

Heritage and Planning Statement

In support of Applications for Planning Permission and Listed Building Consent for the

Proposed change of use planning application, including the conversion of the main building to form a new House of Multiple Occupancy, with associated vehicle parking area and gardens at 17 Irish Street, Whitehaven, Cumbria, CA28 7BU.



Figure 1 - Street Level Photograph of no.17 Irish Street, Whitehaven, Cumbria, CA28 7BU

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1.0 Introduction



Figure 2 – Aerial Photo showing no.17 Irish Street in relation to Trinity Park, and its surroundings.

1.1 This Heritage and Planning Statement is written in support of the Application for Planning Permission as above. The proposal seeks to convert the building's current function (*Residential Apartments, as per the planning applications in 2022*) into a new House of Multiple Occupancy, with associated vehicle parking area and gardens.

A copy of the previous planning application approval (*ref: 4/22/2297/0F1*) and Listed Building Consent approval (*ref: 4/22/2298/0L1*) is available online using the following web links:

Planning Permission: 4/22/2297/0F1 | Copeland Borough Council
 Listed Building Consent: 4/22/2298/0L1 | Copeland Borough Council

- 1.2 The building is located on Irish Street (*also known as the B5345*) which runs from Newton area of Whitehaven at the end of James Street until it reaches the end of Roper Street, where it then changes into Scotch Street. Irish Street dates back to the time of Sir John Lowther who thought the name might encourage Irish merchants to settle in the town.
- 1.3 Situated to the East of the building is Trinity Park, a small urban park, mainly consisting of large grass area, with scattered trees, hedges to the boundaries and a memorial cross in the centre. And it's neighbour, located to the West is no. 18 Irish Street, a Grade II listed building that is currently known as the 'Huntley Guest House'.
- 1.4 The building is three storeys high. Details include a panelled door, up three steps, with a broken pediment, three sash windows on ground floor with flush pediments and foliated tympana, four windows on first floor with Venetian-shaped cornice/pediments, and three windows on the second floor.
- 1.5 The last occupier was Dr Thomas Ickes and late Dr Aidan Timney, who relocated their medical practice from this site to a former law-courts building (*Whitehaven Magistrates Court Building*) at Catherine Street. The building then sat in a "dilapidated state" for approximately 6 years (*since 2016*), and as no-one wanted to purchase this building for development. It was then put up for auction in 2021.

"It's a beautiful building and it's sad that it has been left the way it is ... Someone will get a great building there ... It's in a prominent place in the town and to see that beautiful building brought back to life would be amazing for the town." Cllr Hayes, Mayor of Whitehaven and Town Councillor

https://www.newsandstar.co.uk/news/19580501.well-known-grade-ii-listed-old-surgery-goes-auction/

1.6 This action then presented an opportunity to repurpose this important Heritage Asset, returning it to its original residential function, to then provide new accommodation.

2.0 Building Location and Heritage Status

2.1 Statutory Address: no.17 Irish Street, Whitehaven, Cumbria, CA28 7BU

2.2 Heritage Status: Current listed as Grade II (first listed 13 September 1972)

2.3 Listed Building Ref: 1086757

2.4 Legacy System Number: 75978

2.5 Listed Building Details: https://historicengland.org.uk/listing/the-list/list-entry/1086757

2.6 County: Cumbria

2.7 District: Copeland (*District Authority*)

2.8 NOTE: The Listed Building Details for this location confirms that the building or site itself may lie within the boundary of more than one authority.

2.9 National Grid Reference: NX 97404 17921

2.10 The Listed Building Details are as follows:

1. IRISH STREET 1814 (South Side) No 17 NX 9717 NW 4/66

II GV 2. C18, refaced in Cl9. 3 storeys, with band over ground floor. Panelled door up 3 steps, with broken pediment. 3 sash windows on ground floor with flush pediments and foliated tympana. 4 windows on 1st floor with Venetian-shaped cornice/pediments.

Nos 17 to 20 (consec) form a group.



Figure 3 – Carlisle Speeding Commemorative Plague, located on the West wall of 17 Irish Street.

2.11 In the early 1990's, the 'Renaissance of Whitehaven', a Millennium Project saw £47m invested in the town, and as part of this project, this site was recognised as a site of historical significance, as Carlisle Speeding (1695 – 1755), Architect, Inventor and Mining Engineer who invented the Speeding Steel Mill

- which allowed illumination in coal mines with minimal risk once lived here. To commemorate this, a commemorative plaque was installed on the building, as shown in figure 3 above.
- 2.12 HER Research During the previous planning application, our office contacted the Historic Environment & Commons at Cumbria County Council (14 February 2022), asking to obtain a copy of the HER (Historic Environment Record) for the site at no.17 Irish Street, Whitehaven.

Whilst they confirmed that they do not hold any information on this property in the Historic Environment Record, other than that which is included in the listed building description, they did recommend that we approach the local Records Office at Whitehaven to see what historic records they have on the property, so on 24 February 2022, our office emailed the Records Office, asking for assistance.



Figure 4 – A view of Whitehaven painted by Matthias Read (painted 1736) for his patron, the MP and landowner, Sir James Lowther. https://www.bl.uk/picturing-places/articles/the-view-from-brackenthwaite-matthias-reads-whitehaven-prospects

- 2.13 Historic Research During the previous planning application, we approached the Cumbria Archive Service (25 February 2022), and they sent us a copy of several pages from the book 'Whitehaven 1660 1800, Royal Commission on the Historical Monuments of England' as it contains historical details on no.17 Irish Street. This information includes a historical plan of the property and details as included below:
 - Page 99 No. 43/44 Duke Street had three storeys, and other houses of three storeys with double-pile plans and three cells across the front were 17 Irish Street [Fig 44], which was built slightly earlier than the others in the group, and 14/142 Queen Street [Fig 54].
 - Pages 100 & 101 The 1736 painting suggests that 17 Irish Street, belonging at the time to John Tiffin, gentleman, had a second entrance doorway. The ground and first floors [Fig 41] have been greatly altered and the whole house refenestrated, but the cellars retain evidence of the original division into three heated rooms. The main entrance was probably into a hall opposite the staircase, and the second doorway opened into the room at the far end. This could have been separately occupied, but it may have given access to an office. Illustrations of merchant and gentry houses around the 18th-century maps of Manchester, Leeds and Yorke include several dwellings with two entrances. Sometimes, these led to two independent dwellings; in others, and entrance at the end of the façade may have provided service access; but occasionally, as in a house in Micklegate, York, one doorway seems to have opened into a small, heated room which led nowhere. It is possible that this, like 17 Irish Street in Whitehaven, was an office.

