



Opposition to proposals by Beechcroft Developments Ltd to demolish the Abbey Mill made in their planning application no: 17/02075/FUL

A letter written by the Bishop's Waltham Society September 2017

Simon Avery
Planning Department
Winchester City Council
City Offices
Colebrook Street
Winchester
SO23 9LJ

20th September 2017

Dear Mr Avery

Ref: 17/02075/FUL

Demolition of the Mill Building, Abbey Mill site, Station Road, Bishops Waltham



The Bishop's Waltham Society has a number of concerns about this application and we will be addressing them in two separate letters of objection. This letter specifically concerns the applicant's proposal to demolish the 19th century Abbey Mill building.

We object strongly to the applicant's proposal to demolish the Mill building for the reasons set out below:

1. The nature of the Mill as a heritage asset

a) Cotswold Archaeology's Assessment

The applicant's Heritage Statement prepared by Cotswold Archaeology is clear about the nature of the Mill. "The extant mill building is thought to represent an 1862 reconstruction of a late 18th-century structure (with later alterations). It is a non-designated locally-important heritage asset, with its significance derived mostly from its evidential and historical (illustrative) values."

So, the applicant's own archaeological consultants regard the Mill as "a non-designated locally important heritage asset". We agree.

b) How important locally?

In July 2017, as part of their Community Involvement activity the applicant provided a Consultation Questionnaire for visitors to their public consultation. One question enquired about local attitudes toward the Mill: "The intention is to reuse the mill for assisted living units, subject to a structural survey to determine if it is still structurally sound. If it isn't would you support a new building replicating what is in situ?" This is a complex question since saying 'yes' appears to condone demolition.

This is evident in Beechcroft's summary of answers to this question. The applicant says "A total of 22 respondents answered this question with 19 making positive comments and no negative comment made. Of those who were positive, the following comments were made:

- Nice to smarten up a derelict site;
- Historic landmark and part of the town;
- Mill is dilapidated and not even attractive."

This is disingenuous because it entirely depends on what one regards as ‘positive’ or ‘negative’ comments. Clearly the applicant sees negative views of the mill as ‘positive’. Luckily many respondents saw through this - as exemplified by these nine answers:

- Historical landmark.
- It is an historic building with attractive features which should be replicated.
- But all effort should be made to maintain the original mill.
- It is a lovely building and an important part of local history.
- It’s not possible to answer yes or no to this question without further information.
- I am very keen that Abbey Mill be retained but would have to accept that it may not be viable to do so.
- The building is popular and many people would wish to see it preserved and used in some way.
- Prefer not to but the building may need re-creation
- Would prefer it to remain. If replicated how much would it be identical to the present building?

c) A proper poll of residents’ opinions.

For the avoidance of doubt, it is fortunate that Bishop’s Waltham Parish Council, at the urging of local residents, carried out an opinion poll on attitudes toward the Mill in 2015. All Bishop’s Waltham residents were invited to participate.

There were 476 respondents (350 online and 126 in a paper survey). The results were absolutely clear. To the question “Would you want the Abbey Mill to be demolished or restored?” the votes were as shown in the table below. **82% wanted it to be restored!**

Answer Choices	Responses	
Strongly in favour of restoration	51.05%	242
Prefer to see it restored	31.01%	147
Don't mind. Others can decide	4.85%	23
Prefer to see it demolished to make way for other development	9.70%	46
Strongly in favour of demolition	3.38%	16
Total		474

