

LISTED BUILDING CONSENT APPLICATION – CHANGE OF USE OF SOUGH MILL TO A RESIDENTIAL DWELLING, ASSOCIATED INTERNAL AND EXTERNAL ALTERATIONS INCLUDING A REPLACEMENT GROUND FLOOR ROOM, WORKS TO THE SLUICE GATE, WORKS OF HARD AND SOFT LANDSCAPING, PARKING AND OTHER WORKS INCIDENTAL TO THE APPLICATION PROPOSALS AT SOUGH MILL, OVER HADDON NP/DDD/1224/1404 (GG)

APPLICANT: MR & MRS THOMPSON

Summary

1. The application is for the conversion of the former mill, which is a Grade II listed building, to an open market dwelling with associated internal and external works.
2. The application is recommended for approval.

Site and Surroundings

3. Sough Mill is a Grade II listed building and is on Historic England's Heritage at Risk (HAR) Register. The site comprises the mill building, associated structures, hard standing and bare ground with pockets of tall ruderal vegetation.
4. The building contains structural elements and fabric that date to the late-17th and early 19th centuries, with later additions. It is a well-preserved example of a post medieval water powered corn mill, including mill wheel, power infrastructure, hurst frame and milling machinery. The earliest diagnostic feature appears to be a two-light mullion window with a flush face to the exterior and a deep straight chamfer to the interior which is now obscured by the wheel house.
5. The site is in a picturesque setting set towards the south western edge of the Over Haddon Conservation Area. It is accessed via the steep winding road down from Over Haddon village to the north. There are also footpaths to the north, south and east of the site. The River Lathkill forms the southern edge of the site beyond which is the Twin Dales Ancient Woodland. Given its proximity to the river, the site is within a Flood Zone 2 designated area. The site is also identified as being within an area at risk of flooding from surface water running down from the rising land to the north.
6. Some 200m to the east is the Lathkill Lodge Regionally Important Geological Site (RIGS) and the application site is also within an area defined as a protected species buffer area. The National Nature Reserve (Derbyshire Dales) and the Lathkill Dale SSSI extend into the curtilage of the site to the west and south and the site abuts the public highway and footpath to the north and east. There are lead workings dating from the 18th and 19th centuries within the vicinity of the site.

Proposal

7. Listed building consent is sought for the conversion of the former mill to an open market dwelling. The principal external alterations to the Mill building are the proposals to essentially replace the wheelhouse element on the south side. It is proposed to retain a limestone plinth but then replace the elevations above with vertical timber boarding, behind which it is proposed to have 'clerestory' glazing in part: this would be set under a flat roof. Other external alterations to the mill building include:
 - replacement windows and doors;
 - replacement of modern tiles;
 - conservation rooflights;

- provision of a black flue pipe; and
 - black, cast iron gutters on rise and fall brackets.
8. Internally, the mill machinery would be left in situ and glass walkways would be installed over the existing void, as well as over the drying kiln and wheel pit. The wheelhouse would be converted to a kitchen and dining room, whilst living and sleeping accommodation would be spread over the rest of the building to create a three bedroomed property.
9. Given the nature of the site, and the proposals for residential conversion, a number of groundworks are proposed, both inside the building and across the site, including but not limited to:
- reduction of historic floors for the installation of radon protection measures, insulation and new floors;
 - installation of drainage – both foul and surface water;
 - installation of services;
 - footings for new or replacement boundary walls;
 - a package treatment plant;
 - regrading the bank to the north east, with erection of drystone retaining wall, to accommodate parking area, bin storage, etc; and
 - new surfacing of external areas in the proposed garden, parking areas, etc.
10. With regard to the conversion works, it is proposed to have three spaces set aside for the storage of plant and materials to the front, rear and south side of the building; these are proposed to ultimately become garden areas. Loading/unloading would be undertaken to the front of the building and it is proposed to retain a caravan on the site during the works of conversion; this area will ultimately become an area for vehicle parking and manoeuvring space.
11. With regards to landscaping, it is proposed to grow a 1.2m high native species hedge along the northern boundary of the site with the footpath. To the west, it is proposed to rebuild the boundary wall to define the rear curtilage. The retaining wall to the south is proposed to be rebuilt with gritstone (initially proposed as gabions) and the riverbank is proposed to be seeded with native wetland wildflower seeds to increase biodiversity. The sluice gate to the west of the site is also proposed to be restored.