- Page 108 At 7 Irish Street, built in the 1730's, two fireplaces with attached ovens survive in two of the cellar rooms; and in 1783 the house was advertised to let with various amenities, including a back kitchen which was presumably in the yard.
- Pages 117 & 118 IRISH STREET, No.17 Three storeys and cellar, double-depth, three rooms (13 ½ yds) wide [Fig 41]; built of brick 1730-6. Interior altered and façade refenestrated and rendered 19th century. Original layout deduced from cellar and Matthias Read painting of 1736. Three fireplaces in cellar suggests that all three front rooms were heated; main doorway probably opened into central room opposite stair. Painting shows five-bay façade (now four) and suggests second doorway opened into W room. Cellar has two fireplaces with oven, of uncertain date but probably indicating basement kitchen from start. No original detail survives on upper floors except closed-string staircase with boarded-in balustrades.

Site part of Lons 18 Irish Street which occupies irregular area beside Holy Trinity churchyard, 35 yds 1 ft front, granted 20 Mar 1718/19 to Carlisle Spedding, gentleman (CRO D/Lons/W/BG/Irish Street, 22/9). In June 1730, referred to as 'ground of John Tiffin of Cockermouth, gentleman'; in June 1740, as 'house late of Mr Tiffin' (deeds, Whitehaven Library, 18 Irish Street). From the 1741 Rental onwards, known as 'Minister's House' in Rent Books, owned in the 1762 Census f35 by Revd Thomas Spedding, second son of Carlisle. Taxed on 18 windows, 1770 Window Tax. In 1783, advertised to let as 'genteel dwelling house' containing 'several good lodging rooms, two parlours, a back kitchen and every necessary convenience' (Cumberland Pacquet, 12 Aug 1783).



Figure 5 – An enlargement of the painting by Matthias Read (painted 1736), with Item D showing Thomas Speeding's House, no.17 Irish Street, Lons 18. Page 82 from the book 'Whitehaven 1660 – 1800, Royal Commission on the Historical Monuments of England'

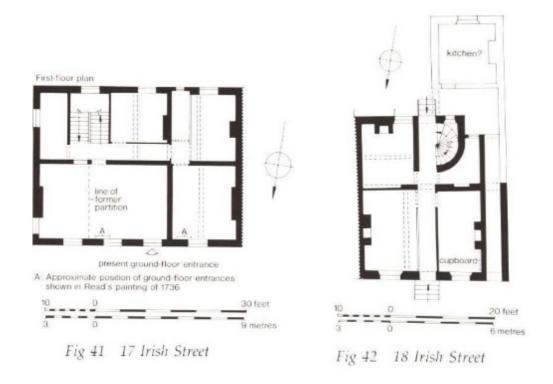


Figure 6 & 7 – Floor Plans [Fig 41 & 42]. Page 118 from the book' Whitehaven 1660 – 1800, Royal Commission on the Historical Monuments of England'.

A copy of these pages are included in the Appendix B.

The book 'Whitehaven 1660 – 1800, Royal Commission on the Historical Monuments of England' ISBN 10: 0113000189 ISBN 13: 9780113000180 is available from bookshops.

2.14 The Historic Research – On 28 February 2022, the Cumbria Archive Centre (*Carlsile*) wrote back to our office, confirming the following information:

There are three references relating to Irish Street, Whitehaven, in the DLONS/W part of the collection. None of them relate specifically to no. 17; they include:

- Reference: DLONS/W/9/40 Title deeds, Whitehaven. These include properties in Irish Street but are not listed in detail.
- Reference: **DLONS/W/11K/7** Correspondence and queries: architect/builder of 20 Irish Street (from series of general estate records, Whitehaven area) 1969
- Reference: **DLONS/W/26G/39** Detached plan from deed showing junction of Irish Street and Roper Street, Whitehaven (from 'West Cumberland Miscellaneous' series) 20th century.

Unfortunately, they were not able to identify any records relating to Carlisle Spedding from 1718.

3.0 Aspirations for Whitehaven

- 3.1 Whitehaven is Georgian town on the North-West Cumbrian coast, originated in 1633 as a small fishing village, developing into the third largest trading port in the UK, exporting coal world-wide.
- 3.2 Since 1990, £20 million of grant funding has been invested, greatly improving public access to the water and providing employment opportunities with the construction of the state of the art boat shed. In recent years Whitehaven has hosted magnificent maritime festivals, bringing many people to the harbour.
- 3.3 Research shows that in 2019 Copeland Council placed a bid to the Government's Future High Streets Fund (FHSF), showing their commitment to revitalise and modernise their town centre. To this end, the proposal at 17 Irish Street aims to:
 - Repurpose, repair, and renew heritage assets.
 - Create new housing opportunities.

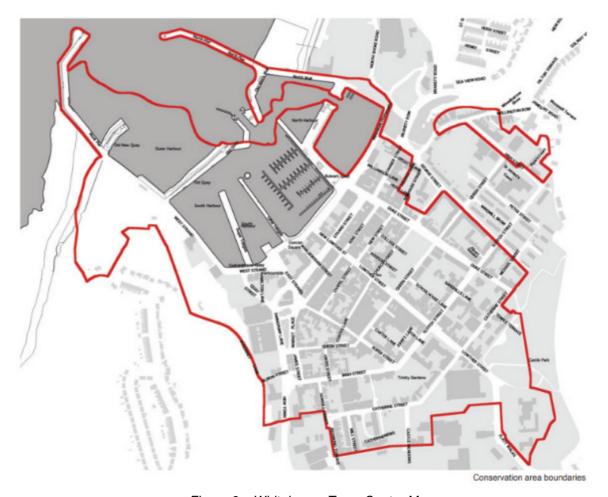


Figure 8 – Whitehaven Town Centre Map

Along with this, the Local Authority launched a survey to help inform the Council's bid to the Government's Future High Streets Fund that aims to revitalise and modernise town centres. The council's initial bid was ranked among the UK's best by Government officials and it has now received funding to develop the full business case. The strategic themes include:

- working with public and private investors to repurpose, repair and renew heritage assets
- creating hubs, workspace and housing and opportunities
- developing creative leisure spaces, ensuring a flow between the retail area and the harbour
- modernising the high street and expanding the 'streetscapes' initiative
- developing creative transport solutions and parking provision
- initiating a digital revolution by developing digital experiences in leisure, tourism and retail

- 3.4 In May 2020, Copeland Borough Council business case to transform Whitehaven include a digital community hub, artisan arcades and a focus on cycling provision was made public. Part of the national FHSF, the proposals include:
 - A new community digital hub on Duke Steet
 - Utilising the C2C challenge cycle route and creating a new cycling hub
 - Developing Residential Opportunities
 - Developing the 'streetscene' and Public Realm

The Council confirmed: "We have secured £1,056,649 from the Local Growth Fund through Cumbria Local Enterprise Partnership to acquire land and buildings to enable a strong case to be made to the Government that we are in a position to deliver its FHSF scheme. We have also committed £601,483 of our own funds to support delivery of the scheme."

https://www.lancs.live/news/local-news/future-vision-whitehaven-25-million-18367531

3.5 Whilst Whitehaven withdrew their bid from FHSF (*due to application issues*), they will be resubmitting a refreshed bid in the Government in 2021. The refreshed bid will be more aligned to the Council's wider ambitions for the town.

https://www.newsandstar.co.uk/news/18976664.traders-say-copeland-council-made-right-decision-pull-bid-1b-future-high-street-fund/



Figure 9 – Photograph of Whitehaven Town Centre.