d) The Mill’s emblematic status

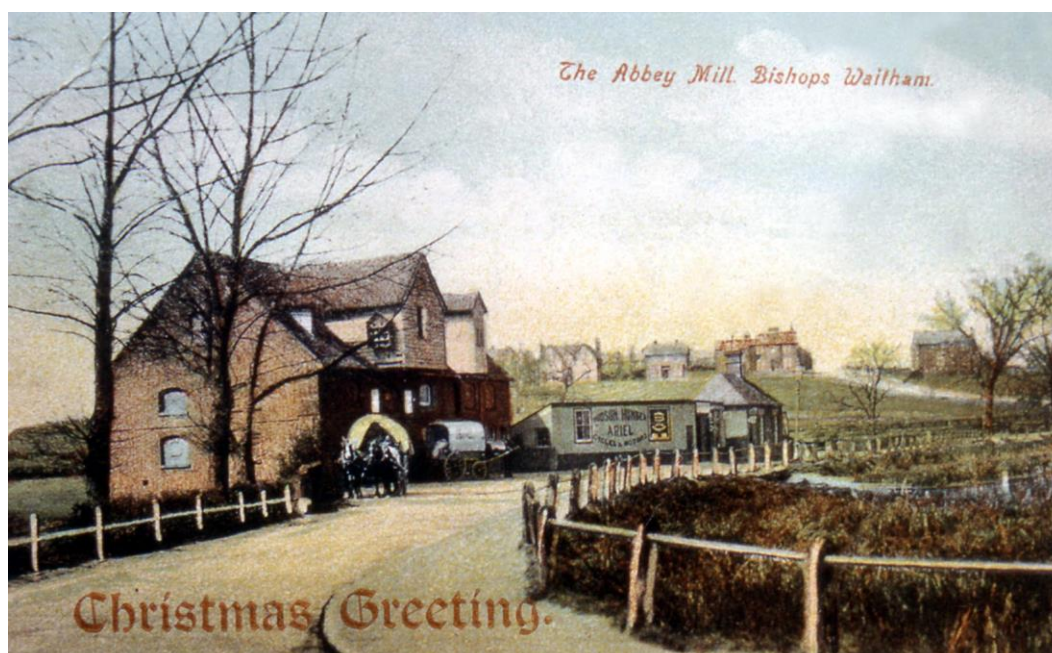
Built in 1862 by Sir Arthur Helps, Queen Victoria’s Private Secretary, the Mill’s size and form quickly became an emblematic structure associated with Bishop’s Waltham for the next 70-100 years.

- The railway from Botley to Bishop’s Waltham opened a year later, in 1863, and passed close to the Mill - as is clear from the train in the background on this postcard published in around 1905. Any passenger using the railway

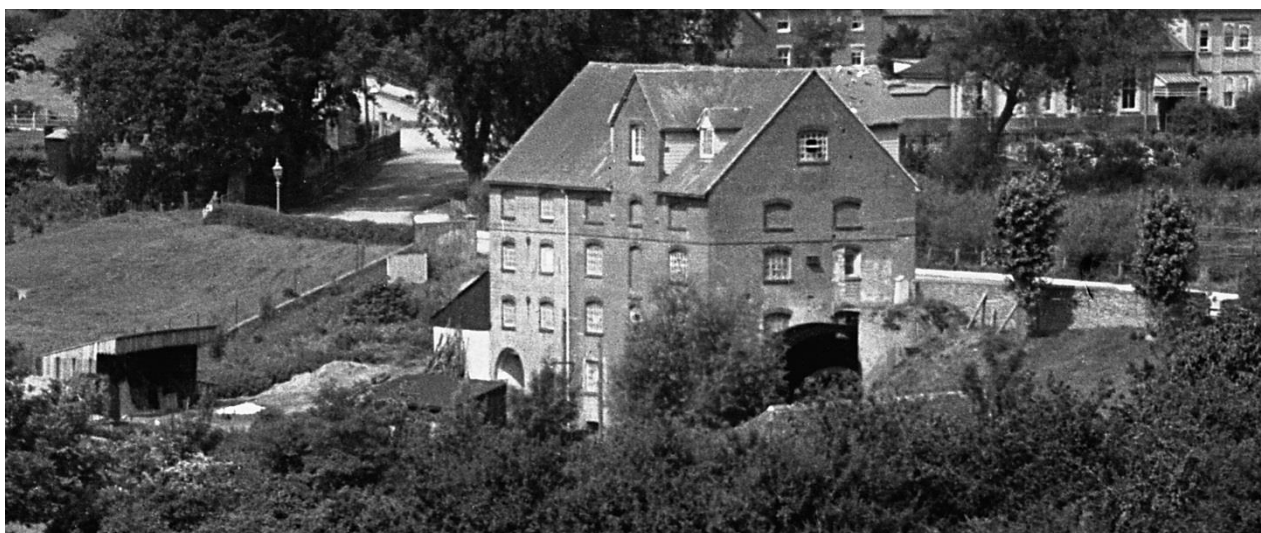
during the 70 years between 1863 and 1933 would have seen the imposing rear of the Mill as their first, and significant, sight of Bishop's Waltham.



