



*A National Amenity Society*

Christopher Harrison  
Planning Case Officer  
Copeland Borough Council  
By email: [Development.control@copeland.gov.uk](mailto:Development.control@copeland.gov.uk)

1<sup>st</sup> February 2023

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

Dear Mr Harrison,

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

## Summary

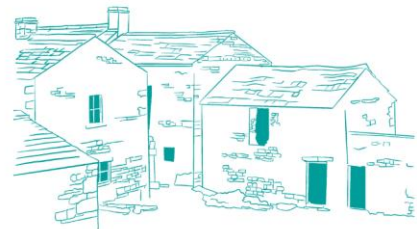
The CBA object to this application for the demolition of building 3 at Cleator Mills. We are concerned about a number of factors and omissions within this application. The chief concern is about the proposed loss of a locally significant, None Designated Heritage Asset (NDHA), some of which has already been demolished, without any information about the building in terms of a heritage assessment or condition survey. A number of online plans and news reports show digital renders of alternative strategies for the site including potential building reuse with now demolished buildings still standing. Adapting and reusing buildings on site would be far preferable on heritage and environmental grounds.

## Significance

Cleator Mills is a former flax mill dating from late C18 – early C19, and despite its current poor external condition retains a number of key architectural features as well as considerable embodied carbon. Online research shows that the remaining buildings are just two of a previously much larger range of industrial units from the same period.

Cleator Mills will have been an important component in the local economy for hundreds of years. 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.

The village appears to have massively expanded in the early C19th, most likely in relation to the mills site, which employed 600 people. 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 8 months. 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 NDHA, which provides a substantial contribution to both the character and identity of the village. As a



result it should be considered against the requirements of chapter 16 of the NPPF, of which further details are given below.

## Comments

The CBA notes that the remaining mill buildings are in poor condition. However, we object to the total demolition of Mill Building 3. The loss of such an NDHA, which articulates the village's past industrial role and importance, would harm the local sense of place and identity. Incremental loss of buildings at Cleator Mills will collaterally amount to substantial harm to the heritage and identity of the village.

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.

In September 2021, Historic England released documents specifically to help prevent the loss of Northern historic textile mills through their adaptive reuse as opposed to their demolition.

Some relevant extracts from this Historic England documents are as follows:

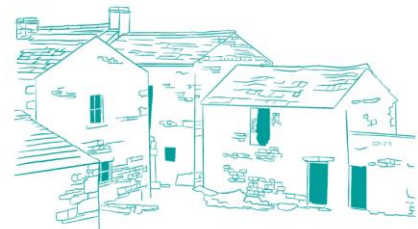
*"The reuse of mills also aligns with national and local ambitions for improving environmental sustainability, and in particular decarbonisation targets. Mills offer a sustainable alternative to urban extensions through reusing brownfield sites, easing pressure on greenfield land and limiting encroachment."*

*"Evidence shows that mills can be successfully renovated to meet energy conservation requirements and explore renewable energy generating opportunities. Research produced for Historic England underlines that refurbishing or retrofitting a historic building can generate a lower level of carbon than an equivalent new build property over a period of 60 years when accounting for whole life carbon impacts."*

*"This has also been articulated through a number of research articles on the 'Circular Economy' in which there is recognition that the adaptive re use of buildings stimulates economic growth, and reduces material usage and energy consumption."*

*"The reuse of these assets can drive wider place-based regeneration efforts in villages, towns and cities of all sizes across the North, providing distinctive anchors that are embedded in the history of a place that can also help to drive its future success."*

There is much to be gained for local communities from heritage led regeneration that builds on historic strengths and demonstrate local resilience. The public benefits from bringing the mills site back to life could be considerable. The CBA thoroughly recommends that the applicant read these documents to gain a better understanding of the merits of repurposing historic mills. The documents can be viewed here: <https://historicengland.org.uk/images-books/publications/driving-northern-growth-repurposing-mills/>



The CBA also feels that consideration has not been given to a number of relevant sections of the National Policy and Planning Framework (NPPF) within this application. The relevant paragraphs are as follows:

**189.** Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets 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.

**190.** 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 or other threats. This strategy should take into account:

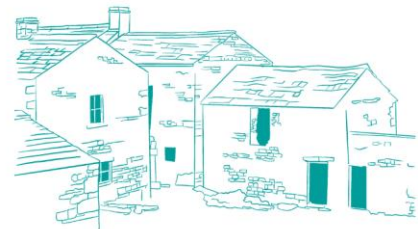
- (a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- (b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- (c) the desirability 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.

**194.** In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

**195.** Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

**196.** Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

**197.** In determining applications, local planning authorities should take account of:



- (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- (b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- (c) the desirability of new development making a positive contribution to local character and distinctiveness.

**203.** 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.

**205.** Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

## Recommendations

The CBA do not consider that this application provides sufficient evidence about the significance of Cleator Mill and its remaining buildings or its condition. Despite not being a designated site, the importance of such a sizable industrial site to the history, identity and character of a place the size of Cleator is substantial. Further loss of the historic structures on site should therefore require clear and convincing justification. **The CBA believe building 3 at Cleator Mills should be considered as a NDHA that is instrumental to the character and identity of its location.** As a result it should be considered against the requirements of chapter 16 of the NPPF. The CBA do not believe that the application will 'avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal', and therefore does not meet the requirements of the NPPF paragraphs 194 & 195. As per paragraphs 194 & 195 of the NPPF, an appropriate heritage statement, in the form of a desk-based assessment (DBA) should also be provided as part of this application.

The CBA have a number of recommendations for this application. Firstly, 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.

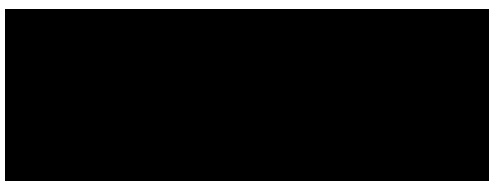




Adaptively reusing building 3 is a far preferable strategy to its demolition on both heritage and environmental grounds. The CBA recommend that no further demolition at Cleator Mills should be permitted without an options appraisal and viability assessment that considers options for the reuse of this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