- 4.0 Housing Need, and the benefits of Houses of Multiple Occupancy.
- 4.1 All designers, planners and stakeholders should be mindful that we remain in a housing crisis. Shelter, the Charity campaigning for housing and homelessness, writes;

"For decades, successive governments have failed to build the homes we need. By 2008, the number of new homes being started had fallen to its lowest peacetime level since 1924 – and house building has barely recovered since then."

(https://england.shelter.org.uk/campaigns /why we campaign/the housing crisis 3)

4.2 We must remain mindful therefore that any positive addition to the housing stock will help reduce the crisis, and can ultimately help release other, suitable housing stock, as required. Shelter advises that we need 250,000 homes a year, to resolve the housing shortage.

https://england.shelter.org.uk/ data/assets/pdf file/0011/689447/Solutions for the housing shortage - FINAL.pdf

- 4.3 We should also remain mindful that failure to provide positive additions to our housing stock generally, will consequentially add financial, social and welfare pressure to our Local Authorities, as they have to deal with increased homelessness and deprivation.
- Houses of Multiple Occupation (*HMO*) are generally more affordable than rending a whole property, and they can provide facilities for a wide range of tenants, raining from students to young professionals. Sharing accommodation can be a cost-effective way to live in desirable areas without the burden of high rents

HMO's offer greater flexibility with shorter-term rental agreements, and they can provide a sense of community. Tenants will have the opportunity to meet new people and form friendships, which can be particularly beneficial for those new to an area.

Shelter, the Charity recognises the benefits that Houses in Multiple Occupation and provides further guidance on HMO's on the following website:

Shelter Legal England - House in multiple occupation (HMO) definition - Shelter England

4.5 The 2004 Review of Housing Supply, by Economist Kate Barker, and commissioned by the then Chancellor and Deputy Prime Minister, in summary highlighted the vast need for more housing, and the need to clear the backlog of provision for housing, spanning several decades.

http://news.bbc.co.uk/nol/shared/bsp/hi/pdfs/17 03 04 barker review.pdf

- 4.6 Housing shortage and lack of supply has been a concern for housing in our country post World War II, and every attempt at strategic planning has in fact aimed to resolve the ongoing shortage, in one way or another.
- 4.7 Whilst formerly, the strategic approach had been the use of housing targets through Regional Spatial Strategies, more recently, the strategy has been to use Local Neighbourhood Plans, 5 year housing targets and the "tilted balance in favour of sustainable development", to help deliver housing and development.
- In a recent interview (*December 2021*) regarding housing development in Copeland, the Mayor of Copeland, Mr. Mike Starkie said that growth is welcome to keep the borough thriving: "*I'm actively encouraging growth wherever housing sites are deemed appropriate.*" He also stated that:

"There's clearly a demand in Copeland for high-end housing. What we need to do is attract people into the borough. For too long people who want to move up the housing ladder have had to leave Copeland. As with any new developments it brings jobs, it brings growth, they leave more affordable housing behind."

https://www.whitehavennews.co.uk/news/19766948.mayor-welcomes-growth-copeland-plans-unveiled-phase-two-development/

Part of the North Park Rheda, Frizington Housing Development includes Beckstones (*by Genesis Homes*), Rheda, located 4 miles from Whitehaven. This comprises of 55 new homes, a mix of 2, 3, 4 and 5-bedroom properties, including 19 bungalows in a mix of 2 and 3 bedrooms. In February, with 20 of the phase one homes already built, and over 50% of these houses are sold, which shows that there is a demand for housing in Copeland.

4.9 In 2015, the UK Government's ambition was to secure 1 million net additions to the housing stock by the end of the Parliament which was expected to be in 2020. The Housing White Paper, 'Fixing our broken housing market' (*February 2017*) included a number of initiatives which aimed to secure a stepchange in housing supply.

'Fixing our broken housing market' (February 2017) can be accessed using the following link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590 464/Fixing_our_broken_housing_market - print_ready_version.pdf

In order to comply with the Government's 300,000 homes a year by the mid 2020's, Copeland Borough Council have published their 'Copeland Five Year Housing Land Supply Statement' 2020/21. Reviewing this document, the following is noted:

The housing requirement in the Copeland Local Plan (*Core Strategy and Development Management Policies DPD*), is for 230 net additional dwellings per annum for the first five years, increasing to 300 net additional dwellings per annum for the remainder of the Plan period. Between 2013 – 2020, the table on page 5 (*previous housing requirement and past delivery*) of the document shows the number of net additional dwellings delivered annually has fallen significantly short of the requirement.

When looking at the town of Whitehaven in 2020, the statement confirmed the following:

- Appendix B (Schedule of Deliverable Housing Sites under 5 units with extant planning permission (full or reserved matters) at 31st March 2020 included within the 5 Year Housing Land Supply) includes 24no. sites in Whitehaven with 17no. of them have been recorded as under construction.
- Appendix C (Schedule of deliverable housing sites with extant planning permission (full or reserved matters) of 5 units or more at 31st March 2020 included within the 5 Year housing land supply) includes 11no. sites in Whitehaven with 8no. of them have been recorded as under construction.

For further details of the Copeland Five Year Housing Land Supply Statement 2020/21, see the following link:

https://www.copeland.gov.uk/sites/default/files/attachments/5yearlandsupplypositionnov20.pdf

4.10 As space is at a premium, converting existing buildings into HMO's makes efficient use of available building stock. Existing properties (*residential and commercial*) can be easily converted into HMO's, increasing the number of available units without the need for extensive new construction.

When looking at the build quality of these conversions, to maintain standards, local authorities can enforce licencing and regulations for HMOs, including stringent fire safety regulations. This ensures that tenants have access to safe and habitable living conditions.

National Planning Policy Framework

4.11 In accordance with the National Planning Policy Framework (*NPPF*) Glossary definition (*see below*), this proposal could be determined as a 'deliverable' site.

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example

because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years."

National Planning Policy Framework, Annex 2: Glossary, Page 66

https://www.gov.uk/government/publications/national-planning-policy-framework--2

As the proposed works includes a Change of Use to a House of Multiple Occupancy, if the scheme is granted Planning Permission and Listed Building Consent, the works here could easily be completed within the 5-year period (to comply with the NPPF's definition of a 'deliverable' site) as noted above.

- 4.12 In accordance with the National Planning Policy Framework (*NPPF*), paragraph 11(*d*), if it is deemed that the most relevant Local Plan policies for determining a planning application are out of date (*or the Local Plan is silent on a matter*), this application should be approved (*unless it is in a protected area (as defined by the NPPF) or the harms caused by the application significantly outweigh its benefits*).
 - Paragraph 11. Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas5, unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area6; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For decision-making this meant that:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

National Planning Policy Framework, Page 6

https://www.gov.uk/government/publications/national-planning-policy-framework--2

5.0 Cumbria Housing Statement March 2020 Update

When reviewing the design proposal, the scheme also complies with several key aims contained within the Cumbria Housing Statement March 2020:

https://www.carlisle.gov.uk/Portals/0/Cumbria%20Housing%20Statement%202020.pdf?ver=fUDkecS Ms8D7yJQFXEtZmQ%3d%3d

5.1 4.1 Housing Growth, Affordability and Community Sustainability

Housing is important to Whitehaven's economic ambitions, and housing projects like these will attract skilled people to live and work in Cumbria.