- ii. The main Winchester to Portsmouth road (then the A333) passed directly in front of Abbey Mill on Station Road until the Great Pond was 'bridged' in 1967. So for 100 years anyone travelling between Winchester and Portsmouth would have seen the Mill's frontage as a symbolic feature of the town. This is clearly captured in the postcard below, dated 1905.



- iii. The view from the Botley road toward Bishop's Waltham (see below) presents an early sight of the town from the south. This detail from a circa 1917 photograph shows the impact that the Mill building would also have had from this approach to the town.



The fact that visitors to the town, quite apart from its residents, would have seen the mill as a central feature of the town confirms the importance of its distinct built form and its setting on the dam wall. This underlines its significance as a **locally important heritage asset** (as correctly described by Cotswold Archaeology).

2. The Mill's place and role within the Conservation Area

Winchester City Council's guidance, contained in Local Plan Part 2, says that "the special architectural or historic interest of conservation areas need to be understood and articulated." The following are the assessments made by Cotswold Archaeology in the Heritage Statement attached to this application (the emphasis is ours):

- "The heritage significance of the Bishop's Waltham fishponds character area of the Bishop's Waltham Conservation Area derives from a number of factors. The principal contributor is the evidential and historical illustrative values of the surviving fishponds and embedded in the physical fabric of the non-designated Abbey Mill."
- "The southern pond, with its earthwork dam, and Abbey Mill retain evidential values in the physical remains/fabric."
- "At present the Site comprises derelict land, contrasting with the other areas within the Conservation Area. Abbey Mill, a historic structure with potential to illustrate the continuation of the use of the Bishop's estate pond into the 19th century is currently disused"
- "Apart from ponds, this area incorporates Abbey Mill, a 19th century mill historically powered by a leat off the northern pond (infilled). The mill comprises a brick structure, built into the dam. It is, however, currently neglected and fenced off, with the appreciation of the building's architectural character affected by the fencing and derelict character of the Site."

It is clear from these comments that the applicant's own advisor believes that the physical fabric of the existing Mill building has evidential and historical illustrative value especially

as a historic structure with potential to illustrate the continued use of the Bishop's ponds into the 19th century. We wholeheartedly agree.

3. WCC Local Plan Part 1 - Joint Core Strategy

Policies within the Joint Core Strategy relating to the historic environment include:

- **Policy CP20 - Heritage and Landscape Character.**

This states that WCC “will support new development which recognises, protects and enhances the District’s distinctive landscape and heritage assets and their settings. These may be designated or undesigned, and include natural and man-made assets associated with existing landscape and townscape character and conservation areas...