RECOMMENDATION:

That the application be APPROVED subject to the following conditions:

- 1. Statutory time limit**
- 2. Approved plans**
- 3. Details of doors and door and window frames**
- 4. Details of rooflights**
- 5. Details of rainwater goods**
- 6. Sample of any new roof slates**
- 7. Sample of the timberwork to the wheelhouse elevations to include colour and treatment**

8. **Sample of roofing material to wheelhouse**
9. **Sample/details of the flue pipe**
10. **Sample panel of retaining walls**
11. **Details of the oil tank and its screening**
12. **Details of screening to bin store**
13. **Sample/details of all hard surfacing materials and retention**
14. **Soft landscaping provision**
15. **Soft landscaping maintenance**
16. **Scheme/programme of archaeological works**
17. **Mix, methodology and sample panel for any repointing, to be informed by mortar analysis and observation of historic finishes**
18. **Methodology for repair and treatment of any structural timber**
19. **Methodology for conservation of mill machinery**
20. **Methodology for the dismantling and rebuilding of the drying kiln**
21. **Details of the repair of the sluice gate, including drawings and an identification of the timber used**

Key Issues

- the impact of the proposed development on the special historic and architectural character and appearance of listed building
- archaeology
- ecology

History

None relevant

Consultations

12. Derbyshire County Council (Highway Authority):
 - no objection
 - request informative with respect to Over Haddon Public Bridleway No. 24 and Over Haddon Footpath 6 (FP 6) be attached to any grant of planning permission.
13. Over Haddon Parish Council:
 - will not alter the situation regarding light and privacy for the residents of the Mill or the nearby neighbours.
 - there will increase traffic from the existing situation - as it is such a steep and winding road, there should be highway conditions applied to this application as it could be a danger to people on what is a regular walking/hiking/cycling/horse riding route by users of the bridleway through Meadow Place

- would support any recommendations for traffic safety, in particular, speed control due to the national speed limit on that section of road
- any development and work which takes place at the Mill will change the character and appearance of the building in the existing landscape and area
- currently, it is a rundown historic corn mill and so any development will alter this, such as creating a garden or car parking, will alter the character of the area.
- any development and work which takes place at the Mill will change the character and appearance of the building in the existing landscape and area
- Lathkill Dale is such an important scientific and ecological site it cannot be left to chance that all species and habitats have not been carefully assessed in this process
- have concerns about the "clean" water that will be released into the River Lathkill from the sewage system and other materials that could find their way into it from everyday living in a previously untenanted building - would like it noted that the River Lathkill is one of the cleanest rivers in England and feel that it is vital this is preserved.
- Mill is one of only four listed structures in the village as the last surviving mill building, and a listed building, on the River Lathkill, Sough Mill and its machinery, have high heritage significance - it would be of public benefit if the mill and its workings could be made accessible, otherwise the heritage importance is lost to everyone but the owners of the mill
- plans for this building as they stand do not benefit the community of Over Haddon in any way but it should be noted that the Parish Council supports the conservation of the Mill as an important heritage asset
- uncertain whether the proposed alterations will have a detrimental impact on the river and increase the risk of flooding in the area - upstream of the Mill, the river has certainly seen a significant increase in rising water levels, flooded paths and erosion in recent years
- feel that the proposed design for the building is very good but the landscaping is a concern but, if it is kept simple, this would be less of a problem - the question has to be whether or not it is suitable for this building in the long run and if it will indeed detract from the area, landscape and heritage
- requests that the application be sent to committee for decision and, should the application be passed, requests that the following conditions be placed:
 - the property should be opened to the public on an annual basis, especially to residents of Over Haddon and this should be covered by a covenant in order to retain this access in perpetuity
 - there should be no domestic paraphernalia left outside the property, at any time, to prevent harm to the character of the site and landscape.

