

REF:1701C/D/CS

Planning Department
Cumberland Council
Development Management
Market Hall
Market Place
Whitehaven CA28 7JG

Chartered Architects and Designers

Suite 1, Manelli House
4 Cowper Road
Penrith
Cumbria
CA11 9BN

t: 01768 868800
e: post@manning-elliott.co.uk
w: www.manning-elliott.co.uk

9th June 2023

Dear Sir/Madam

Re: Application Ref: 4/22/2364/0F1 DEMOLITION OF DILAPIDATED FORMER MILL BUILDINGS AND CONSTRUCTION OF NEW WAREHOUSE UNIT WITH ANCILLARY OFFICES FORMER

Further to queries raised through the process of consultation (specifically email dated 24th April 2023 from Mr C Harrison) for the above application in respect of the submitted information, we hereby submit revised and additional information, revised drawings and comments in response to the points raised for your consideration.

The following points were raised in the above email and have been given a numerical reference for clarity in the order in which they were written and subsequently received where revised or additional information is requested;

1. *Development description;*
 - i. We would propose the new description to be, "Construction of new warehouse unit with ancillary offices".
2. *The application documentation should be updated to reflect the above outlined demolition. It would be useful if you could include details of the reasoning for the demolition and the legislation under which the buildings were demolished;*
 - i. We would refer to the email exchange between our client Mr M Walker and Mr N Hayhurst dated 21st November 2022.
 - ii. All documentation pertaining to this demolition was submitted by Manning Elliott Partnership as agents in support of this email including; 1701C Interim Structural Report by Kingmoor Consulting Structural Engineers which included record photographs and a copy of the Demolition Counter Notice under the Demolition of Buildings – Building Act 1984 – Section 81 ref. DM/008/22.
3. *The Existing Site Plan shows the presence of Mill Building 2 and Mill Building 3, neither of which remain and should be removed for clarity;*
 - i. Please find attached revised drawing 1701C-F07-001(A) Site Plan as Existing.
4. *A proposed site plan has not been submitted.*
 - i. Please find attached drawing 1701C-F07-010(A) Site Plan as Proposed. Note that this has been revised in line with the comments levied against the design under item 12.
5. *The Environment Agency has now confirmed that the revised Flood Risk Assessment is acceptable for their remit. A pre-commencement planning condition is proposed in relation to land contamination;*
 - i. We would be grateful if we could have sight of any draft conditions for comment. In consideration of any conditions in relation to land contamination we note that the EHO has requested a Phase 1 Land Contamination Assessment (item 8) and request that the condition be considered in respect of this additional information hereby submitted.

6. *Natural England confirmed that a Habitats Regulations Assessment (HRA) to assess the potential impacts of the development on the River Ehen Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is required and that without this information Natural England may need to object to the proposal.*
 - i. *We enclose a copy of the requested Habitat Regulations Assessment (HRA) compiled by our ecologist.*
7. *Highways and LLFA - Raise a small number of issues in relation to the layout and drainage etc. which require review;*
 - i. *Mill Street which leads onto Hilden Road and Kiln Brow. This road is not suitable for site traffic.*
 - a. *The access onto Mill Street is proposed to be restricted with a bollard and will be designated as an EVA. Refer to drawing 1701C-F07-010(A) Site Plan as Proposed.*
 - ii. *The highways within the layout are not well defined on the submitted plans etc. and should be clearly demarcated, with particular regard to the entrance, roundabout etc.. This should include details of carriageway widths etc. and any areas that would be proposed for adoption;*
 - a. *No roads within the wider demise, most of which pre-exist (blue line on drawing 1701C-F07-001(A) Site Plan as Existing) are proposed to be altered or adopted.*
 - iii. *The use of a single vehicular entrance would create greater flexibility within the site layout. It appears that space exists within the site to accommodate;*
 - a. *Singular vehicle access is proposed for the site compound. Refer to drawing 1701C-F07-010(A) Site Plan as Proposed.*
 - iv. *Provision should be made/included for pedestrians to walk along and cut through this area in the form of made footways connecting to those to the site frontage and running along the main access road. Connections should also exist to the pedestrian route adjacent to the River Ehen.*
 - a. *Refer to drawing 1701C-F07-011(-) Site Masterplan (Conceptual) as Proposed.*
 - v. *No provision is made for cycle storage.*
 - a. *Cycle storage is now being proposed. Refer to drawing 1701C-F07-010(A) Site Plan as Proposed.*
8. *EHO have requested a Phase 1 Land Contamination Assessment and made recommendations in relation to hours of construction and use.*
 - i. *Please find attached the requested Phase 1 Report and associated appended documents (Exploratory Hole Location Plan, BH and TP Logs)*
9. *Flood and Coastal Defence Engineer - Seeking confirmation if consideration has been given to the influence of the River Ehen on groundwater levels on site, if any, and how this may impact infiltration on site.*
 - i. *Groundwater was measured 2.6m below the finished ground level. This leaves enough room for there to be the required 1m freeboard between the bottom of the soakaway and any groundwater.*
10. *A formal and defined masterplan has not been prepared;*
 - i. *Please find enclosed a copy of drawing 1701C-F07-011(-) Site Masterplan (Conceptual) as Proposed which represents a conceptual masterplan subject to prospective tenant requirements for unallocated buildings.*
11. *A Sequential test is required to demonstrate the development could not be accommodated in areas at lower risk of flooding. The assessment should cover the area of the wider former Borough of Copeland, excluding the Millom area.*
 - i. *Please find attached a copy of a Sequential Test Report by SB Associates. We will also send, under a separate email once we receive it from the intended occupier, a copy of a letter describing their support of this location.*
12. *Design.*

