

CUMBERLAND COUNCIL
CONSULTATION RESPONSE

Proposal: Replacement of two timber doors to front elevation

Address: 16 Foxhouses Road, Whitehaven

Reference: 4/26/2109/OL1

Date: 28/04/26

Description: 16 Foxhouses Road is the end of a rather wonderful terrace of 18th-century town houses. It is grade II listed and located within a conservation area.

Conclusion: Recommend design revision

Assessment:

- The existing doors are described as being warped and rotted, although I can't say whether they are repairable.
- They appear to be good quality historic timber panelled doors (the upper one moreso), although have lost their ironmongery at some point. The lower one also appears to have had its external mouldings removed, which I have not seen before.
- I would recommend repairing either or both the existing doors if they can be repaired. If they cannot be repaired, I would recommend replacement with new timber panelled doors. The upper one should be designed to match the dimensions and profiles of the existing upper door; the lower one, which is of lower quality, affords a bit more flexibility in exact details and dimensions, but should still be a timber panelled door.
- The opportunity to fit higher quality ironmongery may be worth taking too.
- We resist fitment of composite doors within conservation areas (the listed status of the building, prominent frontage, and replacement of timber doors are all confounding factors in this case). This is outlined in our Conservation Area Design Guide.
- I would view the proposed replacement as entailing less-than-substantial harm to the frontage of the building, and hence its overall significance, which is not justified by the benefit. This would affect the whole row of houses, and also have a small negative impact on the conservation area.
- I would suggest including evidence that the existing doors are not repairable, and if so, updated details for new timber doors.

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).

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.

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.

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Conservation and Design Officer