14. PDNPA Conservation Officer:

Initial proposals:

- overall, the design principles of the scheme are sound and it has the potential to effectively conserve the significance of the building
- have concerns about the extent of work to the hurst frame, mill machinery and other timber structures, as well as the proposed reconstruction of the drying kiln and aspects of the landscape works
- specific concerns relate to the mill gear, glass added to the first floor over the mill gear, loss of balusters and floor beams, new floor finishes, reconstruction of drying kiln, insulated concrete floors with tanking, roof and wall insulation, removal of insect damaged timber, removal of limewash, repointing and gabion walls (landscaping)
- at present the level of harm proposed would be a high degree of less than substantial which, according to Chapter 16 of the NPPF, would need to be weighed against the public benefits arising from the scheme.

Amended proposals:

- happy with the response and the amended plans

- whilst there is harm proposed, it is outweighed by the public benefits of securing the long term conservation of the building
- recommend conditions.

15. PDNPA Archaeologist:

- proposed development will provide the mill buildings with a viable future use to secure their future and long-term conservation
- welcome that it includes proposals for the conservation of the sluice gate as well as the mill buildings
- proposed conversion scheme appears to work well with the historic fabric of the building overall, but will result in some loss of historic fabric and limited changes to planform, which will result in minor harm to the archaeological interest of the building
- a full analytical building recording is required, at level 3-4 with interpretation of the development of the mill and its fabric and the Written Scheme of Investigation (WSI) should provide for a dendrochronological assessment to inform the dating of its fabric.

16. PDNPA Ecologist:

- all surveys have been undertaken in line with the relevant guidelines and an appropriate impact assessment has been undertaken along with details for appropriate mitigation/compensatory methods for all surveyed species/habitats
- the mitigation measures for bats are welcomed.

17. Natural England:

- without appropriate mitigation the application would:
 - have an adverse effect on the integrity of Peak District Dales Special Area of Conservation;
 - damage or destroy the interest features for which Lathkill Dale Site of Special Scientific Interest has been notified.
- in order to mitigate these adverse effects and make the development acceptable, the following mitigation measures should be secured:
 - secure condition that the Package Treatment Plant will be monitored and maintained appropriately
 - Habitats Regulations Assessment
- advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures
- a lack of objection does not mean that there are no significant environmental impacts and advise that all environmental impacts and opportunities are fully considered and relevant local bodies are consulted
- further advice on designated sites/landscapes and advice on other natural environment issues is provided.

18. Campaign for the Protection of Rural England (CPRE):

- support the re-use of the mill for a single home for the open market and the investment offered by the applicant
- this is contingent on the applicant addressing adequately the concerns of the PDNPA officers in respect of achieving the conservation of the building and its setting, and protecting biodiversity and protected species
- there is a policy requirement to protect the sensitive and tranquil setting and surroundings of the site - with this in mind the landscaping scheme, including introduction of boundary, retaining and river gabion walling, and hard surfacing should be carefully considered by officers in terms of potential impact on heritage significance, local character and wildlife in accordance with PDNPA Core Strategy policies GSP1, L2, L3, HC1(CI) and Development Management Plan policies DMC 3, 7, 5, 10, 11, 12 and 13

- gabion walling and southernmost boundary walling may well not conserve or enhance the natural beauty or cultural heritage of the site and its setting, contrary to the opinion offered in the statement of heritage significance in respect of the southernmost boundary walling
- the site is sensitive for cultural and environmental reasons and it is crucial that the opportunity for investment in the building and curtilage achieves the conservation and enhancement of natural beauty, wildlife and cultural heritage in the Peak Park.

