

CUMBERLAND COUNCIL
CONSULTATION RESPONSE

Proposal: 3no. two-storey, four-bedroomed detached dwellings with associated infrastructure

Address: The Knoll, High House Road, St Bees

Reference: 4/22/2407/OF1

Date: 18/05/23

Description: The site is a vacant, sloping plot where there formerly stood a house dating from the 1950s, which was derelict for some years before being demolished in 2021.

Conclusion: Request design revision

Assessment:

Since my rather extensive feedback given previously, the designs have been superficially updated with more red sandstone cladding, revised fenestration, and chimneys. While this has improved the elevational appearance of the houses, I previously suggested a substantial design rethink and this detail tweaking has not addressed the majority of the more foundational concerns.

I would draw attention to the following:

- The relationship of the three buildings to one another appears out of character, being neither a high status dwelling arranged in a commanding position over gardens or a variant of a subdivided farm, which characterise the majority of the grain/typology in the area. Working with these starting points as inspiration could unlock a lot of creative potential for the site, and overcome this problem. It could more typically be characterised as “suburban”.
- While there are some bungalows on the south side of part of the road, I would argue that these fail to make a positive contribution to local character and distinctiveness, despite being set in commanding positions within well illuminated gardens.
- Gaps between detached houses are inefficient for sun access and views out, and also increase heat loss. This is therefore not optimum environmentally.
- The garages are likely causing a problem given the scarce sunlight and topology of the buildings, and the car parking itself is somewhat dominating. Where and when does the sun access this site?
- The houses appear to have been designed for flat sites, and the surrounding hard landscaping used to bring the ground level down or up to meet the floor levels as needed. As a consequence, the level changes around houses 2 and 3 are extreme, with a substantial amount of the immediate hard surfacing being staircases. This is a problem for circulation, and the appearance of the scheme.
- The symmetry of plots 2 and 3 in plan suggests that they have been designed substantially in plan, which by definition doesn’t map onto the three-dimensionality of the topology and solar access of the site.
- The proposal will radically change the ratio of hard surfaced or built area to garden within the site. Is the garden that remains useful garden (is there light access, conditions suitable for sitting out, or growing?)

- The house layouts do not appear to be designed around potential for solar access, other than in having shallow plans. The arrangements of internal spaces and consideration for how light changes throughout the day, and how shadows are cast by the houses on one another should be evident.
- Has environmental modelling identified any potential for overheating in summer, and if so, how has this impacted the natural ventilation scheme?
- Layout of the internal spaces and external volumes is the first step to optimising solar access as this is necessary both to minimise heating load and to provide good internal lighting. This is important to maintaining a good mood among the occupants and allowing them to work efficiently without running additional lighting. For example, for house 1 it is likely that some of the best afternoon sunlight will be received by the garage. For house 3, house 2 is likely to provide considerable shade throughout the afternoon.
- Given the potentially low solar yield on the site, solar panels will need to be carefully sited and designed, and may influence the location and orientation of roof pitches. I note that solar panels have been added to the design since the last revision without any revision to roof orientations or pitches. Did these roofs happen to be in the optimum locations for solar generation already or would adjustment bring improved efficiency?

Summary:

I suggest that the apparent heavy weighting in the design first principles towards very traditional detached homes, arranged in a plan driven by the vehicle access, leaving the arrangement of internal spaces, orientation of faces, pitches and openings, and relationship to the partitioned up and steeply sloping external spaces, cannot be considered good quality design.

Design quality exists independent of how visually conspicuous the site is, but I maintain that there will be a small but avoidable negative impact on the character and appearance of the conservation area.

This is a complex but interesting site, with a lot of potential, and the proposal at this stage is neither complex nor interesting, and leaves a long list of questions unanswered which if convincingly addressed in the high level decision making could unlock a better project.

For that reason, I am still unable to support the proposal.

Relevant Policies and Guidance:

Section 72 of the 1990 Act states that “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of [a conservation] area.”

Paragraph 134 of the National Planning Policy Framework (NPPF) asserts that “Development that is not well designed should be refused”.

NPPF para. 197 states that “In determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation...”

NPPF para. 199 states, in the case of designated heritage assets, “great weight should be given to the asset’s conservation”, irrespective of whether potential harm is substantial, less-than-

substantial, or total loss. Where harm to a designated heritage asset is less-than-substantial, it should be weighed against the public benefits of the proposal (para. 202).

Paragraph 203 of the National Planning Policy Framework (NPPF) states the effect on the significance of a non-designated heritage asset should be taken into account when making decisions.

Opportunities should be sought for new development within conservation areas and the settings of heritage assets that enhances or better reveals their significance. (para. 206)

Referring to assets in a conservation area, NPPF para. 207 states that loss of an element that makes a positive contribution to a conservation area should be treated as either substantial (under para. 201) or less-than-substantial harm (under paragraph 202).

The Copeland legacy area's Local Plan contains a number of relevant policies:

- Local Plan Policy ST1C(ii) highlights the importance of protecting, enhancing and restoring the Borough's cultural and heritage features and their settings.
- ST1D emphasises the council's commitment to creating and retaining quality places.
- ENV4A stresses the importance of protecting listed buildings, conservation areas and other features considered to be of historic, archaeological or cultural value.
- ENV4B outlines support for heritage-led regeneration, ensuring assets are put to appropriate, viable and sustainable uses.
- ENV4C aims to strengthen the distinctive character of settlements through high quality urban design and architecture that respect character and setting.
- DM10 emphasises the need for high quality design and quality places. Part B requires design to respond to local character at multiple scales, paying attention to plot size and arrangement, massing and scale, interstitial spaces, and materials. Part C requires the incorporation of existing features such as landscape and vernacular style.
- DM27A outlines support in principle for developments that "protect, conserve and where possible enhance the historic, cultural and architectural character of the borough's historic sites and their settings".
- DM27C outlines the restriction in principle of development within conservation areas to that which preserves or enhances the character or appearance of the area.

The Conservation Area Design Guide is a supplementary planning document adopted in 2017 that is a material consideration in the determination of planning applications within conservation areas. It is therefore applicable to this application.

Sammy Woodford

Conservation and Design Officer