

From: Thomas Whitfield
Sent: 11 July 2025 15:41
To: Development Control
Cc: Samuel Woodford
Subject: Case 4/24/2268/0L1 - 46 Lowther Street, Whitehaven

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Dear Sara Papaleo,

Thank you for notifying The Georgian Group of revisions to application 4/24/2268/0L1 to undertake a scheme of works at Grade II listed 46 Lowther Street, Whitehaven. The Group maintains our objection to the application.

The Group previously offered comments on this application in letters dated 5th September 2024, 27th September 2024 and 22nd May 2025.

Advice and Comments

The Group registers significant concerns that the applicant's revised scheme proposes additional demolition of historic fabric (including removal of fabric from probable original external walls). Despite increasing the amount of demolition proposed, and simultaneously increasing the size of an existing extension, the scheme does not reduce harm elsewhere (notably the relocation of the principal staircase). We therefore maintain our objection to the application on heritage grounds.

The Group furthermore are unclear what is being proposed – we note that 2no. schemes are presented in the application – one for an HMO and one for apartment use. We strongly recommend that the applicant must clarify which scheme is proposed as this has a considerable bearing on our comments.

Relocation of Cellar Stair and New Extension

The Group advises that the other notable revision is the addition of a new two storey extension, replacing an existing WC outshut, to house a stairwell and additional WC,. We advise that the two-storey height of the proposed new extension stairwell is entirely unjustified, likewise the proposal will require the relocation of a potentially original doorway and historic window to provide access, and the demolition of a wall of unknown age or significance.

We additionally advise that the revision to relocate the cellar stair outwith the building would also render the applicant's main submitted justification for the demolition of the existing main staircase obsolete. The demolition of the existing staircase is however still proposed. The Group therefore strongly advises that the proposed relocation of the cellar stair would cause additional harm through loss of historic fabric without offering any clear or convincing justifications. It consequently fails to meet the requirements of NPPF paragraphs 212, 213 and 215.

The Group maintains our strong objection to the proposal to demolish the existing staircase. Our concern on this point remains entirely unaddressed.

The Group maintains our objection to the poorly explained or justified proposals for drylining the basement. Our concerns and queries on this aspect of the proposed scheme are not addressed in the applicant's revised scheme.

1F Wall

The Group recognises that the applicant has revised the proposal to retain more of the wall (possibly original external) at 1F which we previously registered concerns with. We are, however, concerned that it is now

instead proposed to demolish the wall between the room and the stairwell. No method statement or discussion has been submitted to explain this aspect of the works. Reducing the thickness of this wall will result in the irreversible loss of historic fabric causing irreversible harm. We advise that despite this, no clear or convincingly justification has been submitted for this aspect of the scheme under NPPF (2024) paragraph 213.

Cellar Dry-Lining

The Group thanks the applicant for having provided additional supporting documentation for the proposed cavity drainage for the basement. Whilst we maintain that the use of traditional materials would be a preferable solution to damp management, we defer to your LPA Conservation Officer's expert advice.

Conclusion

When making a decision on all listed building consent applications or any decision on a planning application for development that affects a listed building or its setting, a local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Preservation in this context means not harming the special interest of the building, as opposed to keeping it utterly unchanged. This obligation, found in sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (1), applies to all decisions concerning listed buildings. Under section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 they also have a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

The Group advises that the proposed scheme of works is intensive and invasive with the potential to cause significant and irreversible harm (at the upper end of less than substantial) to the building's historic fabric, evidential value and special architectural significance as a grade II listed heritage asset.

We therefore again recommend that the applicant withdraws this application and revises it to address the above advice and recommendations, and those of the LPA Conservation Officer and other consultees. If the applicant is unwilling to do so, listed building consent should be refused.

Yours sincerely,

Dr. Thomas Whitfield

Senior Conservation Adviser (Northern England)



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Georgian Group Heritage at Risk List 2025: Call for nominations.

We are now beginning to compile a new Georgian Group Heritage at Risk list for 2025. You can nominate any Georgian heritage building or landscape (regardless of listed status) which you consider to be 'at risk' by e-mailing atrisk@georgiangroup.org.uk. The deadline for entries is 26 September 2025.

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