Representations

19. To date the Authority has received three representations supporting the proposal. The following reasons are given:

- will rescue and restore an old historic mill which would otherwise become derelict
- will retain the character of the building and save the mill workings
- attended the Parish Council meeting and note that there were no objections raised by the public regarding the proposals
- in discussions with other residents, not aware of any concerns regarding the proposals
- people have spoken with are fully in favour of the plans to convert the mill and save the internal workings, as has been achieved with the mill at Ashford in the Water
- believe that the comments from the Parish Council are an overreaction and represent a minority view rather than the views of the wider community in Over Haddon
- the volume of traffic is very low and there is no current issue regarding safety for walkers/cyclists and horse users
- given the road is a cul-de-sac there is no through traffic and there is no right of way past the small car park
- the nature of the road prevents cars driving at the national speed given the very short section of road and sharp bends
- is highly unlikely there will be any increase in the number of vehicles using the road from the existing residents
- do not see how the change of use and conservation of the building will adversely impact the character and appearance of the local area; proposals will enable the mill and its workings to be preserved and encompassed within a dwelling as was achieved with the Ashford in the Water mill
- do not see how the creation of a garden or car parking area will change the character of the area - vehicles have been parked at the mill for many years when the mill was more recently used by the local gamekeeper and their associates
- given Sough Mill has been in private ownership for many years and there has been no public access - seems rather strange that the Parish Council are suddenly suggesting that the public are given access following its conversion into a private dwelling; there is no public access to the mill at Ashford in the Water so why should there be public access to Sough Mill
- seems unreasonable for the Parish Council to insist on conditions being inserted into the planning permission requiring public access to what has been and remains a private property
- suggestion of conditions regarding no domestic paraphernalia being left outside seems rather strange given that there is an adjacent property which has no such conditions imposed on it
- would appear that the Parish Council response represents a minority view to a proposal to conserve the mill and convert it into a domestic dwelling rather than the views of the wider community.

Main Policies

20. Relevant Core Strategy policies: GSP3, L2 & L3

21. Relevant Local Plan policies: DMC3, DMC5, DMC7 and DMC11

Wider Policy Context

22. National Park designation is the highest level of landscape designation in the UK. The Environment Act 1995 sets out two statutory purposes for national parks in England and Wales:

- Conserve and enhance the natural beauty, wildlife and cultural heritage
- Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public
- When national parks carry out these purposes they also have the duty to:
- Seek to foster the economic and social well-being of local communities within the national parks.

National Planning Policy Framework

23. The National Planning Policy Framework (NPPF) is a relevant factor for the purposes of the regulations. Development plan policies relevant to this application are up-to-date and in accordance with the NPPF and therefore should be given full weight in the determination of this application.

24. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. It is considered that in this case there is no significant conflict between prevailing policies in the Development Plan and the NPPF.

25. Paragraph 189 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks.

26. Paragraph 212 of the NPPF states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

27. Paragraph 215 of the NPPF states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

28. Paragraph 217 of the NPPF states that local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

Peak District National Park Core Strategy

29. GSP3 - *Development Management Principles*. This states that all development must respect, conserve and enhance all valued characteristics of the site and buildings, paying particular attention to, amongst other elements, impact on the character and setting of buildings, scale of the development appropriate to the character and appearance of the

National Park, design in accordance with the National Park Authority Design Guide and impact on living conditions of communities.

30. L2 - *Sites of biodiversity or geodiversity importance*: This states that development must conserve and enhance any features or species of biodiversity importance and, where appropriate, their setting. It also advises that, other than in exceptional circumstances, development will not be permitted where it is likely to have an adverse impact on any features or species of biodiversity importance.
31. L3 - *Cultural heritage assets of archaeological, architectural, artistic or historic significance*: This states that development must conserve and, where appropriate, enhance or reveal the significance of archaeological, architectural, artistic or historic assets and their settings. Other than in exceptional circumstances, development will not be permitted where it is likely to cause harm to the significance of any cultural heritage asset.

Local Plan Development Management Policies

32. DM1 - *The presumption of sustainable development in the context of National Park purposes*: This advises that, when considering development proposals, the National Park Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework
33. DMC3 - *Siting, design, layout and landscaping*. This states that where development is acceptable in principle, it will be permitted provided that its detailed treatment is of a high standard that respects, protects and where possible enhances the natural beauty, quality and visual amenity of the landscape, including the wildlife and cultural heritage that contribute to the distinctive sense of place.
34. DMC5 – *Assessing the impact of development on designated and non-designated heritage assets and their settings*. This relates to development impact on designated and non-designated heritage assets.
35. DMC7 – *Listed Buildings*. This relates specifically to listed buildings and advises that planning applications for development affecting the setting of a listed should be determined in accordance with Policy DMC5 in terms of how their significance will be preserved and why the proposed development and related works are desirable or necessary.
36. DMC10 – *Conversion of a heritage asset*: This states that the conversion of a heritage assets will be permitted provided where it can accommodate the new use without changes that adversely the significance and character of the building and any valued landscape character. In all cases, attention will be paid to the impact of domestication and urbanisation brought about by the use on landscape character and the built environment.
37. DMC11 - *Safeguarding, recording and enhancing nature conservation interests*: This advises that proposals should aim to achieve net gains to biodiversity as a result of development. In considering whether a proposal conserves and enhances sites, features or species of wildlife, all reasonable measures must be taken to avoid net loss by demonstrating that, in the below order of priority, the following matters have been taken into consideration:
- (i) enhancement proportionate to the development;
 - (ii) adverse effects have been avoided;....
 - (iv) appropriate mitigation; and