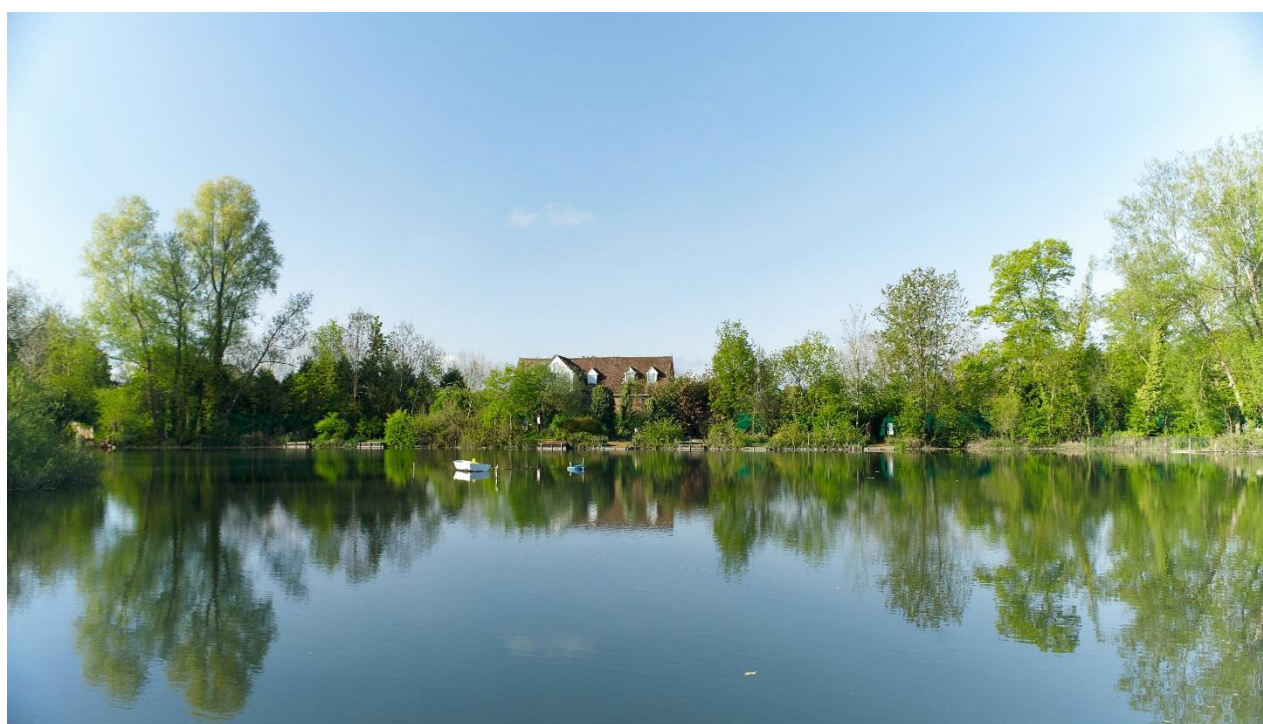
Particular emphasis should be given to conserving:

- recognised built form and designed or natural landscapes that include features and elements of natural beauty, cultural or historic importance;
- local distinctiveness, especially in terms of characteristic materials, trees, built form and layout, tranquillity, sense of place and setting.”

As our emphasis above indicates, we firmly believe that Abbey Mill - an “undesigned” “man-made asset” of locally “historic importance” - as agreed by Cotswold Archaeology - should be conserved because of its:

- “local distinctiveness”
- “built form and layout” and
- its “sense of place and setting” on the dam of the great pond.

This latter point is well captured in this photograph taken in 2010.



© Colin Waterworth 2010

4. Winchester District Local Plan Part 2 - Development Management and Site Allocations

Among the relevant guidance is paragraph 6.4.91 (emphasis is ours):

“Within Conservation Areas, the presumption will be in favour of retaining buildings or structures which make a positive contribution to the architectural or historic interest of the area, even if change of use and some alteration is necessary. Consent for demolition of such buildings will be granted only in exceptional circumstances where a building is beyond repair and incapable of beneficial use or the cost of bringing it into use is greater than the benefit of retaining it. Demolition may exceptionally be allowed where the benefits to the conservation area of the proposed redevelopment would be greater than the harm caused by the demolition. In such cases, the significance of the building itself and its contribution to the significance of the conservation area as a whole would need to be considered. Important factors would be effects on the character of the conservation area and its special qualities.”

We believe that it is clear from the evidence above that the Mill makes a very positive contribution “to the architectural or historic interest of the area” and that therefore the presumption must be in favour of retaining the existing building even if change of use is necessary.

This guidance culminates in Policy DM27 (emphasis is ours):

“Policy DM27 - Demolition in Conservation Area:

Within a Conservation Area, planning permission will only be granted for proposals involving the demolition, in whole or in part, of unlisted buildings or structures where the existing building or structure:

- (i) Makes no positive contribution to the character, appearance or historic interest of the area, either individually or as part of a group, or in more general views within or from outside the conservation area; or
- (ii) Is demonstrated to be incapable of repair or adaptation so as to extend its useful life; or
- (iii) Where the proposed redevelopment would enhance or better reveal the significance of the Conservation Area.”

We argue that the Abbey Mill makes a very powerful contribution “to the character, appearance and historic interest” of the Conservation Area.

It is, we believe, significant that the two previous planning applications by Sainsbury’s (10/01650/FUL) and before them David Wilson Homes (07/01188/FUL) included the adaption and re-use of the Mill building. When the Certificate of Lawfulness (14/02944/LDC) to confirm Sainsbury’s implementation of their planning permission was permitted in June 2015, the applicant was still committed to the conversion of the existing Mill building. It seems unlikely that in the 27 months since then the building has deteriorated to such an extent that it is “incapable of repair or adaptation”. It may be costly, but so is demolition and complete replacement.

