



A National Amenity Society

Christopher Harrison
Planning Case Officer
Copeland Borough Council
By email: Development.control@copeland.gov.uk

13th November 2023

Application 4/22/2364/0F1 – Cleator Mills, Mill Street, Cleator, Cumbria, CA23 3DT

Dear Mr Harrison,

Thank you for re-consulting Council for British Archaeology (CBA) on the above case.

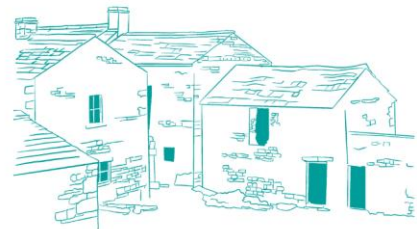
The CBA note the revised proposals for a replacement structure. Despite this **we maintain our objection to this application**, as expressed in our letter of 1st February 2023.

Cleator appears to have massively expanded in the early C19th, most likely in relation to the mills site, which employed 600 people. As such this mill site will make a significant contribution to a local sense of place within the village and surrounding area. Industrial sites, such as this, hold historical and evidential value about the development of the area along with its social and economic backdrop. Further significance is contained within its social history, including the 1915 women's strike, and use as a forces beret factory during the Second World War under Kangol ownership.

Despite not being listed, the importance of such a large flax mill site to the historic development of the village will be substantial. The CBA note another building on site has been demolished within the last year. Additional loss of heritage assets at this site should require clear and convincing justification. We strongly recommend that Building 3 at Cleator Mills should be considered as a non-designated heritage asset (NDHA), which provides a substantial contribution to both the character and identity of the village. The CBA believe this application should be considered against the requirements of chapter 16 of the NPPF. Paragraph 203 requires that ***"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."***

The CBA advise that incremental loss of buildings at Cleator Mills will collaterally amount to substantial harm to the heritage and identity of not only the site but also the village. This application lacks sufficient information about the significance of Cleator Mill and its remaining buildings or its condition.

Furthermore, this application has not taken into account the embodied carbon within the structure as well as the carbon emissions that would be released through its demolition and created in the construction of the proposed new warehouse. The majority of these carbon emissions could be avoided by adapting the existing building for a new sustainable use. Considering the whole life carbon in the built environment is a fundamental part of reaching net zero targets by 2050.



Whilst the CBA recognises that the remaining mill buildings are in poor condition the total demolition of Mill Building 3 amounts to substantial harm of an NDHA, which articulates the village's past industrial role and importance. An alternative strategy for the site that includes repair and maintenance of mill building 1, which we note is in the same ownership, and seeks to adaptively reuse both structures should achieve considerably enhanced public benefits for the local community.

The CBA maintain the same recommendations for this application. An appropriate condition survey should be undertaken, reporting on both the interior and exterior of (ideally) both buildings 1 and 3. This survey should help inform alternative options for the site with greater public benefits than 15 jobs. We recommend that the condition survey should be undertaken by a qualified, independent, professional with relevant historic building experience. An appropriate condition survey should also supplement the distinct lack of interior and exterior photographs of both remaining buildings from the application. This will help determine if the proposed demolition of the building is justified, or if / how it could be adaptively repurposed. It will also create a record of these locally significant buildings, as per NPPF paragraph 205.

Adaptively reusing building 3 is a far preferable strategy to its demolition on both heritage and environmental grounds. The CBA recommend that no further demolition at Cleator Mills should be permitted without an options appraisal and viability assessment that considers options for the reuse of this structure and contains a strategy for mill building 1. **The CBA object to this application.**

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Kind Regards,

Catherine Bell. MA (cons), ACIfA
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications – notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021.**