Mill; Ram Mill; Gorse Mill No. 1; Ace Mill; Greengate Mill; Albert Mill
<b>BEAs &amp; SEAs</b>	Ivy Mill; Vale Mill (Hollinwood); Earl Mill; Belgrave Mills; Werneth Mill; Vale Mill (Chadderton); Stockfield Mill; Fir Mill; Bee Mill; Springfield Mill; Elm Mill; Lily Mills; Briar Mill; Lilac Mill; Fountain Mill; Forge Mill; Adelaide Mill; Rasping Mill; Lumb Mill; Gatehead Mill; Warth Mill; Haybottoms Mill; Oak View Mills; Kinders Lane Mill; Waterside Mill

Figure 9.2: Mills Within Designated Employment Areas

- 9.36 There are a range of allocated Business Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) across the Borough to provide for a broad and diverse range of employment generating uses, which will help meet the needs of a changing local economy and provide opportunities for investment for new businesses and existing firms. There are a number of other established industrial / trading estates across the Borough which are not formally allocated for employment use within the adopted Development Plan but which provide low cost employment premises for a range of types of business.
- 9.37 An '*arc of opportunity*' is also identified within the adopted Development Plan of key development locations for businesses to underpin future economic prosperity. This area stretches from Oldham Town Centre through to the Chadderton Technology Park, Foxdenton and Broadway in Chadderton and onto Hollinwood Business District. The recent SIF Refresh has identified that construction; health and social care; digital industries; business and professional services; manufacturing sub sectors; and logistics are key employment sectors for Oldham and that the Foxdenton, Hollinwood and Greengate / Broadgate BEAs have the greatest potential to attract and accommodate priority sectors.
- 9.38 The overwhelming majority of the subject mills lie within established employment areas and are currently in active employment generating use providing accommodation for single tenants (e.g. storage and distribution warehouses) or low cost premises for a number of businesses within an individual mill. These mills have therefore secured a viable use appropriate within their wider land use setting and, as such, the continuation of these established uses will represent the most sustainable option for these mills going forward.
- 9.39 There will however inevitably be some mill buildings within established employment areas that are underutilised, particularly the upper floors, or which may become vacant in the short term, for example at the end of a lease period or due to business failure, which may

become more prevalent as the wider economic impacts of COVID-19 become clearer. It is apparent that the existing mill stock can provide low cost premises within established employment areas that could prove attractive to a number of the identified key sectors within the SIF Refresh, including manufacturing and logistics particularly those with good connectivity to Manchester and the wider motorway network such as those mills located within designated employment areas to the west of Oldham including Swan Mill, Ram Mill, Gorse Mill No.1, Ace Mill, Greengate Mill and Albert Mill.

- 9.40 The existing mill buildings could also provide potential scope for conversion to business centres, as has been seen with previous schemes in Oldham (e.g. Earl Business Centre) and elsewhere in the country, and could provide affordable start-up units for the digital industry and financial and professional services sectors, which are identified as being key for the Borough within the recent SIF Refresh.
- 9.41 Oldham Council has also recently published a Green New Deal Strategy 2020-2025, which sets out carbon neutrality targets whilst also bringing a new focus on building the green economic sector in Oldham to generate inward investment, jobs and training opportunities for residents. The strategy identifies that the Green Technology Services sector is one of the fastest growing UK economic sectors and supports over 37,000 jobs across Greater Manchester. It is identified that Oldham has a strong asset base for developing the Green Technology Services Sector and the existing mill stock, alongside other support mechanisms (e.g. reduced business rates) could contribute to the development of this sector, providing suitable accommodation with competitive rental levels in accessible locations.
- 9.42 The overwhelming majority of the mills across the Borough are located within existing employment areas and are in well-established employment generating use. These mills



have secured an appropriate viable use appropriate within their wider land use setting and, as such, continuation of the existing use will overwhelmingly represent the most sustainable option for those mills going forward. Individual mill buildings / sites could also provide suitable locations to support priority economic sectors within the Borough, particularly those that are well-related to the Manchester and the motorway network with the designated BEAs to the west of the Borough. This could include providing premises and sites for the logistics; manufacturing sub-sectors; digital industries; financial and professional services; as well as the Green Technology Services sector. There may also be an increased demand for storage and distribution facilities as a result of changing consumer habits as a result of the COVID-19 pandemic.