Heritage Assets: paragraphs 6.4.95 and 6.4.98 are also relevant here (emphasis is ours):

6.4.95 states that “It is very important that changes affecting heritage assets do not harm their special interest and Policy DM28 applies to designated and non-designated assets. This applies not only to a change of use, but to proposed alterations or additions, and to development affecting their setting.”

6.4.98 says that “As heritage assets are irreplaceable, any harm or loss should require clear justification, and applicants will need to show that the benefits of their proposals outweigh any harm to special interest. Where it is clear that a heritage asset has been deliberately neglected or that damage has been caused in the hope of achieving consent, the deteriorated state of the heritage asset will not be taken into account in any decision.”

We are not suggesting that the damage suffered by the Mill “has been caused in the hope of achieving consent” but there can be no doubt that as a heritage asset it “has been deliberately neglected”.

On this point, paragraph 6.4.92 is also important. “Sometimes buildings are acquired with a view to demolition and redevelopment, or owners allow them to fall into disuse and neglect in the hope that they will get planning permission to redevelop a site. To discourage such practices, where buildings make a positive contribution to a conservation area, evidence will be needed that the property has been offered for sale for a reasonable time at a price that reflects its condition, rather than its redevelopment potential.” We have seen no evidence that Sainsbury’s did this.

5. The Mill building itself

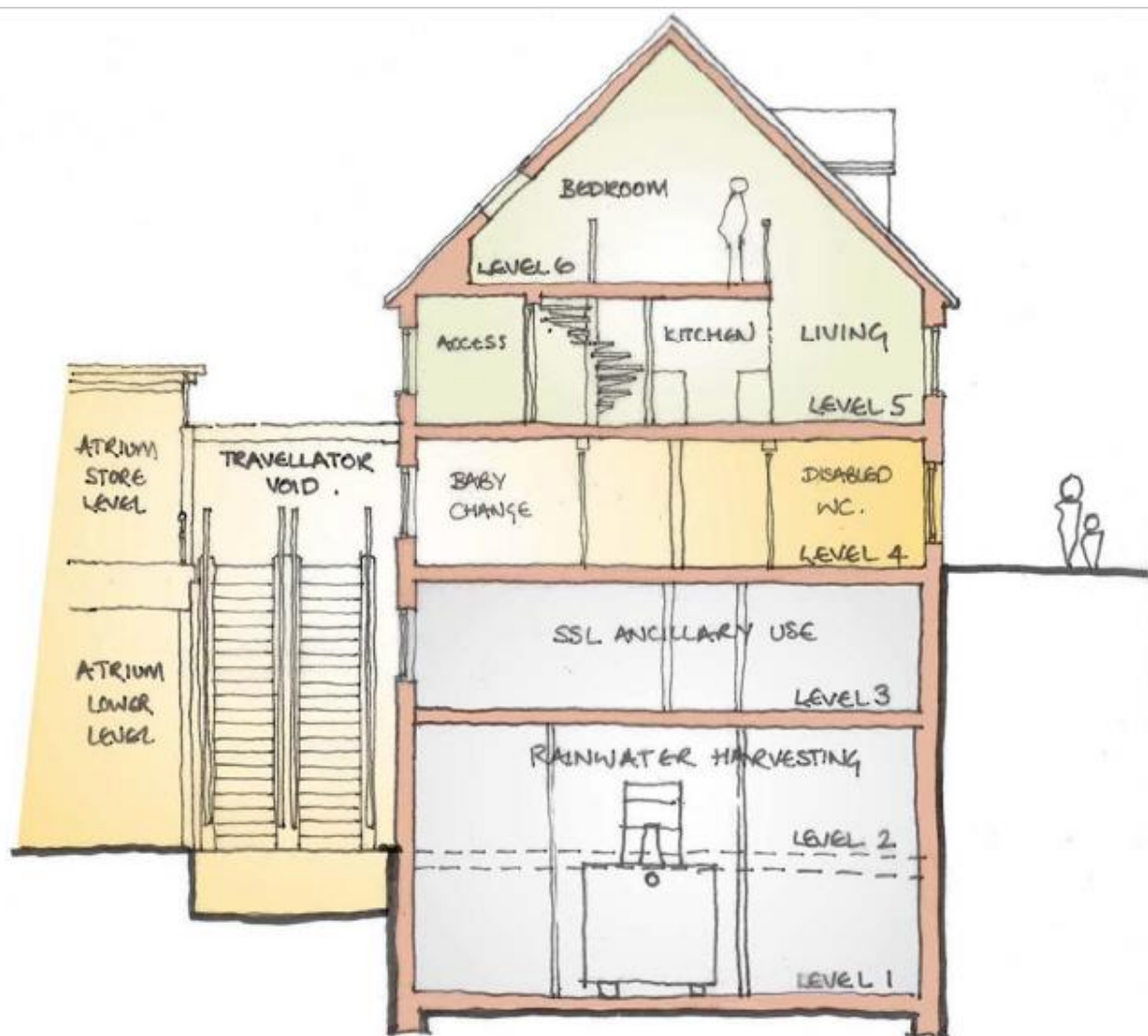
In a variety of documents supporting the application, reference is made to issues with the building itself and its unsuitability for the purpose intended. These include:

