

CUMBERLAND COUNCIL
CONSULTATION RESPONSE

Proposal: Application for consent to supply and install 2 no. Sets of illuminated built up letters.

Address: Levels, 6-8 Duke Street, Whitehaven

Reference: 4/25/2422/OA1

Date: 09/02/26

Description: Levels is the new digital and gaming hub for West Cumbria, located within the restored former Whittles building. It is a grade II listed building located within Whitehaven conservation area. It is located on a prominent junction of two main axial streets in the grid, in an area of high footfall.

Conclusion: No objection

Assessment:

- The signage does not strictly conform with the guidance set out in the Conservation Area Design Guide, consisting of internally illuminated lettering. However, I suggest weight should be given to the following points:
 - The signage appears to be of good quality, and is attractive;
 - This is one of Whitehaven's flagship regeneration projects, and is therefore a landmark in townscape terms, distinct from its surroundings;
 - The function of Levels is a VR and eSports hub. This more modern design of lettering helps subtly convey the modernness of the use.
 - The building as a whole is a dramatically successful piece of heritage-led regeneration, and the lettering is a small part of an overall project that deftly weaves together the historic and the modern.
- I therefore view the slight departure from the guidance of the Conservation Area Design Guide as being justified.

Note:

- Although perhaps not controllable through the planning process, I would say that the colour and brightness of the lighting deserve mention. A slightly dimmer, warmer light is likely to look much more pleasing than a bright, white light.

Relevant Policies and Guidance:

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes a need "in considering whether to grant listed building consent for any works [for the Local Planning Authority to] have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest" [Section 16(2)]. This requirement also applies to the granting of planning permission affecting a listing building or its setting [Section 66(1)].

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

NPPF para. 210 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. 212 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. 215).

Paragraph 216 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. 219)

Referring to assets in a conservation area, NPPF para. 220 states that loss of an element that makes a positive contribution to a conservation area should be treated as either substantial (under para. 213-14) or less-than-substantial harm (under paragraph 215).

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

- BE1 provides for the preservation and enhancement of built heritage assets by:
 - Requiring a heritage impact assessment or heritage statement where the proposal would affect a heritage asset;
 - Giving great weight to the conservation of Copeland’s designated heritage assets when decision making;
 - Ensuring that new development is sympathetic to local character and history;
 - Supporting proposals for the appropriate reuse of vacant historic buildings, recognising that putting buildings into viable uses consistent with their conservation can help sustain and enhance their significance;
 - Supporting proposals that increase the enhancement, promotion and interpretation of Copeland’s architectural and archaeological resources;
 - Strengthening the distinctive character of Copeland’s settlements, through the application of high-quality design and architecture that respects this character and enhances the setting of heritage assets.
- BE2 states that development should preserve or enhance designated heritage assets (or important archaeological sites) and their settings. The more important the asset, the greater weight that will be given to its conservation. Proposals that better reveal the significance of heritage assets will be supported in principle. Any harm to, or loss of, the significance of a designated heritage asset will require clear and convincing justification.
- BE5 refers to the design of shopfronts, urging that appropriate shopfronts, whether historic or recent, should be retained and restored as opportunity allows. Proposals relating to them should consider relevant guidance, including the Shopfront Design Guide supplementary planning document.
- DS4 outlines the Council’s expectation that all new development will meet high-quality design standards that contribute positively to the health and well-being of residents.

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 in the legacy Copeland area. It is therefore applicable to this application.

The Shopfront Design Guide is a supplementary planning document adopted in 2021 that is a material consideration in the determination of planning applications affecting shopfronts within the legacy Copeland area.

Sammy Woodford

Conservation and Design Officer