

**CUMBERLAND COUNCIL
CONSULTATION RESPONSE**

Proposal: Various alterations to refurbish a listed building and the demolition of an existing garage building within the curtilage

Address: 8 Scotch Street, Whitehaven

Reference: 4/25/2310/OL1

Date: 30/09/25

Description: 8 Scotch Street is a grade II listed mid-terrace three-storey townhouse dating from the 18th century.

Conclusion: Request further information and design revision

Assessment:

- Remove panelling from under ground floor staircase.
 - Photo album refers to existing spindles of stairs behind. I am not able to see spindles behind in the photo of the cellar steps
 - Looking at photo from ground floor stairs, it looks to me as though the wall above panelling has been added when the door across the lower rear hall was added, suggesting 1965.
 - Panelling is likely original as the 1965 scheme door is across is.
 - **Timber panelling likely original and should be retained; boarded area above dado height, which backs onto ground-first floor staircase balusters, 1960s addition.**
- Remove door and frame across lower rear hall.
 - Added 1965 scheme to form cloakroom and WC.
 - No objection to removal, although care should be taken not to damage the panelling behind it.
- Enlarge ground floor hall door to kitchen.
 - Door is modern. Surround appears historic.
 - Mitigation of harm provided in form of re-using architrave for historic doorway in front room door. This is not justification, however, and must be set against loss of historic fabric and alteration of spatial relationships.
 - There do not appear to be issues with access or light caused by the current opening.
 - **Justification appears weak given harm, so doorway should remain as-is.**
- Restore hallway panelling and re-reveal door into GF front room.
 - Original door opening into hall still exists but is covered by a large mirror, so this could presumably be opened up without risk.
 - Lost details to do opening e.g. architrave, could be reinstated by a joiner. **Detail drawing would be needed.**
 - **Does this work include repairing or reinstating panelling on both sides of the 1965 door into the entrance lobby?**
- Brick up 1960s back door opening from utility room; install top-opening hardwood window and sink internally.

- No objection.
- At cellar level, reinstate hardwood sash window with external light well.
 - No objection.
- Open up bricked-up rear doorway at top of cellar stairs.
 - No objection.
- Re-panel window reveals at all three floors and lime plaster with casein distemper at ground floor level due to concerns about damp.
 - Panelling formerly existed in window reveals at first and second floor level; full wall was panelled at ground floor level.
 - From photos of this panelling before removal, I believe it was all original to the building, highly significant and in repairable condition.
 - I object to its removal, which has caused substantial harm to the building.
 - As the removal has already taken place, I am not able to inspect it to confirm its condition or repairability. From the photos, it appears that there was some cracking, and that the leaking gutter had caused some localised damage. However, I believe it very likely that most of the panelling could have been saved and appropriate repairs carried out, and that at least several and perhaps all of the sets of shutters and panelling to the upper floor windows could have been saved.
 - The appropriate process ought to have been as follows:
 - Inspection of the panelling to confirm its significance.
 - Repair in situ if possible.
 - If not possible, labelling and removal in the largest chunks practicable.
 - Replacement of irreparable sections in like fashion.
 - Reinstallation and repainting.
 - I note that the 1965 drawings for conversion into a pharmacist's dispensary have internal elevation drawings that show "plywood panelling" to the ground floor front room, which was a waiting room. However, from the photos I have prior to its removal, as well as a photo of some of the panelling after removal, I do believe it to have been the original panelling.
 - **The panelling should be re-created entirely, using the same proportions and detailing. The photos on pages 18, 19 and 22 of the Heritage Statement should be used as a pattern and a suitable joiner engaged.**
 - **Detail drawings should be supplied of the locations and appearance of the panelling, shutters and shutter boxes to be recreated.**
- Removal of plaster cornicing and replacement of historically significant part with copy.
 - This is difficult to comment on as cornicing has already been removed in the ground floor front room (as has the lath and plaster ceiling, which also shouldn't have happened) so it is not possible to say what condition it was in and whether it could have been saved.
 - This is not supported in a general sense, although the outcome is the same: **the cornicing to the ground floor front room should be reinstated in the same dimension and profile as it was.**
 - **Is any of this cornicing retained, which could be copied?**
 - **What are the locations in the house where cornicing was removed?**
- Removal of skirting boards.
 - **Same comments apply as for cornicing above.**
- Repair and replace second floor ceiling joists as necessary.

- No objection.
- Remove floor boards from 2nd floor bathroom and use to repair other floors through the house.
 - There is some harm in this, as the boards are large and historic, and their relocation would require at least partly cutting them up. I would view this as less-than-substantial.
 - **I would be grateful for more information about the specific areas where new floorboards are required, the total surface area of those areas, the surface area of the bathroom, and any information about what will be done with surplus material.**
- Lime plastering and casein distemper to walls between window surround architraves at first and second floor level.
 - No objection.
- Demolish garage.
 - I note that there is no planning application for this, and it will be submitted in future. I question whether this could be consented without a planning application as there would be the opportunity for the details to differ between the two applications.
 - No objection to removal of garage. A positive impact is expected from this.
- Removal of brick wall adjacent to cellar stairs and replacement with vertical timbers.
 - No objection if stair treads are left in place.
- Insertion of new joists adjacent to cellar stairs to support rear hall floor above.
 - No objection.
- Removal of recent dropped ceiling and replacement of attic floor joists.
 - No objection.
- Construction of a blockwork inner wall to cellar front wall window reveals, supporting edge of main floor beam above and masonry between front windows.
 - This is necessary given the poor design and condition of the existing arrangement, which is concentrating load onto an unstable inner lintel over the cellar window.
 - This work will entail less-than-substantial harm to the building through introduction of a flat, blockwork surface in the cellar, and there will be some minor loss of historic fabric such as lintels.
 - However, I view the work as urgently necessary to secure the stability of the front wall, and have no objection to it being carried out as described in the note from WDS.
 - Externally, the cellar window itself will be removed but the sandstone surround retained and infilled, then rendered and painted to match the rest of the wall face.

Summary:

- Drawings of new windows and doors requested.
- Timber panelling to cheek of cellar staircase is likely original and should be retained.
- Door from hallway into kitchen has some significance and is part of the proportion of the spaces. Enlarging it would entail less-than-substantial harm and it should therefore remain as-is.
- Detail drawing of reinstated door and surround from front room into hall should be submitted and approved.
- Clarification should be provided as to the alterations/repairs proposed to the doorway that was inserted from the lobby into the front room in the 1960s.

- The loss of the panelling and shutters appears, from the limited information I have, to constitute substantial harm. Justification has been provided that it was irreparable and needed removing to access the wall, however the photos suggest it was very much repairable and accessing the wall should certainly have been a lower priority than keeping it from damage.
- This cannot be supported, however it has happened and the pragmatic option in my opinion is to require it to be faithfully reinstated. This also applies to the removed cornicing and skirting boards.
- Drawings should be supplied showing where panelling, shutters and shutter boxes, cornicing and skirting boards have been removed.
- Drawings should be supplied showing the layout, design and detailing of the replacements for these elements.
- Clarification should be provided on the area of floor boarding to be removed from the second floor rear room, and where it will be used. A photograph or two to illustrate the boards to be dismantled would be helpful too – I mention this as historic boards can be significantly larger than modern ones, and if this proposal necessitates cutting them up into smaller pieces it would be of higher impact.

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).

Where harm to a designated heritage asset is substantial, consent should be refused unless certain conditions can be demonstrated (para. 216).

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.
- 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.
- DS5 refers to the importance of achieving good standards of design in both hard and soft landscaping.

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.

Sammy Woodford

Conservation and Design Officer