- 9.43 It is therefore recommended that 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 established and emerging key sectors within Oldham through both a positive planning regime and other support mechanisms. This could include the inclusion of mill sites within identified Green Business Districts and providing business rates incentives for the occupation of mills by new and relocating businesses, where appropriate.
- 9.44 Moreover, a marketing strategy could be developed 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 to accommodate key employment sectors highlighting the potential suitability of mill buildings to accommodate such sectors, competitive rental levels and the strategic advantages offered by Oldham relative to the motorway network.
- 9.45 The Council should also seek to work positively and proactively 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 Team, the Local Enterprise Partnership and Historic England.

9.46 It should also be acknowledged that innovative solutions may be required to support the full occupation of individual mills that are currently underutilised, particularly the upper floors of such buildings. This approach could include allowing a broader mix of uses within individual mills, which may not necessarily be fully compliant with established Development Plan policies relating to designated employment areas, such as the provision of residential uses (e.g. flats, older person's accommodation, live / work type units), community or leisure uses in appropriate circumstances where the benefits of securing the active re-use of mill buildings could be seen to outweigh potential conflicts with established Development Plan policies.

9.47 However, it is recognised that, due to the age, scale, format and condition of former mill buildings, it may not be economically viable to secure the repurposing of individual mills to provide modern, fit for purpose employment / commercial floorspace. However, this would need to be robustly demonstrated as part of any future proposals involving the loss of such buildings, particularly the identified high and medium priority mills, and that the benefits of the proposed development would outweigh the harm arising from the loss of any original mill elements.

#### Other Potential Uses

9.48 There are also numerous examples from across the North of England highlighting that textile mills can be successfully repurposed to accommodate a range of other uses, including civic, community, cultural, leisure and retail facilities.

9.49 The '*Engines of Prosperity: New Uses for Old Mills North West*' report provides case studies of a number of mills across the region that have been successfully converted to provide a range of new uses to secure their long term sustainability. This includes Holmes Mill in Clitheroe that has been converted to a mixed use leisure destination and Pendle Village Mill which has been repurposed to create a retail hub. The report highlights a number of key factors that have helped secure the conversion of the mills to such uses:

- Involvement of risk tolerant land owners with development experience and a clear vision;
- Early engagement and a proactive and positive approach from the Local Authority to assist in overcoming obstacles;
- Location and timing can be key to the viability of the development;
- The availability of funding is critical to the regeneration of mill projects;
- Involvement of well-organised trusts or other non-for-profit organisations can unlock opportunities for significant grant funding to plug financial gaps.

9.50 It is therefore evident that mill buildings can be successfully repurposed to a range of other uses, however, previous case studies highlight that the above factors will be fundamental to the delivery of such schemes. It is clear that early engagement between landowners; trust or other non-for-profit organisations; or other parties seeking to bring such schemes forward will be critical alongside access to funding. It is also apparent that the delivery of such schemes elsewhere in the Region have been aided by a proactive and positive approach from the Local Authority to overcome potential obstacles.

9.51 The LPA should also consider the scope for existing individual mill buildings to accommodate future publicly funded civic, community or education uses as a potential avenue to secure the long term sustainability of individual mill buildings that are

appropriately located to accommodate such uses to meet the long term needs of the community.

## Funding Opportunities

- 9.52 A fundamental issue for the renovation of mills is commercial viability and much of the mill stock within Oldham subject to this assessment lies within weaker market areas where capital values are lower and a number of mills, particularly those that have fallen into a state of disrepair, will be subject to significant costs of adaptation that make them commercially unappealing to deliver new uses suited to modern occupiers. The availability of funding is therefore crucial to the delivery of mill redevelopment schemes, although securing commercial funding can be challenging due to the upfront costs and risk profile of mill conversion schemes, particularly in weaker market areas such as those within Oldham where the majority of the subject mills are located. A brief overview of identified funding streams that could potentially be utilised to support the delivery of mill site regeneration schemes is therefore contained below.
- 9.53 The '*Engines of Prosperity: New Use for Old Mills North West*' report addresses the availability of debt funding finance for development schemes and specifically highlights research of the investment market which indicates that where mills are located in unfavourable market locations, there is often uncertainty from an occupier perspective to make an investment proposition viable and that heritage assets are still viewed by some institutions as a non-mainstream investment class. The report also highlights that there does remain a strong appetite from institutions to invest where the conditions are right and this is likely to mean pre-let development.