- (v) in rare cases, as a last resort, compensation measures to offset loss.

Details of appropriate safeguards and enhancement measures for a site, feature or species of nature conservation importance, which could be affected by the development, must be provided in line with the Biodiversity Action Plan.

38. DMU1 - Development that requires new or upgraded service infrastructure: This states that new or upgraded service infrastructure for new development will be permitted subject to it not adversely affecting the valued characteristics of the area and that any new land use does not commence prior to the appropriate delivery of the services.

Supplementary Planning Guidance

39. The PDNPA Design Guide refers to the principles of good design and designing in harmony with the local building tradition. However, this must only be applied where a development is otherwise justified by other policy criteria. The PDNPA Conversion of Historic Buildings (2022) Supplementary Planning Document advises on the principles for converting listed buildings. The PDNPA Climate Change and Sustainable Building Supplementary Planning Document advises on means by which new development should seek to mitigate its carbon footprint.

Assessment

Impact on the listed building and its setting

40. The Mill is in a state of disrepair and, without intervention, this important heritage asset, and the historic mill workings contained within may be lost. The Conservation Officer advises that the overall significance of the Mill is very high, derived from its largely historic and legible plan form and the survival of historic machinery and an historic drying kiln. The vernacular construction of the mill, and its setting within Lathkill Dale, also contribute strongly towards its significance. To this end, it is considered that a viable reuse of the building is imperative if the building, and the contribution this makes to the character and appearance of the area, is to be retained and preserved for future generations.
41. There are considered to be significant public benefits in seeking the viable reuse of the building, subject to those proposals being appropriate to conserving the special historic and architectural character and appearance of the building, inclusive of its historical workings, in the proposals as presented. Officers have engaged with the Applicants in seeking to achieve this end, through pre-application discussions and also through amendments sought during the consideration of the application proposals.
42. The Conservation Officer advises that, overall, the design principles of the scheme are sound and it has the potential to effectively conserve the significance of the building. Initial concerns were raised about the extent of work to the hurst frame, mill machinery and other timber structures, as well as the proposed reconstruction of the drying kiln and aspects of the landscape works which included a proposed outbuilding. Amendments have been submitted to the initial proposals which include the following:
- the use of gabions has been amended to a gritstone drystone wall construction to the south of the building;
 - the initial proposal for a detached outbuilding has been removed from the plans and has resulted in the following proposals:
 - an oil boiler is now proposed to be housed within the utility/ground floor wc
 - an oil tank would be located in within the parking area
 - other water purification plant, etc. will now be housed in the wheelhouse below the kitchen;