This project will be able to play a key role in creating and sustaining local communities within this urban location.

According to the Cumbria Housing Statement, Cumbria is one of the few areas in England where all the local housing targets significantly exceed the Government's standard methodology for estimating housing needs.

Whilst this House of Multiple Occupancy may not be recognised as a standard Housing Development, the project will provide accommodation for workers, bring more people into the town, helping the workforce growth.

Living close to city centre / major transport links is appealing to many people, and as demand for multi-let property is increasing, this building is located in an ideal position to provide affordable flexible housing options to the people of Whitehaven.

5.2 4.2 Improving Living Conditions and Creating Thriving Communities

The proposal seeks to re-use existing building stock and change it's use into a House of Multiple Occupancy, providing accommodation for a wide range of people. The works involved will be of a good standard, in order to make the building warm, safe and decent.

As the local authority seeks to bring empty buildings back into positive use, the essence of this project also aims to take an empty building and repurpose it to serve today's tenants requirements.

Whilst this historic building is Grade II listed, the proposal seeks to improve the energy efficiency where possible, in order to make these homes comfortable.

5.3 <u>4.3 Supporting Independent Living and helping Achieve Healthier, Happier Lives</u>

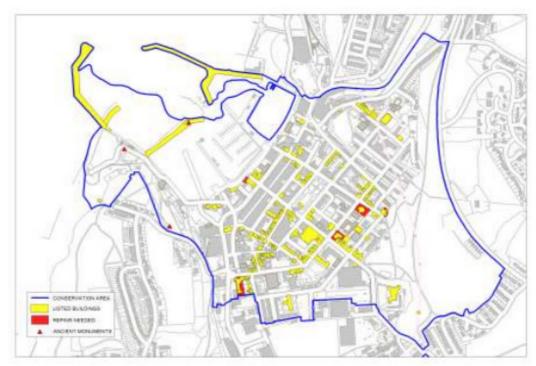
Empty buildings can have a negative effect on existing neighbourhoods, legally recognised as threats to public safety (they can attract theft, vandalism, illegal occupation by squatters, or drug-related crimes), and socially recognised as threats to the community (they can become superficial environments with unsightly rubbish, overgrown gardens, or at worst, they can attract illegal activity).

Neglected and unused buildings are ubiquitous in our surroundings and often go unnoticed, but they should be seen as valuable resources, offering the potential for community projects, commercial developments, or in this case, residential accommodation opportunities that could enrich the lives of many.

This proposal seeks to re-use an existing building, making it safe and useful to the people of Whitehaven.

6.0 Copeland Local Development Framework – 1 Supplementary Planning Document – September 2012

In accordance to Section 7 of the 'Copeland Local Development Framework – Supplementary Planning Document – September 2012', there are 253 Listed Buildings and several Scheduled Ancient Monuments within the recently combined Town Centre and High Street Conservation Area (see Map 3 on page 13 of the document / yellow areas on the plan below), and 17 Irish Street is included in this document.



Map 3 Listed Buildings, Archaeology and Buildings in need of Repair

Figure 10 - Copy of Map 3 from the Supplementary Planning Document

- As Whitehaven is well known for having the most intact Georgian townscapes in the country, this project seeks to protect this special characteristic, therefore the scheme proposal includes simple minimal repairs and refurbishments to achieve a contemporary architectural solution to revive this abandoned building, with most of the works being contained within the existing building.
- 6.3 Section 7.8 (*Materials, see page 21*) includes a photograph of no.17 Irish Street (*labelled as Trinity House*), highlighting the fact that traditional materials (*like those used in Georgian Buildings*) are sympathetic to the character of the town centre. The traditional materials used at no.17 Irish Street include rendered stone rubble walls, stone door and window surrounds and wooden window frames and doors, all of which are to be retained, repaired where required, and redecorated where needed.

The 'Copeland Local Development Framework – Supplementary Planning Document – September 2012' can be viewed using the following weblink:

https://www.copeland.gov.uk/attachments/whaven-town-centre-and-harbourside-spd

7.0 Design Influence from the previous Pre-App Advice and previous Planning Applications

7.1 In 2021, a Pre-Application Enquiry Advice (ref: PAA/21/0081) was received from Copeland Borough Council and, and in 2022, Planning Application approval (ref: 4/22/2297/0F1) and Listed Building Consent approval (ref: 4/22/2298/0L1) were received from Copeland Borough Council. Details of these applications are available online using the following web links:

Planning Permission: 4/22/2297/0F1 | Copeland Borough Council
 Listed Building Consent: 4/22/2298/0L1 | Copeland Borough Council

- 7.2 As the scheme proposal is for the re-use of existing listed building, the design is subject to a number of criteria, as follows:
 - A. Adequate <u>internal space standards</u> and exclusive use of kitchen and bathroom facilities can be achieved without extensive alterations or additions to the property;
 - B. Adequate and appropriate external <u>amenity space</u> is provided;
 - C. The conversion works conserve the <u>character of the building</u>;
 - D. No alterations or associated works create amenity problems for <u>residents of adjacent properties</u>.
- 7.3 Upon reviewing the important points raised in both the previous pre-app advice and planning applications, the current design proposal attends to these points as follows:
 - A. <u>Internal Space Standards</u> With regards to the proposed Bedrooms within the House of Multiple Occupancy, in accordance with 'The Licencing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018', each new adult single bedroom in both the main building will have a floor area of more than 6.51 m² (square metres). No room under 4.64 m² can be used for sleeping accommodation.

And as the proposal includes ten bedrooms in the main building, with shared amenities such as bathrooms, toilets and cooking facilities, this HMO will require HMO Licensing, in accordance with the order.

The Licencing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 can be seen on the following link:

The Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018

Minimising Alterations / Additions – Due to the layout of the existing building, the building includes three large reception rooms, one on each floor (*stacked on top of each other*) to the North-West corner of the building. These rooms will be converted into open plan Living Dining on the Ground Floor, and bedrooms on the First and Second Floors. By doing this, new plumbing and heating pipework can be limited to serve these spaces, minimising any cutting into existing beams or removing historic timber floors and ceilings.

B. <u>Amenity Space</u> – The proposal seeks to retain the existing rear communal garden area so that it can be used by the tenants of the House of Multiple Occupancy. This grass area is shown on the accompanying drawings and it is approx. 14 metres from the rear of the building.

This building benefits from being located next to a public amenity space, which the tenants can use Trinity Park, originally the Trinity Church Gardens (*the Church building no longer exists*) is a approx. 3,400 m² garden is mainly a grassed area, containing a range of trees, planting and a World War Memorial Cross, dedicated to able seaman William A. Berry, R.N, HMS Kite.