- 9.54 A number of areas of public sector funding have also been identified that may provide opportunities to support the regeneration of existing mill sites:

Home Building Fund

- 9.55 The 2017 Budget set out plans to increase funding available through the Home Building Fund from £3billion to £4.5billion to support the delivery of new homes across England. The Home Building Fund is a flexible form of funding administered by Homes England on behalf of the Government. The fund provides development finance providing loan funding to meet the development costs of building homes for sale or rent, as well as infrastructure finance providing loan funding for site preparation and the infrastructure needed to enable housing to progress and to prepare land for development. Finance is available to all private sector organisations involved in delivering new homes and the provision of enabled sites ready for residential-led schemes. The fund is subject to some core eligibility criteria, including a requirement for applicants to demonstrate that without the funding the scheme would not progress quickly, or at all; the borrower must be a private sector entity which has majority control over the site; the project must deliver at least five homes; and infrastructure projects must ultimately lead to the development of new housing.
- 9.56 The Home Building Fund has recently been used to support the delivery of the conversion of Weir Mill in Stockport to provide 250 flats supported by a £7million Housing Infrastructure Fund loan and could therefore provide a potential funding opportunity for private sector developers seeking to deliver marginal mill conversion schemes within Oldham.

### Levelling Up Fund

- 9.57 The Levelling Up Fund was announced in the Spending Review and will invest in local infrastructure covering a range of high value local investment priorities, including local transport schemes, urban regeneration projects and cultural assets. The Fund is jointly managed by HM Treasury (HMT), the Ministry of Housing, Communities and Local Government (MHCLG) and the Department for Transport (DfT).
- 9.58 The Levelling Up Fund is a competitive fund and the first round will focus on three themes: smaller transport projects that make a genuine difference to local areas; town centre and high street regeneration; and support for maintaining and expanding cultural and heritage assets. This will include investment to upgrade eyesore buildings and dated infrastructure, the acquisition and regeneration of brownfield sites, as well as regenerating or creatively heritage assets and may therefore present an opportunity to secure funding for the repurposing of mill buildings within Oldham.

### Heritage Enterprise

- 9.59 The Heritage Enterprise process has been introduced for projects that seek to achieve economic growth by investing in heritage. It is aimed at community organisations and commercial organisations working in partnership with community organisations to help them rescue neglected historic buildings and sites and return them to viable productive use. Heritage Enterprise is designed to bridge the funding gap that prevents a historic asset in need of repair from being returned to a beneficial and commercial use. The case for grant funding through the Heritage Enterprise will be dependent upon their being a conservation deficit (i.e. the existing value of the heritage asset plus the cost of bringing it back into use is greater than the value of the development that has been completed).



- 9.60 The Heritage Enterprise process funds not-for-profit organisation or partnerships between commercial and not-for-profit organisations and a key aim of the process is the integration of commercial and community interests within heritage-led regeneration projects.
- 9.61 The Heritage Enterprise process ultimately aims to unlock heritage assets in need of investment and utilise them as a stimulus for economic growth, which will primarily involve the repair and adaptation of a historic building or grouping of historic buildings for an end use that generates a sustainable commercial income. Priority will be given to projects that are located within areas of the UK that are experiencing economic disadvantage and which focus on heritage assets that are considered 'at risk' and formally designated (e.g. listed or locally listed building, scheduled monument or in a conservation area).
- 9.62 Applications for grants through Heritage Enterprise will be considered solely on the basis of the conservation deficit and not on the applicant's inability to fund a commercially viable scheme. It is expected that the fund will support an economic use that creates sufficient revenue to provide a reasonable return for the owner / developer and provide enough income to pay for ongoing maintenance and repair of the heritage asset once the development is completed. The Heritage Enterprise process will also consider projects that focus on residential / social housing where it is demonstrated that this is the most appropriate economically viable use for a building or group of buildings and where local need for housing is clearly evidenced.