- replacements of floorboards are proposed to be sourced in a like for like manner; and
 - the insulated walls with tanking will have a loosefill insulation and have reverted to an approved limecrete radon detail.
43. There were a number of concerns raised by the Conservation Officer which included tanking, the reconstruction of the drying kiln, limewash removal, insulation and timber replacement to which the Applicant has provided further information. The tanking to the walls is proposed to remain where internal levels are below external levels, as external drainage alone cannot control the moisture ingress due to the site location at the foot of a hill.
44. The reconstruction of the drying kiln is primarily required on safety grounds as the engineers have condemned its current state due to possibility of imminent collapse but, instead of committing to a wholesale re-construction at this stage, the Applicants have suggested an approach to proceed with dismantling but only until a point of solid construction which can then allow the structure to be stabilised.
45. It was advised that the limewash on the side of the building contributes evidential value to its significance and that its removal would be harmful and unnecessary. To this end, the Applicants have advised that the limewash is a 20th century addition to the building from the time of the modern roof and before the current one that used to cut across the first floor milling room window. A historic, early 20th century photograph, with a gabled roof against the south gable, illustrates no limewash. The Applicants therefore consider that it has very limited historic value. The internal limewash is generally modern and its removal is required on internal walls that are to be insulated/lime plastered as it reduces vapour permeability too much.
46. With regard to the roof and wall insulation, it was considered that the loss of the interior wall finish would harm the building's special interest and it was asked whether analysis of the thermal performance of the walls had been undertaken; it was queried whether the improved thermal performance would be significant and enough to outweigh the harm. To this end, the Applicants have advised that the external walls to be insulated have been carefully chosen to impact as little as possible on the significance of the building. As such, the full ground to second floor internal gable, adjacent to the hurst frame, is proposed to be uninsulated to retain the character of that space. The Applicants advise that insulation will improve thermal elements, by more than halving the heat loss, and it is considered that, in this respect, the benefits outweigh the heritage impact.
47. The Applicant advises that the proposed roof insulation is the most important, as most heat is lost upwards through the roof and the details propose a u-value which is still significantly lower than the minimum required for Building Regulations. However, the levels chosen will allow for the purlins to remain of uncovered, breathable construction and the character of the space would be maintained.
48. Concern was raised with proposals to remove timbers damaged by insects. To this end, the Applicants have submitted a specialist timber report and the removal of insect damaged timber is to be avoided where possible. This advises that any removal and treatment should be accurately specified and justified and that the general strategy for treating of timbers is to be limited to joist ends only where projecting into stonework and treatment would be from Natural England's bat safe list. It is advised that other timbers are only to be replaced if the existing cannot be braced or repaired in situ and any live infestation/rot will be initially treated having regard to SPAB/English heritage guidance of changing atmospheric conditions to un-desirable living conditions which the conversion will address.

49. It was advised that a full analytical building recording would be required, at level 3-4, with interpretation of the development of the Mill and its fabric and that the Melbourne Estate archives should be consulted for the documentary research and the WSI should provide for a dendrochronological assessment to inform the dating of its fabric. However, the Applicants have advised that there was a significant cost to consulting the Melbourne Archives and, therefore, the decision was taken to employ the services of a millwright and timber specialist at this stage.
50. The Conservation Officer advises that the responses to the concerns raised, and as detailed in the amended plans, have addressed much of the initial concern. To this end it is advised that, whilst there is a degree of harm proposed in facilitating for the conversion, it is considered that this is outweighed by the public benefits of securing the long term conservation of the building. Given the above, it has been advised that the proposals are considered acceptable subject to any listed building consent being subject to appropriate conditions, as listed in the recommendations above.
51. Therefore, subject to appropriate conditions, the proposals are considered to be compliant with Policies GSP3 and L3 of the Core Strategy and Policies DM1, DMC3, DMC5, DMC7 and DMC10 of the Development Management Plan.

Archaeology

52. Sough Mill and its associated water management system is a site of archaeological interest and the site is considerably older than the current buildings. A mill is documented at the site since at least 1528 and the mill site could well have medieval origins. Although no fabric or features predating the 17th century are currently visible with the present building and structures on site, there is potential for evidence of earlier structure and milling use of the site from the medieval period onwards both within the fabric and the building, belowground internally and within the wider site.
53. Archaeological interest includes below ground and within the structure of the building and its associated water management system itself. The standing mill building and structures, including associated water management features and sluice gate has archaeological interest because of its potential to contain currently concealed evidence related to its construction, development and use. Any remains would be considered heritage assets of archaeological interest. Although features that fell beyond the structure of the listed building and structures would be considered non-designated heritage assets, and likely of no more than regional significance in their own right, they would directly contribute to the understanding and significance of the listed building.
54. Within the footprint of such ground works and ground disturbance, any surviving archaeological remains, features and deposits relating the earlier use and development of the Mill site will be destroyed. Given how well preserved and relatively untouched the Mill currently is, and extent of groundworks that would be required across the building and site to achieve a residential conversion, this represents a significant and permanent loss of the belowground archaeological interest and its contribution to the Mill's significance as a heritage asset.
55. To this end, the Archaeologist advises that, notwithstanding the information submitted with the application documents, a full analytical building recording is required, at level 3-4, with interpretation of the development of the Mill and its fabric. It is advised that the Melbourne Estate archives should be consulted for the documentary research, if this has not been done already, and the Written Scheme of Investigation (WSI) should provide for a dendrochronological assessment to inform the dating of its fabric.