C. <u>Protecting the Character of the Building</u> – Keeping historic buildings like this on in continued use will require repairs and alterations, and these works will inevitably result in some loss of fabric.

As a Grade II Listed Building, this building is recognised by the Government as having special architectural or historic interest that merits statutory protection. To protect the historic materials at this site and preserve the architectural character of the building, the proposed scheme seeks to make minor alterations to the internal layout, so that the building can accommodate tenants, giving them access to modern day living conditions that meet the requirements of today's standards / regulations. To achieve this, and as the building was originally residential in nature, the proposed changes have been kept to a minimum.

Where physical investigations and/or a qualified assessment do determine that significant historic fabric cannot, by virtue of its condition, be saved (e.g. rotten roof timbers) or where its removal is part of an approved scheme of alterations (blocking an internal door and frame), the local authority will be informed of these works prior to their commencement, so that they can assess the works and grant the relevant approvals.

With regards to the elevations, as the exterior appears to be in good condition, the works would be kept to a minimal amount, only repairing areas that required repair. The original windows and window frames and external doors are to be kept and re-decorated. The exterior walls are also to receive a fresh coat of paint to rejuvenate the façade. The aim of these minimal works is to help protect the existing architectural character, safeguard the historic façade and enhance the street scene.

D. <u>Protecting residents of adjacent properties</u> – The proposal seeks to retain and re-use the amenity space that currently exists on site, with little changes, and improvements only where needed.

The existing 1.9m high stone boundary wall that currently exists along the Western side of the site, behind the main building will be retained, as the vehicular parking / garden wall.

8.0 Response to the Local Authority Policy Position

Copeland Local Plan 2013-2028, Core Strategy and Development Management Policies DPD, Adopted December 2013:

- 8.1 The Planning Application ref: 4/22/2297/0F1 and Listed Building Consent Application ref: 4/22/2298/0L1 each includes Planning Conditions that relate to various Planning Policies.
- We have reviewed the Planning Policies mentioned in the approval notices contained within Copeland Local Plan 2013-2028, Core Strategy and Development Management Policies DPD, Adopted December 2013 using same to help explain the design rationale and compliance, where appropriate.

These analyses are not conclusive, and our office is happy to discuss them further. The intention is to further develop the collaborative and proactive approach to design, working towards a satisfactory outcome for the Applicant.

Planning Policy

Copeland Local Plan 2013-2028, Core Strategy and Development Management Policies DPD, Adopted December 2013:

Policy ENV3 – Biodiversity and Geodiversity

The Council will contribute to the implementation of the UK and Cumbria Biodiversity Action Plan within the plan area by seeking to:

A Improve the condition of internationally, nationally and locally designated sites

- B Ensure that development incorporates measures to protect and enhance any biodiversity interest
- C Enhance, extend and restore priority habitats and look for opportunities to create new habitat
- D Protect and strengthen populations of priority or other protected species
- E Boost the biodiversity value of existing wildlife corridors and create new corridors, and stepping stones that connect them, to develop a functional Ecological Network
- F Restrict access and usage where appropriate and necessary in order to conserve an area's biodiversity value

Policy DM25 supports this policy, setting out the detailed approach towards managing development proposals that are likely to have an effect on nature conservation sites, habitats and protected species.

ENV4 - Heritage Assets

Design Response

The proposals only relate to the conversion of existing buildings, with the proposed development not impacting any priority habitats, and will impact less than 25 square metres (5m by 5m) of on-site habitat and 5 metres of on-site linear habitats.

On this basis, the proposed development falls below the biodiversity net gain threshold and a ten percent biodiversity net gain is not required to be delivered. The Council's policy is to maximise the value of the Borough's heritage assets by:

A Protecting listed buildings, conservation areas and other townscape and rural features considered to be of historic, archaeological or cultural value

B Supporting proposals for heritage led regeneration, ensuring that any listed buildings or other heritage assets are put to an appropriate, viable and sustainable use C Strengthening the distinctive character of the Borough's settlements, through the application of high quality urban design and architecture that respects this character and enhances the settings of listed buildings Policy DM27 supports this policy, setting out the Council's approach to development

The proposal seeks to protect this listed building by repairing and restoring the building so that it can actively contribute to society.

If this building is allowed to continue to be disused (*like it has for the last 6 years*), this Heritage Asset and its surrounding streetscape will suffer further damage through its neglect, which could ultimately lead to its demolition.

Recognised as a Heritage Asset, the principal aim for this building should be to protect it by giving it an appropriate, viable and sustainable use

DM10 - Achieving Quality of Place

The Council will expect a high standard of design and the fostering of 'quality places'. Development proposals will be required to:

which affects built heritage and archaeology.

A Incorporate a complementary mix of uses, especially within or near town centres or at sites adjacent to public transport routes B Respond positively to the character of the site and the immediate and wider setting and

enhance local distinctiveness

C Incorporate existing features of interest including landscape, topography, local vernacular styles and building materials; and in doing so, have regard to the maintenance of biodiversity

D Address vulnerability to and fear of crime and anti-social behaviour by ensuring that the design, location and layout of all new development creates:

- i) Clear distinctions between public and private spaces
- ii) Overlooked routes and spaces within and on the edges of development
- E Create and maintain reasonable standards of general amenity

F Incorporate new works of art as part of development schemes where appropriate

The application site sits withing Irish Street, which is predominantly a series of Historical Buildings. The street already provides a mixed-use typology, including residential and Community facilities.

The Change of Use to a House of Multiple Occupancy adds and enhances the character of the street, and the town generally.

A number of the soft spaces within the site will be finished with grass and planting, adding to the feeling of urban park land, next to the existing Trinity Park.

The balance of public and private spaces is maintained, with overlooking encouraged where possible.

Irish Street predominantly features a series of historical buildings, with approximately 27 properties providing housing to the town. This building type re-enforces the reason to repurpose the existing building towards providing residential accommodation.

An occupied building will also remove vulnerability to fear and crime from the area as the residents will be able to provide supervision, which will detract anti-social behaviour.

If the building is left un-occupied, it could attract homeless people, criminals and/or squatters, therefore it is essential to give this building an active purpose, in order to comply with this policy.

DM22 - Accessible Developments

The Council will require development proposals to be accessible to all users and accord with the following principles:

A The layout of the development responds positively to existing movement patterns in the area by providing or contributing towards:

- i) Permeable and legible layouts which are convenient for access into and through the site for pedestrians, cyclists and disabled people
- ii) Access for public transport
- iii) Access for emergency and service vehicles
- B Incorporate innovative approaches to managing vehicular access and parking with:
- i) Standards incorporated into the design of the development which manage traffic access and speeds without excessive engineering measures
- ii) Incorporate car parking, through a variety of on street and off street arrangements which avoid vehicles dominating the street scene, whilst meeting adopted car parking standards which reflect the needs of the Borough in its rural context

Where necessary the potential transport implications of development will be required to be supported by a Transport Assessment and a Travel Plan to manage any significant transport implications.