#### Architectural Heritage Fund

- 9.63 The AHF's Heritage Impact Fund offers loans from £25,000 to £500,000 to support applicants who are undertaking a capital project or are looking to build upon or scale-up an

existing enterprise. The Heritage Impact Fund provides funds to applicants across the UK seeking to acquire, reuse or redevelop buildings which are of historic or architectural importance, which could include buildings which are listed, in Conservation Areas or that may be of special significance in the community. The end use should be financially viable and help support the objectives of the organisation and provide impact to or benefits to the communities in which buildings are based. The fund is only open to formally constituted and incorporated charities, community businesses or social enterprises whose members have limited liability.

- 9.64 The AHF also offers loan finance for purposes which are not eligible for funding through the Heritage Impact Fund. These include projects which may require longer-term finance or demonstrate less community benefit than is required to access HIF funding. A loan could provide mortgage-style finance secured against a restored asset providing affordable housing or a community space or may enable a Trust to restore and sell on a historic building.

#### Tax Incremental Funding

- 9.65 The '*Engines of Prosperity: New Use for Old Mills North West*' report also highlights a potential opportunity to utilise Tax Incremental Financing to enable the upfront abnormal or gap funding costs of a mill development scheme to be met. This is a means by which the tax revenues generated by a project are recycled back into the scheme, primarily at the outset by utilising borrowing against the projected tax revenue stream. It is principally used in connection with commercial projects that generate business rate income, however, '*Engines of Prosperity: New Use for Old Mills North West*' highlights that this model could potentially be applied to residential schemes utilising New Homes Bonus and / or a proportion of Council Tax receipts.

### Local Authority Funding

- 9.66 A number of Local Authorities across the country have sought to acquire property assets taking advantage of low borrowing rates offered by the Public Works Loan Board (PWLB) to fund the acquisition. Local Authorities have been able to take advantage of the difference between below market interest rate paid and the market rate that can be subsequently charged for the asset. This is an approach that Oldham Council could consider working in isolation or as part of a joint venture to secure the delivery of suitable mill redevelopment opportunities across the Borough. However, the authority will evidently need to give careful consideration as to whether it has the resources to acquire mill assets and bring them forward for redevelopment, particularly in view of the identified risks associated with mill conversion schemes.
- 9.67 It is apparent that commercial viability is a fundamental issue in the delivery of mill redevelopment schemes, although there are evidently opportunities available to support the delivery of such schemes. However, it is apparent that economic uncertainty created following the COVID-19 pandemic may affect potential funding options for mill conversion schemes and it is important that the Council remain proactive in identifying potential funding streams that remain available to support landowners, developers and other parties seeking to bring forward such schemes.

## **Enforcement Action & Associated Measures to Secure Retention of Mill Buildings**

- 9.68 There are notable examples of mills that have stood vacant for a prolonged period and, as a result of inactivity and a lack of general maintenance and upkeep by the landowner, these

buildings fall into disrepair and attract anti-social behaviour. These mills have therefore become blights on local communities and can lead to pressure for the demolition of the buildings, which can ultimately lead to an erosion of local identity and sense of place.

- 9.69 It is important that early signs of neglect are detected as historic buildings can begin to decline rapidly and become targets for vandalism. The effect of this on local communities and their experience of place is clear. Where buildings are beginning to fall into a state of decline, the local authority should identify the owner of the mill buildings and make contact to draw their attention to these signs. Prompt action will prevent repair costs escalating and avoid the loss of historic fabric.

#### S.215 Notices

- 9.70 In relation to non-designated mill buildings, there are limited enforcement measures which can be taken to improve the condition of a site under Section 215 of the Town and Country Planning Act 1990. A Section 215 Notice is used to secure improvements to the external, visible appearance of either a piece of land or a building but does not necessarily address the cause of any damage to the building fabric. These enforcement notices are relatively straightforward and can be effective in achieving improvements to the quality of the historic environment.
- 9.71 The steps to initiate a Section 215 Notice are set out within the Historic England guidance '*Stopping the Rot*' (2016). This provides case studies to demonstrate the effectiveness of a simple process at improving the condition of a site or area. Section 215 is a broad power which can be used in respect of any land designated or not, including buildings, in use or vacant.

9.72 As part of a comprehensive approach, the local authority could serve a Section 215 Notice on all mills considered to be having an adverse impact on local amenity. Buildings should be identified and surveyed to list the repairs required for improvement of the building / site's appearance. The repairs should not lead to a requirement for planning permission through alteration, but be repairs such as work to gutters, roofs, removal of vegetation, render / painting repair and joinery work. Preliminary letters are sent to owners with a list of essential works along with an explanatory note. Such notices are often quite effective and can be negotiated with the owners.