The proposed building comprises a generic industrial building that does not respond to its context, which comprises a particularly attractive site, which is characterised by the castellated red sandstone of the surviving fragments of the locally significant mill building, mature deciduous woodland and riverbank.

The design of the proposed building and layout of the associated yards etc. require review and revision.

- i. The adoption of a linear building form to align more with the retained mill. This would also allow betterment of highway layout and pedestrian routes etc. delivering improved visibility and legibility etc.*
 - a. The building form and orientation, designed to meet the requirements of the potential occupier, would not suit the operational requirements of the potential occupier if the building is reorientated.
- ii. The use of the building to form the front/side boundary enclosure to remove the requirement for fencing to the site frontage/side, making the location a more inviting location for users. Setting the entrance boundary enclosure to the rear elevation to reduce its visual presence.*
 - a. The security fencing and the site compound has been reduced with the building itself providing site enclosure where possible. In order to improve the setting of the building and taking into consideration the comments from Highways, a singular entrance is proposed which in addition to limiting traffic movement allows for a reduction in security fencing.
- iii. The screening of or relocation of vehicle parking spaces to the side or rear of the site.*
 - a. Staff and visitor vehicular parking has been condensed and is limited to a location adjacent to the offices behind landscaped screening at the front of the building close to the main entrance.
- iv. The introduction of structural planting to the site boundaries and beyond to create tree lines routes that soften the environment and views of the development, whilst maintaining natural surveillance of the external storage areas.*
 - a. Structural planting with native species will be provided to the northern boundary between the proposed site compound and the proposed adjacent housing site. Planting has also been provided on the southern boundary between the proposed site compound and the proposed adjacent unit (K). Due to the drainage easement, it has not been possible to plant the western boundary.
- v. The introduction of planting area to the site frontage.*
 - a. Planting with native species will be provided to the front of the building to provide screening around the proposed site compound entrance and the customer and visitor parking.
- vi. The improvement of the building design. The site demands and requires great design aspiration and not simply a function building design as proposed. It should include features and materials to the frontage and sides of the building that better respond to the site context etc. Greater flexibility exists to the rear elevation. Higher quality boundary treatments to the front entrance would also assist.*
 - a. It is proposed to use higher quality materials including red sandstone facades to the walls and stone heads and sills to the office unit. The walls which face onto publicly accessible and public parking areas will also be embellished in sandstone. It is proposed that the stone will match that of the former mill buildings.
- vii. Refuse collection and storage areas should be detailed.*
 - a. A large, secure refuse collection area has been added to the site plan adjacent to the entrance to the compound behind significant areas of planting / screening.

We would like to encourage positive determination of the current subject application and remain happy to engage on that understanding going forwards in any way in the hope of facilitating a positive outcome.

Yours faithfully

Chris Staniowski

Director & Architect

Manning Elliott Partnership

Chartered Architects and Designers

Enc: Shadow Habitats Regulations Assessment Report
 Phase 1 Desktop Study Report - Preliminary Environmental Risk Assessment
 App Plans
 BH Logs
 TP Logs
 Sequential Test Report

 1701C-F07-001(A) Site Plan as Existing
 1701C-F07-005(A) Proposed Elevations
 1701C-F07-010(A) Site Plan as Proposed
 1701C-F07-011(-) Site Masterplan (Conceptual) as Proposed