DM27 – Built Heritage and Archaeology

A Development proposals which protect, conserve and where possible enhance the historic, cultural and architectural character of the Borough's historic sites and their settings will be supported. This will be particularly relevant in the case of:

- i) Scheduled Ancient Monuments
- ii) Conservation Areas
- iii) Listed Buildings and structures
- iv) Non-listed buildings and structures or landscape features of local heritage and archaeological value
- v) Surface and below ground archaeological deposits
- B Development proposals which have a significant adverse effect on a Scheduled Ancient Monument or its wider site or setting will not be permitted
- C Development within Conservation Areas will only be permitted where it preserves or enhances the character or appearance of the area and, where appropriate, views in and out of the area. The Council will pay particular attention to:
- i) How new development respects the character of existing architecture and any

Due to the location of the site, this development benefits from good quality existing vehicular and pedestrian networks, public transport links and has adequate access for emergency and service vehicles.

The existing car parking facilities to the site will be maintained, providing vehicular parking for the new residents of the building. As they are located to the rear of the building, this will help to keep the street clear, reducing the need for on street parking.

Irish Street is predominantly a one-way street, with double yellow lines painted down both sides of the street.

The proposal's principal aim is to embrace the 'Less is More' approach. By doing this, the scheme proposes a minimal number of interventions within the building to provide a maximum preservation of existing historic fabric.

With the repair works only being carried out where necessary, this approach will preserve more of the original architecture, and it will add more to the economic viability of the building.

historical associations, landscape features, open spaces, trees, walls and quality of townscape

- ii) The impact of any proposed works to trees with regard to policy DM28
- iii) The design of any proposals for new or altered shopfronts and / or signage, which should be an integral part of the design and avoid the use of internally illuminated signage
- D Development which affects Listed Buildings or their setting will only be permitted where it:
- i) Respects the architectural and historic character of the building
- ii) Avoids any substantial or total demolition, or any demolition that is not related to proposed development affecting the building iii) Does not have a significant adverse effect on the setting or important views of the building
- iv) Involves a change of use to all or part of the listed building which contributes to the conservation and overall economic viability of the building, and where the use can be implemented without any adverse alterations to the building
- E Any development proposal which is considered to affect an existing or potential site of archaeological importance will be required to be accompanied by an assessment. Where archaeological archaeological deposits are evident, below ground or on the surface, evidence should be recorded and where possible preserved in-situ. Proposals for development where archaeological interest has been established will not be approved until evidence has been provided that the risk of archaeological disturbance has been adequately investigated and has been minimised. Planning permission will not be granted if the impact on potential archaeology is unacceptable.

Policy DM28 - Protection of Trees

A Development proposals which are likely to affect any trees within the Borough will be required to:

- i) Include an arboricultural assessment as to whether any of those trees are worthy of retention and protection by means of a Tree Preservation Order
- ii) Submit proposals for the replacement or relocation of any trees removed, with net provision at a minimum ratio of 2:1, with preference for the replacement of trees on site and with native species
- B Any proposed works to Trees within Conservation Areas, or protected with Tree Preservation Orders, will be required to

Again, this policy was included into the Planning Application Approval Notice with regards to ensuring that the nearby trees are protected where possible in accordance with this policy.

include an arboricultural survey to justify why works are necessary and that the works proposed will, where possible, not adversely affect the amenity value of the area. Applicants for development that will result in the loss or deterioration of ancient woodland or veteran trees outside woodland should demonstrate that the need for and benefits of the development will clearly outweigh the loss.

9.0 Proposals, Significance, Impact and Potential for Harm

9.1 The proposed alterations are shown on the accompanying drawings, and include –

'Change of Use from the Previously Approved Residential Apartments (Copeland Borough Council Planning ref: 4/22/2297/0F1 and 4/22/2298/0L1) into a new House of Multiple Occupation at 17 Irish Street, Whitehaven, Cumbria, CA28 7BU'

9.2 The proposal includes for the alteration / redevelopment of the existing building designated no.17 Irish Street are to be kept to a minimum, with a limited number of internal changes, there is no need to extend the building. The proposal seeks to repair and restore the building and convert it into a new House of Multiple Occupancy.

9.3 Proposed Internal Works to Ground Floor

The proposed internal works to the ground floor will involve making changes to the internal layout to provide new two new bedrooms, a living / dining room, laundry room, kitchen, bathroom, separate WC and entrance lobby / entrance corridor.

The specific works to this floor include -

9.4 Door Openings (*Blocking up and New Doors*)

These works (as indicated on drawing reference 2101-SK-108) are as follows:

• Carefully removing 3no. existing doors, and architraves and block up one of the openings with timber studwork with insulation between the frame, finished with plasterboard and skim.

• Carefully removing 1no. existing kitchen hatch and blocking up the opening with timber studwork with insulation between the frame, finished with plasterboard and skim.

• Installing 5no. new doors, 1no. to the Living / Dining Room, 1no. to the Stairwell, 1no. to the Entrance Lobby, 1no. to the Laundry Room and 1no. to the Bathroom.





Figure 11 & 12 – internal photograph showing door opening at base of stairs to be retained and to receive a new door.

NOTE: All new internal doors are to be in a style to match the other doors, and where doors are being removed (*where openings are being blocked up*), if the doors are in good condition, or of historical significance, they will be reinstalled to other openings (*where suitable*).





Figure 13 & 14 - internal photograph showing living room door and kitchen hatch to be blocked up.

Impact

When designing the new layout, to reduce the construction impact within the building, blocking up a few internal doors, the kitchen hatch and creating a small amount of new door openings was considered suitable, to a) reduce impact and b) plan the new individual spaces.

To promote the understanding and appreciation of this historic building, this record, along with investigations during the works will help illustrate where modern alterations may have an impact on the original building.

Potential for Harm

Regarding the potential for harm, this work is restricted to a minimum amount of internal doors and internal partitions only.

As the building was previously a townhouse that was converted into a medical surgery, it is considered that many of the existing doors and openings may not be historical original or significant, therefore the potential for harm is very low (on a spectrum of say very low, low, neutral, high and very high).

9.5 Improving Walls / Adding Partitions

- Improving the internal wall to the East of the staircase with timber studwork, insulation, plasterboard and skim (including decoration and skirting boards to match existing).
- Installing new internal timber stud partitions to the existing WC and forming a larger WC to include a shower and the new bathroom (to the North of the Study).
- Installing a new internal timber stud partition to form the new Laundry Room.



Figure 15 & 16 – image showing stairwell wall to be improved.

The impact of constructing new timber framed partitions is minimal as the quantity of new partitions will be very low, and all fixings between the existing structure and the new partitions will also be kept to a minimum. The works to the existing stairwell wall will provide additional protection to the stairwell, in fire protection and acoustic properties.

Potential for Harm

The potential for harm for these new interventions is considered low. The method for connecting the new timber framed partitions will be carried out in such a way as to include minimal fixings to the original historical materials, which will enable them to be easily removed in the future if required.