#### Community Protection Notices

9.73 An additional power under the Anti-Social Behaviour, Crime and Policing Act (2014) includes a Community Protection Notice. The notice can be served on an individual or body if satisfied on reasonable grounds that:

- a. the conduct of the individual or body is having a detrimental effect, or persistent or continuing nature, on the quality of life of those in the locality, and
- b. the conduct is unreasonable

9.74 They could offer the possibility of helping to tackle Heritage at Risk issues. They also have certain advantages over section 215 Notices. For example, they can be used to control ongoing issues '*of a persistent or continuing nature*' rather than problems reoccurring and new Notices being required.

#### Article 4 Directions

- 9.75 Part 11 Class B of the General Permitted Development Order (GPDO) allows for the demolition of buildings as permitted development subject to certain conditions and limitations, as well as a prior notification process.
- 9.76 Furthermore, from 31<sup>st</sup> August 2020, Part 20 Class ZA of the GPDO allows for the demolition of vacant and redundant free-standing buildings that fell within the following use classes on 12<sup>th</sup> March 2020 as permitted development:
- B1(a) offices;
  - B1(b) research and development;
  - B1 (c) industrial processes (light industrial); and
  - free-standing purpose-built residential blocks of flats (C3).
- 9.77 The building must have been built before 1<sup>st</sup> January 1990 and have been entirely vacant for at least six full months prior to the date of the application for prior approval. The new permitted development right allows for redevelopment of a single new building within the footprint of buildings with a footprint of up to 1,000 sq.m, and with a maximum height of 18 metres. The demolition or the replacement build of buildings with a footprint greater than 1,000 sq.m is not permitted. The right does not apply to part of a building, nor does it allow for the demolition of more than one building within the curtilage and the incorporation of any additional footprint.
- 9.78 It is also necessary for the developer to apply to the LPA for prior approval of the following before beginning the development:



- the transport and highways impacts of the development;
- contamination and flooding risks;
- the impact of noise from other premises on the future residents;
- design and external appearance of the new building;
- the adequacy of natural light in all habitable rooms of each new dwelling;
- the impact of the introduction of residential use into an area; and
- the impact of the development on the amenity of the new building and of neighbouring premises, including overlooking, privacy and light.

9.79 The prior approval process does not require assessment of the heritage value of the building or the impact of the demolition on the heritage values of the wider landscape. It is therefore apparent that the existence of these permitted development rights could potentially lead to the demolition of individual mills subject of this assessment, which are identified as having landscape and / or heritage value, without the need for planning permission leading to an erosion of local identity and sense of place.

9.80 However, Article 4 directions may be used to require planning permission for the demolition of a non-designated heritage asset (such as a locally listed building outside of a conservation area), by removing the demolition rights available pursuant of the General Permitted Development Order. Paragraph 53 of the NPPF confirms that the use of Article 4 directions to remove national permitted development rights should:

- where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre);

- in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities);
- in all cases, be based on robust evidence, and apply to the smallest geographical area possible.

9.81 The demolition of mill buildings of particular heritage and landscape value and their associated structures would undermine the integrity of the historic environment of Oldham, eroding elements of the site and the group value of the whole. Demolition should only occur where full consideration has been given through the planning system. For this reason, the LPA should consider the use of Article 4 Directions to remove permitted development rights for the demolition of such buildings / structures and recommendations on the individual mills where the LPA may consider introducing such measures are contained within the individual site appraisals.

9.82 Historic England advice is that Article 4 Directions should only be used in exceptional circumstances where evidence suggests that the exercise of permitted development rights would harm local amenity or the proper planning of the area, which is reflective of previous Government guidance relating to the use of Article 4 directions.

9.83 An Article 4 direction does not prevent the development to which it applies, but instead requires that planning permission is first obtained from the local planning authority for that development. This allows full consideration of the heritage value of the mill and the cumulative impact on the wider landscape setting to be assessed. The Mills Strategy sets a hierarchy of mill categories where those in the high and medium groups should be retained as far as possible. These buildings and sites are considered to be of heritage

interest and contribute to understanding the significance of mills to the history of Oldham and its landscape and, as such, it is considered that the use of Article 4 directions to prevent the demolition of those mills as permitted development may be appropriate in this context.