56. However, it is advised that this harm should be weighed against the considerable benefits of securing the future of this important heritage asset as a balanced planning decision is reached. Therefore, it is advised that, should the proposals be deemed acceptable with respect to the advice of the Conservation Officer, and with respect to planning balance, then a conditioned scheme of archaeological work is required to mitigate the impacts detailed above. On this basis, it is considered that the proposals will accord with Policies GSP3 and L3 of the Core Strategy and Policies DM1, DMC3, DMC5, DMC7 and DMC10 of the Development Management Plan.

Landscaping

57. The proposed landscaping is considered appropriate in principle to the setting of the Mill. A boundary treatment is required between the footpath and first floor bedroom door for privacy, security and safety from falling. Instead of erecting a stone wall, which could be seen to alter the permeability of that part of the site historically, it is proposed to install a native plant hedge, managed to a height of 1.2m. The hedge will have a post and wire fence inner core and be carried along the back side of the parking area to form the necessary fall protection for footpath users. That will then also allow the stone walls to reduce in height around the parking area.
58. In terms of the proposed retaining walls, the initial proposal for gabions has been amended to a gritstone, drystone wall construction to the south of the building. To this end, and subject to appropriate conditions, the proposals are considered to be compliant with Policies GSP3 and L3 of the Core Strategy and Policies DM1, DMC3, DMC5, DMC7 and DMC10 of the Development Management Plan.

Ecology and biodiversity

59. The Authority has a duty to consider impact upon European Protected Species under the Conservation of Habitats and Species Regulations 2017 (as amended) for all applications.
60. An Ecology Assessment (December 2024) by Dunelm Ecology has been submitted in support of the application. It is noted, with respect to bats, that one day time inspection (May 2024) and three dusk emergence surveys (June, July and August 2024) were conducted on the Mill. Low numbers of brown long-eared droppings and feeding remains were found and numerous roosting opportunities in the form of external wall crevices and gaps around gable verges and roof slates were identified during the day time inspection. Low numbers of bats were recorded emerging from the building and several species were recorded foraging in the surrounding area during all nocturnal surveys. Based on the field survey results, the mill was assessed as supporting common pipistrelle and brown long-eared day roost sites.
61. Whilst no evidence of nesting birds was found within the Mill, the external wall crevices have potential to be used by crevice dwelling species. No evidence of otter or water vole was recorded during the survey, although suitable habitat and evidence of water voles has been recorded within the wider area. The site provided sub-optimal burrowing habitat for water voles and, therefore, they are unlikely to be impacted. Otters may occasionally forage/commute along the river when it holds water, but no resting places would be impacted by the proposals.
62. Given the above, it is advised that all surveys have been undertaken in line with the relevant guidelines. An appropriate impact assessment has been undertaken along with details for appropriate mitigation/compensatory methods for all surveyed species/habitats and the mitigation measures for bats are welcomed. Conditions are requested with respect to all mitigation and enhancement measures identified in Section 4.3 of the

Ecology Survey (2024) being adhered to and with regard to works not being undertaken during the bird breeding and nesting period. On this basis, the proposals are considered to comply with Policies GSP3 and L2 of the Core Strategy and Policy DMC11 of the Development Management Plan.

Conclusion

63. The proposals, in their amended form and subject to appropriate conditions, will preserve the special historic and architectural character and appearance of the building. The proposals will also serve to preserve archaeological interests. To this end, the proposals are considered to comply with the aims of Policies GSP3 and L3 of the Core Strategy and Policies DM1, DMC3, DMC5, DMC7 and DMC10 of the Development Management Plan.
64. The Applicants have submitted sufficient information to address ecology. To this end, and subject to appropriate conditions, the proposals are considered to be compliant with Policies GSP3 and L2 of the Core Strategy and Policy DMC11 of the Development Management Plan.

Human Rights

Any human rights issues have been considered and addressed in the preparation of this report.

List of Background Papers (not previously published)

Nil

Report Author and Job Title

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