9.6 Removing Existing Partitions

These works (as indicated on drawing reference 2101-SK-108) are as follows:

Removing the existing internal timber stud partition to the existing WC, make the room larger.

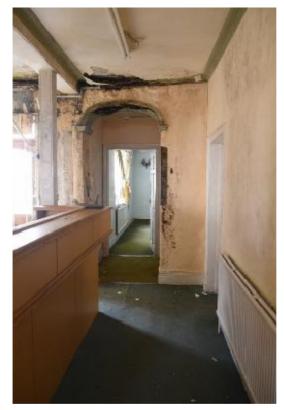




Figure 17 & 18 – image showing partial existing partitions to be removed.

The impact of this work has been considered. The benefit of this small alteration modernises the building, provides more space to the existing WC, and provides a new ground floor bathroom, serving the ground floor apartment. However, the finished treatment of any historic fabric is likely to need to be re-assessed once stripped back, to ensure the preservation of any historic finish or structure.

Potential for Harm

The potential for harm is considered to be low. The new works to the existing WC and new ground floor bathroom are primarily expected to be cosmetic in nature.

9.7 Window Repair / New Window Installation

- Installing 1no. new window to the new bathroom, to provide daylight and natural ventilation to this room. To ensure that privacy is maintained for the residents and the neighbours, these 2no. windows are to include obscure glass.
- The existing window to the existing WC will be uncovered, repaired where required, and altered to include obscure glazing (either replacement glass or an obscure film), so that the window can allow natural daylight in, without causing privacy issues.





Figure 19 & 20 - images showing new window location and neighbour's wall

The impact of the proposed window works has been considered. Due to their location, the impact is minimal, and the neighbour's privacy has been considered and resolved by ensuring that the windows are obscure.

The new window is located on a rear façade, which will not be seen from the street. The window is also being installed to a building extension, and not the original structure as demonstrated on the original floor plan [Fig 41 & 42] (Page 118 from the book' Whitehaven 1660 – 1800 Royal Commission on the Historical Monuments of England).

Potential for Harm

Due to the location of this work, the potential for harm is considered very low.

9.8 Proposed Internal Works to First Floor

The proposed internal works to the first floor will involve small changes to the existing building layout, to accommodate four new bedrooms, bathroom, WC, a small kitchen and circulation spaces as shown on the accompanying drawings.

The specific works to this floor include -

9.9 Door Openings (*Blocking up and New Doors*)

- Carefully removing 2no. existing doors, and architraves and blocking up the openings with timber studwork with insulation between the frame, finished with plasterboard and skim.
- Carefully removing 1no. existing door and retaining the existing architraves and opening.
- Creating 2no. new door opening (including installing a new door frame, door and architrave) in an existing wall, 1no. to new bedroom 03 and 1no. to new bedroom 04, as shown on the accompanying plans.
- Installing 5no. new doors, 1no. to new bedroom 3, 1no. to new bedroom 4, 1no. to new bedroom 6, 1no. to the new Bathroom and 1no. to the Stairwell.

NOTE: All new internal doors are to be in a style to match the other doors, and where doors are being removed (*where openings are being blocked up*), if the doors are in good condition, or of historical significance, they will be reinstalled to other openings (*where suitable*).

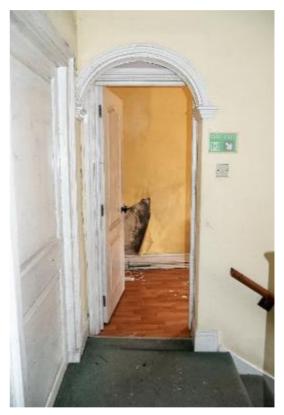




Figure 21 & 22 – internal photograph showing 2no. stairwell doors to be blocked up.

Impact

To reduce the impact, the option to blocking up some internal doors, and creating some new door openings was considered as a more suitable, working with the existing layout, and making minimal changes.

Potential for Harm

Regarding the potential for harm, like the work on the other floors, this work is restricted to a minimum of door openings, and as these door positions will be recorded, should they ever need to be reinstated, these internal alteration works will be reversible.

9.10 Removing Existing Partitions

- Removing the existing internal timber stud partition to the existing WC, make the proposed bathroom a suitable size. This includes removing any necessary skirting boards, and existing flooring.
- Removing the existing column that forms a treatment room. Whilst the column is believed to not be structural, this will require investigation.



Figure 23 - internal photograph showing the wall and column to be removed.

The removal of both the partition and the column will be of minimal impact to the overall layout of the first-floor layout. As both the partition and the column appear to be modern interventions, removing them will not cause any impact of harm to the character of the building.

Potential for Harm

The potential for harm is considered to be low. Once the partition has been removed, the proposed works to this new bathroom is primarily expected to be cosmetic in nature.

9.11 Improving Walls / Adding Partitions

- Improving the internal walls to the East and West of the staircase with timber studwork (including decoration).
- Installing 1no. new timber framed partition that will form new bedrooms 03 and 04.
- Installing 2no. new timber framed partitions that will form the new corridor.
- Installing 2no. new timber framed partitions that will be located between the new bathroom, new WC and the new bedroom towards the rear of the property.
- All new timber framed partitions, and wall improvements mentioned above are to include insulation, plasterboard and skim and skirting boards to match existing.



Figure 24 – image showing the location of the new partitions forming the new corridor.

The quantity of new timber framed partitions is kept low as to minimise any impact to the building. All new fixings between the new partitions and the existing structure will be kept to a minimum. Like with the works on the other floors, this work will be carried out in such a way that it could easily be removed if required in the future.

Potential for Harm

The potential for harm for these new interventions is considered low. The method for connecting the new timber framed partitions will be carried out in such a way as to include minimal fixings to the original historical materials, which will enable them to be easily removed in the future if required.

9.12 Internal Works to Second Floor

The proposal to the second floor includes changes to the existing building layout, to accommodate four new bedrooms, bathroom, WC, a small kitchen and circulation spaces as shown on the accompanying drawings.

The specific works to this floor include -

9.13 Door Openings (Blocking up and New Doors)

These works (as indicated on drawing reference 2101-SK-108) are as follows:

- Carefully removing 4no. existing doors, and architraves and blocking up 4no. openings with timber studwork with insulation between the frame, finished with plasterboard and skim. The remaining opening will be opened up more, to help form the new corridor.
- Installing 6no. new doors, 1no. to the WC, 1no. to the bathroom, and 1no. to each new bedroom (07, 08, 09 and 10).

NOTE: All new internal doors are to be in a style to match the other doors, and where doors are being removed (*where openings are being blocked up*), if the doors are in good condition, or of historical significance, they will be reinstalled to other openings (*where suitable*).

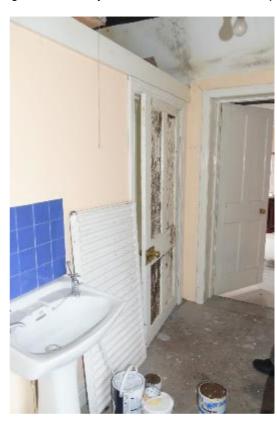




Figure 25 & 26 – images showing 2no. doors to the stairwell to be blocked up.