## Policy Recommendations

- 9.84 The NPPF recognises that heritage assets, which range from sites and buildings of local historic value to those of highest significance (e.g. World Heritage Sites), are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 9.85 Paragraph 190 of the NPPF confirms that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats. This strategy should take into account:
- a. The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
  - b. The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
  - c. The desirability of new development making a positive contribution to local character and distinctiveness; and
  - d. Opportunities to draw on the contribution made by the historic environment to the character of a place.
- 9.86 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. The preceding sections of the Mill Strategy have included assessment of the landscape and heritage value of the individual mills, as well as consideration of viability issues affecting the potential redevelopment of mill sites, which has led to the categorisation of the individual mills as high, medium and low priority. The following policy recommendation is therefore put forward for the conservation of the non-designated mills within each level of priority:

**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:

<p><b>High Priority Mills</b></p>	<p>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)</p>
<p><b>Medium Priority Mills</b></p>	<p>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</p>

**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.

9.87 In order to assist the Development Management function in applying the suggested Mills Policy in relation to future development proposals, it is recommended that a Visual Buffer Zone be designated around the seven identified Mills Clusters, as detailed within the accompanying Landscape Overview prepared by Martin Woolley Landscape Architects. The Visual Buffer Zones could be defined on the Local Plan Policies Map to retain a high degree of visibility around each mill to prevent inappropriate future development from reducing the intervisibility between mills and irreversibly changing the historic landscape character.



- 9.88 The importance of the range of views and view types towards and across a mill or a cluster of mills is a fundamental component of Oldham landscape character and is worthy of protection. The Council may wish to develop an Oldham View Management Framework to designate particular vistas that will support the protection and enhancement of key views of existing mills.
- 9.89 It is also recommended that all applications involving the alteration, extension or demolition of high and medium priority mills should be accompanied by Heritage Statements, which should be reflected within the Council's Validation Checklist for Planning Applications. The Heritage Statements should provide clear justification for any works to the high and medium priority mills relative to their significance and setting and should also consider how social significance could be incorporated into any development scheme, particularly where the significance of the mill arises from its past activity or events. This could include the delivery of public art within the scheme linked to the past use of the mill or reflecting the social significance of a mill within the public realm.
- 9.90 Based on the findings of the Mill Strategy, the following table sets out a number of key actions to secure the sustainable future of the mill stock:

Priority Level	Summary of Key Actions
<b>High</b>	<ul style="list-style-type: none"> <li>▪ Identification of high priority mills as non-designated heritage assets.</li> <li>▪ Imposition of Article 4 Directions to remove permitted development rights for demolition relating to high priority mills.</li> <li>▪ 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</li> </ul>

	<p>how social significance of the mills could be incorporated into the scheme.</p> <ul style="list-style-type: none"> <li>▪ Oldham Council to update validation checklist to reflect the need for proposals affecting high priority mills to be accompanied by a Heritage Statement.</li> <li>▪ 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.</li> <li>▪ Building recording to be undertaken in connection with proposals involving the loss of key elements of high priority mill building fabric.</li> </ul>
<b>Medium</b>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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 scheme.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Oldham Council to update validation checklist to reflect the need for proposals affecting medium priority mills to be accompanied by a Heritage Statement.</li> <li>▪ 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.</li> <li>▪ Building recording to be undertaken in connection with proposals involving the loss of key elements of medium priority mill building fabric.</li> </ul>
<b>Low</b>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ Building recording to be undertaken in connection with proposals involving the loss of key elements of low priority mill building fabric, where deemed appropriate.</li> </ul>
<b>General</b>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Prospective designation of identified mill clusters as Conservation Areas.</li> <li>▪ Definition of Visual Buffer Zones around the identified mill clusters.</li> </ul>

- 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 established and emerging key employment sectors within Oldham through both a positive planning regime and other support mechanisms.
- Development of a marketing strategy collaboratively between bodies including Oldham Council, the Local Enterprise Partnership,

	<p>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.</p> <ul style="list-style-type: none"><li>▪ Use of appropriate enforcement powers for any mills which may fall into disrepair.</li></ul>
--	---