Risk from the Flood Zone

The Flood Risk report stipulates that Finished Floor levels for the new buildings will have to be 300mm above the 1-in-1000 flood levels. But our understanding is that there is no requirement to demolish any existing building that fails this test. Indeed Sainsbury’s got around the problem by raising the ground level around the Mill to a sufficient height.

In the Design and Access Statement (p 19), the applicant states that “The Building has five floors but the lowest is below the minimum level required in relation to flood risk and the floor to ceiling heights, averaging 2.0m, are well below the limits acceptable for residential use.”

This is at some odds to Sainsbury’s plans - their intended use of the floors is shown in the sketch below taken from Figure 21 in their Design and Access Statement.



Levels 5 and 6 were intended to accommodate three residential duplex apartments, Level 4 provided access from Station road but would accommodate a disabled WC and baby changing room and Level 3 was to be used as offices and training rooms. Levels 1 and 2 were to be used for rainwater harvesting.

Surely an acceptable solution to flood risk would be to use the lowest levels as bin storage or bicycle space or as a space for any other necessary services for the site. The danger of flooding a living space is thereby obviated.

We fear that the danger of flooding is being used as an argument for demolition when it could be the prompt for some creative thinking.

6. The absence of important documents

We have been told verbally on two occasions by the applicant that they have still not had access to the Abbey Mill building in order to conduct the full structural survey that is clearly essential. That Sainsbury's continues to deny the buyer access to the only building on the site seems totally extraordinary so we have asked for confirmation of this in writing - something which, to date, has not been forthcoming.

It seems to us that this application can hardly go any further without a full structural survey of the Abbey Mill building conducted by a reputable firm of structural engineers.

We are also concerned that in July 2017 Cotswold Archaeology stated (our emphasis) that:

“The development plans associated with the Abbey Mill building are still emerging. The details of the proposals with regard to the Mill and Scheduled Monument require further discussion, and as such, will be addressed in an additional Heritage Statement, which will inform the scope of discussions with Winchester County Council.”

This additional Heritage Statement remains absent.

In conclusion

Our objection to the proposed demolition of the Mill building in this application is based on the following:

- The Mill building is a non-designated locally important heritage asset
- Over 80% of local residents are strongly in favour or would prefer the Mill to be restored
- The Mill’s impressive built form and its setting on the dam wall have been significant local features of the town since it was built (or re-built) in 1862 and are therefore reasons for it to be retained
- Under WCC Policy CP20, the Mill’s historic importance, local distinctiveness as well as its built form and layout, together with the sense of place and setting, mean that it should be protected
- Under WCC Policy DM27, the significance of the building itself and its positive contribution to the character, appearance and historic interest of the Bishop’s Waltham Conservation Area means there should be a presumption that it be retained, NOT demolished
- Flood risk is not *per se* a reason for demolition of an existing building - other creative solutions should be applied

We hope that these will be taken into serious consideration.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Tony Kippenberger', with a long horizontal stroke extending to the right.

Tony Kippenberger
Chairman