

Oliver Hoban

From: Sarah Papaleo
Sent: 27 April 2023 14:34
To: Development Control
Subject: FW: 4/23/2010/0F1 and 4/23/2011/0F1 - FORMER KANGOL FACTORY, CLEATOR MILLS, CLEATOR

From: Samuel Woodford [REDACTED]
Sent: Thursday, April 27, 2023 2:30 PM
To: Sarah Papaleo [REDACTED]
Subject: RE: 4/23/2010/0F1 and 4/23/2011/0F1 - FORMER KANGOL FACTORY, CLEATOR MILLS, CLEATOR

Hi Sarah, in the case of 4/23/2010/0F1, the same appears to be true as with Chris's application in the sense that it's a shed without any context.

It's difficult to make the case that a proposal is well designed if taking the National Design Guide's characteristics of well designed places as a measure (which doesn't seem unreasonable as that's the purpose of it). The first three are relevant particularly to the character and appearance of development. This is also a way of encapsulating local heritage value, and therefore needs to be understood first in order for new character and appearance to be said to respond in some way to it.

Those three characteristics of well design places are context, identity and built form. The distinctions between them are occasionally blurry, so it's not a tick-box exercise, but it seems clear that a building designed in an absence of context cannot be considered contextual, and which is anonymous cannot be a response to identity. Built form is more a property of the interrelationships of parts of the scheme, and in this latter sense we might consider the cumulative effect of all the buildings and spaces, the remaining fragments of the Mills, and whatever proposed housing emerges around them. Are they related and coherent, or are they islands that ignore each other?

If the design of this shed can be seen as weak in its contextualisation and identity, I think that should preclude it from being considered well designed, and in accordance with para. 134 of the NPPF, if it cannot demonstrate it is well designed (and here a burden falls on the application), it should be refused permission. This of course, doesn't go into the other characteristics of well

design places outlined in the National Design Guide, but a quick look suggests it would score poorly too on its encouragement of nature, circulation quality (the whole scheme appears to be designed for car use at the expense of walkability), or resource management, as it appears to lack consideration for embodied energy or for lifetime energy use (e.g. solar management, passive ventilation, active travel etc.)

I also note that the D&A statement says the landscaping will have no impact as the site is exclusively concrete and tarmac, but from what I can see of the map, aerial photo and streetview, this particular red line encloses an area of grass that bounds the driveway on its north side. Possibly the D&A statement is generic and actually only applies to one of the new buildings (G?), but has been submitted against all of them?



With 4/23/2011/0F1, basically the same applies. It seems marginally less bad as there is at least some kind of cladding variation, but it's a very thin thing to be calling depth.

Hope this helps. Just let me know if you need more feedback on anything.

Sammy

Conservation and Design Officer | Neighbourhoods
Place, Sustainable Growth and Transport | Cumberland Council
Market Hall | Market Place | Whitehaven | CA28 7JG

[Redacted]
[Redacted]
cumberland.gov.uk

Please note, this reflects my view as conservation and design officer and does not bind the Council to a particular course of action

My normal working days are Mon-Thu