Figure 27 & 28 - images showing 2no. doors in the new open plan living space to be blocked up.

Blocking up a minimal quantity of internal doors within this floor will help to minimise the impact of the new layout. The proposal seeks to keep all interventions to a minimum, to protect the historical materials.

Potential for Harm

As these proposed internal alteration works will be recorded, and are reversible, the potential for harm is kept low. Existing doors that have been removed from openings that are being blocked up can be reused in other openings within the building.

9.14 Improving Walls / Adding Partitions

- Improving the internal walls to the East and West of the staircase with timber studwork (*including decoration*).
- Installing 1no. new timber framed partition that will form new bedrooms 08 and 09.
- Installing 2no. new timber framed partitions that will form the new corridor.
- All new timber framed partitions, and wall improvements mentioned above are to include insulation, plasterboard and skim and skirting boards to match existing.





Figure 29 & 30 – shows where a new opening will be made, and new partitions are to be installed.

Impact will be low as only 3no. new timber framed partitions will be installed, with all new fixings kept to a minimum. The improvements to the stairwell wall will also comprise of timber frame, insulation, plasterboard and skim, with minimal fixings to the existing structure.

Potential for Harm

Harm to the existing building for these new interventions is low. All new timber framed partitions can easily be removed in the future if required.

9.15 Creating an Opening in an Existing Partition

These works (as indicated on drawing reference 2101-SK-108) are as follows:

- Removing a small section of an existing wall around an existing door opening, located to the north of the existing fireplace / chimney to enable the new access corridor (see Figure 29).
- Creating 3no. new door opening (including installing a new door frame, door and architrave) in an existing wall, to provide access to new bedrooms 07, 08 and 09;

Impact

The impact to the existing partitions has been kept to a minimal amount, as only 2no. walls will be opened up to serve the new layout.

Potential for Harm

The potential for harm low, as these 2no. openings can easily be blocked up again, should they need to be. The openings are being kept small, with one being the size of a door opening, and the other making an existing door opening larger, to form part of a new corridor.

9.16 Proposed Works in General (to all three floors)

- The existing sanitary fittings (toilet, sink, bath and shower), accessories that were installed to serve the building's former function are to be carefully removed from various treatment rooms and toilets.
- The installation of new sanitary fittings (*toilets, sinks, baths and showers*) as indicated on the proposed plans will be of a modern or period style alternative.

- The installation of new kitchen appliances (worktops, kitchen units, kitchen sinks & taps shelving, fridges, washing machines, tumble dryers and dishwashers) as indicated on the proposed plans will be of a modern or period style alternative.
- The existing carpet/vinyl/etc., underlay and carpet gripers are to be removed, for due replacement.
- Remove all existing wallpaper and prepare existing plasterwork for painting.

9.17 Proposed External Works

The proposal includes for the existing building's three primary elevations to be cleaned, along with the roof, and for the external walls to receive repair works to address the existing cracks in the façade. The walls will also be re-rendered and painted to suit. Details of the render and the proposed colours are to be issued to the local authority for approval, before works commence.

9.18 Other maintenance works include:

- The removal and replacement of an existing lintel to the first-floor staircase window on the rear elevation, as the existing lintel is damaged beyond repair.
- The removal and replacement of an existing beam to the cellar, due to its bad condition.
- The removal and replacement of an existing beam to the underside of the second floor in the existing kitchen, again due to its bad condition.
- The existing chimneys will be cleaned, repointed where necessary, made good of any damage, and painted, in a colour to suit the main building.

Where suitable, lintels and beams that are to be replaced are to be replaced with 'like-for-like' replacements, and the specification of the new lintels and beams are to be approved by the local authority, before any works commence.



Figure 31 – Front elevation, showing crack between front door and window, and a crack from the window down to the ground, to be repaired.

9.19 Enclosed are some photographs taken of the boundary wall for your review. We note that certain parts of the wall appear to have been repaired / replaced using blockwork.

Due to the historical significance of the boundary wall, when the garage outbuilding is to be demolished, parts of the boundary wall that are located close to the garage are to be protected throughout these works.

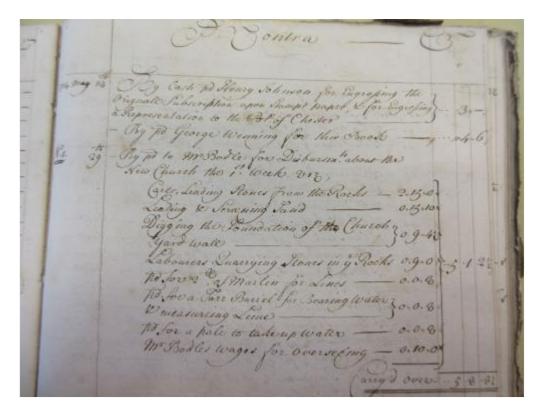


Figure 32 – DH 41 May 1714, detailing the Trinity Church (now demolished) Construction.

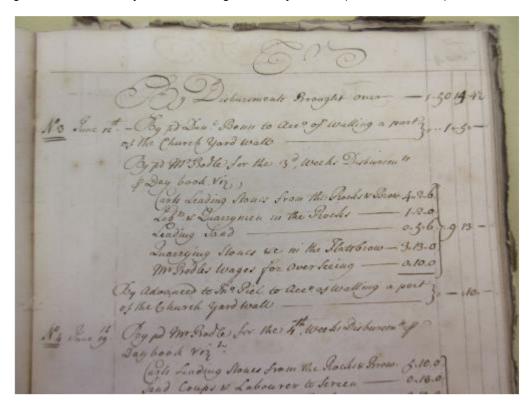


Figure 33 – DH 41 June 1714, detailing the Trinity Church (now demolished) Construction.



Figure 34 & 35 – Existing boundary wall, photographs taken inside the site, June 2022.

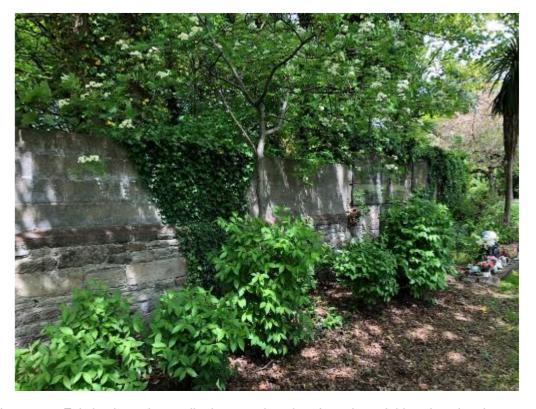


Figure 36 – Existing boundary wall, photographs taken from the neighbouring site, June 2022.

10.0 Appendix A

Extracts from 'Whitehaven 1660 – 1800, Royal Commission on the Historical Monuments of England' Pages 82, 99, 100, 101, 108, 117 and 118

11.0

Appendix BDesign and Access Statement