CUMBERLAND COUNCIL

CONSULTATION RESPONSE

Proposal: Replacement of 5no. timber windows with uPVC sashes and 1no. external fire door with a uPVC sash window

Address: Highfield House, St Bees Road, Whitehaven

Reference: 4/25/2389/0L1

Date: 02/12/25

Description: Highfield House is a grade II listed building, dating at its core to the 18th century. It currently forms part of a care home.

Conclusion: Request further information and design revision

Assessment:

- The existing windows are not sashes, but top-hinged mock sashes.
- They look likely to date from perhaps thirty years ago, and were clearly constructed from low quality timber, which has led to them having a short life.
- They do not look reparable, from the photos, and as they are modern examples, I do believe there is any harm entailed in their replacement.
- The replacement windows would have the advantage of being sliding sashes where these are mock-sashes, however, in other respects – the use of plastic framing, thick glazed units, and black rubber gaskets, they would have a harmful effect on the building (notwithstanding the condition of the current windows).
- We typically do not approve use of plastic window on listed buildings (or more generally in conservation areas, though this building is not within a conservation area).
- Could I clarify whether it is intended to remove the external fire escape staircase as part of the conversion of the first floor fire door into a window?
- Local Plan policy BE1 requests that applications for works to heritage assets are accompanied by a heritage statement. This could be appended to the design and access statement, and would only need to provide enough detail to allow the potential impact of the proposal on the building's significance to be understood.

Suggestions:

I suggest the following options:

- Replace the windows with copies of the existing windows, but constructed from a more durable timber such as Accoya, sustainably sourced hardwood, or Douglas Fir with a linseed oil based paint. This would not require listed building consent.
- Update the details of proposed replacements in this application to timber sliding sashes, which would be appropriate to the building. Slim double glazing is often supported in such windows as a way of providing an improved u-value.
- Consider whether secondary glazing could be use in conjunction with replacement windows. I see from the photos that at least a couple of the windows have shutters inside, which may

make this impossible, but if there is the opportunity to add secondary glazing, this can have a big impact on thermal performance compared with single glazing. This would not require listed building consent if there is no impact on internal features such as shutters and panelling.

- Consider installation of insulated curtains. These can provide quite a significant improvement to the coziness of a room at night, and would not need listed building consent.
- Make use of the shutters themselves. Shutters existing mainly to insulate single-glazed windows at night, so if they are present and can be brought into use, this will have an effect.
- If this is part of an overall issue with energy costs at the building, I recommend hiring a specialist to carry out a full appraisal of the building and the ways in which it could be improved, given its listed status. When justifying individual measure to improve the thermal performance of a listed building, making use of a "whole house" approach is good practice.

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)].

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).

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.

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